

THE WORKING WATCHLIST · VOLUME I · POST 02

# The Roosevelt Weekly Report. *Volume I · Post 02.*

Eight sectors, each paired with the live U.S. statute, regulation, court venue, or licensing window now active — and the recommendation we are making to principals.

**THIS WEEK  
ON THE DESK**

- 5 MAY** UAE National AI Strategy 2031 federal-tier delivery patterns continue to anchor sovereign agentic procurement reads. The MBR Centre for Government Innovation is the public touchpoint.
- 6 MAY** PIF HUMAIN public mandate and the SDAIA Allam baseline (LEAP 2024 disclosure) frame the Saudi-side selection cycle for sovereign AI builds.
- 7 MAY** BIS AI Diffusion Framework (Jan 2025 IFR) and NIST AI RMF 1.0 continue to set the U.S.-side clearance frame against which any GCC sovereign build clears.

**LEAD SECTOR  
THIS WEEK  
DUAL-USE CHIP &  
SOVEREIGN-AI  
COMPUTE**

The Gulf sovereign agentic window is the cleanest U.S.-side compute clearance read available this week. The UAE's stated half-of-government-services AI / agentic posture under the National AI Strategy 2031 framework, and PIF's launch of HUMAIN as the kingdom's sovereign AI vehicle in May 2025, have between them moved the partnership question from *whether* a sovereign build will integrate agentic systems to *who* the canonical early-adoption partners will be. Reading the BIS AI Diffusion Framework and NIST AI RMF 1.0 in the same week is what produces a clearance-defensible build; reading them apart is what produces compliance-stranded vendor commitments. Watch BIS Federal Register entries and ECCN 3A090 advisory opinions as the leading signal.

Nº	SECTOR	KEY OBSERVATIONS THIS WEEK	WHY IT MATTERS	RECOMMENDATIONS WE ADVISE
I	Sovereign asset <i>recovery</i>	<b>U.S. COURT TRACK</b> FSIA § 1605(a)(6) confirmation cycles continue against blocked sovereign assets. OFAC 31 CFR Part 560 specific licensing remains the parallel attachment instrument.	The recognition cycle still moves <i>quarter by quarter</i> , not on headlines. Few Gulf-side advisors read this surface cleanly at executive tier.  <b>PUBLIC RECORD:</b> DOJ CIVIL DIVISION · OFAC RECENT ACTIONS	Read DOJ SOI filings against OFAC specific-license issuances on the same week, not in series. Track filings weekly.
II	Critical-minerals <i>offtake</i>	<b>U.S. INCENTIVE TRACK</b> IRA §§ 45X & 48C, DPA Title III, DOE LPO and DFC postures continue to move on quarterly cycles. DPA Title III FY-cycle remains active.	Static channels continue to misread an environment where U.S.-side incentive cycles move <i>quarterly</i> .  <b>PUBLIC RECORD:</b> IRS § 45X FINAL REGS (OCT 2024) · DOE LPO BOARD MINUTES	Sequence § 45X / § 48C / DPA reads in instrument order, not headline order, before the next award window.
III	Dual-use chip & sovereign-AI compute <small>LEAD THIS WEEK</small>	<b>U.S. LICENSING TRACK</b> BIS § 1758 licensing under the AI Diffusion Framework (Jan 2025 IFR), NIST AI RMF 1.0 alignment, and ITAR / EAR / Wassenaar end-use verification all live against the UAE 2031 target and PIF / HUMAIN launch.	The <i>partnership cycle</i> inside the sovereign agentic window decides the canonical early-adoption reference points for the decade that follows.  <b>PUBLIC RECORD:</b> BIS FEDERAL REGISTER · ECCN 3A090 ADVISORY OPINIONS · UAE NATIONAL AI STRATEGY 2031 · HUMAIN PUBLIC MANDATE	Sequence the build in instrument order. Prefer NIST RMF + BIS Diffusion-cleared vendors with production load in regulated environments.
IV	U.S. inbound <i>investment review</i>	<b>U.S. REVIEW TRACK</b> CFIUS, ICTS (Commerce), and Team Telecom continue to run sequential, not parallel, on sovereign-linked agentic and AI-compute transactions.	<i>Cumulative</i> review timing — not any single review — sets the deal calendar.  <b>PUBLIC RECORD:</b> CFIUS ANNUAL REPORT · FCC TEAM TELECOM ORDERS · COMMERCE ICTS RULEMAKING	Map the full sequential review path before the first filing, not after.
V	GCC arbitration & award enforcement	<b>ARBITRATION &amp; ENFORCEMENT</b> DIFC seat, recognition into GCC commercial-court systems, and <b>beneficial-ownership unwind</b> across BVI / Cayman / Jersey / Mauritius / Singapore continue.	The factual support layer for recognition is most often built <i>after</i> , not before, the award lands.  <b>PUBLIC RECORD:</b> DIFC COURT OF APPEAL DOCKET · NY 28 U.S.C. § 1782 FILINGS	Build the beneficial-ownership unwind workspace before the award, not after.
VI	Northern Iraq <i>energy corridor</i>	<b>RISK &amp; LICENSING</b> Baghdad–Erbil revenue-sharing framework, UAV-strike threat surface, and OFAC general & specific licensing on northbound flows. The Washington and Ankara cadences continue to set restart and reactivation gates.	Restart gates ride <i>three reads at once</i> . Commercial-flow assumptions break otherwise.  <b>PUBLIC RECORD:</b> OFAC GENERAL LICENSES · STATE DEPARTMENT BRIEFINGS	Track the Washington and Ankara cadences in parallel, not in series.
VII	Family-office <i>migration</i>	<b>VEHICLE &amp; REMEDIATION</b> DIFC / ADGM / VCC structures continue as principal vehicles. KYC remediation via Refinitiv World-Check, Dow Jones Risk Center, LexisNexis Bridger remains the pre-onboarding-defensible standard.	Vehicles must be <i>regulator-defensible at first onboarding</i> , not the third.  <b>PUBLIC RECORD:</b> ADGM & DIFC PUBLIC REGISTERS · MAS VCC REGISTER	Sequence KYC remediation before vehicle migration, not after.
VIII	War-interval <i>defence procurement</i>	<b>PROCUREMENT CADENCE</b> 30 / 60 / 90 onboarding posture, executive-tier cyber readiness, standing sovereign tabletop architecture. The cadence continues to outpace procurement re-cycle.	Procurement re-cycle remains <i>slower</i> than the cadence at which the threat surface actually moves.  <b>PUBLIC RECORD:</b> DOD CONTRACT AWARDS · CISA ADVISORIES	Hold a standing instructable file, not an open-ended engagement.

SECTORS WATCHED <i>Eight, weekly</i>	INSTRUMENTS TRACKED <i>Six statutes &amp; CFRs</i>	OPEN WINDOWS <i>Two on calendar this quarter</i>
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**FREE READ OF THE WEEK**

BIS AI Diffusion Framework (commerce.gov/bis) — review the January 2025 interim final rule against any sovereign-tier compute exposure in your portfolio.

**READING-DESK MEMOS**

Available on request to qualifying principals. [arintelconsulting.com](mailto:arintelconsulting.com)