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*The World Reacts to the Crisis in Ukraine:  
A Deep Dive on the New Export Controls*

March 22, 2022

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# Today's Panel



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# Agenda

- 1. Introduction**
- 2. Major U.S. Developments**
- 3. Major EU Developments**
- 4. Major UK Developments**

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# Introduction

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# Major U.S. Developments

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# U.S. Export Controls

## *Key Developments*

The United States significantly expanded its controls on the exports of U.S. goods, software and technologies to or within Russia or Belarus:

**New Commerce Control List (“CCL”) Controls:** New license requirements for exports to Russia and Belarus on all Export Control Classification Numbers (“ECCN”) in Categories 3–9 of the CCL.

**Expanded Military End User (“MEU”) and End Use Controls:** Expands current restrictions on Russian and Belarussian ‘military end users’ and ‘military end uses’ to cover all items subject to the EAR, with limited exceptions.

### **Two New Foreign Direct Product (“FDP”) Rules:**

- A general FDP rule establishing controls over foreign-produced items exported to Russia and Belarus that are: (i) the direct product of *certain* U.S.-origin software or technology subject to the EAR; or (ii) produced by plants or equipment which are themselves the direct product of *certain* U.S.-origin software or technology subject to the EAR. This rule does not apply to foreign made items that would be classified as EAR99.
- A more extensive FDP rule on exports to Russian and Belarussian MEUs of foreign-produced items that are: (i) the direct product of *any* software or technology subject to the EAR that is on the CCL; or (ii) produced by plants or equipment which are themselves the direct product of *any* U.S.-origin software or technology on the CCL. Covered entities are on the BIS Entity List with a “footnote 3 designation.” This rule applies to EAR99 items, with limited exceptions.
- All “partner countries” are excluded from the scope of the new FDP rules.

**Entity List additions:** 47 transfers from the MEU List and over 90 new entries on the Entity List.

All Russia- and Belarus-related license applications will be treated under a policy of denial with limited exceptions.

# U.S. Export Controls

## *Key Developments*

**Donetsk and Luhansk Controls:** New license requirements for all items subject to the EAR to the Russian-backed separatist regions of Ukraine, with limited exceptions.

**Luxury Goods Controls:** New license requirements for luxury goods where they are destined for Russia or Belarus, or where a Russian or Belarussian oligarch or malign actor, anywhere in the world, is a party to the transaction.

- These controls complement, but are significantly broader than, the scope of the luxury good import ban that takes effect, following the expiration of OFAC General License 17, on March 25, 2022. Currently the import ban only covers Russian-origin fish and seafood, alcoholic beverages, and non-industrial diamonds, though Treasury may designate other covered imports.

**Oil and Gas Refining Equipment Controls:** New Russian energy sector license requirements, supplementing existing project-based controls with a list of items restricted for export to or within Russia.

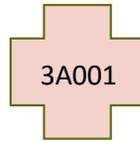
- These controls complement a separate ban on the import of certain Russian-origin fossil fuels that, following the expiration of OFAC General License 16, takes effect on April 22, 2022. (Pursuant to OFAC guidance in FAQ 1024, U.S. persons may find new buyers for, or redirect, intended imports of covered fossil fuels that are en route to the United States.)

**U.S. dollar denominated banknotes:** Banned for export, reexport, or supply to the Government of Russia or any person located in Russia, except for personal remittances to and personal maintenance payments by U.S. individuals located in Russia, as authorized by OFAC General Licenses 18 and 19.

# U.S. Export Controls

## Jurisdiction Scenarios

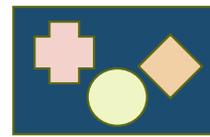
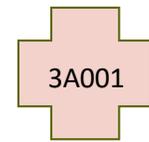
### ① Item-Based Controls



Because 3A001 is controlled under Categories 3 – 9 of the CCL, a license is required.



