# BLANKROME

George T. Boggs | Senior Counsel International Trade

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George Boggs has experience in all areas of international trade controls, including compliance counseling as to the various regulatory regimes administered by the Bureau of Industry and Security ("BIS") of the Department of Commerce (Export Administration Regulations); the Directorate of Defense Trade Controls ("DDTC") of the Department of State (ITAR regulations); the Office of Foreign Assets Control ("OFAC") of the Department of the Treasury (executive orders and sanction laws and regulations); the Bureau of Alcohol, Tobacco, Firearms and Explosives of the U.S. Department of Justice regarding the manufacture, import, and export of certain military weapons; and the Department of Energy regarding the export of nuclear technology and services.

George advises clients on the application of these regulatory regimes to export and re-export transactions. He reviews proposed transactions for compliance with trade control laws, conducts export control and customs due diligence in mergers and acquisitions, and reviews and/or prepares internal technology control and compliance programs and corporate international trade policies. Because companies often need to know whether their technology and/or products are regulated by the Department of State or the Department of Commerce, he advises such companies on making self-classifications and/or preparing and filing commodity jurisdiction requests with DDTC.

George also has experience in advising and representing clients in connection with transactions that may be subject to review by the interagency Committee on Foreign Investment in the United States ("CFIUS"). Such experience includes evaluating whether a voluntary submission to CFIUS should be made, and if so, developing and implementing a strategy to seek a successful conclusion of the review process on an expedited basis.

In addition, he assists companies with technology or products controlled by the Department of Commerce in determining the appropriate classification of such items on the Commerce Control List—whether through self-classification or commodity classification requests filed with BIS. He also regularly assists clients in obtaining licenses from the Department of Commerce, OFAC, and the Department of State.

George conducts internal investigations of companies with respect to their compliance with export control laws and sanction programs, and assesses the potential liabilities arising from any compliance deficiencies. He also assists clients in the preparation of voluntary and directed disclosures to BIS, DDTC, and OFAC, and he develops strategies to deal with any identified violations. In addition George represents clients in the defense of any related federal, civil and/or criminal investigations, including negotiating the most favorable possible settlements with the applicable government agency.

George has developed and maintained relationships with representatives of the relevant regulatory agencies, and with business and professional trade groups interested in export control matters. He also has advised clients on anti-boycott laws.

#### **International Business Transactions**

Over the years, George has advised numerous U.S. companies with respect to the international corporate and tax consequences of their foreign business transactions. Such work included the creation of foreign branches and subsidiaries, as well as the acquisition and restructuring of foreign business operations. These matters often involve working with local counsel in foreign jurisdictions, and he has established a network of foreign attorneys qualified in all such matters.

With the growth in foreign business activity in the United States, George has advised foreign companies with respect to their U.S. investments, including U.S. branches and subsidiaries, and the tax and corporate planning for their U.S. operations.

In addition, he has negotiated international joint venture and partnership agreements, international agency and distributorship agreements, international commercial sales contracts and related documents for sales of petroleum products, aircraft, and consumer products, and financing transactions.

#### Admissions

- Supreme Court of the United States
- District of Columbia
- U.S. Tax Court
- United States Court of Federal Claims
- Virginia

## Education

- Princeton University, AB
- University of Virginia School of Law, JD

### Recognitions

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