

RACHEL K. ALPERT, Partner

Rachel K. Alpert is co-chair of the firm's National Security, Sanctions, and Export Controls Practice, and a partner in its Investigations, Compliance, and Defense Practice. She is an international trade and sanctions lawyer who brings a wealth of experience in economic sanctions, export controls, and international legal issues from her seven years in the United States Department of State's Office of the Legal Adviser. She counsels domestic and international clients on a range of issues, including trade sanctions compliance, supply chain and human rights accountability, and CFIUS matters.

Drawing on her State Department experience advising policy-makers at all levels on legal issues affecting US relations with countries in the Western Hemisphere, Ms. Alpert supports organizations in the oil and gas, communications, travel, and other industries on legal issues involving export controls and US sanctions laws and regulations under the International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR), and Office of Foreign Assets Control (OFAC) regulations. She also advises companies and investors on business human rights and supply chain accountability and on national security reviews of foreign investments in the United States by the Committee on Foreign Investment in the United States (CFIUS).

While at the State Department, Ms. Alpert advised on the implementation of approximately \$2 billion in US foreign assistance resources to prevent trafficking in persons and end modern slavery, to combat transnational crime, promote democracy, and to provide urgent humanitarian assistance throughout the world. She reviewed and drafted legislative text and prepared senior leaders for Congressional testimony. She also collaborated with agencies throughout the US government on legal issues related to Cuba, Venezuela, and Nicaragua sanctions programs.

Ms. Alpert started her State Department career in the employment law section, representing the State Department in employment litigation and advising department bureaus and principals on employment law issues within the Department and at US embassies around the globe.

Representative matters include the following:

- Advised multiple companies on compliance with the US Government's Xinjiang Supply Chain Business Advisory
- Sought and obtained licenses from the US Department of the Treasury's Office of Foreign Assets Control under the Russia, Iran, Venezuela, Syria, and Cuba sanctions programs
- Successfully engaged with the State Department regarding an investigation under Title IV of the Cuban Liberty and Democratic Solidarity (LIBERTAD) Act of 1996
- Representation of Latin American bank in connection with engagement with the US government on sanctions-related matters



RACHEL K. ALPERT Partner

WASHINGTON, DC

Office: 202 639-6081

Email: ralpert@jenner.com

PRACTICE GROUPS

Congressional Investigations
Human Rights and Global Strategy
Investigations, Compliance and Defense
Litigation
National Security, Sanctions, and Export
Controls
Public International Law

INDUSTRY GROUPS

Environmental, Social, and Governance
Life Sciences

EDUCATION

Harvard Law School, JD, 2008; Jack Kent
Cooke Foundation Graduate Fellowship;
Board of Student Advisers, Legal Writing
Teaching Assistant and Adviser, Frederick
Sheldon Traveling Fellowship; Managing
Editor, *International Law Journal*

Tel Aviv University, MA, 2005; *magna cum
laude*

Yale University, BA, 2003; *cum laude*,
Richard U. Light Fellowship; Flute, Yale
Symphony Orchestra

ADMISSIONS

District of Columbia

Maryland

- Advised on US sanctions and export controls considerations for transactions valued in the tens of billions of dollars
- Obtained CFIUS clearance for transactions valued in the tens of billions of dollars on both the US business and foreign party sides of the deals
- While at the State Department, negotiated agreement with the Netherlands in respect of Curacao for the use of facilities in Curacao as a humanitarian hub for assistance to Venezuela on behalf of the US Government
- While at the State Department, led negotiations regarding taxation and foreign assistance in multiple countries in Central Asia on behalf of the US Government
- State Department Office of the Legal Adviser, 2012 - 2019

Publications

- Co-Author, Client Alert: A New Frontier in Supply Chain Diligence: Uyghur Forced Labor Prevention Act Becomes Law, December 28, 2021
- Co-Author, Client Alert: An Arms Embargo and Export Controls on Cambodia for Corruption, Human Rights Abuses, and China's Military Influence, December 10, 2021
- Co-Author, Client Alert: 4 Key Questions Answered in OFAC's Guidance for the Virtual Currency Industry, October 20, 2021
- "OFAC Ransomware Guidance Reflects Resolve to Fight Attacks," *Bloomberg Insights*, September 30, 2021
- "Aligning Sanctions Laws with Humanitarian Principles: Pre-authorizing Aid in Afghanistan and Other Crises," *Just Security*, September 3, 2021
- "Aligning Sanctions Laws with Humanitarian Principles: Pre-authorizing Aid in Afghanistan and Other Crises," *Just Security*, September 3, 2021
- Co-Editor, Client Alert: UK Sanctions Overview – Jenner & Block Authors Chapter in GIR's Guide to Sanctions, August 2, 2021
- Co-Author, Client Alert: Six Best Practices for Excising Xinjiang Forced Labor from Supply Chains, July 20, 2021
- Co-Author, Client Alert: Congress Targets Foreign Funding within American Colleges and Universities, June 22, 2021
- Co-Author, Client Alert: Lessons from the SAP SE Settlement on the Benefits of Self-Reporting Corporate Export Control and Sanctions Violations, May 11, 2021
- Co-Author, Client Alert: Burma Sanctions Reach the Military-Industrial Complex, March 30, 2021
- Co-Author, Client Alert: Russia Sanctions – A Targeted Multilateral Approach, March 5, 2021
- Co-Author, "Six Best Practices in Corporate Human Rights and Social Responsibility," *Corporate Counsel*, February 8, 2021
- Co-Author, Client Alert: New Directions on US Sanctions, January 27, 2021

Speaking Engagements

- Presenter, “OFAC Insights on Enforcement and Compliance,” C5’s London Forum on Global Economic Sanctions, November 18, 2021
- Panelist, “The New Disruptor: Sanctions and Human Rights Law in the Cross-Border Supply Chain,” American Foreign Law Association, November 17, 2021
- Panelist, “The Tab on FABs: Semiconductor Supply Chain Security,” LIST Society at UVA Law and NPSC at the Frank Batten School of Public Policy, October 25, 2021
- Presenter, “Corporate Human Rights and Supply Chain Consideration,” Lex Mundi Global Summit, Munich, Germany, October 22, 2021
- “Global Contracting: Enforcement, Sanctions, Human Rights, and Data Privacy Considerations,” Association of Corporate Counsel of New York City, September 14, 2021
- Presenter, “Best Practices in Corporate Human Rights and Social Responsibility,” Celesq, West LegalEdcenter, May 17, 2021
- Concluding Remarks on Panel, “How Law and Policy Shape Global Humanitarian Assistance,” Law of International Development Initiative, Georgetown University, April 12, 2021
- Panelist, “Compliance Challenges with China’s New Export Control Law,” Institute of International Banking Law & Practice, March 02, 2021
- Adjunct Professor, International Law, Georgetown University Law Center, Spring Semester, Spring Semester, 2021
- Presenter, “Comprehensive Overview of US Sanctions Regulatory Regimes and the Key Components of an Effective Sanctions Program,” American Conference Institute, July 28, 2020
- Lecturer, “Sanctions and International Law,” Georgetown University Law Center International Law Course, Washington, DC,, March 31, 2020