

## Gregory Husisian

### Partner

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Gregory Husisian is a partner and litigation attorney with Foley & Lardner LLP. Gregory is chair of the firm's International Trade and National Security Practice, focusing on both international trade and international regulatory issues.

Before entering private practice, Gregory clerked for the Honorable Jerry E. Smith of the Fifth Circuit Court of Appeals.

### **International Regulatory Counseling**

Gregory regularly counsels clients regarding international regulatory issues posed by the Office of Foreign Assets Control (OFAC) and other economic sanctions, export controls issues posed by the International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR), and anticorruption issues posed by the Foreign Corrupt Practices Act (FCPA) and other anticorruption laws. He also represents companies with national security concerns in acquisitions before the Committee on Foreign Investment in the United States (CFIUS).

As a member of the Foley Government Enforcement Defense & Investigations Practice, the co-chair of the Foley Automotive Team, and a member of the Foley International Team, Gregory's practice encompasses all aspects of international regulation of exports and international conduct, including counseling, compliance, training, investigations, and enforcement actions/self-disclosures.

Gregory has authored a guide to international compliance best practices and risk-assessment toolkits designed to help multinational companies identify and manage their international regulatory risk. These items are available on request by emailing Gregory.

### **Compliance and Regulatory Risk Management**

Gregory regularly counsels clients regarding compliance and regulatory risk-management across the broad range of international and domestic regulatory regimes, including through the conduct of comprehensive risk assessments, the creation of codes of conduct and compliance policies, the construction of internal controls and standard compliance operating procedures, and the establishment of national and international compliance and risk management departments. Gregory has conducted compliance audits and training at numerous companies in the United States, South America, Europe, and Asia.

### **International Trade**

Gregory has more than 25 years of experience representing clients in international trade litigation, including regarding antidumping and countervailing duty proceedings, section 232 national security reviews, and GSP issues before the U.S. Trade Representative. His international trade litigation experience includes many of the largest international trade matters, including numerous carbon, electrical, and stainless steel products; a wide range of chemical and mineral products; and numerous consumer goods. He represents clients in appeals before the Court of International Trade and the Court of Appeals for the Federal Circuit, as well as in cases before NAFTA Panels.

Gregory also counsels clients regarding Customs & Border Protection classification issues, protests, audits, self-disclosures, and responses to Customs subpoenas and requests for information.

### **Representative Experience**

#### **International Trade**

Gregory has represented foreign and domestic companies in dozens of major international trade proceedings, including antidumping and countervailing duty matters. A selection of his most recent representations includes:

- **Section 232 National Security Review.** Represented users of specialty steels opposing imposition of Section 232 tariffs on electrical steel products not produced within the United States
- **International Trade Commission Investigation.** Lead counsel for Japanese steel producer in the ITC investigations regarding Grain-Oriented Electrical Steel from Japan, successfully achieving a negative determination and no imposition of duties
- **International Trade Commission Investigation.** Lead counsel for importer of Silica Bricks from China in ITC investigation, successfully achieving a negative determination and no imposition of duties
- **International Trade Commission Sunset Review.** Co-lead counsel for a major provider of uranium enrichment services in a sunset review of Low Enriched Uranium from France
- **Department of Commerce Review.** Represented a major provider of uranium enrichment services in numerous administrative reviews, achieving low margins that allowed the continued participation of the respondent in the U.S market

#### **Economic Sanctions**

Gregory represents U.S. and foreign companies in all matters related to economic sanctions, including counseling, licensing, compliance, training, and internal investigations and self-disclosures. Representative

recent matters include:

- **OFAC Investigation.** Led large internal investigation for major European insurance company into potential OFAC issues in Cuba, Iran, Sudan, and Syria
- **OFAC Investigation.** Led internal investigation in Mexico for automotive company regarding potential dealings with specially designated persons and related anticorruption issues
- **OFAC Internal Investigation.** Led internal investigation for multinational automotive company into apparent sales into Iran from its foreign subsidiaries, in potential violation of regulations
- **OFAC Licensing.** Secured licenses for a multinational insurance company allowing the provision of global insurance policies, including for persons stationed in Cuba, Iran, and Sudan
- **OFAC Licensing.** Secured licenses for large provider of on-line courses, allowing provision of courses to Iranian students
- **OFAC Compliance.** Prepared economic sanctions compliance policies and internal controls for numerous companies operating in the United States, Europe, Latin America, and Asia to minimize the risk of violations of U.S. and EU economic sanctions regulations

