AKSHAYAAI RESEARCH — CHIPS / SHORT-REPORT ASSESSMENT

AMD — Hunterbrook China Export-Control Short

v1 · 2026-11-19 · Hunterbrook thesis published this morning; AMD had not issued a formal response at time of writing · Running document
Source tags: **[Reported]** company filings, official data or news reports · **[Estimate]** third-party estimate · **[AkshayaAI view]** AkshayaAI's judgement, including every rating · **[Calc]** our calculation. **Not investment advice:** 'strong' marks where the evidence is strongest, not a recommendation to buy or sell.

Key takeaways

• Hunterbrook published a short report on AMD on 2026-11-19 alleging that U.S.-blacklisted Chinese server maker **IEIT Systems** has continued to receive newer AMD firmware since its March 2025 Entity List placement — six firmware versions, most recent 2026-10-19. **[Reported]**

• The investigation does NOT establish an export-control violation. Hunterbrook could not determine how IEIT obtained the firmware or whether licenses existed. AMD declined to answer their questions. **[Reported]**

• Market reaction: AMD down somewhere between -2.9% and -7.9% intraday depending on snapshot; no AMD formal rebuttal yet. Hunterbrook disclosed it is **short AMD and long a basket of comparable securities**. **[Reported]**

• Business-case read: this is a HEADLINE/REGULATORY risk, not a durable earnings-degradation thesis. AMD's 2027 earnings power is driven by hyperscaler AI capex (~$690B in 2026) — OpenAI 6GW, Meta 6GW, MI350/MI400/MI450 ramp. China DC revenue is already export-control-capped by the H20/MI308 regime. **[AkshayaAI view]**

• AkshayaAI view: short is a 1-3 month tactical trade on headline risk; the long-term AMD thesis is unchanged. Worst plausible: BIS fine / single-quarter one-off hit. Best plausible: compliance clarifies, no action, Data Center continues to ramp +135% in 2027 per Oppenheimer. **[AkshayaAI view]**

1. What Hunterbrook actually said

Attribution below follows the Hunterbrook investigation published 2026-11-19 at hntrbrk.com/investigations/amd-china and amplified via Investing.com, TipRanks and multiple X accounts. AkshayaAI has not independently verified the firmware-repository claims or the licensing-income trace.

1.1 The core allegation — IEIT firmware persistence

• **IEIT Systems** is a Chinese server manufacturer placed on the U.S. Commerce Department's **Entity List in March 2025**. Under the Entity List, U.S. exports to IEIT require a BIS license. **[Reported]**
• Hunterbrook alleges IEIT has **continued to publish BIOS/firmware updates containing at least six newer versions of AMD firmware** since the blacklisting, the most recent dated **October 19, 2026**. **[Reported]**
• Hunterbrook could not determine how IEIT obtained the newer firmware, or whether AMD held an export license authorising the activity. **[Reported]**

1.2 The related-entity claim (possible sanctions-evasion shell game)

• Hunterbrook alleges three entities — **Maginfra (China), Kaytus (Singapore), and Aivres (California)** — sell servers built on AMD chips under their own brands. **[Reported]**
• Firmware across these three entities and IEIT reportedly is **99.94% identical**, a near-fingerprint match that Hunterbrook argues suggests they may be reselling IEIT-designed servers. **[Reported]**
• If accurate, this would be a textbook Entity-List evasion pattern. Hunterbrook stops short of asserting evasion as fact — they report the firmware fingerprint and identify the pattern. **[Reported]**

1.3 Other flags raised

Allegation	Number	Context
Licensing income traced to 2 Chinese chip JVs blacklisted in 2019	$67M in 2025	Hunterbrook: licensing income appears tied to entities already on the Entity List. AMD position unclear. **[Reported]**
Assembly / test / packaging dependence on Chinese partner Tongfu	Majority of AMD chip ATP	Per AMD's own 10-K: two JVs 85%-owned by Tongfu Microelectronics handle the bulk. Not new; structurally a supply-chain dependency. **[Reported]**
China + Hong Kong revenue (FY2025)	$7.75B	From AMD 10-K. ~1/4 of total AMD revenue. **[Reported]**