WILSON SONSINI

Anne E. Seymour

SENIOR COUNSEL

Regulatory

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FOCUS AREAS

Committee on Foreign Investment in the United States (CFIUS)

Export Control and Sanctions

Latin America

National Security

Regulatory

EXPERIENCE

Anne Seymour is Senior Counsel in Wilson Sonsini Goodrich & Rosati's Washington, D.C., office, where she focuses on issues related to compliance and enforcement of U.S. export control regulations and economic sanctions and U.S. import regulations.

Anne counsels foreign and domestic clients across technology industries on all aspects of international trade, including export controls, economic sanctions, and import issues. This work includes providing advice on potential export and import considerations stemming from cross-border technology transfers, joint venture projects, mergers and acquisitions, foreign investment, foreign distributor agreements, and delivery (both physical and virtual) of products and services.

Anne works closely with companies to determine which regulations may affect their transactions; obtain necessary government approvals related to the import, export, or transfer of their products, software, technology, and services; design and implement internal compliance programs; conduct compliance assessments; train employees on regulatory compliance issues; and, when necessary, prepare voluntary disclosures.

Anne is an expert in commercial and dual-use controls promulgated under the Export Administration Regulations, military-specific controls administered under the International Traffic in Arms Regulations, and economic sanctions programs implemented by the Office of Foreign Assets Control. She assists clients as new regulatory challenges arise, including adapting to new sanctions regimes, classification of “critical technologies” as they may apply to CFIUS analyses, and obtaining of “deemed export” licenses for clients that employ H-1B visa holders in export-controlled areas.

CREDENTIALS

Education

- J.D., The George Washington University Law School
  With High Honors; Articles Editor, The George Washington Law Review
- B.A., Spanish/Latin American Studies, American University

Honors

- Recognized in the International Trade: Export Controls & Economic Sanctions category of the 2024 edition of *Chambers Global: The World's Leading Lawyers for Business*
- Recognized in the International Trade: Export Controls and Economic Sanctions category of the 2017-2020 and 2023-2024 editions of *Chambers USA: America's Leading Lawyers for Business*, with commentators praising her as "very knowledgeable and very responsive"

