Christopher T. Timura

Partner

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Christopher T. Timura is a partner in the Washington D.C. office of Gibson, Dunn & Crutcher LLP and a member of the firm's International Trade, White Collar Defense and Investigations, and ESG Practice Groups.

Chris helps clients solve problems that arise at the intersection of U.S. national security, foreign policy, and international trade regulation. His clients span sectors and range from start-ups to Global 500 companies. He is regularly ranked in *Chambers Global* and *U.S.A.* guides for his work and is a regular speaker and writer on the policy drivers, trends, and impacts of evolving international trade policy and regulation. Chris has also been recommended by *The Legal 500 US* for his work in customs, export controls and economic sanctions.

Chris advises clients on compliance with U.S. export controls (ITAR and EAR), import controls, and economic sanctions, and advocates for clients before the departments of State (DDTC), Treasury (OFAC and CFIUS), Commerce (BIS), Homeland Security (Customs & Border Protection), and Justice in civil and criminal enforcement actions, UFLPA and other forced labor-related detentions, and investment reviews. Chris works with in-house counsel, boards, and other business leads to investigate compliance concerns, and leverage new and existing business processes to advance international trade and human rights-related policy compliance in their companies and organizations, supply chains, and customer sales and distribution networks. He also helps clients who are working with advanced technologies design efficient compliance systems and to win difficult-to-obtain export control and sanctions authorizations to support global R&D, supply chains, and varying types of sales channels. In M&A and other transactions, he conducts expedited diligence on international trade compliance and ESG issues and supports management and compliance teams as they work to spin off or integrate business operations.

On a *pro bono* basis, Chris assists NGOs with their efforts to strengthen the enforcement of anti-human trafficking and forced labor laws and controls on technologies used in human rights violations. He serves on the ABA's Export Controls and Economic Sanctions Committee and on the Department of Commerce's Regulations and Procedures Technical Advisory Committee.

Representative Engagements Include:

- For multiple clients, advise on the regulatory initiatives of the Department of Commerce Bureau of Industry and Security (BIS) Office of Information and Communications Technology and Services (OICTS).
- Represent global telecommunications, semiconductor manufacturing, and industrial equipment firms on compliance with new U.S. controls on advanced integrated circuits, supercomputing, and semi-conductor manufacturing equipment and China.

Capabilities

International Trade Advisory and Enforcement
Aerospace and Defense
Artificial Intelligence
Consumer Products and Retail
Data Centers and Digital Infrastructure
ESG: Risk, Litigation, and Reporting
Emerging Companies / Venture Capital
Family Office
Investment Funds
Mergers and Acquisitions
National Security
Private Equity
Robotics
Sanctions and Export Enforcement
Technology Transactions
Transportation and Space
White Collar Defense and Investigations

Credentials

Education

University of Michigan - 2004 Ph.D.
University of Michigan - 2003 Juris Doctor
University College London - 1997 Master of Science
Denison University - 1996 Bachelor of Arts

Admissions

District of Columbia Bar
Virginia Bar

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- Advise multiple firms on the development of supplier and vendor codes of conduct, audit tools, and programs to mitigate the risk of forced labor in supplier and supplier sub-tier supply chains and to comply with the Uyghur Forced Labor Prevention Act and similar prohibitions.
- Help clients manage U.S. export control and sanctions compliance while maintaining ongoing operations in or exiting heavily sanctioned jurisdictions.
- Represent multiple clients managing compliance with evolving end use and end user-based export controls in Russia, China, and elsewhere.
- Advise multiple companies on the export controls, including export and deemed export licensing requirements, associated with ML- and AI-enabled software used to process geospatial imagery and data.
- Represent global energy firms (oil, gas, and renewables) on export controls compliance in the context of projects in heavily sanctioned jurisdictions.
- Represent global telecommunications and data satellite company with all aspects of international sanctions and export controls compliance, including classification, licensing, investigations, and disclosures.
- Advise major financial services and communications companies in U.S. export control and sanctions compliance and licensing.
- Represent global humanitarian and human rights NGO on compliance with international export controls and on the development of human rights-focused export controls.
- Represent private equity firms focused on the acquisition and sale of aerospace and defense and other advanced technology companies.
- Represent a global telecommunications company on all aspects of its export controls program, including classification, licensing, investigations, and voluntary and directed disclosures.
- Work with private equity firms to map sensitive technologies owned and used by portfolio companies and to develop trade compliance procedures to better protect same in advance of potential review by CFIUS.
- Assist pharmaceutical, medical device, and clinical and research companies in obtaining licenses to enable continuing humanitarian exports to countries subject to significant export controls.
- Represented global video communications provider in investigation of exports of encryption-capable products to restricted parties and other customers and historical filing and reporting failures. BIS resolved the matter without charges or penalties.
- Obtained OFAC specific license to provide healthcare-related services to persons resident in comprehensively sanctioned countries for a global provider of business processes and digital services.
- Represented international marine insurer in investigation and disclosure to OFAC of potential violations involving payments to insureds in countries subject to U.S. sanctions.
- Advised major international manufacturer of oil and gas development and production equipment on Section 232 investigation on aluminum and steel imports and on compliance with U.S. export controls and sanctions. Worked with same to identify and mitigate potential collateral impacts of U.S. sanctions under CAATSA and other proposed sanctions.
- Advised publicly traded companies on Iran-related disclosure requirements and other disclosures regarding potential sanctions and export controls liability.
- Represented international automaker in Department of Commerce Section 232 Questionnaire process.
- Counseled semiconductor manufacturer under criminal investigation for exports of