### **Export Controls (ITAR, EAR, Nuclear)**

Gregory represents U.S. and foreign companies in all matters related to the ITAR, EAR, and nuclear controls, including counseling, classification reviews, classification requests, licensing, compliance, training, and internal investigations and self-disclosures. Representative recent matters include:

- **Export Controls Classification Reviews and International Investigation.** Led classification review and investigation into potential EAR violations at large petroleum products supplier
- **Export Controls Classification Reviews.** Led classification reviews to determine export status of ITAR- and EAR-controlled goods, information, software, and technology for numerous manufacturers and software companies
- **Export Controls Internal Investigation and Voluntary Self-Disclosure.** Led internal investigations into the potential unlicensed export of defense articles appearing on the U.S. Munitions List and the Commerce Control List for numerous manufacturers and defense contractors, resulting in the filing of voluntary self-disclosures with the State Department's Directorate of Defense Trade Controls and the Commerce Department's Bureau of Industry and Security
- **Nuclear Export Controls Internal Investigation and Voluntary Self-Disclosure.** Conducted internal investigation and prepared voluntary self-disclosure for exporter covered by the Nuclear Regulatory Commission's nuclear export controls
- **ITAR Compliance.** Prepared export controls compliance policies and technology control plans for defense contractors subject to the International Traffic in Arms Regulations (ITAR)
- **EAR Compliance.** Prepared export controls compliance policies for companies producing and exporting goods covered by the Commerce Control List and subject to controls under the Export Administration Regulations (EAR)

### **Anticorruption/Foreign Corrupt Practices Act (FCPA)**

Gregory represents U.S. and foreign companies in all matters related to the FCPA and other anticorruption regimes, including counseling, compliance, training, and internal investigations. Representative recent matters include:

- **Foreign Corrupt Practices Act Internal Investigation.** Conducted numerous internal investigations into alleged FCPA and anticorruption violations in China and Latin America for multiple automotive companies
- **FCPA Compliance.** Prepared anticorruption, FCPA, and anti-kickback compliance policies and internal controls for companies operating in the United States, Europe, Latin America, and Asia to minimize the risk of violations of anticorruption laws
- **FCPA DOJ Opinion Release.** Prepared DOJ Opinion Request for multinational company seeking to hire director with ties to foreign government

### **Committee on Foreign Investment in the United States**

- **Represented U.S. and Foreign Companies in CFIUS Proceedings.** Represented numerous companies in CFIUS proceedings, including receiving approval for sale of company engaged in providing firearm ballistics analysis for the U.S., state, and local governments
- **Represented U.S. Company being acquired by Chinese company in CFIUS Proceedings.** Represented a U.S. defense contractor that produces EAR-controlled, 600-series military goods before CFIUS, receiving first approval of 600-series defense contractor to a Chinese owner

### **Anti-Boycott**

- **Anti-Boycott Investigation and Voluntary Self-Disclosure.** Conducted an internal investigation into potential violations of U.S. anti-boycott regulations and filed a voluntary self-disclosure with the U.S. Commerce Department's Office of Anti-Boycott Compliance
- **Anti-Boycott Compliance.** Prepared anti-boycott compliance policies for multinational corporations in a variety of industries, including a Fortune 100 energy company, a manufacturer of industrial equipment, and numerous automotive suppliers

### **Presentations and Publications**

Gregory is an experienced speaker who has presented at nearly 100 conferences and webinars on international regulatory, international trade, and compliance issues, covering topics such as export controls, economic sanctions, the FCPA, and antidumping and countervailing duty proceedings. Some of his most recent presentations include:

- "International Trade Issues in the Trump Administration," *Tampa Steel Conference* (Tampa, FL)
- "Anticipating and Controlling International Trade Risk under the Trump Administration," *Danish-American Business Forum* (Copenhagen)
- "International Trade & Investment Under the Trump Administration: Risks and Opportunities"
- "Compliance & Risk Management: Best Practices for Operating at Home and Abroad"

