



Twenty-Eight Chinese Entities Added to Entity List for Alleged Human Rights Abuse

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On October 7, 2019, the U.S. Department of Commerce, Bureau of Industry and Security (BIS) added 28 Chinese entities to the Entity List for participating in human rights violations in China's Xinjiang Uighur Autonomous Region (XUAR). Specifically, BIS added the XUAR People's Government Public Security Bureau, eighteen of its subordinate municipal and county public security bureaus, one subordinate institute, and eight other entities to its [Entity List](#). In making these listings, BIS cited China's campaign of repression, mass detention, and high-technology surveillance against Uighurs, Kazakhs, and other Muslim minority groups in the XUAR as the reason for the export restrictions.

The license requirements apply to any transaction in which items subject to the EAR are to be exported, reexported, or transferred (in-country) to any of the entities or in which such entities act as purchaser, intermediate consignee, ultimate consignee, or end-user. Unlike the blanket presumption of denial for all items subject to the EAR that BIS will sometimes impose (as it did for Huawei and many of its affiliates in recent months), for these entities, exports of certain items will be subject to a case-by-case license review policy. Broadly, the items subject to case-by-case review are items that detect radioactive, biological, and chemical weapons and explosives. Exporters will have to know the precise Export Control Classification Number ("ECCN") to determine whether the licensing policy to export to one of these entities is subject to a policy of denial or case-by-case review.

The newly listed entities are as follows:

- Aksu District Public Security Bureau, including one alias (Aqsu District Public Security Bureau);
- Altay Municipality Public Security Bureau;
- Bayingolin Mongolian Autonomous Prefecture Public Security Bureau;
- Boertala Mongolian Autonomous Prefecture Public Security Bureau, including one alias (Bortala Mongolian Autonomous Prefecture Public Security Bureau);
- Changji Hui Autonomous Prefecture Public Security Bureau;
- Dahua Technology;
- Hami Municipality Public Security Bureau, including two aliases (Kumul Municipality Public Security Bureau; and Qumul Municipality Public Security Bureau);

- Hetian Prefecture Public Security Bureau;
- Hikvision;
- IFLYTEK;
- Kashgar Prefecture Public Security Bureau;
- Kelamayi Municipality Public Security Bureau;
- Kezilesu Kyrgyz Autonomous Prefecture Public Security Bureau, including one alias (Kizilsu Autonomous Prefecture Public Security Bureau);
- Megvii Technology;
- Sense Time;
- Shihezi Municipality Public Security Bureau;
- Tacheng Prefecture Public Security Bureau;
- Tumushuke Municipal Public Security Bureau, including one alias (Tumxuk Municipal Public Security Bureau);
- Turfan Municipality Public Security Bureau, including one alias (Turpan Municipality Public Security Bureau);
- Urumqi Municipal Public Security Bureau;
- Wujiaqu Municipality Public Security Bureau;
- Xiamen Meiya Pico Information Co. Ltd.;
- Xinjiang Police College;
- Xinjiang Production and Construction Corps (XPCC) Public Security Bureau;
- XUAR People's Government Public Security Bureau;
- Yili Kazakh Autonomous Prefecture Public Security Bureau, including one alias (Ili Kazakh Autonomous Prefecture Public Security Bureau);
- Yitu Technologies; and
- Yixin Science and Technology Co. Ltd., including four aliases (Yixin Technology; Yuxin Technology; Yuxin Science and Technology; and Ecguard).

For any questions or additional information about this latest move by BIS or any other concerns about U.S. trade compliance or policy, please contact the professionals at Winston & Strawn, LLP.

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