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ITAR-controlled satellite components.

- Advised major Asian trading company on compliance with U.S. sanctions and export controls while operating in countries subject to comprehensive U.S. sanctions.
- Brokered comprehensive export-control agreement and procedures among U.S., Canadian, and European companies participating in aerospace R&D collaboration using shared IT and software development systems.
- Represented former CEO of company facing potential criminal and civil enforcement action for its failure to develop adequate export control compliance policies and procedures.
- Advised international provider of nuclear enrichment services on potential commercial impacts of Section 232 remedies to be developed based on Department of Commerce investigation.
- Represented major U.S. aerospace firm in a global investigation and disclosure to DDTC regarding unauthorized access by non-U.S. persons to technical data stored in the company's enterprise resource planning software and systems. DDTC resolved the matter without charges or penalties.
- Developed integrated anti-corruption, international trade, and political risk diligence process for multiple private equity and other investment firms.
- Advised several Top 10 private equity firm on the development of Environment, Social, and Governance (ESG) standards for fund portfolio companies, including development of a reporting process for same.
- Advised hedge fund on the development of an ESG policy, including support on benchmarking of Social and Governance policies for use in outreach to the management team of fund investments.
- Counseled leading U.S. company involved in lithium ion battery research, development and production on entry into defense and space systems markets, including development of ITAR compliance and licensing program.
- Represented major defense contractor in comprehensive review of ITAR agreement compliance, including review of sub-licensee activity and compliance, and amendment of agreements to remedy compliance issues, to incorporate Export Control Reform-required changes, and to ensure that the ITAR agreements authorized foreseeable business opportunities for the companies involved.
- Developed custom investigation and reporting software tools to support the investigation and remediation efforts to support same.
- Represented non-U.S. firm in parallel BIS and DOJ investigations in company's role in exports of aircraft to country subject to comprehensive trade embargo.
- Advised defense contractor on a series of commodity jurisdiction and classification requests of regularly exported products to obtain export classifications that would lessen export compliance burdens.
- Represented chemicals manufacturing firm in export classification requests of nano-sized chemical compounds and analysis of potential controls on technology related to same.
- Represented a Hong Kong-based business-to-business seller of electronic components in an export control investigation which resulted in no penalties and the first ever delisting of a company from the U.S. Government Entity List.
- Developed international sanctions, export controls, AML, and anti-corruption policies and compliance procedures for international debit and credit card transaction service provider.
- Represented non-U.S. investment manager in OFAC investigation and disclosure into investments that later became the subject of U.S. blocking under executive orders.

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- Advised international petroleum refiner on development of anti-corruption, sanctions, and export control procedures.
- Conducted expedited international trade compliance diligence to acquisitions of multiple engineering companies by semiconductor manufacturer.
- Counseled dozens of companies on export control classification request filing and reporting requirements for products with cryptographic (i.e., encryption) capabilities.
- Represented global freight forwarding and logistics provider in a series of export controls and sanctions investigations involving services to countries under comprehensive trade and service embargoes.
- Represented a telecommunications engineering firm in obtaining BIS licensing for the design and installation of telecommunications and data infrastructure in country subject to comprehensive sanctions.
- Developed survey of potential national and international export control- and intellectual property-related “regulatory takings” that could impact engineering firm’s ability to transfer and patent its vanguard energy technology in the U.S. and other key international destinations.

Recent Speaking Engagements:?