- “Changing Landscape of International Trade—Risks and Opportunities” (Chicago, IL and Milwaukee, WI)
- “Coping with U.S. International Regulations,” *Danish-American Business Forum* (Copenhagen)
- “Regulation of Exports and International Conduct,” *Foro Automotriz Querétaro* (Querétaro Mexico)
- “International Distribution: How (And When) to Conduct an Internal Investigation”
- “Anticipating and Controlling International Trade Risk Under the Trump Administration: Considerations for PE Funds”
- “Navigating the Conflict Minerals Rules”
- “Dealing with Third-Party Risk in International Transactions” (Chicago, IL and Milwaukee, WI)
- “International Regulatory Issues for the Fashion Industry,” *Custom-Made Fashion Industry Assoc.* (Miami, FL)
- “The Changing U.S. Cuba Landscape: Managing Risks and Opportunities” (webcast)
- “U.S. Enforcement Trends Impacting Latin American Financial Services Companies” (Miami, FL)
- “Dealing with Third-Party Risk Overseas” (Chicago, IL and Milwaukee, WI)
- “Navigating the Conflict Minerals Rules” (Chicago, IL and Milwaukee, WI)
- “Compliance and Regulatory Risk Management: Coping with the Aggressive Enforcement of U.S. Laws at Home and Abroad,” *Original Equipment Suppliers Assoc.* (Troy, MI)
- “Practical Suggestions for Internal Risk Assessment for FCPA, OFAC, and AML” (webcast)
- “The Extra-Territorial Application of U.S. Law: Export Controls, Sanctions, and the FCPA” (Aalborg, Denmark)
- “Webcast Q&A on Practical Suggestions for Internal Risk Assessment for FCPA, OFAC, and AML” (webcast)
- “Coping with International Enforcement Actions: Investigation and Compliance Strategies,” *Danish-American Business Forum* (Copenhagen, Denmark)
- “Business Development or Bribery: New Standards, New Challenges Under the FCPA”
- “Surviving OFAC Sanctions: New Rules and Risks for Operating Overseas”
- “Cross-Border Trade Laws: A Strategy for Survival,” *ACC Europe and Transparency International* (Vienna, Austria)
- “Export Controls & Economic Sanctions: New Rules, New Risks, New Realities” (Milwaukee, WI)
- “Key Strategies and Considerations for Doing Business in the Americas”
- “Business Development or Bribery: New Standards, New Challenges Under the FCPA” (Milwaukee, WI and Chicago, IL)
- “Export Diversion and End-Use Monitoring,” *Automotive Industry Action Group* (Troy, MI)
- “A Twelve Step Program for International Compliance,” *Association of Corporate Counsel* (Livonia, MI)
- “FCPA, Export Control, and Economic Sanctions: Enforcement Trends and Compliance,” *Original Equipment Suppliers Assoc. Legal Council* (Troy, MI)
- “FCPA and Foreign Export Control Law Update,” *Original Equipment Suppliers Assoc. Legal Issues Council* (Troy, MI)
- “Coping with U.S. Regulation of Exports’ International Conduct” (Livonia, MI)

- “Strategies for Working with Law Firms on International Compliance and Enforcement Actions,” *BDO International Forensics Conference* (New York, New York) (Keynote Speaker)
- “Foreign Corrupt Practices Act: Overview, Developments, and Red Flags” (Chicago, IL and Milwaukee, WI)
- “Regulations, Enforcement Trends and Compliance Practices for Today’s Environment: A Focus on NHTSA, Export Controls, Antitrust and FCPA,” *Original Equipment Suppliers Assoc.* (Troy, MI)
- “Coping with U.S. Regulation of Exports and International Conduct,” *Original Equipment Suppliers Assoc.* (Troy, MI)
- “U.S. Export Controls and Economic Sanctions Compliance” (Livonia, MI, Waltham, MA, and Milwaukee, WI)
- “Key Strategies and Considerations for Doing Business in the Americas: Restrictions on Trade With Cuba and Other Sanctioned Countries” (Miami, FL)
- “The Role of EU Trade Associations in the Initiation and Resolution of Trade Disputes” (Brussels, Belgium)
- “Export Controls for Government Contractors” (Livonia, MI, Boston, MA, and Milwaukee, WI)
- “The Long Arm of U.S. Law: Avoiding FCPA Liability for the Overseas Conduct of Dealers and Franchisees” (Milwaukee, WI and Chicago, IL)
- “Coping with U.S. Export Controls and Sanctions in the Latin American Market” (Miami, FL)
- “Current Trends in FCPA Enforcement and Compliance” (Milwaukee, WI and Chicago, IL)
- “U.S. Export Controls Reform and Free Trade Developments: Prospects for Change in 2011,” *Overseas Automotive Council* (Miami, FL)
- “Establishment of an Effective FCPA Compliance Program,” *D.C. Bar Assoc.* (Washington, D.C.)
- “The Opportunities of Trade & Challenges of Corruption: Working with Emerging Economies,” *George Washington University School of Business* (Washington, D.C.)
- “The Future of U.S. Export Controls and Sanctions,” *IDCC*
- “Conducting an Effective Internal Investigation of Suspected FCPA Violations,” *American Conference Institute* (New York, New York)
- “FCPA Compliance Strategies for High-Tech Companies,” *Practicing Law Institute* (San Jose, CA)
- “FCPA Compliance for Pharmaceutical and Life Sciences Companies,” *American Conference Institute* (New York, New York)

