

Anthony Rapa | Partner

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Anthony leads Blank Rome's National Security team. A dual U.S./UK-qualified practitioner with on-the-ground experience spanning four continents, he counsels companies and private equity sponsors regarding cross-border trade, operations, investments, and geopolitical strategic planning.

Anthony has been recognized as a leading practitioner by the *Legal 500*, *Who's Who Legal*, and *Global Investigations Review*. A former member of the *Law360* International Trade Editorial Advisory Board, he is a trusted advisor to clients on matters involving economic sanctions, export controls, and investment screening involving the Committee on Foreign Investment in the United States ("CFIUS").

Anthony has advised clients across a broad range of industries, including aerospace and defense, manufacturing, automotive, aviation and aviation-adjacent, technology/software, semiconductors, telecommunications, maritime, financial, shipping, freight forwarding and logistics, and energy.

Economic Sanctions

Anthony advises on the full range of issues arising under economic sanctions regulations administered by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"), including sanctions regarding Russia, China, Iran, Cuba, and Venezuela, among others.

Export Controls

Anthony advises on all aspects of export controls, including dual-use export controls administered by the U.S. Department of Commerce's Bureau of Industry and

Security ("BIS") under the Export Administration Regulations ("EAR"), and military export controls administered by the U.S. Department of State's Directorate of Defense Trade Controls ("DDTC") under the International Traffic in Arms Regulations ("ITAR").

Mergers and Acquisitions

Anthony has led trade and national security diligence on hundreds of transactions, valued in the tens of billions of dollars total.

On buy-side deals, this includes advising on sanctions and export control risks related to the target company and its operations, managing risks through terms in the transaction documents, seeking mitigation of compliance issues pre-closing, interfacing with lenders and underwriters, and advising on national security issues that could subject the transaction to CFIUS review.

On sell-side deals, this includes working to confirm that the company is "exit-ready," including through identification and remediation of compliance issues, negotiation of transaction documents, and drafting of disclosure schedules.

Internal Investigations

Anthony has led dozens of internal investigations around the world, including complex, large-scale investigations involving collection of data across borders, including in Europe, the Middle East, and Asia. This includes development of investigation work plans, management of data privacy issues, collection and processing of data, interviewing of witnesses, submission of voluntary disclosures to the relevant agencies (OFAC, BIS, DDTC), responding to government requests for information, and negotiation of settlements.

Anthony's experience includes the closeout of several large-scale enforcement matters without a penalty.

License Requests

Anthony assists clients in obtaining licenses from regulators to engage in activities requiring specific authorization, including OFAC, BIS, and DDTC licenses. This work includes submission of license applications and, as warranted, advocacy before the relevant agency.

Counseling Regarding Transactions/Operational Matters

Anthony advises clients on day-to-day counseling matters, covering all sanctions and export control issues that may arise for a company in the ordinary course of business. This includes advice regarding potential acceptance of new orders, shipments, entry into new markets, and counterparty due diligence.

Development of Compliance Programs

Anthony advises clients across many industries in the implementation of trade compliance programs, including the development of policies and procedures, and related training.

Compliance Audits

Anthony has led compliance audits for companies seeking to evaluate their trade compliance functions, including through transaction testing, gap analysis, and domestic and international site visits. This has included, for example, ITAR compliance audits for companies in the aerospace and defense industry.

Export Control Classification

Anthony assists clients in classifying their products (hardware and software) against relevant export control lists under the EAR and ITAR, including through self-classification and, as warranted, submission of classification requests to regulators. This has included, for example, a comprehensive export control assessment for the entire product range of a large manufacturing company.

Information and Communications Technology and Services ("ICTS") Rules

Anthony has provided cutting-edge advice to clients regarding the recently implemented ICTS rules administered by the U.S. Department of Commerce, which figure to evolve into a CFIUS-type regime of particular interest to the technology and telecom industries.

Supply Chain Diligence

Anthony assists clients in conducting supply chain diligence and is familiar with compliance issues presented under the Uyghur Forced Labor Prevention Act. This includes development of diligence questionnaires, liaising with suppliers, synthesis of diligence responses, and assessment of human rights and related issues.

Thought Leadership

Anthony actively engages in the marketplace of ideas regarding international trade and national security issues. He has been quoted by the *Associated Press*, *CNBC*, *The Wall Street Journal*, *Compliance Week*, *Law360*, and others, and has contributed articles to publications including *Reuters Legal*, *Bloomberg Law*, *New York Law Journal*, and *Law360*. He also actively participates in speaking engagements, including webinars organized by Strafford, Federal Publications Seminars, and the Society of Industrial Security Professionals.

Outside The Firm

Born and raised in New York City, Anthony is a proud Yankee fan, an avid chef (particularly of Italian food), and a classic rock devotee. He and his wife live on a farm in Virginia with their corgi-lab mix.

Select Engagements

Risk Assessments/Internal Investigations

- Led a sanctions internal investigation for a U.S. private equity sponsor and its European portfolio company.
- Led a sanctions internal investigation for a U.S. logistics provider.
- Led an export controls investigation for a U.S. cybersecurity company.
- Conducted large-scale export control-related internal investigations in the United Kingdom and Italy for a large U.S. aerospace and defense company.
- Led a sanctions internal investigation for a European manufacturer.
- Conducted export control compliance audits in Saudi Arabia and Spain for a large U.S. defense contractor.
- Led a sanctions risk assessment for a mining company based in Australia.
- Conducted a sanctions risk assessment for an energy company based in Norway.

Export Control Product Classification

- Led a comprehensive U.S./EU export control product classification assessment for a large European manufacturer.

Government Negotiations/Authorization Requests

- Successfully defended a Norway-based oil and gas exploration company against BIS allegations that it had violated the EAR.
- Represented a Japanese company in discussions with BIS, OFAC, and the U.S. Department of State regarding an energy exploration project, and obtained a favorable advisory opinion from the authorities.

Trade Compliance Counseling

- Advised a U.S. firmware developer regarding export control restrictions.

Development of Compliance Infrastructure

- Seconded to a large European bank, assisting in all aspects of U.S. and EU sanctions compliance.
- Developed a comprehensive sanctions compliance policy for a Singapore-based bank.
- Developed sanctions and export control compliance policies for implementation at portfolio companies of large private equity sponsors.

Admissions

- District of Columbia
- England and Wales

- New York
- United States Court of Federal Claims

Education

- Drew University, BA, summa cum laude
- Seton Hall University School of Law, JD, summa cum laude

Recognitions

- 2021, International Trade, listed in *The Legal 500 United States*
- 2018–2020, “Future Leader,” Investigations, listed in *Who’s Who Legal*
- 2017, “40 Under 40,” listed in *Global Investigations Review*