

Anthony Rapa | Partner
International Trade

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CO-CHAIR, INTERNATIONAL TRADE PRACTICE GROUP

Anthony Rapa is co-chair of Blank Rome's International Trade practice group. A dual U.S./UK-qualified practitioner, he counsels companies, private equity sponsors, and financial institutions regarding cross-border trade, operations, and investments, drawing from on-the-ground experience spanning four continents.

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

Anthony has advised clients across a broad range of industries, including aerospace and defense, manufacturing, automotive, aviation and aviation-adjacent, technology/software, semiconductors, emerging technologies, telecommunications, financial, 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").

Foreign Investment Review / CFIUS

Anthony advises clients on CFIUS requirements in the context of foreign investment in U.S. businesses and real estate. This includes advice regarding the extent of CFIUS jurisdiction, the intersection of the CFIUS rules and export controls, whether a CFIUS filing is required or warranted under the circumstances, and the preparation and submission of CFIUS filings.

Mergers and Acquisitions

Anthony has led trade and national security diligence on hundreds of transactions, valued in the tens of billions of dollars total. This includes advising on sanctions and export control risks related to the target company and its operations, negotiating transaction documents, interfacing with lenders and underwriters, and advising on CFIUS issues.

Internal Investigations

Anthony has led dozens of internal investigations around the world, including in Europe, the Middle East, and Asia. This includes preparation and submission of voluntary disclosures to the relevant agencies (OFAC, BIS, DDTC), responding to government requests for information, and negotiation of settlements.

License Requests

Anthony assists clients in obtaining licenses from regulators to engage in activities requiring specific authorization, including OFAC, BIS, and DDTC licenses.

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.

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.

Information and Communications Technology and Services (“ICTS”) Rules

Anthony has advised clients regarding the ICTS rules administered by the U.S. Department of Commerce.

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.

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*, *National Law Journal*, and others, and has contributed articles to publications including *Reuters Legal*, *Bloomberg Law*, *New York Law Journal*, *Law360*, and *TechCrunch*. Anthony currently serves on the Board of Editors of *The Global Trade Law Journal*. He also actively participates in speaking engagements, including webinars organized by the Practising Law Institute and the American Conference Institute.

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

- Conducted a cross-border sanctions internal investigation for a global logistics provider.
- Conducted a cross-border sanctions internal investigation for a large French company.
- Conducted a sanctions internal investigation for a large European manufacturer.

- Conducted internal investigations for the UK and Italian subsidiaries of a large aerospace and defense company.
- Conducted internal investigations for a large aerospace and defense company under a consent agreement.
- Conducted an export controls internal investigation for a U.S. cybersecurity company.
- Conducted export controls compliance audits in Saudi Arabia and Spain for a large aerospace and defense company.
- Conducted a comprehensive export controls compliance audit across the three subsidiaries of a U.S. aerospace and defense company.
- Conducted comprehensive compliance policy review, export control classification exercise, and supply chain review for a large European manufacturer.
- Conducted a sanctions risk assessment for an Australian mining company.
- Conducted a sanctions risk assessment for a Norwegian energy company.
- Advised a semiconductor developer / government contractor with respect to export control and CFIUS issues identified in the course of its sale to a European investor, including an internal investigation of compliance issues, preparation and submission to DDTC of a voluntary disclosure, and review of a CFIUS mitigation agreement, resulting in closeout of DDTC matter without penalty and clearance of transaction by CFIUS.
- Advised semiconductor foundry / government contractor in acquisition by an investor, conducting comprehensive export control classification assessment of the company's products and liaising with buyer's counsel.
- Advised private equity sponsor on ten-figure acquisition of large cybersecurity company / government contractor, leading international trade due diligence, identifying material compliance issues, negotiating a special indemnity in the purchase agreement, driving remediation of the compliance issues, and taking the transaction through closing and successful closeout of enforcement matter by authorities.
- Advised private equity sponsor in acquisition of Israeli defense contractor, leading international trade due diligence.
- Advised private equity sponsor in acquisition of assets of defense contractor, assisting buyer in obtaining an ITAR registration and implementing compliance policies and procedures pursuant to transition services agreement.
- Advised Japanese electronics company on its entry into U.S. defense business, including with regard to strategic planning, obtaining an ITAR registration, and implementing compliance policies and procedures.
- Developed sanctions and export control compliance policies for implementation at portfolio companies of large private equity sponsors.
- Developed a comprehensive sanctions compliance policy for a Singapore-based bank.
- Conducted export control jurisdiction and classification assessment for aerospace and defense company.
- Advised aerospace and defense company in preparation and submission of export license requests.

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*