### **Treatises and Textbooks**

- *U.S. Regulation of Exports and International Conduct*, in *International Trade: Statutes and Strategies* (Thomson/West)
- This 2700-page treatise includes chapters covering: “U.S. Export Controls,” “U.S. Sanctions,” “U.S. Export Controls and Sanctions Risk Management and Compliance,” “The Foreign Corrupt Practices Act,” “The Foreign Corrupt Practices Act Risk Management and Compliance,” and “U.S. Anti-Boycott Regulations.”
- *A Guide to International Compliance Best Practices: Identifying and Managing Risk* (available on request).



- *The Foreign Corrupt Practices Act: Coping with Corruption in Transitional Economies* (Oceana Publications)
- “The Subsidies Agreement,” in *The World Trade Organization: The Multilateral Trade Framework for the 21st Century and U.S. Implementing Legislation* (American Bar Assoc.)

### **Export Controls and Sanctions Articles/Interviews**

- Quoted in: Harry Dixon, “DOJ Would Strongly Enforce More Russia Sanctions,” *Law360* (June 16, 2017)
- “Easing Iran Sanctions Presents Opportunities and Pitfalls for Multinational Companies,” *22 Int’l Trade Law & Regulation* (2016)
- “New International Markets Present Opportunities—and Compliance Issues,” *Automotive World* (Feb. 17, 2016)
- “Treasury Department Eases Cuba Sanctions Under Iran Nuclear Deal” (Jan. 25, 2016)
- “New Export Control Rules Dictate New Compliance Procedures for Defence Contractors,” *21 Int’l Trade Law & Regulation* (2015)
- “Historic Easing of Cuba Sanctions Opens New Opportunities for Trade with Cuba While Underscoring the Importance of Sanctions Compliance,” *21 Int’l Trade Law & Regulation* (2015)
- “Frequently Asked Questions About U.S. Cuba Policy Changes” (Jan. 2015)
- “White House to Ease Cuba Embargo: Historic Announcement May Open New Opportunities for U.S. and Multinational Corporations” (Dec. 22, 2014)
- “New Sanctions-Easing Initiative Could Mean New Opportunities in Cuba (Dec. 18, 2014)
- “Compliance Solutions for Defence Contractors and Companies Dealing in Controlled Goods and Information: Responding to the Aggressive Enforcement of US Regulations,” *21 Int’l Trade Law & Regulation* (2014)
- “New U.S. Government Sanctions on Russia Expand Scope of Prior Restrictions,” *20 Int’l Trade Law & Regulation* (2014)
- Quoted in: “Russia Sanctions Put U.S. Firms in a Tough Spot,” *CFO Magazine* (April 2, 2014)
- “New Russian Sanctions Underscore Need for Multinational Organisations to Re-Examine their International Compliance,” *20 Int’l Trade Law & Regulation* (2014)
- Quoted in Michael Crittenden, “Congress Advances Ukraine Measures,” *Wall Street Journal* (March 27, 2014)
- “White House Expands Russian Sanctions: New Executive Order Targets Major Russian Industries” (March 21, 2014)
- “Fewer Sanctions Means New Opportunities – and Risks,” *Corporate Compliance Report* (Apr. 4, 2013)
- “Eased Sanctions Present New Opportunities and Risks,” *Legal News* (April 1, 2013)
- Quoted in: William Mauldin and Michael Crittenden, “U.S. Expands Sanctions Against Moscow,” *Wall St. J.* (March 27, 2014)
- “Long-Anticipated Changes to U.S. Munitions Export Controls Pose New Compliance Difficulties for Defense Contractors All Over the World,” *Int’l Trade Law & Regulation* (2013)
- “Q&A With Foley & Lardner’s Gregory Husisian,” *Law360* (March 20, 2013)

