



DEPARTMENT OF COMMERCE
Bureau of Industry and Security

In the Matter of:

Vladimir Kuznetsov

Inmate Number: 91806-053

FCI Allenwood Low

Federal Correctional Institution

P.O. Box 1000

White Deer, PA 17887

ORDER DENYING EXPORT PRIVILEGES

On April 30, 2024, in the U.S. District Court for the Eastern District of New York, Vladimir Kuznetsov (“Kuznetsov”) was convicted of violating Section 38 of the Arms Export Control Act (22 U.S.C § 2778) (“AECA”). Specifically, Kuznetsov was convicted of knowingly and willfully exporting and attempting to export from the United States to Russia without obtaining required U.S. government authorization rifle parts and accessories designated as defense articles on the United States Munitions List, to wit: one Accuracy International AICS AX MK II rifle chassis, one “H-S Precision” aluminum rifle stock, one “Kinetic Research Group” savage 180-Alpha rifle chassis, one Dakota bolt shroud, one Timney Sportsman trigger assembly, multiple firearm magazines, and other firearms accessories. . As a result of his conviction, the Court sentenced Kuznetsov to 46 months in prison and two years of supervised release.

Pursuant to Section 1760(e) of the Export Control Reform Act (“ECRA”), the export privileges of any person who has been convicted of certain offenses, including, but not limited to, Section 38 of the AECA, may be denied for a period of up to ten (10) years from the date of his/her conviction. *See* 50 U.S.C. § 4819(e). In addition, any Bureau of Industry and Security (“BIS”) licenses or other authorizations issued under ECRA, in which the person had an interest at the time of the conviction, may be revoked.

Id.

BIS received notice of Kuznetsov's conviction for violating Section 38 of the AECA. BIS provided notice and opportunity for Kuznetsov to make a written submission to BIS, as provided in Section 766.25 of the Export Administration Regulations ("EAR" or the "Regulations"). 15 C.F.R. § 766.25.² BIS has not received a written submission from Kuznetsov.

Based upon my review of the record and consultations with BIS's Office of Exporter Services, including its Director, and the facts available to BIS, I have decided to deny Kuznetsov's export privileges under the Regulations for a period of 10 years from the date of Kuznetsov's conviction. The Office of Exporter Services has also decided to revoke any BIS-issued licenses in which Kuznetsov had an interest at the time of his conviction.³

Accordingly, it is hereby **ORDERED**:

First, from the date of this Order until April 30, 2034, Vladimir Kuznetsov, with a last known address of Inmate Number: 91806-053, FCI Allenwood Low, Federal Correctional Institution, P.O. Box 1000, White Deer, PA, and when acting for or on his behalf, his successors, assigns, employees, agents or representatives ("the Denied Person"), may not directly or indirectly participate in any way in any transaction involving any commodity, software or technology (hereinafter collectively referred to as "item") exported or to be exported from the United States that is subject to the Regulations, including, but not limited to:

- A. Applying for, obtaining, or using any license, license exception, or export control document;

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2025).

³ The Director, Office of Export Enforcement, is the authorizing official for issuance of denial orders, pursuant to amendments to the Regulations (85 *Fed. Reg.* 73411, November 18, 2020).

- B. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or engaging in any other activity subject to the Regulations; or
- C. Benefitting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the Regulations, or from any other activity subject to the Regulations.

Second, no person may, directly or indirectly, do any of the following:

- A. Export, reexport, or transfer (in-country) to or on behalf of the Denied Person any item subject to the Regulations;
- B. Take any action that facilitates the acquisition or attempted acquisition by the Denied Person of the ownership, possession, or control of any item subject to the Regulations that has been or will be exported from the United States, including financing or other support activities related to a transaction whereby the Denied Person acquires or attempts to acquire such ownership, possession or control;
- C. Take any action to acquire from or to facilitate the acquisition or attempted acquisition from the Denied Person of any item subject to the Regulations that has been exported from the United States;
- D. Obtain from the Denied Person in the United States any item subject to the Regulations with knowledge or reason to know that the item will be, or is intended to be, exported from the United States; or
- E. Engage in any transaction to service any item subject to the Regulations that has been or will be exported from the United States and which is

owned, possessed or controlled by the Denied Person, or service any item, of whatever origin, that is owned, possessed or controlled by the Denied Person if such service involves the use of any item subject to the Regulations that has been or will be exported from the United States. For purposes of this paragraph, servicing means installation, maintenance, repair, modification or testing.

Third, pursuant to Section 1760(e) of ECRA (50 U.S.C. § 4819(e)) and Sections 766.23 and 766.25 of the Regulations, any other person, firm, corporation, or business organization related to Kuznetsov by ownership, control, position of responsibility, affiliation, or other connection in the conduct of trade or business may also be made subject to the provisions of this Order in order to prevent evasion of this Order.

Fourth, in accordance with Part 756 of the Regulations, Kuznetsov may file an appeal of this Order with the Under Secretary of Commerce for Industry and Security. The appeal must be filed within 45 days from the date of this Order and must comply with the provisions of Part 756 of the Regulations.

Fifth, a copy of this Order shall be delivered to Kuznetsov and shall be published in the *Federal Register*.

Sixth, this Order is effective immediately and shall remain in effect until April 30, 2034.

Steven Fisher
Acting Director
Office of Export Enforcement