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US EAR Export Licensing Cases for Advanced Computing GPUs to EAR Country Group D:1-D:4 Countries (Caucasus & Moldova)

Research Date: 2026-09-02 **Countries covered:** Armenia, Azerbaijan, Georgia, Moldova **Scope:** Specific approved/denied export license cases, diversion concerns, policy context

Executive Summary

All four countries are designated under US Department of Commerce EAR Country Group D (subgroups D:1 National Security / Nuclear; D:3 Chemical-Biological) and are categorized as **Tier 3** under the January 2025 AI Diffusion Rule. They are not under the full D:5 US arms embargo. The primary enforcement driver since 2022 has been **diversion of US-origin advanced computing items (including GPUs) to Russia and Iran**, not civilian license applications. Documented public cases are dominated by **Entity List additions** (denial-based controls) and re-export investigations, not affirmative license approvals. Affirmative license approvals by BIS for advanced GPUs to these destinations are essentially **non-public**; documented public outcomes are overwhelmingly denials (via Entity List or Return Without Action).

ARMENIA (D:1 / D:3) — Tier 3 under AI Diffusion Rule

Policy Context

- Armenia is in EAR Country Group D (D:1 NS, D:3 CB), subject to US nuclear/chem-bio controls.
- Designated Tier 3 in January 13, 2025 AI Diffusion Rule (alongside Azerbaijan, Georgia, Moldova).
- March 2023: US Department of Justice, Department of Transportation, and Treasury joint memo identified Armenia as one of the “trans-shipment points commonly used for the illegal shipment of restricted goods to Russia and Belarus.”
- Armenia imports of US chips/microprocessors rose 515% between 2021-2022, with 97% of the volume ultimately re-exported to Russia per BIS/Commerce data.

- Russia-Armenia trade hit \$10.2B Jan-Oct 2024; 96.3% settled in rubles.

Denied Cases / Entity List Additions (Armenia-based actors diverting GPUs/electronics to Russia)

Case 1: Milur Electronics LLC (Yerevan, Armenia) — Entity List / Treasury OFAC - Type: Front company for sanctioned Russian Milandr chip designer - Date: OFAC designation 2023; BIS Entity List addition December 19, 2023 (one of 12 entities under BIS notice “BIS Adds 12 Entities to Entity List for Supporting Russia’s War Against Ukraine”). - Why denied / listed: Acting as procurement front for Radioavtomatika / Milandr to obtain US-origin electronics; shipped GPUs and other controlled items to Russian military-industrial users. - Source: BIS press release “BIS Adds 12 Entities to Entity List for Supporting Russia’s War Against Ukraine,” December 19, 2023 — <https://www.bis.doc.gov/index.php/documents/about-bis/newsroom/2353-bis-adds-12-entities-to-entity-list-for-supporting-russia-s-war-against-ukraine> (accessed 2026-09-02; page redirects to <https://www.bis.gov/>) - Federal Register: <https://www.federalregister.gov/documents/2023/12/21/28156/additions-to-the-entity-list>

Case 2: Taco LLC (Yerevan, Armenia) — Treasury sanctions - Date: 2023 - Why listed: Identified by US Treasury as supporting Radioavtomatika (sanctioned Russian entity) in obtaining controlled US-origin microelectronics including GPUs. - Source: Caucasus Watch analysis — <https://caucasuswatch.de/en/insights/money-flows-and-re-exports-how-armenia-became-a-transit-hub-in-the-shadow-of-sanctions.html> (accessed 2026-09-02)

Case 3: Four Armenia-based entities — BIS Entity List, December 19, 2023 - Per BIS press release: BIS added **four Armenia-based entities** in the December 19, 2023 rule, “determined to be involved in the diversion of U.S.-origin goods to Russia. The entities have been involved in shipping electronics, including GPUs, to Russian companies.” - Specific entity names: not yet captured in this round (see BIS URL). - Source: BIS press release — <https://www.bis.doc.gov/index.php/documents/about-bis/newsroom/2356-bis-adds-12-entities-to-entity-list-including-armenia-based-companies-for-diversion-to-russia>

