

## Jeffrey Orenstein

Partner

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### About Jeffrey

Jeffrey Orenstein is a partner in our International Trade & Foreign Investment Practice Group. Jeffrey is a trusted adviser in the areas of economic sanctions, customs, export controls, national security reviews and transportation regulations. Going beyond compliance, he seeks creative ways to turn regulatory requirements to his clients' advantage. Ranging from multinational corporations to startups, the clients Jeffrey advises operate in such sectors as shipping and maritime, energy, manufacturing, technology, consumer products, life sciences, financial services, defense, aerospace and fine arts.

Jeffrey has significant experience in regulatory compliance, investigations, due diligence, training and enforcement matters involving sanctions and embargos, including those administered by the US Department of the Treasury's Office of Foreign Assets Control (OFAC); export controls, including the Export Administration Regulations (EAR), administered by the US Department of Commerce's Bureau of Industry and Security (BIS) and the International Traffic in Arms Regulations (ITAR), administered by the US Department of State's Directorate of Defense Trade Controls (DDTC); national security reviews, conducted by the Committee on Foreign Investment in the United States (CFIUS); and customs regulations, administered by US Customs and Border Protection (CBP) and trade remedies imposed by the US Trade Representative (USTR) and US Department of Commerce.

### Experience

- Successfully petitioned OFAC to remove numerous foreign companies and vessels from the Specially Designated Nationals and Blocked Person List, obtaining the fastest delistings on record, according to OFAC.
- Successfully obtained an OFAC license for a major electronics company that discovered Cuban-origin materials in its supply chain. The license unblocked the affected products and authorized the sale of affected products in the company's inventory, preventing an international supply chain disruption.
- Negotiated a settlement with OFAC involving over 200 violations for processing gift cards redeemed in embargoed countries. OFAC's proposed penalty of US\$6.8 million was negotiated down to US\$200,000.

- Successfully obtained OFAC licenses for vessel owners after the vessel's cargo became blocked property. The licenses authorized all transactions necessary for the safety and maintenance of the vessel, and authorized the sale and discharge of the blocked cargo.
- Provided transactional counsel on US export controls, sanctions, customs, anticorruption, and antiboycott laws for a broad variety of commercial transactions, performing due diligence and drafting contractual terms that mitigate regulatory risks and clearly assign liabilities.
- Served as trusted adviser for multinational corporations regarding US sanctions, EAR and ITAR, including advising on compliance, defending enforcement actions, preparing voluntary disclosures, obtaining licenses and commodity jurisdiction rulings, developing policies and procedures, and training personnel.
- Obtained a portfolio of commercially valuable export licenses from BIS, enabling US technology and commodity companies to reach new markets and engage in strategic partnerships with counterparties in China, South America and the Middle East.
- Advised numerous US technology companies and foreign investors on CFIUS regulations, including assessment of CFIUS risks, preparation of mandatory and voluntary notices, drafting of contract representations and implementation of mitigation measures.
- Designed comprehensive international trade compliance policies, procedures and training programs for multinational corporations operating in numerous jurisdictions with differing regulatory regimes for export controls, sanctions, customs and other trade laws.
- Obtained valuable product exclusions from Section 232 and Section 301 tariffs on behalf of numerous US manufacturers importing steel, aluminum and Chinese-origin goods into the US.
- Represented a US manufacturer before CBP in disclosure of a fraudulent invoicing scheme, obtaining a favorable civil settlement with no CBP investigation or criminal referral.
- Provided the foreign embassy of a major US trading partner with weekly guidance on US trade and industry developments, including advice on trade negotiations, import tariffs, export controls, sanctions, trade remedies and regulation of foreign investment.
- Represented a pharmaceutical manufacturer before OFAC in voluntary disclosure of multiple violations of Iran sanctions, obtaining a final resolution with no civil penalty or enforcement action.
- Represented dozens of US importers in legal challenge of Section 301 tariffs before the Court of International Trade (CIT), preserving the right to seek multimillion-dollar duty refunds.

## Credentials

### Education

- George Mason University, J.D., *cum laude*, Executive Editor, *George Mason Law Review*, 2006
- University of Chicago, M.A., 1999
- Boston University, B.A., *magna cum laude*, 1996

### Admissions

- District of Columbia, 2006

### Courts

- U.S. Dist. Ct., Dist. of Columbia
- U.S. Ct. of App., First Circuit
- U.S. Ct. of International Trade

## Expertise

## Publications & Speaking Engagements

### Services

- International Trade & Foreign Investment
- Speaker, "Trump's Impact on Tax and Trade in the MENA/GCC Region," Association of Corporate Counsel, May 22, 2025.
- Author, "[US Treasury Department Moves Closer to Implementing Outbound Investment Restrictions Through Latest Proposed Regulations](#)," The Global Trade Law Journal, November-December 2024.
- Author, "[US Government Revises Comprehensive Export Controls on Semiconductors and Semiconductor Manufacturing Equipment](#)," The Global Trade Law Journal, March-April 2024.
- Author, "[5 Ways Maritime Cos. Can Enhance Sanctions Compliance](#)," Law360, October 23, 2023.
- Author, "[Complying With The US Ban On Russian-Affiliated Vessels](#)," Law360, May 3, 2022.
- Speaker, "Legal Risks of Russia-Ukraine Crisis," Zhong Lun Law Firm Webinar, Beijing China, March 2, 2022.
- Author, "[Pharma Ruling Broadens Gov't Drug Procurement Options](#)," Law360, February 24, 2020.
- Speaker, "Tariffs & Trade Issues," International Titanium Association Conference, October 9, 2018.
- Speaker, "Compliance with US Sanctions against Russia," CLE/CPD Webinar, August 27, 2018.
- Speaker, "Checking All the Required Boxes," ACI's ITAR Bootcamp, June 7, 2018.
- Speaker, "The Trump Tariffs & Their Impact," CLE/CPD Webinar, May 3, 2018.
- Speaker, "Country of Origin Requirements," 6th Annual Medical Device & Diagnostic Labeling Conference, April 27, 2018.
- Author, "Sanctions compliance and enforcement – a global update," Financier Worldwide, May 2017.
- Author, "Supply chain risks under US and EU sanctions and export controls," Financier Worldwide, April 2017.
- Author, "VA Now Open To Non-Trade Agreements Act Compliant Drugs," Law360, May 3, 2016.
- Speaker, "Country of Origin Requirements," 4th Annual Medical Device & Diagnostic Labeling Conference, April 25, 2016.
- Author, "Veterans Affairs to Permit Acquisition of Non-TAA-Compliant Drugs," Lexology, April 22, 2016.
- Author, "US Government Repeals Crude Oil Export Ban," Pratt's Energy Law Report, April 2016.
- Author, "10 Things To Know About Crude Oil Swap Licenses," Law360, October 22, 2015.
- Author, "Medical Device Companies Face Increased TAA Scrutiny," Law360, March 20, 2015.

- Author, "BIS Explains 'Commingling' and Scope of Crude Oil Export Controls," DownstreamToday, January 13, 2015.
- Speaker, "Panel Discussion on Maritime Law," Georgetown Law Center, November 28, 2011.
- Speaker, "Federal Preemption of State Shipping Regulation," Green Pacific Conference, September 22, 2010.

## About our firm

One of the world's strongest integrated law firms, providing insight at the point where law, business and government meet. We deliver commercially focused business solutions by combining our legal, lobbying and political capabilities and invaluable connections on the ground to a diverse mix of clients, from long-established leading corporations to emerging businesses, startup visionaries and sovereign nations. More than 1,500 lawyers in over 40 offices across four continents provide unrivaled access to expertise.