- “Emerging Trends in U.S. Sanctions: The Year in Review,” *Int’l Trade Law & Regulation* (2013)
- “Export Controls’ Red Flags,” *Aftermarket Business World* (Jan. 19, 2012)
- “US Regulation of Exports and International Conduct in the 21st Century: The Essential Elements of an Anti-Boycott Compliance Programme,” 18 *Int’l Trade Law & Regulation* (2012)
- “Economic Sanctions Compliance,” *Aftermarket Business World* (Dec. 23, 2011)
- “The Essential Elements of an Export Controls and Economic Sanctions Compliance Programme for Multinational Corporations,” 18 *Int’l Trade Law & Regulation* (2012)
- “Export Controls on Information and Technology,” *Aftermarket Business World* (Oct. 24, 2011)
- “Export Controls on Goods,” *Aftermarket Business World* (Sept. 12, 2011)
- “Export Control & Economic Sanction Red Flags,” *Corporate Compliance Insights* (Dec. 16, 2011)
- “Basic Export Controls Compliance Principles,” *Aftermarket Business* (Aug. 2, 2011)
- “Taking an Integrated Approach to Compliance,” *Corporate Compliance Insights* (July 1, 2011)
- “Dodging U.S. Exporting Pitfalls: Boycotts and Bribes and Banned Technologies – Oh My,” *Aftermarket Business World* (Apr. 18, 2011)
- “Export Controls Developments in 2011,” *International Law360* (Jan. 28, 2011)
- “The Essential Elements of an Effective Compliance Program,” 17 *Int’l Trade Law & Regulation* (2011)
- “Minimizing Regulatory Risks for Multinational Corporations,” *Export/Import Daily Update* (six-part series on FCPA, export controls, sanctions, and anti-boycott risk mitigation) (Sept. 2010)
- “A Risk-Based Approach for Anti-Boycott Compliance,” *Corporate Compliance Insights* (July 23, 2010)
- “A Risk-Based Approach for Exporters Coping with U.S. Export Controls and Sanctions Regulations,” *Corporate Compliance Insights* (June 25, 2010)
- “Coping with U.S. Regulations of International Conduct: Strategies for Export Controls and Economic Sanctions,” *Insights: Corporate Securities & Law Advisor* (Feb. 2010)
- “21st Century Export Control Compliance Strategies,” *Export/Import Daily Update* (Jan. 29, 2010)
- “Coping with U.S. Regulation of International Conduct: Compliance Strategies for Export Controls and Sanctions,” 23 *Insights: The Corporate & Securities Law Advisor*, No. 10 (Dec. 2009)
- “Coping with the New Export Control Paradigm,” *International Law360* (Sept. 2009)
- “The Sanctions Paradox,” 24 *Cornell Law Forum* 15 (1998)
- “Extra-Territorial Sanctions in an Interdependent World,” *Int’l & Nat’l Security Law Practice Group Newsletter* (Fall 1996)

## CFIUS

- Quoted in: Tracey Samuelson, “Congress Weighs Changes to Foreign Investment Oversight,” *NPR: Marketplace* (May 21, 2018)
- “Trump Administration’s Clashes with China on Trade and Investment Demonstrate Importance of Vetting International Trade and National Security Risks in Deals” (April 17, 2018)
- “Private Equity Funds under Trump: One Year on,” *Private Funds Management* (Jan. 12, 2018)
- Quoted in: Evelyn Cheng, “Chinese Takeovers of US Companies Plummet This Year Amid Tough Trump Talk,” *CNBC* (Aug. 16, 2017)



- “Private Equity and the New Trump Administration: Your Top Ten Questions Answered,” *Nat’l Law Review* (April 18, 2017)
- Quoted in: Chelsea Naso, “Reciprocity in CFIUS Reviews Might Hit Chinese Deals Hardest,” *Law360* (March 14, 2017)
- “CFIUS and the New Trump Administration: Your Top Ten Questions Answered,” *Nat’l Law Review* (Jan. 25, 2017)