Case 4: Armenia-domiciled entities — September 26, 2024 BIS Entity List (4 entities) - Federal Register: “Addition of Certain Entities to the Entity List,” 89 FR 78721 (Sep 26, 2024) - Entities added under destination scopes Armenia, Georgia, Hong Kong, China for diversion of US-origin goods to Russia (incl. GPUs). - Source:

<https://www.federalregister.gov/documents/2024/09/26/2024-21958/addition-of-certain-entities-to-the-entity-list>

Case 5: Armenia in 73-entity Russia package (September 2024) - BIS press release: Commerce added 73 entities for Russia diversion (revoking Russia/Belarus export privileges). Includes Armenia-based actors. - Source: BIS PDF — <https://www.bis.doc.gov/index.php/documents/federal-register-notice-2/2715-101-2024/file>

Notable civilian-sector actors (no public BIS denial found, but high diversion-risk profile)

- **American University of Armenia (AUA)** — Academic/research institution; no public BIS license case on record.
- **Microsoft Armenia / Innovation Center** — Microsoft opened an Innovation Center in Yerevan; no public EAR license case surfaced.
- **VivaCell-MTS** — Armenian mobile operator (subsidiary of Russian MTS). High diversion-risk profile given Russian parent; not on BIS Entity List as of latest review.
- **UCOM / Team Telecom Armenia** — Domestic telecom operators; no public EAR case.
- **Enterprise Armenia / AI initiatives** — Government AI promotion body; no public EAR case.

Diversion pattern

- Armenia's official exports jumped from \$3.0B (2021) to \$13.1B (2024), driven heavily by Russian gold/diamond re-exports and microchip transshipment.
- BIS/Commerce data: Armenian imports of US chips/microprocessors rose 515% (2021–2022); 97% ultimately sent to Russia.
- The transshipment corridor largely closed after Russia abolished its gold export duty in April 2024.

Sources — Armenia

- BIS — “BIS Adds 12 Entities to Entity List for Supporting Russia's War Against Ukraine” (Dec 19, 2023) — <https://www.bis.doc.gov/index.php/documents/about-bis/newsroom/2353-bis-adds-12-entities-to-entity-list-for-supporting-russia-s-war-against-ukraine>
- BIS — “BIS adds 12 entities to Entity List including Armenia-based companies for diversion to Russia” (Dec 19, 2023) — <https://www.bis.doc.gov/index.php/documents/about-bis/newsroom/2356-bis-adds-12-entities-to-entity-list-including-armenia-based-companies-for-diversion-to-russia>

bis-adds-12-entities-to-entity-list-including-armenia-based-companies-for-diversion-to-russia

- Federal Register — Additions to the Entity List (Dec 21, 2023) — <https://www.federalregister.gov/documents/2023/12/21/2023-28156/additions-to-the-entity-list>
- Federal Register — Addition of Certain Entities to the Entity List (Sep 26, 2024) — <https://www.federalregister.gov/documents/2024/09/26/2024-21958/addition-of-certain-entities-to-the-entity-list>
- Caucasus Watch — “Money Flows and Re-Exports: How Armenia Became a Transit Hub in the Shadow of Sanctions” — <https://caucasuswatch.de/en/insights/money-flows-and-re-exports-how-armenia-became-a-transit-hub-in-the-shadow-of-sanctions.html>
- Euractiv — “Armenia’s exports to Russia raise concerns over sanctions circumvention” — <https://www.euractiv.com/?p=2067204>
- Caliber.az — “Diamonds, microchips and guns: Armenia’s mythical divorce from Russia” — <https://caliber.az/en/post/diamonds-microchips-and-guns-armenia-s-mythical-divorce-from-russia>
- tvyal.com — “Armenia’s Exports Quadrupled—Until Russia Closed a Sanctions Loophole” — <https://tvyal.com/analysis/en/2026/2026-05-01>
- Caspian Post — “How Russia Uses the South Caucasus to Circumvent Sanctions” — <https://caspianpost.com/caucasus-caspian-intelligence/how-russia-uses-the-south-caucasus-to-circumvent-sanctions>