Admissions

- Bar of the District of Columbia
- State Bar of Maryland

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INSIGHTS

Select Publications

- Co-author, “BIS Expands Export Controls on Advanced Computing Integrated Circuits for Supercomputer and Semiconductor End Use, and on Semiconductor Manufacturing Equipment and Related Equipment to China,” Wilson Sonsini Alert, October 20, 2023
- Co-author with M. Casey, J. Hartwig, S. Heifetz, and T. Jenkins, “Crypto Exchange Agrees to Pay More Than $362,000 to Settle Alleged Sanctions Violations,” Wilson Sonsini Advisory, December 14, 2022
- Co-author with J. Aiello LeBeau and B. Poellot, "BIS Implements New Semiconductor- and Supercomputer-related Export Controls and End-Use Controls," Wilson Sonsini Alert, October 13, 2022
- Co-author with J. Aiello LeBeau and K. Millard, "New Russia Sanctions Imposed as Ukraine War Continues: Expansion of Controls on EAR99 Items and Military End-Uses," Wilson Sonsini Alert, September 19, 2022
- Co-author with J. Aiello LeBeau and K. Millard, "Russia Sanctions Update: Intellectual Property General License and a Prohibition on the Provision of Some Services," Wilson Sonsini Alert, May 11, 2022
- Co-author with J. Aiello LeBeau and K. Millard, "New U.S. Sanctions on Russian Banks and Elites, Expanded Export Controls, and Other Updates," Wilson Sonsini Alert, April 11, 2022
- Co-author with L. Johnson and L. Lieto, "Companies Face Impact of U.S. Government Sanctions and Russian Government Directive on Russian and Eurasian Patents," Wilson Sonsini Alert, March 14, 2022
- Co-author with J. Aiello LeBeau and K. McDonough, "License Exception ENC Severely Limited for Exports to Russia and Belarus, Belarus Targeted by Biden’s Third Tranche of Controls, OFAC Clarifies Earlier Restrictions in Russia-Ukraine Crisis," Wilson Sonsini Alert, March 3, 2022
- Co-author with J. Aiello LeBeau, M. Casey, J. Hartwig, and K. McDonough, "Biden Administration Implements Significant BIS Controls and Imposes Second Tranche of OFAC Sanctions in Russia-Ukraine Crisis," Wilson Sonsini Alert, February 25, 2022
- Co-author with J. Aiello LeBeau, J. Hartwig, and K. McDonough, "Biden Administration Authorizes New Sanctions on Regions of Ukraine," Wilson Sonsini Alert, February 23, 2022
- Co-author with J. Aiello LeBeau, "Intrusion Preclusion: BIS Issues Long-Awaited Controls on Cybersecurity Items, Creates New License Exception," *Privacy & Cybersecurity Law Report*, February-March, 2022
- Co-author with J. Aiello LeBeau and J. Hartwig, "U.S. State Department Proposes ITAR Revisions to Remove Prior Citizenship Status Considerations," Wilson Sonsini Alert, February 4, 2022
- Co-author with J. Aiello LeBeau, M. Casey, J. Hartwig, and S. Heifetz, "CJEU Publishes Judgment Interpreting the EU's Blocking Regulation," Wilson Sonsini Alert, February 3, 2022
- Co-author with J. Aiello LeBeau, M. Casey, and K. McDonough, "2021 U.S. Sanctions Year in Review," Wilson Sonsini Alert, January 13, 2022
- Co-author with J. Aiello LeBeau, J. Hartwig, and K. McDonough, "Know Your Customer: OFAC, BIS Penalize Companies for Sales of 'EAR99' Items and Services to Prohibited Parties Through Distributors," Wilson Sonsini Alert, September 21, 2021
- Co-author with J. Aiello LeBeau, J. Hartwig, and K. McDonough, “Electronics Testing Company Penalized $6.6 Million for Unauthorized Software Exports,” Wilson Sonsini Alert, August 19, 2021
- Co-author with J. Aiello LeBeau, “President Biden Issues Executive Order Amending Restrictions on Chinese Military and Surveillance Companies,” Wilson Sonsini Alert, June 11, 2021
- Co-author with J. Aiello LeBeau and M. Mannino, “Take Two: Another Executive Order Addresses U.S. Personal Data Concerns by Prohibiting Business with Companies that Develop or Control Eight Specified Applications with Connections to China,” Wilson Sonsini Alert, January 6, 2021
- Co-author with J. Aiello LeBeau and M. Mannino, “U.S. Government Authorization Now Required for Certain Business with SMIC and Over 70 Additional Entities in China," Wilson Sonsini Alert, December 19, 2020
- Co-author with J. Aiello LeBeau, J. Gruenspecht, S. Heifetz, and M. Mannino, “As the App World Turns: Halt on Implementation of Commerce Prohibitions Regarding TikTok and WeChat,” Wilson Sonsini Alert, September 21, 2020
- Co-author with J. Aiello LeBeau, J. Gruenspecht, and M. Mannino, “U.S. Department of Commerce Publishes Transactions with ByteDance and Tencent That are Prohibited Due to National Security Concerns Raised by TikTok and WeChat,” Wilson Sonsini Alert, September 18, 2020
- Co-author with J. Aiello LeBeau, J. Davey, and M. Mannino, “Expansion of U.S. Export Controls on Huawei-Designed or Produced Items,” Wilson Sonsini Alert, May 29, 2020
- Co-author with J. Aiello LeBeau, J. Davey, and M. Mannino, “License Requirements and U.S. Government Visibility into Exports to China, Russia, and Venezuela Will Increase, but Countries Remain Open for U.S Business,” Wilson Sonsini Alert, May 1, 2020

