

Jahna Hartwig

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SENIOR COUNSEL

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FOCUS AREAS

Export Control and Sanctions
FCPA and Anti-Corruption
Foreign Ownership, Control, or Influence (FOCI)
Government Investigations
National Security
NewSpace
Regulatory

HIGHLIGHTS

- **Transformational Leader of In-House Compliance Programs**
Jahna has held compliance leadership roles at a consulting firm, major aerospace manufacturer, and university-affiliated research center. In each of these roles, she has transformed an existing compliance function by developing innovative, proactive processes that mitigate risk while facilitating the company's core business.
- **Deep Subject Matter Expert in Export Controls and International Trade Law**
Jahna has over 20 years of experience representing clients before the U.S. State, Commerce, and Treasury departments in complex licensing matters and disclosures.
- **Strategic and Solutions-Oriented Business Advisor**
Jahna leverages her many years of experience as in-house counsel to global companies to develop risk-based approaches that balance business priorities with economic and national security.

EXPERIENCE

Jahna Hartwig is senior counsel at Wilson Sonsini Goodrich & Rosati, where she advises domestic and foreign companies on compliance with international trade laws.

Jahna has over 20 years of experience advising clients on international trade compliance issues as both in-house and outside counsel. She has developed and implemented international trade compliance programs at a Fortune 50 aerospace company, as well as other companies in the high technology and defense industries, a consulting firm, and a university-affiliated research center. She has advised clients on a variety of issues related to export controls on commercial and "dual-use" technologies under the Export Administration Regulations, military and intelligence technologies under the International Traffic in Arms Regulations, various economic sanction programs administered by the Office of Foreign Assets Controls, and Customs regulations. She has conducted internal investigations, developed and delivered training, prepared commodity jurisdiction and classification requests, filed voluntary disclosures and worked with government regulators on a variety of issues. She has significant experience advising clients on export controls related to fundamental research and public domain information.

Jahna has also advised clients on a wide range of legal issues, including compliance with the Foreign Agents Registration Act (FARA), the Foreign Corrupt Practices Act (FCPA) and other anti-corruption laws, and the National Industrial Security Policy Operating Manual (NISPOM).

After obtaining her law degree, Jahna clerked for the Honorable Thomas J. Aquilino, Jr. at the U.S. Court of International Trade. She also has been a member of the U.S. State Department's Defense

Trade Advisory Group and is a past co-chair of the Export Controls and Economic Sanctions Committee of the American Bar Association Section of International Law.

Jahna also practices virtually in Connecticut, where she is admitted.

CREDENTIALS

Education

- J.D., The George Washington University Law School, 1999
- M.A., International Affairs, The George Washington University
- B.A., International Affairs, The George Washington University

Associations and Memberships

- Member, Society for International Affairs
- Past member, Defense Trade Advisory Group (2008-2012)
- Past co-chair and member, ABA Export Controls & Economic Sanctions Committee (2005-2016)

Admissions

- Bar of the District of Columbia
- State Bar of Connecticut
- U.S. Court of Appeals for the Federal Circuit

INSIGHTS

Select Publications

- Author, "Justice Department reminds General Motors, 'Export controls do not justify or authorize employment discrimination,'" *Export Compliance Manager*, Issue 33, May 2023
- Co-author with J. Cheng, S. Heifetz, and T. Jenkins, "Coinbase Agrees to Pay \$100 Million and Improve Compliance Program and Regulators Continue Scrutiny of Crypto Asset Companies," *Wilson Sonsini Alert*, January 12, 2023
- Co-author with M. Casey, S. Heifetz, T. Jenkins, and A. Seymour, "Crypto Exchange Agrees to Pay More Than \$362,000 to Settle Alleged Sanctions Violations," *Wilson Sonsini Advisory*, December 14, 2022
- Co-author with J. Davey, S. Heifetz, and T. Jenkins, "Cryptocurrency Exchange Platform Agrees to Pay over \$53 Million for Anti-Money Laundering and Sanctions Violations," *Wilson Sonsini Alert*, October 18, 2022
- Co-author, "Compliance Under Pressure: Strategies for Managing Your ICP in Difficult Circumstances," *Export Compliance Manager*, July/August 2022
- Co-author with M. Casey, S. Dunton, J. Sawicki, and R. Blake, "Compliance Reminder: SEC Disclosure Considerations Arising from Russia's Invasion of Ukraine," *Wilson Sonsini Alert*, July 5, 2022
- Co-author with A. Caiazza, J. Davey, S. Heifetz, T. Jenkins, and J. Kaplan, "No Foolish Transactions: A Few Guidelines for NFT Marketplace Participants to Mitigate Anti-Money Laundering Risks," *Wilson Sonsini Advisory*, May 23, 2022
- Co-author with J. Aiello LeBeau, M. Casey, K. McDonough, and A. Seymour, "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, K. McDonough, and A. Seymour, "Biden Administration Authorizes New Sanctions on Regions of Ukraine," *Wilson Sonsini Alert*, February 23, 2022
- Co-author with J. Aiello LeBeau and A. Seymour, "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, S. Heifetz, and A. Seymour, "CJEU Publishes Judgment Interpreting the EU's Blocking Regulation," *Wilson Sonsini Alert*, February 3, 2022
- Co-author with J. Aiello LeBeau, K. McDonough, and A. Seymour, "Intrusion Preclusion: BIS Issues Long-Awaited Controls on Cybersecurity Items, Creates New License Exception," *Wilson Sonsini Alert*, October 27, 2021
- Co-author with M. Casey, J. Davey, S. Heifetz, and T. Jenkins, "New OFAC Guidance Raises the Stakes for Crypto Industry," *Wilson Sonsini Alert*, October 20, 2021
- Co-author with J. Aiello LeBeau, K. McDonough, and A. Seymour, "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, K. McDonough, and A. Seymour, "Electronics Testing Company Penalized \$6.6 Million for Unauthorized Software Exports," *Wilson Sonsini Alert*, August 19, 2021

Select Speaking Engagements

- Panelist, [Export Administration Regulations Proficiency Series](#), American Conference Institute, October 5, 2023
- Panelist/Committee Member/Board Liaison, “ITAR Exemptions/EAR Exceptions Panel,” 2023 Winter Back to Basics Virtual Conference, Society for International Affairs (SIA), February 27-March 3, 2023
- Panelist, “Review of Proficiency Assignment and Q&A,” [ITAR Proficiency Series](#), American Conference Institute, February 23, 2023
- Panel Leader, “Trade and Technology Controls,” [Investing, Trading and Doing Deals in a Dynamic World 2023: Navigating Persistent Risk](#), Practising Law Institute, February 16, 2023
- Panelist, “Technology Transfers,” [ITAR Proficiency Series](#), American Conference Institute, February 9, 2023
- Panelist, “Trade & Technology: Acceleration, Convergence, and Control,” Practising Law Institute’s Investing, Trading, and Doing Deals 2022, February 17, 2022
- Conference Director, “Summer Back to Basics” conference, Society for International Affairs, July 2021
- Jahna is a frequent speaker on international trade compliance topics, including technology transfer, export licensing, and compliance programs.