AZERBAIJAN (D:1 / D:3) — Tier 3 under AI Diffusion Rule

Policy Context

- Tier 3 / Country Group D (D:1 NS / D:3 CB) under EAR.
- No specific public BIS Entity List additions of Azerbaijan-domiciled GPU-diversion actors have been surfaced in this research round (Azerbaijan has been less of a documented transshipment corridor than Armenia/Georgia).
- Azerbaijan borders Iran and Russia (Dagestan/Russia directly) — geographic diversion-risk concern.
- 2023-2024 Nagorno-Karabakh conflict raised US national-security sensitivity on dual-use exports.

Approved Cases

- **No publicly documented BIS affirmative license approval for advanced GPUs (H100/A100/MI300X/Blackwell) to Azerbaijan** surfaced in primary BIS/Federal Register sources. (Note: BIS does not publish affirmative approvals as a matter of policy.)

Denied Cases

- **No publicly documented specific BIS license denial involving a named Azerbaijani entity** has been surfaced in this research round. Diversion-risk profile is documented but specific denied cases remain in the unverified/secondary-source tier.

Notable civilian-sector actors

- **PASHA Holding** — Azerbaijani conglomerate; no public BIS case surfaced.
- **AzInTelecom** — State-affiliated telecom/datacenter operator; no public BIS case.
- **Center for Analysis and Communication of Economic Reforms (CACER)** — Government think tank under presidential administration; no public BIS case.
- **Azerbaijan AI / State AI initiatives** — Government programs (e.g., “Azerbaijan 2030” digital agenda); no public BIS case.

Diversion concerns

- Geographic exposure: shared border with Russia (Dagestan) and Iran.
- Less public documentation of Azerbaijani GPU diversion than for Armenia or Georgia; Azerbaijan’s role is more often cited as a destination for sanctioned Russian goods (reverse flow).

Sources — Azerbaijan

- BIS Entity List search (no Azerbaijan entries surfaced under Russia-diversion rules as of this research round) — <https://www.bis.gov/>
- Squire Patton Boggs — “Bureau of Industry and Security Issues Export Controls Further Restricting Advanced Semiconductors to China” (Dec 2024) — <https://www.squirepattonboggs.com/en/insights/publications/2024/12/bureau-of-industry-and-security-announces-two-new-rules-updating-the-export-administration-regulations>

- King & Spalding — “Department of Commerce Issues Export Controls on Advanced Computing Chips and Artificial Intelligence Models” — <https://www.kslaw.com/insights/articles/departments-of-commerce-issues-export-controls-on-advanced-computing-chips-and-artificial-intelligence-models>
 - AI Diffusion Rule overview — BIS press release Jan 13, 2025 (Tier 3 includes Azerbaijan) — <https://www.bis.gov/>
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GEORGIA (D:1 / D:3) — Tier 3 under AI Diffusion Rule

Policy Context

- Tier 3 / Country Group D under EAR.
- December 19, 2023 BIS rule added at least one Georgia-domiciled entity for diversion of US-origin goods to Russia (part of the 12-entity package).
- September 26, 2024 Federal Register notice added a Georgia-domiciled entity (4-entity package, alongside Armenia).
- Major documented transit corridor via Georgian ports (Poti, Batumi) and overland crossings.
- Georgia restricted sanctioned-vehicle transit in August 2023, causing an immediate drop in Armenian vehicle exports through Georgia.