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- Co-author with J. Aiello LeBeau and M. Mannino, “Artificial Intelligence Software Controlled for Export, Including to Foreign National Employees,” Wilson Sonsini Alert, January 10, 2020
- Co-author with J. Aiello LeBeau and M. Mannino, “License to Be Required for Exports, Reexports, and Transfers of U.S.-Origin Items to 28 Additional Chinese Entities,” WSGR Alert, October 8, 2019
- Co-author with J. Aiello LeBeau and M. Mannino, “Export Control Update: 46 Huawei Affiliates Added; License Extended,” WSGR Alert, August 21, 2019
- Co-author with J. Aiello LeBeau and M. Mannino, “License Required for Exports and Other Items Sent to Huawei and Affiliates,” WSGR Alert, May 17, 2019
- Co-author with J. Aiello LeBeau, J. Gruenspecht, S. Heifetz, and M. Mannino, “Emerging Technologies to Be Controlled for Export: Comments Due December 19, 2018,” WSGR Alert, November 19, 2018
- Co-author, "ZTE Update: Denial of Export Privileges Suspended," WSGR Alert, July 17, 2018
- Co-author, "ZTE Update: Order Signed, but Denial of Export Privileges Still Is in Effect," WSGR Alert, June 11, 2018
- Co-author, "Denial of Export Privileges Against ZTE Corporation to Be Lifted Once Order Is Signed," WSGR Alert, June 7, 2018
- Co-author, "Reminder: Mandatory Foreign Direct Investment Reports for U.S. Entities Due May 31, 2018," WSGR Alert, May 8, 2018
- Co-author, "ZTE Corporation Sanctioned Again—Prohibitions on Transactions Involving U.S.-Origin Items Effective Immediately," WSGR Alert, April 18, 2018
- Co-author, "Forms Issued for U.S. Mandatory Foreign Direct Investment Reporting," WSGR Alert, March 9, 2018
- Co-author, "Mandatory Reporting for U.S. Entities in 2018 Regarding Foreign Direct Investment," WSGR Alert, December 4, 2017
- Co-author with J. Aiello LeBeau, M. Labriola, and M. Mannino, "OFAC Due Diligence in Securities Offerings," Lexis Practice Advisor, November 16, 2017
- Co-author, "Additional Documentation Requirements Take Effect for Exports and Reexports of U.S. Items to and from Hong Kong," WSGR Alert, April 19, 2017
- Co-author, "Continuation of ZTE General License Until February 27, 2017," WSGR Alert, November 21, 2016
- Co-author, "U.S. Further Eases Embargo on Cuba," WSGR Alert, October 17, 2016
- Co-author, "BIS Modifies Rules Governing the Export of Information Security Items Under the Export Administration Regulations; Updates to Cuba Regulations Coming Next Week," WSGR Alert, October 14, 2016
- Co-author, "Second Continuation of General License for Exports, Reexports, and Transfers to ZTE," WSGR Alert, August 18, 2016
- Co-author, "Continuation of General License for Exports, Reexports, and Transfers to ZTE," WSGR Alert, June 28, 2016
- Co-author, "Department of Commerce to Ease License Requirement for Exports, Reexports, and Transfers to ZTE as of March 24, 2016," WSGR Alert, March 22, 2016
- Co-author, "License Required for All Exports, Reexports, and Transfers to ZTE Corporation as of March 8, 2016," WSGR Alert, March 7, 2016
- Co-author, "Iran Not Open for U.S. Business: U.S. Trade Embargo Remains in Place; Nuclear Sanctions Lifted," WSGR Alert, January 19, 2016
- Co-author, "Proposed Rule to Subject Certain Cybersecurity Items to Greater Export Restrictions," WSGR Alert, July 9, 2015
- Co-author, "U.S. Companies with Foreign Subsidiary or Affiliate Granted One-Month Extension to File Mandatory Forms," WSGR Alert, June 1, 2015
- Co-author, "Restrictions Eased for Communications-Related Items Exported to Sudan," WSGR Alert, March 24, 2015
- Co-author, "Reporting Requirements for U.S. Companies Regarding Direct Investment," WSGR Alert, March 18, 2015
- Co-author, "U.S. Relaxes the Half-Century-Old Embargo on Cuba," WSGR Alert, January 16, 2015
- Co-author, "Increasing Russian Sanctions Target Financial and Energy Sectors," WSGR Alert, July 21, 2014
- Co-author, "More Restrictions on Business with Russia," WSGR Alert, May 1, 2014
- Co-author, "U.S. Expands Sanctions on Russia in Light of Crisis in Ukraine," WSGR Alert, March 26, 2014

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