

# Export Controls, Economic Sanctions & Compliance

Polsinelli's cross-departmental team of international trade attorneys are experienced at navigating the complicated web of regulations overseen by several federal agencies that apply to exports of U.S. origin products and technology. Polsinelli attorneys assist U.S. firms, their foreign trading partners, and transportation and cargo carriers with navigating through and beyond this complex and ever-evolving regulatory environment to achieve compliance with U.S. export controls. Whether you need a one-time license, a comprehensive export program, or are seeking information on possible restrictions to exporting your product or service, Polsinelli can help.

- Export control services include advice and counsel on the requirements of the Export Administration Regulations (EAR), International Traffic in Arms Regulations (ITAR), Foreign Assets Control Regulations (FACR), and the Foreign Trade Regulations.
- The firm assists clients in determining the proper commodity jurisdiction of their products, software and technology/technical data, as well as their classifications under the Commerce Control List, U.S. Munitions List and Schedule B Code.
- Polsinelli's attorneys determine the applicable export and reexport licensing requirements for companies' products and technology/technical data, assess whether any license exceptions or exemptions are available, and assist companies in obtaining the requisite government authorizations.
- Polsinelli assists companies in ensuring that their proposed shipments and technology transfers are subject to effective end-use, diversion risk ("red flag"), restricted parties list, and embargoed country screening protocols, and works with them to establish and rollout effective screening mechanisms.
- The firm works with companies to navigate the often complex embargo and economic sanctions programs of the United States and other countries in which they do business.
- Polsinelli conducts internal technology reviews for companies and provides guidance in issues relating to deemed exports and transfers of technical data to foreign national employees.
- The firm assists clients in ensuring proper export clearance and Automated Export System (AES) compliance, as well as analyzes their AES data in order to assess compliance risks, evaluate third party service provider compliance levels, and identify additional cost-saving opportunities.
- Polsinelli's attorneys advise companies on the export and customs clearance requirements of non-US jurisdictions.
- The firm also counsels companies on the intricate U.S. antiboycott regulations, and assists in the timely submission of reportable foreign boycott-related requests to the Office of Antiboycott Compliance.
- Polsinelli routinely provides in-house export compliance training, conducts internal export compliance assessments, and assists companies in the preparation and submission of voluntary disclosures, when warranted.
- Polsinelli assesses target companies' potential import and export liability as part of due diligence investigations in proposed mergers, acquisitions & divestitures.
- Polsinelli attorneys help clients prepare and submit voluntary disclosures of violations to the relevant government agencies, navigate enforcement actions, and work to obtain the most favorable possible result.

- The firm represents clients through all stages of export enforcement actions, including detentions, seizures, forfeitures, administrative subpoenas and penalty cases.

## Publications

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May 8, 2026

**U.S. Court of International Trade Invalidates Trump Section 122 Global Tariffs, the Administration Appeals, and Tariffs Likely Will Remain in Effect for Most Importers**

April 17, 2026

**IEEPA Refund Portal Opens on April 20: What Importers Should Know About Filing, Timing and Liquidity Options**

April 14, 2026

**CBP to Launch Phase One of CAPE for IEEPA Refunds on April 20**

April 3, 2026

**Trump Administration Resets Section 232 Metals Tariffs, Retaining 50% Duties on Most Primary Metals and Imposing Tiered Full-Value Duties on New Product Groupings**

April 3, 2026

**Trump Administration Expands Section 232 Tariffs to Patented Pharmaceuticals and APIs**

April 2, 2026

**Updates on the IEEPA Refund Process and Section 232 Derivative Content Value Calculations**

March 18, 2026

**USTR Initiates New Multi-Country Section 301 Investigations**

March 9, 2026

**CIT Suspends Prior Order Requiring Immediate Refunds of IEEPA Duties**

March 5, 2026

**CIT Orders Refund of IEEPA Duties on “Any and All” Unliquidated Entries**

February 23, 2026

**Post-SCOTUS Tariff Reset: Trump Replaces IEEPA Duties with Temporary Section 122 10% Import Surcharge, Likely to Increase to 15%**

February 20, 2026

**U.S. Supreme Court Strikes Down IEEPA Tariffs; Trump Announces Replacement Tariffs: What Importers Should Do Now to Seek Refunds and Secure Supply Chains**