### ② De Minimis Rule



Because 3A001 is controlled content and is >25% value of finished product, a license is required.



### ③ Foreign Direct Product Rule – Russia



Because the 3A001 item is a direct product of U.S. software and technology, a license is required for export to Russia.



### ④ Foreign Direct Product Rule – Russia MEU



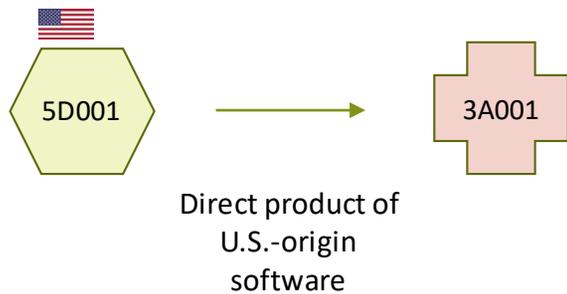
Because the EAR99 item is a direct product of U.S. software and technology, a license is required for export to Russian military end user (Entity List with footnote 3 designation).



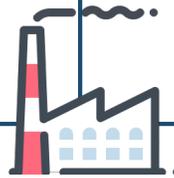
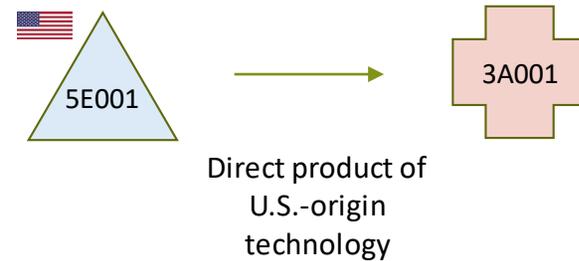
# U.S. Export Controls

## Foreign Direct Product Rule

### ① Standard Foreign Direct Product Rule – Software

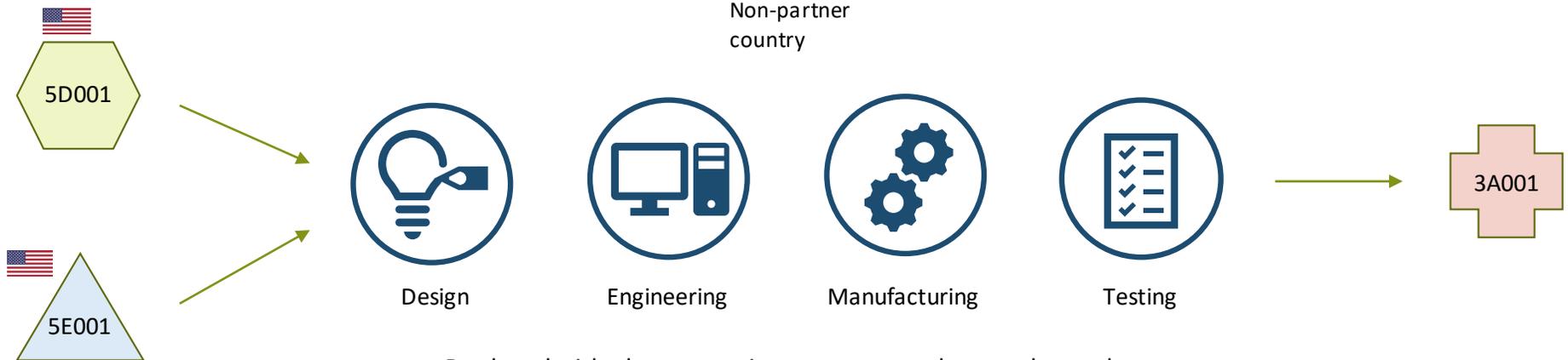


### ② Standard Foreign Direct Product Rule – Technology



Non-partner country

### ③ Plants and Major Components



Produced with plants or major components that are themselves the direct product of U.S.-origin software or technology

