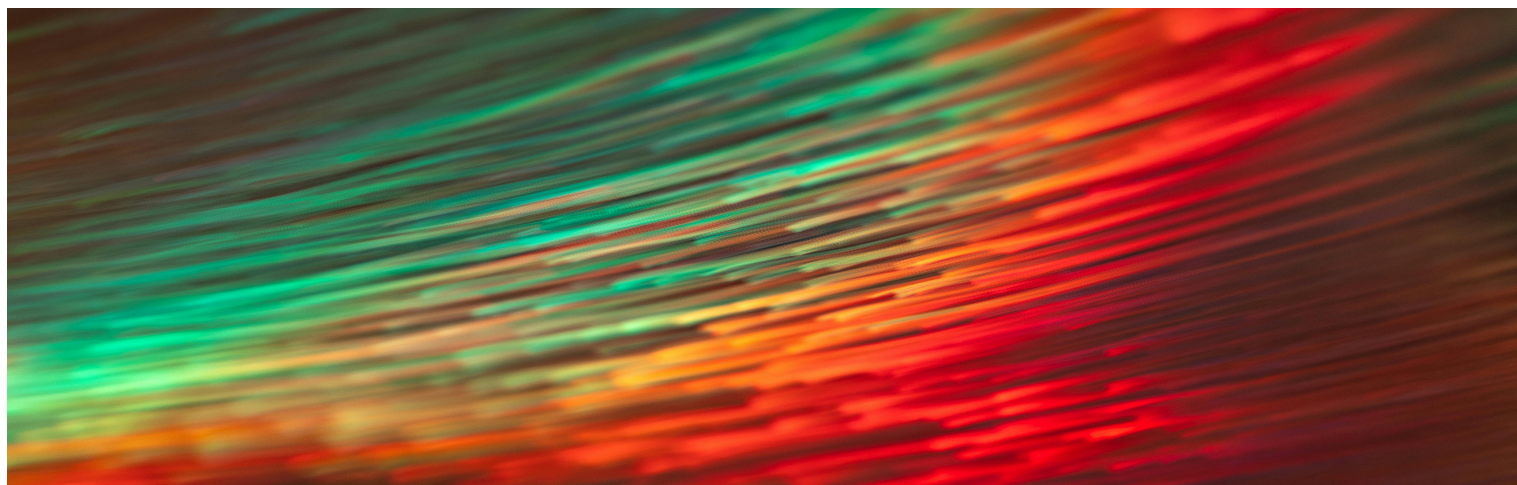




Optics, Photonics, Imaging, & Lasers (OPIL)

The Optics, Photonics, Imaging, & Lasers (OPIL) sector is experiencing dynamic and vibrant growth in the US and globally. Yormick Law focuses on the international business and trade and national security aspects of the OPIL sector. Yormick Law attorneys regularly advise US and non-US companies in navigating and analyzing jurisdiction and classification of products and technologies under increasingly strict US export control laws and regulations, on licensing, authorizations, and reporting requirements, and representing companies in government investigations and voluntary disclosures of violations of the Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR). We also advise OPIL companies on importation and supply chain strategies and compliance with US Customs laws and regulations.

For many OPIL and related technology companies, the complexity of complying with export controls and employment discrimination laws is challenging. We often advise clients on the intersection of export controls and employment laws in the recruitment and employment of foreign persons and work with immigration counsel to address the range of immigrant and non-immigrant visa strategies for companies.

The OPIL sector is particularly vibrant in locations where the firm has a presence—Florida, New England (particularly Massachusetts and New Hampshire) and New York, particularly the Rochester-Finger Lakes region. The firm is a Preferred Partner of the American Precision Optics Manufacturers Association (APOMA) and a Supporting Industry Member of New York Photonics. Additionally, individual attorneys are members of SPIE and attend events such as Photonics West, Defense+Security, and Optifab.

The firm's involvement in the OPIL sector is rooted in Managing Member, Jon P. Yormick, been actively involved in the Rochester-Finger Lakes OPIL community for nearly 20 years, regularly attending meetings, and giving presentations on issues relating to export controls and unmanned aerial systems (UAS), at organizations that support the sector's growth, such as New York Photonics (formerly Rochester Regional Photonics Cluster), the Monroe County Upstate New York (MCUNY) APEX Accelerator, NY SMART I-Corridor, the Greater Rochester Enterprise, NextCorps (formerly High Tech Rochester).

In 2026, the firm launched a quarterly series of meetings, *Export Controls & National Security Roundtables*, in Rochester, to gather companies in the Buffalo-Rochester-Syracuse corridor to discuss developments and share best practices regarding export controls and national security compliance, building on a prior series of meetings hosted at Greater Rochester Enterprise that began at the start of Export Control Reform (ECR) in 2013, which includes several companies from the OPIL community.

Representative Matters

OPTICS, PHOTONICS, IMAGING, & LASERS (OPIL)

Advising a Pennsylvania designer and manufacturer of optical filters, laminations, and thin film coatings for precision optics regarding an ITAR and EAR jurisdiction and classification analysis of certain short wave pass (SWP) filters for commercial and defense aviation use, and preparing a Commodity Jurisdiction (CJ) ruling request submitted to the US Department of State, Directorate of Defense Trade Controls (DDTC)

Advised a New York precision optics manufacturer on EAR classification of optics “specially designed” for potential defense applications and related export controls under the EAR

Successfully obtained export and reexport licenses for a New York-based subsidiary of a European commercial laser manufacturer from the US Department of Commerce, Bureau of Industry and Security (BIS) for sales to China, the Kingdom of Saudi Arabia, a technology license to share EAR-controlled technology with a Taiwanese supplier, and also continuing advice to the client on export controls compliance issues regarding the “deemed export” rule under the EAR relating to employment of the foreign person engineers from Germany and India, including conducting export compliance training

Advised a Cleveland-based defense subcontractor on jurisdiction and classification of an electro-optical cable assembly and related Multifunction Towed Array (MFTA) items manufactured for US Navy Anti-Submarine Warfare program, the commercial applications of similar products for underwater seismic surveys for oil/gas exploration, and US export controls risks and compliance regarding use by Chinese commercial vessels operating in the South China Sea.

Successfully represented a New York optics company before BIS, Office of Export Enforcement (OEE) New York Field Office in the investigation of potential export and reexport violations of EAR- and ITAR-controlled optic devices, resulting in a finding of no violations and advised the company on jurisdiction and classification determinations, export license requirements, and enhancements to its export compliance program

Provided analyses for an Arizona-based subsidiary of an Ohio-based company on potential export controls covering a fiber optic sensing perimeter security system, including advising on entering into a non-disclosure agreement for testing at a leading US research university.

Advised a New York precision optics company on ITAR compliance relating to the employment of a Canadian optics designer

Advised a New York supplier to the OPIL sector on compliance with DFARS regulations relating to Controlled Unclassified Information (CUI) and Commercially available off-the-shelf items

Represented a New York global leader in the development, manufacture and distribution of imaging and marking consumables on customs and international trade matters, including representation before CBP on requests for information, NAFTA verification, prior disclosures and

NAFTA duty refunds, and before the Canada Border Services Agency (CBSA) in classification verification proceedings

IF YOUR COMPANY OPERATES IN THE OPTICS, PHOTONICS, IMAGING & LASERS SECTOR AND NEEDS ASSISTANCE WITH EXPORT CONTROLS, LICENSING, COMPLIANCE, OR GOVERNMENT INVESTIGATIONS, PLEASE CONTACT US AT INFO@YORMICKLAW.COM