February 13, 2026

**President Trump Announces Trade Framework with India**

January 20, 2026

**Trump Administration Adopts a Dual-Track Approach to Restore U.S. Semiconductor Manufacturing Leadership**

January 16, 2026

**CBP Guidance Regarding Section 232 Dutiable Metal Content Valuation**

December 17, 2025

**CIT Denies Preliminary Injunction in IEEPA Tariff Litigation, Reaffirming its Authority to Order Reliquidation**

November 18, 2025

**New Tariff Exemptions Announced for Agricultural Products**

November 14, 2025

**President Trump Secures Multiple New U.S.-Asia Trade Deals and Foreign Investment Commitments**

November 12, 2025

**Lower Tariffs Take Effect Under New China Trade Deal**

October 22, 2025

**IEEPA Tariffs Head to Supreme Court: Could Refunds Be Next? What Businesses Should Know**

October 22, 2025

**New National Security Tariffs on Trucks, Truck Parts and Buses Take Effect Nov. 1**

October 3, 2025

**U.S. Imposes New Section 232 Tariffs on Timber, Lumber and Derivative Wood Products**

September 25, 2025

**U.S. Implements EU Tariff Rate Adjustments on Aircraft and Parts, Autos and Parts, Generic Pharma and More**

September 24, 2025

**Tariff Tensions Prompt VA to Rethink Contractor Pricing**

September 18, 2025

**Administration Opens Process to Expand Section 232 Duties to Additional Steel and Aluminum Derivative Products and Automobile Parts**

September 11, 2025

**Polsinelli Life Sciences Spotlight - Volume 2 - Adapting by Design: Navigating Complex Times in Life Sciences**

September 11, 2025

**The U.S. Supreme Court Will Soon Decide the Fate of President Trump's Tariffs**

September 3, 2025

**False Claims Act: DOJ Doubles Down on Duty Evasion Outside the Traditional Trade Enforcement Scheme**

August 22, 2025

**United States and European Union Add Commitments to Trade Framework**

August 7, 2025

**New 25 Percent Additional Tariffs on Imports from India**

August 5, 2025

**Reciprocal Tariffs Take Effect August 7**

July 31, 2025

**New Section 232 Tariffs Formalized on Copper Imports**

July 31, 2025

**New 40% Tariffs on Imports from Brazil into the U.S.**

July 31, 2025

**New National Security Probes on Imports of Polysilicon and Drones**

July 31, 2025

**Multiple Trade Deals Reached as August 1 Deadline Nears**

July 8, 2025

**Deadline for New Country-Specific Reciprocal Tariff Rates Delayed to August 1, With Some Rate Increases Scheduled**

May 29, 2025

**Court Strikes Down Fentanyl and Reciprocal Tariffs, but Appeals Court Temporarily Stays Impact**

May 13, 2025

**U.S. Launches National Security Investigation Into Aircraft and Jet Engine Imports**

May 13, 2025

**United States and China Announce Temporary 115 Percent Reduction in Tariffs While Trade Discussions Continue**

April 16, 2025

**New Section 232 Trade Investigation on Imports of Processed Critical Minerals and Their Derivative Products Could Result in Trade Actions Later This Year**

April 15, 2025

**New Section 232 Trade Investigations on Pharmaceutical and Semiconductor Imports Could Lead to Tariffs Mid-Year**

April 10, 2025

**Increase of Certain Reciprocal Tariffs Paused, While China Duties Ratchet Higher**

April 3, 2025

**New "Reciprocal" Tariffs Announced, Effective Starting April 5 for Nearly All Countries and Sectors**

March 27, 2025

**Potential New U.S. Import Tariffs on Countries Importing Venezuelan Oil**

March 27, 2025

**New U.S. Import Tariffs on Certain Automobiles and Parts**

March 7, 2025

**25% Duties on U.S. Imports from Canada and Mexico Lifted for USMCA-Eligible Merchandise**

March 4, 2025

**Increased Duties on Chinese Imports and Guidance Regarding New Tariffs on Canada and Mexico**

March 3, 2025

**Another New Section 232 Investigation on Imports of Timber, Lumber and Derivative Products**

March 3, 2025

**Increased Tariffs on Imports from Canada, Mexico and China Set to Take Effect March 4**

February 26, 2025

**New Section 232 Investigation on Imports of Copper, Scrap Copper and Derivative Products**

February 14, 2025

**Reciprocal Tariffs to be Investigated, Potentially Imposed Later in 2025**

February 11, 2025

**Expanded Section 232 Tariffs on U.S. Imports of Steel and Aluminum Articles**

February 3, 2025

**New Tariffs on U.S. Imports from Canada, Mexico and China**

January 21, 2025

**CBP's Proposed Changes to De Minimis Shipments**

**CIT Upholds List 3 and 4 Section 301 Tariffs**

March 20, 2023

**USITC Releases Report on the Economic Impact of the Section 232 and 301 Tariffs on U.S. Industries**