- Briefing: Impact of Section 301 Tariffs on Forced Labor Enforcement, American Apparel & Footwear Association, September 2, 2026.
- "Tariff Evasion," December 2025, Gibson Dunn Webcast.
- Aviation Weekly Defense Conference, Moderator, Innovate to Secure – Critical Thinking on Innovation and National Security, National Press Club, May 14, 2025.
- The Evolving Scope of Critical Technology and Interplay with Mandatory Filings, ACI 11th National Conference on CFIUS, April 25, 2025, Washington, DC.
- Quantum Computing and Advanced Technologies: Strategic Considerations for Upgrading Classification, Licensing and Compliance, ACI 2nd Forum on Global Export Controls, ACO February 25, 2025, Washington, DC
- Workshop: The Ins and Outs of CBP’s UFLPA Compliance, Due Diligence and Documentation Requirements, ACI 13th Advanced Forum on Import Compliance & Enforcement, November 19, 2024, Washington, DC
- Panel: Navigating ICTS Supply Chain Rules: How Industry Is Preparing to Screen Technology Transactions Amid Increased ICTS Oversight, ACI 6th Conference on China Trade Controls, November 13, 2024, Washington, DC
- "Managing Responsibilities in Your Supply Chain – Environmental, Human Rights, and Governance," Association of Corporate Counsel, Ethics & Compliance Network Presentation, September 2024
- “U.S. Export Enforcement Trends and Investigation Best Practices 2024” with Fronteo, June 2024, Taipei, Taiwan.
- “Emerging Trends in U.S. Export Control Enforcement,” June 2024, Gibson Dunn Webcast.
- “Operationalizing Clouds as Data Infrastructure Amid Complex Export Controls: Navigating Complex Data Outsourcing Needs, Creating Strategic Service Contracting Relationships,” ACI Global Encryption, Cloud & Cyber Export Controls, May 2024, San Francisco, CA.
- “Navigating OFAC’s Maritime Sanctions,” Maritime Sanctions Caribbean Multilateral Workshop, CARICOM, April 2023, Bahamas.
- “Cloud Encryption and Sharing and Storing Cloud Data: Mitigating International Technology Transfer Risk,” ACI Global Encryption, Cloud & Cyber Export Controls, March 2023, San Francisco, CA.

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- “How the New Export Controls on China May Impact Auto IC Supply Chains,” 2nd Zhangjiang Automotive Semiconductor Ecosystem Summit 2022, November 2022.
- “How ESG Should Inform International Trade Compliance, and Vice Versa,” Gibson, Dunn & Crutcher LLP, September 2022, Webinar.
- “Prospects of Russian Sanctions and Possible Measures by Korean Companies,” Korea International Trade Association, May 2022, Webinar.
- “Solving for Third Party Screening, Diligence, and Risk Management in the Context of Crisis, Integration, and Change,” Ankura, Gibson Dunn, and Descartes, May 2022, Webinar.
- “Implementation and Compliance Workshop for Representatives of the Taiwan Economy On Proliferation-Sensitive Ballistic Missile Technologies,” CRDF Global, February 2022, Virtual Workshop.

Selected Publications:?

- “Immediate Impacts, Risks, and Uncertain Future of President Trump’s Unprecedented Worldwide Tariffs,” Gibson, Dunn & Crutcher LLP Client Alert, April 2025
- “BIS Update Conference Takeaways: Expect “Dramatic Increase” in Export Controls Enforcement Against U.S. Adversaries, Gibson, Dunn & Crutcher LLP Client Alert, March 2025
- “BIS Connected Vehicles Rule Effective as of March 17, 2025, Gibson, Dunn & Crutcher LLP, Client Alert, March 2025
- International Trade 2024 Year-End Update, Gibson, Dunn & Crutcher LLP, Client Alert, February 2025
- BIS Lays the Groundwork for Global and Metered Access to Frontier AI Models and the Computing Power to Train them, Client Alert, January 2025
- “In Three New Rules, BIS Continues Efforts to Reshape Global Semiconductor Supply Chains and the future of AI Training and Supercomputing,” Gibson, Dunn & Crutcher LLP Client Alert, October 2023.
- “Child and Forced Labor Risks Global Task Force,” Gibson, Dunn & Crutcher LLP Client Alert, May 2023
- “U.S. and International Partners Adopt New Code of Conduct for Export Controls and Human Rights,” Gibson, Dunn & Crutcher LLP Client Alert, April 2023.
- “2022 Year-End Sanctions and Export Controls Update,” Gibson, Dunn & Crutcher LLP Client Alert, February 2023.
- “CFIUS Increases Transparency with Release of Enforcement and Penalty Guidelines,” Gibson, Dunn & Crutcher LLP Client Alert, October 2022.
- “United States Creates New Export Controls on China for Semi-Conductor Manufacturing Technology, Advanced Semiconductors, and Supercomputers in New Phase of Strategic Tech Competition,” Gibson, Dunn & Crutcher LLP Client Alert, October 2022.
- “EU to Ban Forced Labour Products,” Gibson, Dunn & Crutcher LLP Client Alert, September 2022.
- “Enforcement of the Uyghur Forced Labor Prevention Act Begins in the United States,” Gibson, Dunn & Crutcher LLP Client Alert, June 2022.

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