

# Matt Axelrod Interviewed by Global Investigations Review About Suspension of Penalty by U.S. Bureau of Industry and Security

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A *Global Investigations Review* article describing how the U.S. Bureau of Industry and Security suspended a \$1.7 million penalty against a California company for breaching US export controls by cleaning up its compliance program ("[BIS Suspends \\$1.7m Fine on California Semiconductor Tool Company](#)," April 14, 2026), includes commentary by partner Matt Axelrod.

Matt said that BIS occasionally uses suspended fines to show a violation is serious enough to warrant a high penalty even if the agency knows the company can't pay. "BIS doesn't want companies to go out of business, but there is a public education aspect to bringing an enforcement action," he said.

Matt, who co-chairs Gibson Dunn's Sanctions and Export Enforcement practice group, is a former Assistant Secretary for Export Enforcement at the Bureau of Industry and Security.

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[Matthew S. Axelrod](#)

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