Denied Cases / Entity List Additions

Case 1: Georgia-domiciled entity — December 19, 2023

BIS Entity List - Part of BIS “BIS Adds 12 Entities to Entity List for Supporting Russia’s War Against Ukraine.” - Why listed: Diversion of US-origin goods (including GPUs) to Russia. - Specific entity name(s) to be confirmed from Federal Register text. - Source: <https://www.bis.doc.gov/index.php/documents/about-bis/newsroom/2353-bis-adds-12-entities-to-entity-list-for-supporting-russia-s-war-against-ukraine>

Case 2: Georgia-domiciled entity — September 26, 2024 BIS Entity List (4-entity package)

- Federal Register: 89 FR 78721 — Added entities under destination scopes Armenia, Georgia, Hong Kong, China for diversion of US-origin goods to Russia (incl. GPUs). - Source: <https://www.federalregister.gov/documents/2024/09/26/2024-21958/addition-of-certain-entities-to-the-entity-list>

Case 3: Kairos Logistics (Georgia) — Documented diversion investigations

- Per Ukrainian/Georgian investigative outlet ifact (August 2024): documented flow of drones, processors, GPS devices,

and memory cards via Kairos Logistics. - Why flagged: Re-export of dual-use controlled items to Russia. - Source: shadowline.pro — “How Central Asia became a main hub for evading Russian sanctions” — <https://shadowline.pro/how-central-asia-became-a-main-hub-for-evading-russian-sanctions/> - RBC Ukraine — “Media discovered how sanctioned goods enter Russia through Georgia” — <https://newsukraine.rbc.ua/news/media-discovered-how-sanctioned-goods-enter-1722550541.html>

Case 4: Cargo Rapido (Georgia) — Documented diversion investigations - Per ifact (August 2024): documented flow of processors and memory cards. - Why flagged: Re-export of dual-use controlled items to Russia. - Source: same as above.

Approved Cases

- **No publicly documented BIS affirmative license approval for advanced GPUs to Georgia** surfaced in primary sources (BIS does not publish affirmative approvals).

Notable civilian-sector actors

- **Bank of Georgia** — Major Georgian bank; no public BIS license case surfaced.
- **TBC Bank** — Major Georgian bank; no public BIS license case surfaced.
- **Georgian AI initiatives / USAID programs** — Various public-private AI programs; no public BIS license case.
- **PASHA Bank Georgia operations** — Tied to Azerbaijani PASHA Holding ecosystem; no public BIS case.

Diversion pattern

- Georgia’s Black Sea ports (Poti, Batumi) are major transit corridors for sanctioned goods to Russia.
- Car exports rose 600-800% in 2024-2025, with documentation often listing Armenia, Kazakhstan, or Kyrgyzstan as destinations.
- Russian crude flows via Georgia, including to a new Kulevi refinery (Rusneft, Oct 2025).
- After August 2023 Georgian transit restrictions, the channel partially shifted.

Sources — Georgia

- BIS press release Dec 19, 2023 — <https://www.bis.doc.gov/index.php/documents/about-bis/newsroom/2353-bis-adds-12-entities-to-entity-list-for->

supporting-russia-s-war-against-ukraine

- Federal Register Sep 26, 2024 — <https://www.federalregister.gov/documents/2024/09/26/2024-21958/addition-of-certain-entities-to-the-entity-list>
 - Shadowline — “How Central Asia became a main hub for evading Russian sanctions” — <https://shadowline.pro/how-central-asia-became-a-main-hub-for-evading-russian-sanctions/>
 - RBC Ukraine — <https://newsukraine.rbc.ua/news/media-discovered-how-sanctioned-goods-enter-1722550541.html>
 - Compensation.com.ua — “Sanctioned goods continue to be shipped from Georgia to Russia” — https://compensation.com.ua/en/news/Sanctioned_goods
 - Caspian Post — <https://caspianpost.com/caucasus-caspian-intelligence/how-russia-uses-the-south-caucasus-to-circumvent-sanctions>
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MOLDOVA (D:1 / D:3) — Tier 3 under AI Diffusion Rule

Policy Context

- Tier 3 / Country Group D under EAR.
- Moldova has ongoing Russian influence/transnistria concerns; partial recognition of Russian-controlled territory.
- Transnistria is an unmanaged frozen-conflict zone with documented Russian military presence.
- No specific BIS Entity List additions of Moldova-domiciled entities surfaced in this research round under Russia-diversion rules.
- EU candidate country status (granted June 2022) — additional EU/US alignment pressure.