# U.S. Export Controls

## *Partner Countries*

### **List of Partner Countries as of March 10, 2022**

Australia

Austria

Belgium

Bulgaria

Canada

Croatia

Cyprus

Czech Republic

Denmark

Estonia

Finland

France

Germany

Greece

Hungary

Ireland

Italy

Japan

Latvia

Lithuania

Luxembourg

Malta

Netherlands

New Zealand

Poland

Portugal

Romania

Slovakia

Slovenia

South Korea

Spain

Sweden

United Kingdom

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# Major EU Developments

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# The EU Export Control System aka “*EU Export Controls*”

- When referring to “**EU export controls**,” we actually refer to a hybrid set of EU and EU member state legislation that together form the export control-related set of rules that apply to parties that undertake business with an EU nexus.
- The relevant EU legislation, the “**EU export control system**” includes, *inter alia*, common export control rules, including a common set of criteria for assessment and consistent types of **authorizations** (individual, global and general authorizations) as well as a common list of dual-use items used throughout the EU member states, often referred to as “**EU Dual-Use Regulation**”.
- Furthermore, **EU economic sanctions**, such as the Regulation (EU) 833/2014 (as amended), include additional restrictions on exports that apply throughout the EU.
- The EU export control system and EU economic sanctions thus form a **minimum export control-related set of rules**.
- Yet, **EU member states may implement further restrictions** on export controls. In their responses to the Ukraine crisis, several have made use of this.

# The “New” EU Dual-Use Regulation

- On **9 September 2021**, “*Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items (recast)*” has come into effect.
- The “**New EU Dual-Use Regulation**” not only modernized, but also substantially expanded the scope and breadth of the EU system for the control of exports, brokering, technical assistance, transit and transfer of dual-use products and technologies.
- The **main novelty introduced** by the regime is that it contains **stronger human rights considerations**, namely stricter controls to avoid that certain surveillance and intrusion technologies exported from the EU contribute to human rights abuses.
- Exporters are also “*encouraged*” **to conduct their own due diligence** with regard to certain items they intend to export and itself notify the competent authority if their due diligence findings reveal that there is a risk.
- For the use of certain **EU General Export Authorizations**, the maintenance of an Internal Export Control Compliance Programs has become “*mandatory*”.

# EU Economic Sanctions

- EU Economic Sanctions, **broadly comparable to U.S. sectoral sanctions**, are designed to restrict trade, usually within a particular economic sector, industry or market – e.g., the oil and gas sector or the defence industry - of a targeted jurisdiction.
- **“Broad” EU Economic Sanction** are in place against, *inter alia*, the Crimea and since recently the non-government controlled areas of the Donetsk and Luhansk oblast.
- **“Targeted” EU Economic Sanctions**, i.e. including more limited and more specific restrictions, are more common and apply, *inter alia*, against Russia, Belarus, Iran, Iraq, Libya, Myanmar (Burma) and Syria.
- The **EU Sanctions Map** (<https://sanctionsmap.eu>), the **official tool** of, maintained by and regularly updated by the EU, may serve well to provide an **overview of applicable EU Sanctions**, including details on the of the applicable EU economic sanctions.

