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#### PRACTICES

Economic Sanctions & Export Controls

FCPA & International Anti-Corruption

National Security

#### EDUCATION

J.D., Saint Louis University School of Law, 2006

B.A., George Washington University, *magna cum laude*, 2005

## Christopher Stagg

### COUNSEL

Christopher Stagg wrote U.S. export control laws and companies now turn to him to provide practical and strategic counsel to resolve complex export control issues.

He helps clients navigate export controls by providing regulatory interpretations and clear guidance, rendering jurisdiction and classification determinations, seeking the reversal of unfavorable agency actions through reconsiderations and appeals, advocating before the government for regulatory revisions to advance client interests, developing effective policies and procedures, conducting internal investigations and risk assessments, and advising on consent agreements and other enforcement actions. He also advises companies on issues involving economic sanctions and the Committee on Foreign Investment in the United States (CFIUS).

Mr. Stagg brings special insight into export controls and national security issues by drawing on his substantial experience within government at the Department of State's Directorate of Defense Trade Controls (DDTC). He was deeply involved as DDTC's deputy lead in rewriting the International Traffic in Arms Regulations (ITAR) and Export Administration Regulations (EAR), including the revisions to the U.S. Munitions List (USML) and Commerce Control List (CCL). He was an active participant in related interagency policy subcommittees chaired by the National Security Council.

Mr. Stagg's government experience further included authoring U.S. policy on designating and determining items on the Munitions List, drastically reforming the ITAR's commodity jurisdiction process – the most significant such effort in history, holding a leadership role within the commodity jurisdiction and advisory opinion teams, advising on national security investigations with the intelligence community and federal law enforcement, and working with U.S. allies on bilateral and multilateral defense trade issues. He also had the lead role on addressing jurisdictional issues involving emerging technologies, software, and technical data.

Mr. Stagg holds numerous leadership roles within the American Bar Association (ABA) – he is the Vice Chair of the National Security Committee, the Vice Chair of the Export Controls and Economic Sanctions Committee, and has been the Co-Editor of the *Year-in-Review for Export Controls and Economic Sanctions* since 2013.

Prior to joining Miller & Chevalier, Mr. Stagg handled export controls, economic sanctions, and CFIUS issues at his own firm and with a major international law firm in Washington, DC.

### Representative Engagements

#### In Private Practice

- Provided counsel to aerospace and defense companies on complying with ongoing and previous Consent Agreement requirements under the ITAR and Arms Export Control Act (AECA).
- Replaced a defense prime's long-standing outside export controls counsel to represent the company as its lead ITAR lawyer to successfully obtain rapid resolution from DDTC in a high-stakes matter.
- Advised companies and individuals on ITAR and export control defenses to alleged violations, including related administrative, constitutional, and criminal legal defenses.
- Advised several defense primes and other companies on designing and implementing effective policies and procedures to handle jurisdiction and classification assessments.
- Provided hundreds of jurisdiction and classification assessments that address complex ITAR and EAR items, including those involving software, technical data, and services.
- Successfully represented multiple companies in commodity jurisdiction requests and appeals, as well in obtaining favorable ITAR interpretations through advisory opinion requests.
- Successfully represented multiple companies in commodity classification (CCATS) requests and appeals, as well in obtaining favorable EAR interpretations through advisory opinion requests.
- Successfully advocated through public comments to proposed rulemaking numerous revisions to export control regulations and the receipt of favorable interpretations.
- Successfully sought the reinstatement of a debarred party under the ITAR and AECA.
- Advised multiple non-U.S. companies on application of the EAR's *de minimis* and foreign direct product rules.
- Counseled numerous companies as their lead ITAR lawyer on developing licensing strategies and handling licensing provisos (including seek their reconsideration).
- Lead audits and internal investigations concerning potential violations of the ITAR and EAR, including advising on decisions whether to submit voluntary disclosures.
- Counseled companies on identifying the applicability and related risks of CFIUS, including preparing related CFIUS filings and determining whether critical technologies are involved.
- Advised a Fortune Global company and its senior executive management team on rapidly changing economic sanctions developments concerning Countering America's Adversaries Through Sanctions Act (CAATSA) and regulatory changes by the Office of Foreign Assets Control (OFAC).
- Served as lead outside counsel to assist a telecommunications company on

establishing ongoing civilian communications services in compliance with regulatory requirements under export controls and economic sanctions laws.

## **In Government**

- Served as the deputy lead for the DDTC on Export Control Reform and served as a member on interagency policy subcommittees chaired by the National Security Council staff.
- Revised the USML and CCL for Export Control Reform, as well as key regulations within the ITAR and EAR.
- Authored the U.S. government's policy on designating and determining items on the USML.
- Substantially reformed the ITAR's commodity jurisdiction process – the most significant such effort in history – by directly revising the government's analysis and review procedures for commodity jurisdiction determinations.
- Held a leadership position within the commodity jurisdiction section and decided hundreds of cases and appeals whether an item is subject to the ITAR or EAR.
- Principal ITAR advisor to the Federal Bureau of Investigation and Homeland Security Investigations on export controls and national security investigations.
- Provided internal and external training on the ITAR, including the commodity jurisdiction process, the rulemaking process, and the regulatory revisions under Export Control Reform.
- Represented the United States in bilateral and multilateral defense trade discussions with the United Kingdom, Canada, France, Israel, and NATO.

## **Government Experience**

- Senior Policy Advisor, Directorate of Defense Trade Controls, U.S. Department of State, 2010-2013

## **Rankings and Recognition**

- Department of State Appreciation Award, Export Control Reform, 2013
- Department of State Appreciation Award, National Security Investigations, 2013
- Immigration and Customs Enforcement Director Award for Counterproliferation Investigations, 2013
- Department of State Appreciation Award, Commodity Jurisdiction, 2011

## **Affiliations**

- American Bar Association
- Society for International Affairs
- New York City Bar Association

## **Admissions**

### **STATE ADMISSIONS**

- District of Columbia
- New York