



## Gwen Green

Of Counsel

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**Gwen Green concentrates her practice on international trade and regulatory compliance matters that facilitate clients' efficient trade with and from the U.S.**

### PRACTICES

Export Control (ITAR/EAR) and Trade Sanctions (OFAC)  
 Foreign Corrupt Practices Act and Anti-Corruption  
 Government Investigations and White Collar Defense  
 Commercial Litigation  
 Compliance Services  
 Compliance Systems, Audits, and Disclosures  
 Committee on Foreign Investment in the United States (CFIUS)  
 International Arbitration  
 International Trade and Compliance

### EDUCATION

Harvard Law School, J.D., 2007  
*Civil Rights- Civil Liberties Law Review*,  
 General Editor  
 College of William and Mary, B.A., 2004  
*cum laude*  
 Public Policy, with high honors in  
 Government

### BAR ADMISSIONS

District of Columbia

### COURT ADMISSIONS

U.S. Supreme Court  
 U.S. District Court for the District of  
 Columbia

Gwen counsels U.S. and non-U.S. companies, organizations, and individuals on laws and regulations affecting international trade and business, including the International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR), U.S. sanctions regulations administered by the Office of Foreign Assets Control (OFAC), laws governing the Committee on Foreign Investment in the United States (CFIUS), and the Foreign Corrupt Practices Act (FCPA).

A significant part of Gwen's practice involves internal investigations, voluntary disclosures, and compliance program reviews involving the ITAR, EAR, U.S. economic sanctions, and the FCPA. Her practice also includes counseling and advising clients in due diligence investigations, audits, and risk assessments. In addition, Gwen helps clients navigate the complex regulatory and compliance issues often implicated in foreign investments in the United States and guides clients through the CFIUS review process.

Gwen regularly advises clients how to develop and implement effective corporate compliance programs in the areas of U.S. export controls, U.S. economic sanctions, anti-boycott regulations, and the FCPA. Gwen's comprehensive understanding of these complex, highly-regulated and ever-changing areas allows her to proactively guide clients to re-evaluate and revise programs so they can continue doing business. When possible violations are discovered, Gwen provides strategic advice regarding the voluntary disclosure process, and she helps clients navigate and negotiate potential penalties.

### CLIENT RESULTS

Counseling Fortune 100 heavy equipment manufacturer on U.S. export controls and economic sanctions compliance matters.

Counseling major defense contractor on compliance with U.S. export controls, including internal investigations, voluntary disclosures, and general advice and counsel.

Conducting numerous detailed audits and risk assessments of compliance programs.

Drafting numerous voluntary self-disclosures to the Departments of State,

Commerce, and Treasury.

Representing clients in internal and government investigations involving potential violations of U.S. export controls, economic sanctions, and the FCPA.

## PUBLICATIONS

"Beware of Export Control Compliance in COVID-19 Teleworking Environment," *Holland & Hart News Update*, Co-Author, 03/25/2020

"3D Printing/Blockchain Merger: A potential supply chain security and export control compliance tool?," *WorldECR*, Co-Author, February 2020

"Russian Nationals and Others Charged with Attempting to Evade U.S. Sanctions to Aid Russian Government-Controlled Business," *International Compliance Blog*, Co-Author, 12/20/19

"OFAC: Sanctions Compliance Provisions in Lease Agreements Alone May Be Insufficient," *International Compliance Blog*, Co-Author, 11/27/19

"U.S. Hits Cuba With Another Round of Sanctions - De Minimis Threshold Dropped to 10 Percent," *International Compliance Blog*, Co-Author, 10/22/2019

"OFAC Sanctions "Sudanese Oligarch" for Fraud and Corrupt Dealings in South Sudan," *International Compliance Blog*, Co-Author, 10/18/2019

"Trump Administration Tightens Cuba Sanctions, Eliminates "U-Turn" Authorization," *International Compliance Blog*, Co-Author, 09/12/2019

"Partial Economic Embargo: United States Significantly Expands Sanctions Against Venezuela's Government," *International Compliance Blog*, Co-Author, 08/07/2019

"OFAC Expands Sanctions-Related Rejected Transaction Reporting Requirements," *Holland & Hart News Update*, Co-Author, 07/19/2019

"Export Control Laws Not a Blank Check to Exclude Job Applicants," *Holland & Hart News Update*, Co-Author, 02/21/2019

"Treasury Issues New CFIUS Interim Rules," *Holland & Hart News Update*, Co-Author, 10/23/2018

"Accelerating International Cooperation in Fraud, Corruption, and Other Government Investigations and Enforcement Actions in 2017," *TerraLex Connections*, Co-Author, February 2018

"Why is Sudan Not Subject to the Same ITAR Prohibitions as Other State Sponsors of Terrorism?," *International Compliance Blog*, Co-Author, 10/18/2017

"U.S. Government Revokes the Sudanese Sanctions Regulations, But Restrictions and Risks Remain," *Holland & Hart News Update*, Co-Author,

October 2017

"Accelerating International Cooperation in Fraud, Corruption, and Other Criminal Investigations and Enforcement Actions," *Holland & Hart News Update*, Co-Author, 09/12/2017

"Sanctions économiques et contrôle export: regards croisés franco-américains," *Echanges Internationaux, Comité Français de la Chambre de Commerce Internationale (ICC France)*, Co-Author, April 2017

### **SPEAKING ENGAGEMENTS**

"Europe /United-States of America: Export Control of Dual-Use Goods and International Economic Sanctions Outlook for 2017," *ICC France Conference*, Paris, France, February 6, 2017

"International Business Transactions: Compliance Challenges and Cross-border Investigations," *Association of Corporate Counsel Ethics Day*, Denver, CO, December 8, 2016

"2016 U.S. Export Controls Compliance Seminar," *U.S. Commercial Service*, Boise, ID, May 2016

"When Do I Need to Worry About Export Control Laws for Technology?," *Association of Corporate Counsel, Houston Chapter, IP Practice Group*, Houston, Texas, October 11, 2012

### **PROFESSIONAL AND CIVIC AFFILIATIONS**

- American Bar Association, Fellow
- District of Columbia Bar Association, Member
- District of Columbia Court of Appeals Board on Professional Responsibility, Alternate Hearing Committee, Member
- D.C. Bar Foundation, Young Lawyers Network Leadership Council, Member
- Young ICCA (International Council for Commercial Arbitration), Member
- Access College Foundation, Former Board Member
- Society for International Affairs, Member