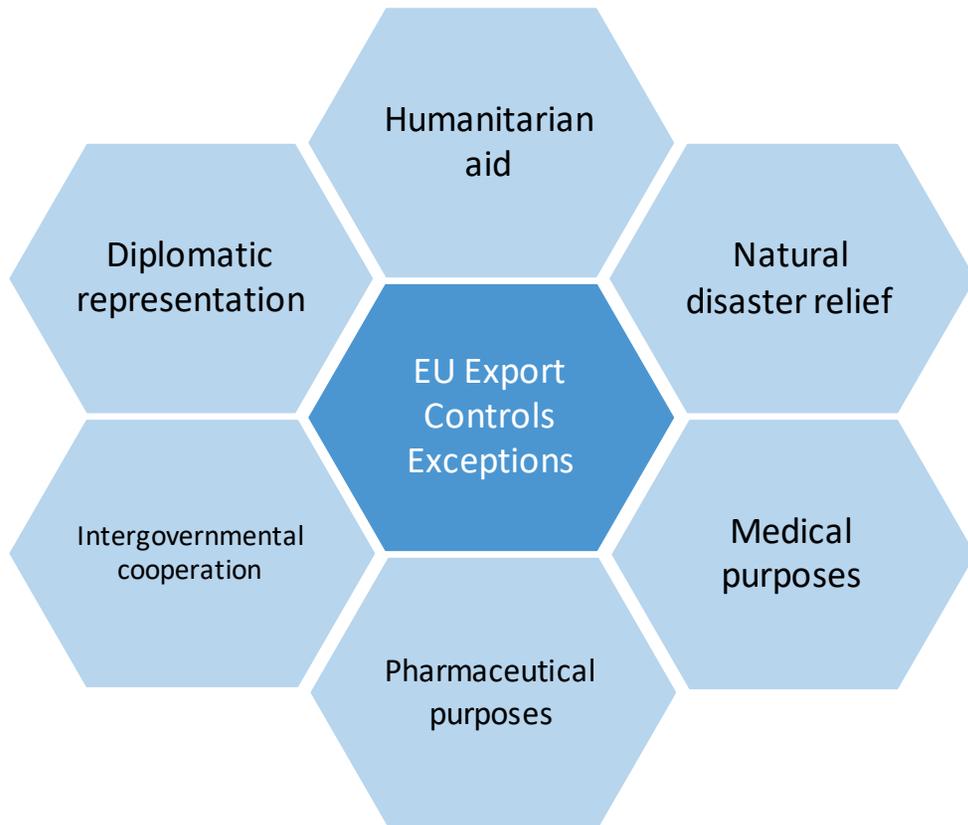
The screenshot shows the 'EU Sanctions Map' interface. At the top, there is a search bar and a dropdown menu for 'THEMATIC RESTRICTIONS'. Below the map, there is a search bar and a dropdown menu for 'REGIMES, PERSONS, ENTITIES'. The main part of the interface is a table with columns: Country or Category, Specification (Type), Adopted by, Restrictive measures, List, Legal acts, and Guid. The table lists various countries and categories with corresponding icons for restrictive measures and legal acts.

Country or Category	Specification (Type)	Adopted by	Restrictive measures	List	Legal acts	Guid.
<input type="checkbox"/> Afghanistan	Restrictive measures imposed with respect to the Taliban	UN	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Belarus	Restrictive measures against Belarus	EU	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Bosnia & Herzegovina	Restrictive measures in view of the situation in Bosnia and Herzegovina	EU	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Burundi	Restrictive measures in view of the situation in Burundi	EU	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Central African Republic	Restrictive measures against the Central African Republic	UN	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Chemical weapons	Restrictive measures against the proliferation and use of chemical weapons	EU	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> China	Specific restrictive measures in relation to the events at the Tiananmen Square protests of 1989	EU	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Cyber attacks	Restrictive measures against cyber-attacks threatening the Union or its Member States	EU	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Democratic Republic of the Congo	Restrictive measures against the Democratic Republic of the Congo	UN and EU	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Guinea	Restrictive measures against the Republic of Guinea	EU	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Guinea-Bissau	Restrictive measures against those threatening the peace, security or stability of the Republic of Guinea-Bissau	UN and EU	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Haiti	Prohibiting the satisfying of certain claims by the Haitian authorities	EU	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Human rights	Restrictive measures against serious human rights violations and abuses	EU	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Iran	Restrictive measures in relation to serious human rights violations in Iran (19)	EU	🚫🚫🚫🚫	📄	📄	📄
<input type="checkbox"/> Iraq	Restrictive measures in relation to the non-proliferation of weapons of mass destruction (WMD)	UN and EU	🚫🚫🚫🚫	📄	📄	📄

