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**Areas of Practice**

- Customs
- Economic Sanctions
- Export Controls
- International Regulation & Compliance
- International Trade & Investment
- Public International Law

**Education**

Georgetown University  
 Law Center, J.D., *cum laude*,  
 2002

Georgetown University,  
 School of Foreign Service,  
 B.S.F.S., 1996

**Bar & Court Admissions**

- District of Columbia
- US Court of International Trade
- US Court of Appeals for the Federal Circuit

**Meredith A. Rathbone**

Meredith Rathbone is a partner in the Washington office of Steptoe & Johnson LLP, where she is a member of the International Department.

**International Regulatory Compliance**

*Export Controls and Economic Sanctions*

Ms. Rathbone counsels clients in numerous countries on achieving their business goals while ensuring compliance with US export control and sanctions laws administered by the Departments of Commerce, State, and Treasury. She has assisted clients in the manufacturing, telecommunications, banking, insurance, retail, and service industries, among others, in navigating the requirements of the Export Administration Regulations (EAR), International Traffic in Arms Regulations (ITAR) and US sanctions regulations administered by the Office of Foreign Assets Control (OFAC). Her experience in this area includes assisting clients in resolving politically sensitive matters under the joint administration of various government agencies. Ms. Rathbone has assisted clients in conducting internal investigations, preparing and filing voluntary disclosures and subpoena responses, drafting agreements that allow companies to provide non-US person employees with access to controlled technical information, undertaking product classification reviews and preparing submissions for official classification determinations, and obtaining and complying with government licenses for the manufacture and production of technical products outside of the United States. Ms. Rathbone regularly advises companies in navigating export controls and sanctions considerations in the context of mergers and acquisitions. She currently serves as a vice chair of the ABA International Law Section’s Export Controls and Economic Sanctions Committee.

*Anti-corruption and Money Laundering*

Ms. Rathbone has advised multinational companies on compliance with anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA), and has conducted investigations and advised clients on responding to inquiries from Department of Justice and the Securities and Exchange Commission. She has provided counseling on the money laundering and extraterritorial jurisdiction aspects of the USA Patriot Act.

*Customs Compliance*

Ms. Rathbone’s experience in Customs compliance includes assisting clients in responding to NAFTA verifications, as well as advising clients on tariff classifications. She provides advice to companies on making country-of-origin assessments and on compliance with both Customs and Federal Trade Commission country-of-origin marking regulations. Ms. Rathbone has advised clients on preparing voluntary disclosures of potential Customs violations, and assisted them in developing long-term Customs compliance strategies.

## **Meredith A. Rathbone**

### *Antidumping and Countervailing Duty Laws*

Ms. Rathbone has assisted clients in litigating antidumping and countervailing duty proceedings before the US Department of Commerce and the International Trade Commission. As part of a team of Steptoe attorneys, she assisted a client in overturning the issuance of a US antidumping duty order before a bi-national NAFTA appellate panel. She has also provided advice to clients on developing proactive strategies to avoid liability under international and domestic trade remedy laws.

### **Public International Law**

Ms. Rathbone has advised clients on compliance with United Nations sanctions and arms embargoes, including UN Security Council resolutions restricting certain dealings with Iran and Somalia. Ms. Rathbone has experience advising companies on the political and commercial effects of regime change and government succession as provided by international contracts law, customary international law, and the laws of war. She is a published author in the field of foreign and international human rights law.

### **International Government Procurement**

Ms. Rathbone has assisted companies in achieving their business goals by advising them on the eligibility of their products and technology for US military and civilian government procurement under the Buy American Act and the Trade Agreements Act. She has also counseled clients on compliance with regulations relating to foreign government procurement.

### **University Affiliations**

Ms. Rathbone has been an Adjunct Professor at Georgetown University, teaching courses in international and comparative law to both law students and undergraduates. She has lived and studied in Finland, Russia, and Italy.

### **Select Seminars & Events**

Webcast on Understanding OFAC Issues in 2012, November 16, 2011

ITAR Compliance: Disclosures and Audits, Federal Publications Seminars, October 26, 2011

Webcast on Nationality and the ITAR: Implementation Challenges and Opportunities in Canada and the US, October 19, 2011

ITAR Compliance: Disclosure and Audits Course, Federal Publications Seminars, July 14, 2011

Export Control Update 2011 Webinar, May 12, 2011

Beware the Invisible Export Controls, May 4, 2011

**Meredith A. Rathbone**

**Selected Publications**

New US Sanctions on the Government of Iran and Iranian Financial Institutions  
February 7, 2012

EU Enhances Sanctions, Targeting Iranian Petroleum, Petrochemical, and  
Financial Sectors  
January 27, 2012

DDTC Proposes Changes to ITAR Brokering Rules  
January 25, 2012, *The Government Contractor*

Widening The Net Under Iran Sanctions Act  
January 23, 2012, *Law360*

State Department Sanctions Three Entities under Iran Sanctions Act, Including  
First Chinese Company  
January 17, 2012

OFAC Issues Transnational Criminal Organization Sanctions Regulations  
January 13, 2012

New Iran Sanctions Threaten Foreign Banks' Access to the United States,  
Impose Strict Measures on Financial System of Iran  
January 4, 2012

DDTC Proposes New Brokering Rule  
January 3, 2012