Approved Cases

- **No publicly documented BIS affirmative license approval for advanced GPUs to Moldova** surfaced in primary sources.

Denied Cases

- **No publicly documented BIS license denial involving a named Moldovan entity** for GPU/advanced-computing diversion surfaced in this research round. Moldova’s role as a trans-shipment corridor is less documented than Armenia/Georgia.

Notable civilian-sector actors

- **Orange Moldova** — Subsidiary of Orange Group (France); no public BIS case.
- **Moldcell** — Moldovan mobile operator; no public BIS case.
- **Government digital transformation / EU partnership** — Various EU-funded programs; no public BIS case.
- **Moldova USAID programs** — Various US-funded AI/governance programs; no public BIS case.

Diversion concerns

- Transnistria-based Russian military presence creates documented diversion-risk profile.
- Less public documentation than Armenia/Georgia but EU and US officials have flagged Moldova as a corridor-of-concern.

Sources — Moldova

- BIS Entity List (no Moldova-domiciled entities added under Russia-diversion rules as of this research) — <https://www.bis.gov/>
 - EU Council statements on Moldova alignment with restrictive measures (2024-2025) — <https://www.consilium.europa.eu/>
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Cross-Country Policy & Enforcement Context

AI Diffusion Rule (January 13, 2025)

- BIS final rule establishing tiered license requirements for advanced AI computing.
- Tier 3: country-specific validated licenses required; presumption of denial for many transactions; Armenia, Azerbaijan, Georgia, Moldova all in Tier 3.
- Rule rescinded/paused May 2025 under Trump administration — successor framework TBD.

Entity List cumulative additions

- December 19, 2023: 12 entities added including actors in Armenia, Georgia (Russia diversion).
- September 26, 2024: 4 entities added including Armenia and Georgia.
- May 2024: 73-entity Russia package (includes actors operating through Armenia/Georgia).

- December 2, 2024: BIS advanced-computing/AI package — 140 entity additions (mostly China).

Federal Register / BIS URLs (master list)

- BIS press releases: <https://www.bis.gov/> (formerly <https://www.bis.doc.gov/>)
 - Federal Register Entity List filter: <https://www.federalregister.gov/agencies/industry-and-security-bureau>
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Methodology Note

This file will be updated as additional targeted searches return results. Primary BIS/Federal Register direct fetches were redirected (302) during this session; secondary reporting (Reuters, FT, Russian-language outlets, Caucasus Watch, Caspian Post) has been used to corroborate. The user should treat Entity List addition dates and entity counts as confirmed; specific entity names (e.g., the four Armenia-domiciled actors in the December 19, 2023 rule) require direct verification of BIS PDF / Federal Register text in a follow-up round.

Research Gaps to Address in Follow-up

1. Specific names of the four Armenia-domiciled entities added December 19, 2023.
2. Specific names of the September 26, 2024 Armenia/Georgia entities.
3. Any BIS license-application denial statistics for Country Group D (BIS publishes annual “License Application Denial Trends” reports).
4. Any Azerbaijan-specific BIS enforcement actions in 2022–2025.
5. Any Moldova-specific BIS enforcement actions in 2022–2025.
6. NVIDIA / AMD public 10-K or 10-Q disclosures of license-application volumes and outcomes by destination.
7. US Embassy Yerevan / Baku / Tbilisi / Chisinau statements on AI / GPU partnerships.