# Ukraine Crisis related changes to „EU“ Export Controls – Recent Amendments to Regulation (EU) 833/2014

- The scope of **export control restrictions related to dual-use goods and technologies has been expanded**.
  - Previously, since 2014, the export control restrictions applied foremost to the military sector.
  - The broadened scope now (also) encompasses, with limited exemptions, exports that are intended for civilian users or uses in Russia more generally.
- In addition, the **export of so-called “Advanced Technology” has been restricted**.
  - Such items include goods and technology from sectors such as electronics, computers, telecommunications and information security, marine, and lasers and sensors.
  - Of note, overlap with the Dual-Use-Regulation is plausible.
- Further, export of goods and technology suited for use in the **space and aviation industry** as well as in the **energy sector** have been restricted.
- The **list of specifically targeted entities has been expanded substantially**, including entities connected to Russia’s military and certain industrial base.
- The restrictions - in addition to the sale, supply, transfer and export - also (again) **extend to the provision of brokering services as well as technical and financial assistance**.
- The recent amendments only include **limited exceptions**, mostly requiring prior authorization from or at a minimum notification to the competent authorities.

# EU Export Controls – Exceptions, Authorizations & Notification Requirements



- The export control regulations include limited **exceptions** for certain **specified purposes**.
- These exceptions regularly are limited to **non-military end-users** and do often require **previous authorization** by the competent authorities.
- Certain exceptions, rather than an authorization, require **notification** to the competent authorities of the EU member state tasked to enforce.
- Finally, limited “**grandfathering**” of contracts is available, yet often subject to a case-by-case assessment, i.e. subject to prior authorization.

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# Major UK Developments

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# UK Export Controls

***Before the invasion***, the UK had in place restrictions on exports to Russia of military and dual-use goods, technology and related activities, export of goods to or for use in Crimea and exports to Russia of energy-related goods and services. Those are contained in [The Russia \(Sanctions\) \(EU Exit\) Regulations 2019](#), alongside the UK's financial sanctions on Russia.

***Since the invasion***, in addition to financial restrictions and designations, UK has taken the a number of key steps vis-à-vis trade restrictions:

- On 24/25 February, the UK suspended with immediate effect:
  - approval of all new licences for export of dual-use items to Russia; and
  - all existing licences for export of dual-use items to Russia.
- On 28 February, UK Export Control Joint Unit removed Russia (and on 9 March, Belarus) as permitted destination from various open general export licences (OGEL's), including OGELs re chemicals, cryptographic development, export after exhibition and oil and gas exploration.
- From 1 March, the UK introduced [The Russia \(Sanctions\) \(EU Exit\) \(Amendment\) \(No. 3\) Regulations](#), which:
  - expanded existing restrictions on military and dual-use items to also cover “critical industry goods” (electronics, IT, telecoms, info security, sensors and lasers, navigation, avionics, marine, aerospace, propulsion (in each case, including related software and tech)). Largely aligned with EU. Extend to making restricted goods and tech available to a person “connected with Russia”.
  - limited exceptions, incl. re personal items, movement of aircraft and vessels, consumer communications devices and software updates.
- Also from 1 March, the UK introduced [The Russia \(Sanctions\) \(EU Exit\) \(Amendment\) \(No. 4\) Regulations](#), prohibiting (*inter alia*) Russian vessels from entering UK ports, and preventing registration on UK Ship Register of ships owned/controlled/chartered/operated by a designated person or persons connected with Russia.
  - General Licence for certain technical assistance, financial services, brokering and insurance services relating to vessels.
- From 8 March, the UK introduced [The Russia \(Sanctions\) \(EU Exit\) \(Amendment No. 6\) Regulations](#), which prohibited landing in or overflight of the UK by Russian aircraft and imposed other aviation-related restrictions, and extended restrictions to aviation/space goods and tech.
  - A General Licence has been provided regarding insurance relating to aviation and space goods and tech.