### **Anti-Money Laundering**

- “Anti-Money Laundering and OFAC Compliance for Multinational Financial Institutions: Implementing a Risk-Based Approach,” *Financier Worldwide* (Dec. 2014)
- “The Essential Elements of an Economic Sanctions and Anti-Money Laundering Compliance Programme for International Financial Institutions,” *18 Int’l Trade Law & Regulation* (2012)
- Quoted in: Nick Kochan, “Regulation: Banks Under the Cosh from Corruption Vigilantes,” *Euromoney* (Dec. 2011)
- Quoted in: “Shut Out: Embassies Paying Price for Tighter Banking Regulations,” *The Washington Diplomat* (Jan. 2011)
- “A Risk-Based Approach for International Financial Institutions Coping with U.S. Anti-Money Laundering and Sanctions Regulations,” *Corporate Compliance Insights* (July 16, 2010)
- “Risk Management for International Financial Institutions: Implementing a Coordinated Compliance Approach,” *Bloomberg’s Corporate Counsel Law Report* (May 3, 2010)
- “U.S. Regulation of International Financial Institutions: It’s Time for an Integrated Approach to Compliance,” *127 Banking Law Journal* 195 (Mar. 2010)
- “Coping with U.S. Regulations of International Conduct: Strategies for the Anti-Money Laundering Regulations,” *Insights: Corporate Securities & Law Advisor* (Feb. 2010)
- “Coping with U.S. Regulation of International Conduct: Anti-Money Laundering and Sanctions Compliance Strategies for Financial Institutions,” *24 Insights: The Corporate & Securities Law Advisor*, No. 1 (Jan. 2010)

### **FCPA Articles/Interviews**

- “The Foreign Corrupt Practices Act and the New Trump Administration: Your Top Ten Questions Answered,” *Nat’l Law Review* (May 10, 2017)
- Quoted in: “Avoiding FCPA Pitfalls When Entertaining Foreign Officials,” *LexisNexis Corporate Law Advisory* (2017)
- “The Future of the Foreign Corrupt Practices Act under the Trump Administration,” *23 Int’l Trade Law & Regulation* (2017)
- Quoted in: “2016 Anti-Bribery Cases—The Year of Internal Controls, Books & Records,” *LexisNexis Corporate Law Advisory* (2016)
- Quoted in: Matt Dunning, “Directors and Officers Policies May Not Cover Many FCPA Costs: Investigation Costs Can Easily Outstrip D&O Policy Limits,” *Business Insurance* (April 28, 2014)

- Quoted in: Nicole Di Schine, “Risk-Based Solutions to Complying with Anti-Money Laundering, Export Controls, Economic Sanctions and the FCPA,” *FCPA Report*, Vol. 3, No. 2 (Jan. 22, 2014)
- “Newly Issued Guidance Underscores Need For Effective Anti-Corruption Compliance,” *Int’l Trade Law & Regulation*, Vol. 19, Issue 2 (2013)
- “Tough New Iran Sanctions Could Impact Automotive Suppliers,” *Dashboard Insights* (March 15, 2013)
- Quoted in: “International Bribery Probes Could Boost D&O Buying,” *Business Insurance* (May 3, 2012)
- Quoted in: “Wal-Mart Faces Scandal Over Alleged Bribery in Mexican Unit,” *Business Insurance* (April 29, 2012)
- Quoted in: Matt Dunning, “International Bribery Probes on Horizon,” *Business Insurance* (Feb. 27, 2012)
- Quoted in: “Shale Gas Developments Herald Big Export Opportunities,” *Financial Times* (Dec. 17, 2011)
- “The Essential Elements of an FCPA Compliance Programme,” *17 Int’l Trade Law & Regulation* (2011)
- Quoted in: Matt Dunning, “More Countries Putting Focus on Anti-Bribery Laws,” *Business Insurance* (Nov. 6, 2011)
- Quoted in: Matt Dunning, “Proactive FCPA Compliance Program Essential,” *Business Insurance* (Oct. 16, 2011)
- “U.S. Regulation of Exports and International Conduct: Dealing with Merger Issues Under the FCPA,” *Corporate Compliance Insights* (Aug. 26, 2011)
- “Mergers and the FCPA,” *Aftermarket Business World* (July 19, 2011)
- “Third Parties and the FCPA,” *Aftermarket Business World* (June 27, 2011)
- “Basic FCPA Compliance Principles,” *Aftermarket Business World* (May 22, 2011)
- Quoted in: Nick Kochan & Robin Goodyear, “Corruption: The New Corporate Challenge” (2011)
- Quoted in: “The Law of Unintended Regulatory Consequences: The Need for Corrective SEC Regulations for the Whistleblower Provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act,” *4 Bloomberg Law Reports* No. 33 (Sept. 2010)
- “A Risk-Based Approach to Coping with the FCPA,” *Corporate Compliance Insights* (June 18, 2010)
- “No Doctoring the Books,” *MX: Medical Device and Diagnostic Industry* (May 2010)
- Quoted in: “SEC, Justice Gets New FCPA Power Over Directors,” *Agenda Week* (April 5, 2010)
- Quoted in: “Experts Highlight Increased Focus on Individuals in FCPA Prosecutions,” *Inside U.S. Trade* (Jan. 8, 2010) (also available in *World Trade Online*) (January 6, 2010))
- “Coping with U.S. Regulations of International Conduct: Strategies for the FCPA,” *Insights: Corporate Securities & Law Advisor* (Feb. 2010)
- “Recent Opinion Sheds Light on the Relevance of Due Diligence to the FCPA’s ‘Knowledge’ Requirement,” *7 Corporate Accountability* No. 45 at 1346 (Nov. 13, 2009)
- “Coping with U.S. Regulation of International Conduct: Compliance Strategies for the Foreign Corrupt Practices Act,” *23 Insights: The Corporate & Securities Law Advisor*, No. 9 (November 2009)
- Quoted in: “The FCPA’s Murky ‘Knowledge’ Element,” *FCPA Professor* (Oct. 27, 2009)
- “The ‘Knowledge’ Requirement of the FCPA Anti-Bribery Provisions: Effectuating or Frustrating Congressional Intent,” *24 Andrews Litigation Reporter: White-Collar Crime Reporter*, No. 1, at 3 (Oct.

