SQUIRE PATTON BOGGS

Peter C. Alfano III



Partner

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Languages spoken
English | Italian

About Peter

Peter Alfano is a leading partner in the International Trade & Foreign Investment Practice Group, advising a broad set of global clients on how to navigate the complex requirements of doing business with the US government, with a particular focus on regulatory issues related to foreign investment in the US and national security reviews before the Committee on Foreign Investment in the US (CFIUS).

Peter advises investors and global businesses across a broad range of industries — including supply chains, advanced manufacturing, aerospace and defense, infrastructure (including renewable energy, oil & gas, energy distribution, maritime port operations), ICTS businesses, semiconductors, government contractors, emerging technologies and healthcare/life sciences.

Peter concentrates his practice representing and advising transacting parties, both US businesses and non-US investors, before CFIUS, including assessing CFIUS risks and obligations, counseling on risk shifting deal provisions and transaction structures, negotiating national security agreements (NSAs) with CFIUS, as well as counseling clients on ongoing NSA compliance requirements, reporting obligations and modification requests.

Peter is a member of the firm's Foreign Direct Investment (FDI) Task Force where he assists transacting parties in assessing and managing foreign investment screening obligations for cross-border M&A transactions that trigger foreign investment review (CFIUS-like) filings in other jurisdictions.

In addition to foreign investment reviews, Peter has over 15 years of experience counseling on complex compliance obligations and risk mitigation strategies related to national security regulatory regimes. Peter's experience in these areas has included advising on compliance matters under the Export Administration Regulations (EAR) and Export Control Reform Act (ECRA); International Traffic in Arms Regulations (ITAR, 22 CFR 120-130); the Executive Order on Securing the Information and Communications Technology and Services (ICTS) Supply Chain (EO 13873, May 15, 2019) and implementing regulations (15 CFR 7); sanctions administered by the Office of Foreign Assets Control (OFAC) of the US Treasury Department, including the Non-SDN Chinese Military-Industrial Complex Companies List under EO 14032 and related Chinese military company lists; addressing Foreign Ownership, Control or Influence (FOCI) issues and mitigation arrangements under the National Industrial Security Program (32 CFR Part 117); and the Foreign Corrupt Practice Act (FCPA).

Peter is the recipient of the prestigious Burton Award. The Burton Award is supported by the Library of Congress and awarded to attorneys who have demonstrated achievement in the law and legal writing. Peter is a frequent speaker and commentator on issues relating to foreign investment screening and national security compliance strategies. He is also the Principal Writer and Content Editor for the CFIUS and foreign investment review sections of the "Tradepractitioner.com" Blog, authoring of 40+ distinct blog posts relating to CFIUS/FDI laws.

Experience

- Represent global European-based advanced manufacturing business in successful CFIUS clearances involving acquisitions of US targets in aerospace and defense supply chains.
- Represent US-based chemical company in an internal investigation and subsequent voluntary self-disclosure and remediation concerning apparent violations of the Export Control Reform Act.
- Represent Japanese based chemical company in successful acquisition of US advanced materials manufacturer in US defense supply chain and negotiate a national security agreement to address CFIUS concerns.
- Provide ITAR and CFIUS counseling to US integrated circuit business with defense contracts for its successful acquisition by European based private equity fund.
- Provide counseling and manage multiple voluntary notifications to CFIUS, on behalf of a Chinese diversified electronics manufacturer investing in technology sector businesses.
- Provide CFIUS, ITAR, and DCSA counseling to US based semiconductor equipment manufacturer with a cleared facility in its acquisition by an Asian private equity fund.
- Provide CFIUS counseling and negotiate national security agreement obligations on behalf of a Swedish based industrial group in the acquisition of US manufacturing industries supporting sensitive industries.
- Represent Japanese automotive components manufacturer in obtaining CFIUS clearance in the successful sale of US production operation to a China based manufacturing company.
- Represent Middle East state-owned (sovereign wealth owned) investor in acquisition of US manufacturing business supporting sensitive supply chains, obtaining CFIUS clearance for acquisition.

Credentials

Education

- The George Washington University, J.D., 2010
- St. John's University, M.A., 2005
- Northeastern University, B.A., 2003

Admissions

- District of Columbia, 2012
- Massachusetts, 2011
- New York, 2011

Recognitions

- Recognized in *The Best Lawyers in America* 2023

Expertise

Services

- Litigation
- International Trade & Foreign Investment
- Government Investigations & White Collar

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.