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# Russia-Counter Sanctions

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# Russian Counter-Sanctions – Possible Enhancement of Compliance Program



## **Enhancement 1: Manage external sanctions & export control-related communication**

**Step 1:** Identify respective external statements, such as published statements on websites and Annual Reports.

**Step 2:** Undertake initial risk assessment to identify contradicting statements (e.g., “we fully comply with U.S., UK, EU and Russian export control law everywhere we work”).

**Step 3:** Devise appropriate governance enhancements to duly manage external sanctions & export control compliance-related communication.

## **Enhancement 2: Manage internal sanctions & export control-related policies & compliance management programs**

**Step 1:** Identify respective internal statements, such as global sanctions and export control policies, trainings, and acknowledgements.

**Step 2:** Undertake initial risk assessment to identify contradicting statements (e.g., “we must fully comply with U.S. and Russian export control law everywhere we work.”).

**Step 3:** Devise appropriate governance enhancements to duly manage internal sanctions & export control compliance-related communication.

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Additional Resources

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## Additional Resources

- [Webcast: The World Reacts to the Crisis in Ukraine: Sanctions and Export Controls Imposed by the U.S., the EU, the UK, Australia, Japan and Other Countries](#)
- [Webcast: The World Reacts to the Crisis in Ukraine: Sanctions Imposed by the U.S., the EU, the UK, Australia, Japan and Other Countries](#)
- [Client Alert | United States Responds to the Crisis in Ukraine with Additional Sanctions and Export Controls](#)
- [Client Alert | US and Allies Announce Sanctions on Russia and Separatist Regions of Ukraine](#)

# David P. Burns

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David P. Burns is a litigation partner in the Washington, D.C., office of Gibson, Dunn & Crutcher. He is the co-chair of the firm's National Security Practice Group, and a member of the White Collar and Investigations and Crisis Management practice groups. His practice focuses on white-collar criminal defense, internal investigations, national security, and regulatory enforcement matters. Mr. Burns represents corporations and executives in federal, state, and regulatory investigations involving securities and commodities fraud, sanctions and export controls, theft of trade secrets and economic espionage, the Foreign Agents Registration Act, accounting fraud, the Foreign Corrupt Practices Act, international and domestic cartel enforcement, health care fraud, government contracting fraud, and the False Claims Act.

Prior to re-joining the firm, Mr. Burns served in senior positions in both the Criminal Division and National Security Division of the U.S. Department of Justice. Most recently, he served as Acting Assistant Attorney General of the Criminal Division, where he led more than 600 federal prosecutors who conducted investigations and prosecutions involving securities fraud, health care fraud, Foreign Corrupt Practices Act violations, public corruption, cybercrime, intellectual property theft, money laundering, Bank Secrecy Act violations, child exploitation, international narcotics trafficking, human rights violations, organized and transnational crime, gang violence, and other crimes, as well as matters involving international affairs and sensitive law enforcement techniques. Prior to joining the Criminal Division, Mr. Burns served as the Principal Deputy Assistant Attorney General of the National Security Division from September 2018 to December 2020. In that role, he supervised the Division's investigations and prosecutions, including counterterrorism, counterintelligence, economic espionage, cyber hacking, FARA, disclosure of classified information, and sanctions and export controls matters. He also spent five years as an Assistant United States Attorney in the Southern District of New York, Criminal Division, from 2000 to 2005.

Mr. Burns has been recognized by *Chambers USA – America's Leading Business Lawyers* as a leading White Collar attorney in the District of Columbia and *Who's Who Legal* and *Global Investigations Review (GIR)* recognized him as a leading investigations lawyer, deemed "excellent" for his work across "federal, state, and regulatory investigations". *Who's Who Legal* also recognized Mr. Burns as a leading lawyer in the area of Business Crime Defense.