2009)

- “The Foreign Corrupt Practices Act: Risk-Management and Compliance Strategies For High-Tech Companies,” Practising Law Institute’s FCPA Conference: Implications for Technology Companies (Sept. 2009)
- “The Foreign Corrupt Practices Act: Risk-Management and Compliance Strategies For Life Sciences and Pharmaceutical Companies,” for the American Conference Institute’s FCPA and Pharmaceutical and Life Sciences Industries Conference (March 2009)

## General Compliance and Investigations

- The Twelve Compliance Steps Every Multinational Corporation Should Undertake in Light of Recent Trump Administration Enforcement Activity,” *Nat’l Law Review* (May 27, 2018)
- “Recent Enforcement Actions Demonstrate Multinational Automotive Companies Should Conduct Risk Assessments,” *Dashboard Insights* (May 24, 2018)
- “6 Ways to Manage International Regulatory Risk Under Trump,” *Law360* (May 21, 2018)
- “Know the Risks: Domestic and International Compliance,” *Dashboard Insights* (March 19, 2018)
- “Managing Compliance Risk in the Auto Sector Under the Trump Administration,” *Morning Consult* (Feb. 6, 2018)
- “Top Legal Issues Facing the Automotive Industry: Compliance” (Annual Foley White Paper) (2014-2018)
- “Cybersecurity and the New Trump Administration: Your Top Ten Questions Answered” (April 27, 2017)
- “New Administration Ramps up Enforcement Efforts,” *Dashboard Insights* (Feb. 27, 2017)
- “New Attorney General Issues Guidance on Corporate Compliance Programs” (March 2, 2017)
- “White Collar Enforcement and the New Trump Administration: Your Top Ten Questions Answered,” *Nat’l Law Review* (Feb. 9, 2017)
- “Be Fully Compliant and Avoid Lawsuits,” *Dashboard Insights* (June 16, 2016)
- Quoted in: Che Odom, “DOJ Compliance Expert Brings Different Touch, Attorneys Say,” *Bloomberg Law* (July 1, 2016)
- “Know the Risks: Domestic and International Compliance,” *Dashboard Insights* (Feb. 9, 2016)
- “Top Compliance Issues Facing Manufacturers in 2016,” *Nat’l Law Review* (Jan. 25, 2016)
- Quoted in: Greg Creason, “U.S. Government May be Harsh on Companies that Don’t Adequately Manage Risk,” *AIAG Newsletter* (Jan. 7, 2016)
- Quoted in: Aebra Coe, “Automotive Legislation and Regulation to Watch in 2016,” *Law360* (Dec. 24, 2015)
- “U.S. Regulations Can Raise Risks for Reshoring and Next-Generation Manufacturing,” *Manufacturing Industry Advisor* (Oct. 1, 2014)
- Interview: CBN, “U.S. Re-Shoring Regulations at ‘Cross Purposes’” (broadcast July 22, 2014)
- “Managing International Compliance Risks,” *Aerospace Manufacturing and Design* (July 16, 2014)
- “Re-Shoring and U.S. Regulation of Exports and International Conduct: ‘Wily’ Ways to Deal with the Regulatory Consequences of America’s Manufacturing Renaissance,” *Industry Today* (May 2014) (Vol.

