

EXPORT CONTROLS & ECONOMIC SANCTIONS



Manufacturers, distributors, retailers, technology companies, service providers, and foreign suppliers turn to Husch Blackwell for guidance on export controls and economic sanctions. We advise on compliance and licensing related to Export Administration Regulations (EAR); International Traffic in Arms Regulations (ITAR); Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) regulations; trade sanctions and embargoes administered by the Office of Foreign Assets Control (OFAC); Foreign Corrupt Practices Act (FCPA) compliance and representation; and anti-boycott compliance.

The multidisciplinary strength of the broader firm enables us to call on attorneys in other strategic areas of law, including corporate, government relations, white collar crime and investigations, intellectual property, and environmental matters.

Representative Experience

Led worldwide investigation on U.S. export controls and economic sanctions compliance for global supplier of equipment for oil and gas exploration.

Conducted deemed export control reviews for various global pharmaceutical, biotechnology, and financial services clients.

Represented global media and communications clients

Husch Blackwell's department stands out due to its exceptional combination of local expertise and global reach.

— Chambers USA
2025 —

Contact Information

Cortney O'Toole
Morgan
202.378.2389
cortney.morgan@
huschblackwell.com

Grant D. Leach
402.964.5143
grant.leach@
huschblackwell.com

before OFAC in trade sanctions investigation.

Submitted numerous voluntary disclosures to Directorate of Defense Trade Controls (DDTC), Bureau of Industry and Security (BIS), Bureau of Census, Foreign Trade Division (Census), and OFAC concerning export compliance issues, including unlicensed exports of goods and technical data.

Advised clients on export controls, sanctions, FCPA, and antiboycott matters, including internal audits and investigations.

Provided acquisition due diligence advice to clients in export controls, sanctions, and FCPA matters.

Reviewed documentation to determine whether it contains antiboycott information/language, which would prohibit an activity or require reporting to the Department of Commerce as per the EAR.

Analyzed exported goods to assist in determination of applicability of export control licensing/approvals by BIS and DDTC; advised clients concerning commodity classifications for Export Control Classification Numbers and United States Munitions List.

Counseled a global financial reporting service on U.S. sanctions compliance in connection with a reporter's pending trip to Iran to cover an extremely urgent assignment, which entailed advising on authorized types of travel under pre-existing general licenses for journalistic activities and also confirming what electronic devices the reporter could and could not take with them into Iran under

applicable U.S. export controls.

Counseled a leading biofuel producer and commodities trader on potential U.S. economic sanctions applicable to them as a result of their contemplated entry into a cross-border joint venture with a Mexican counterparty that was simultaneously engaged in ongoing transactions with the Cuban government. This work included performing sanctions diligence on the Mexican counterparty as well as advising the client on how to restrict its own operations and the joint venture's operations in order to avoid violating U.S. sanctions against Cuba.

Assisted client in matters involving U.S. export controls and trade sanctions including advice relating to ongoing sales, installation, and training activities performed in Iran and associated payment transactions conducted under various General Licenses issued by the U.S. Treasury Department – Office of Foreign Assets Control (OFAC).

Assisted in an internal export compliance review of client's export shipments of EAR and ITAR controlled aviation equipment and parts, including preparing and submitting various voluntary self-disclosures under the EAR and Census Foreign Trade Regulations, as well as advising and assisting client in conducting an internal investigation relating to certain unauthorized shipments to countries in the Middle East.

Served as outside export controls and trade sanctions compliance counsel to a publicly traded transportation company including entry into a joint venture with a Russian

counterparty which involved the transfer of certain product designs to the joint venture and the development of appropriate safeguards to prevent the joint venture from potential reexports to prohibited and sanctioned parties in Russia or the Crimea Region of Ukraine.