# Patrick Doris

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Patrick Doris is a partner in Gibson Dunn’s Dispute Resolution Group in London, where he specialises in global white-collar investigations, commercial litigation and complex compliance advisory matters.

Mr. Doris’ practice covers a wide range of disputes, including white-collar crime, internal and regulatory investigations, transnational litigation, class actions, contentious antitrust matters and administrative law challenges against governmental decision-making.

Mr. Doris handles major cross-border investigations in the fields of bribery and corruption, fraud, sanctions, money laundering, financial sector wrongdoing, antitrust, consumer protection and tax evasion.

Mr. Doris’ recent commercial disputes experience has extended to advising corporations, UK public bodies and sovereign states in claims in courts and tribunals in the UK and around Europe. He has particular expertise in antitrust cases, human rights disputes and collective actions.

Mr. Doris is recognised by *Legal 500 UK 2022* in the field of Regulatory Investigations and Corporate Crime. He is also ranked as a leading individual in the field of Administrative and Public Law, in which clients have noted his: “...exceptional contribution to ... work to decriminalise homosexuality worldwide”. Clients describe him as “totally committed, a great manager and really goes the extra mile” and “outstanding, has tremendous judgment, works exceptionally hard and always gives the impression that he is 100% dedicated to and focused on your case”. He is also ranked for International Arbitration and Litigation (White Collar) in the *Lawdragon 500 Global Litigation Lawyers guide 2021*.

Mr. Doris earned his LL. M. (first class) in European Law in 1996; and received his BA in Law in 1994 from Trinity Hall, Cambridge University. Before entering private practice, Mr. Doris taught law at the University of Warwick and worked in the Criminal Division of the Law Commission of England & Wales, the UK government’s primary law reform body. Mr. Doris speaks English, Spanish, French and Catalan, with recent experience of conducting investigations in each of those languages.

# Christopher T. Timura

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Christopher T. Timura is Of Counsel in the Washington D.C. office of Gibson, Dunn & Crutcher LLP and a member of the firm's International Trade Practice Group. Mr. Timura helps clients solve regulatory, legal and political problems that arise at the intersection of national security, trade, and foreign policy, and to develop corporate social responsibility (CSR) and environmental, social, and governance (ESG) strategies, policies, and procedures. His clients range from start-ups to Fortune 50 companies, and span industries including aerospace and defense, auto, energy (nuclear, oil and gas, and renewable), chemicals, finance, infrastructure and development, information security, insurance, investment management and advising, medical device, pharmaceuticals, private equity, semiconductors, telecommunications, and travel.

Mr. Timura counsels clients on compliance with U.S. and international customs, export controls, and economic sanctions law and represents them before the departments of State (DDTC), Treasury (OFAC and CFIUS), Commerce (BIS), Homeland Security (CBP and ICE), and Justice in voluntary and directed disclosures, civil and criminal enforcement actions and investment reviews. Working with in-house counsel, boards, and other business personnel, he helps to identify and leverage existing business processes to integrate international trade compliance, and CSR-related data gathering, analysis, investigation, and reporting throughout client business operations. In M&A and other transactions, he conducts expedited diligence on international trade compliance and CSR issues and supports business and compliance teams as they work to spin off or integrate business operations in new organizations.

Mr. Timura also assists clients with the development of effective international trade compliance-, trade licensing-, and CSR-strategies to support global R&D, supply chain, and customer bases. On a *pro bono* basis, Mr. Timura assists clients with immigration issues and works with several international rule of law training NGOs on the investigation and enforcement of anti-human trafficking and forced labor laws, wildlife trafficking laws, and on related legislative reform.

Mr. Timura received his J.D. from the University of Michigan Law School, where he served as an articles editor of the *Michigan Journal of International Law* and received the William W. Bishop Jr. Award for his performance in the international law curriculum. In 2001, he served as a law clerk to a member of the United Nations International Law Commission. Mr. Timura also earned a Ph.D. in cultural anthropology at the University of Michigan.