17, Issue 3)

- “How to Manage Compliance Risks in Reshoring Manufacturing,” *Law360* (April 16, 2014)
- Quoted in: John Trentacosta, “What You Don’t Know ... Can Hurt You,” *Manufacturing Leadership Journal* (April 1, 2014)
- “Coping with U.S. Conflict Minerals Certification Requirements,” 19 *Int’l Trade Law & Regulation* (2013)
- Quoted in: Melissa Maleske, “Mistakes and Realities of Implementing and Executing Effective Compliance Programs: Striking the Right Balance is Essential to Success,” *Inside Counsel* (Sept. 27, 2013)
- “New Conflict Mineral Rules Require Dramatically Expanded Supply Chain Due Diligence,” *Compliance Online* (June 24, 2013)
- “A Compliance Primer for the Automotive Industry,” *Aftermarket Business World* (twelve-part series on compliance complications for members of the automotive industry) (2012)
- Quoted in: Judy Greenwald, “Regulatory Risks Differ by Industry: Wide Range of Laws Affect Private Firms, Nonprofit Groups,” *Business Insurance* (Jan. 23, 2012)
- “A Basic Compliance Primer,” *Corporate Compliance Insights* (twelve-part series on application of compliance principles) (2011)
- “Dodging U.S. Exporting Pitfalls,” *Aftermarket Business* (April 2, 2011)
- “The Pitfalls of Operating Abroad,” *Corporate Compliance Insights* (June 17, 2011)
- “A United Compliance Approach,” *Aftermarket Business World* (April 21, 2011)
- Quoted in: “The Changing Role of the Compliance Officer,” *Corporate Secretary* (Feb. 2011) at 12
- “Compliance Strategies for Multinational Corporations: Implementing an Integrated, Risk-Based Approach to Compliance,” *Corporate Compliance Insights* (June 11, 2010)
- “Risk-Management for Multinational Corporations: Sentencing Guidelines Proposals Reflect Evolving Compliance Norms,” 5 *Global Trade & Customs Law Journal* 293 (July 2010)
- “Revisiting Multinational Corp. Compliance Programs,” *International Law360* (April 12, 2010)
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## International Trade

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## Thought Leadership

A frequent author, Gregory is the co-author of the first published treatise on the FCPA and is the author of an in-depth treatise on U.S. Regulation of Exports and International Conduct, published by Thomson/West. The latter treatise is the first comprehensive treatment of the complex regulations that apply to multinational corporations that sell and operate abroad, and includes extensive coverage of dual-use export controls, munitions export controls, economic sanctions, the FCPA, and the antiboycott regulations. He has published or been quoted in more than 200 articles on international trade and international regulatory issues and is the Country Reporter for U.S. trade law for the *Journal of International Trade Law & Regulation*.

## Awards and Recognition

- JD Supra Readers’ Choice Awards, Compliance category (2024)

## Sectors

- Automotive
- Cannabis
- Energy & Infrastructure
- Equipment & Industrial Product Manufacturing
- International Trade & National Security
- Manufacturing
- Smart Manufacturing
- Supply Chain
- Sustainability & Product Stewardship

## Practice Areas

- Appellate
- Environmental, Social, and Governance (ESG)
- Government Enforcement Defense & Investigations
- International Government Enforcement Defense & Investigations
- Litigation
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## Education



- Cornell Law School (J.D., magna cum laude, 1990)
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  - Managing editor, *Cornell Law Review*
  - National editor, *Harvard Journal of Law & Public Policy*
- Cornell University (B.A., 1987)
  - Economics
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## Admissions

- District of Columbia
- Court of Appeals for the Federal Circuit
- Court of International Trade