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Richard Roeder is a senior associate in the Munich office of Gibson, Dunn & Crutcher. He is a member of the firm's International Trade, White Collar Defense, and Investigations and FCPA, as well as the Transactional Practice Groups Mergers and Acquisitions, Private Equity, Latin America, and Capital Markets. Mr. Roeder focuses on international trade compliance and white collar investigations, as well as transactional regulatory risk assessments and advises clients from various industries in the areas of sanctions, anti-money-laundering and anti-corruption compliance. Mr. Roeder focuses on clients in the banking, insurance, automotive, mining, oil and gas, healthcare and information technology industries.

In 2018, Mr. Roeder was seconded to our Washington, D.C. office where he worked with our U.S. sanctions and export control team and specifically assisted our clients in managing the challenges posed by the divergence between U.S. and EU economic and financial sanctions (e.g. regarding the EU Blocking Statute).

He is the author, among other books, with Washington D.C. partner Adam Smith and former counsel Stephanie Connor, of "U.S., EU, and UN Sanctions: Navigating the Divide for International Business" (2019) and author of "Foreign Mining Investment Law" (2016) and, with Munich partner Michael Walther, co-author of the renowned International Legal Guide to Sanctions, there focusing on EU sanctions and German export controls.

Mr. Roeder has recently been featured in the Legal 500 Germany 2022 as an excellent advisor on any issues related to economic and financial sanctions as well as export control law. Market participant characterized Mr. Roeder as a responsive lawyer with a distinguished sense for future developments and challenges his clients face, providing them with state of the art business information and sophisticated legal advice.

Prior to joining Gibson Dunn, Mr. Roeder was a fellow of what today is called the Mercator Fellowship on International Affairs, working for the German Ministry of Economics, the German Foreign Service, the European Union and the United Nations Development Program.

Mr. Roeder received his law degree (first state exam) from Bucerius Law School, Hamburg, Germany and undertook his clerkship (culminating in the second state exam) at the High Court of Munich, Germany. He holds a Master of Laws (LL.M.) degree from the University of California, Berkeley, USA, a Master of International Studies (M.I.S.) degree from the University of Queensland, Australia and earned his doctoral degree on Foreign Mining Investment Law from the University of Cologne, Germany.

Mr. Roeder speaks German, English, French, and Spanish.

# Lindsay Bernsen Wardlaw

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Lindsay Bernsen Wardlaw is a consultant at Amalie Trade Compliance Consulting, where she provides operational advice to clients regarding how to build and enhance their export, sanctions, customs, and antiboycott compliance programs.

Before joining Amalie, Lindsay was an international trade attorney at Gibson, Dunn & Crutcher LLP and at Sidley Austin LLP. In that capacity, she worked on trade-related client counseling; WTO, customs, and trade remedies litigation; sanctions and export controls investigations; trade and anti-corruption based merger and acquisition due diligence; CFIUS filings; and international investor-state arbitration matters.

Ms. Wardlaw earned her J.D., magna cum laude, from the University of Michigan Law School, where she was the Editor-in-Chief of the Michigan Journal of International Law and the student coach of Michigan Law's Vis International Commercial Arbitration Moot team. She also served as an advanced Student Attorney with the school's International Transactions Clinic, where she assisted social enterprises in building their FCPA, anti-money laundering, sanctions, and export compliance programs.

Lindsay spent the summer after her first year of law school at the U.S. Department of Justice, where she worked on matters before the Court of International Trade, Court of Appeals for the Federal Circuit, and Court of Federal Claims.

Prior to law school, Ms. Wardlaw was a corporate trade compliance manager and analyst at two Fortune 500 companies, specializing in global trade compliance program-building and process improvement. To improve her knowledge of import law, Lindsay took the U.S. CBE in April 2016. She passed with the highest score in the nation and currently holds a U.S. Customs Broker License.

She received her undergraduate degree cum laude from the University of Texas at Dallas.

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