ArentFox Schiff LLP
Attorneys

Kay C. Georgi

PARTNER

Kay is a partner in the International Trade group and has more than 36 years' experience advising clients on all aspects of international trade, with particular capability in the areas of export control and sanctions, Foreign Corrupt Practices Act (FCPA), and import (customs) matters.



Industries

AI & Emerging Technologies
— ArentFox Schiff Industry Guide to the Metaverse
National Security
Nonprofits & Associations
— Higher Education

Practices

Business Compliance & Integrity Monitorships
International Trade & Investment
— Export Controls & Economic Sanctions
Insurance & Reinsurance

International

Japan
Latin America
Europe
China
Asia
Australia

Languages

Italian
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Education

Cornell Law School, JD, summa cum laude, international legal affairs, 1989

Cornell University, BA, distinction, classics and archaeology, 1985
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Offices

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Ranked as one of the nation's leading International Trade: Export Controls & Economic Sanctions lawyers by *Chambers USA*, recognized as "Lawyer of the Year" in Trade & Customs in the *2025 Lexology Index Awards*, and named as a leading international trade practitioner by *Legal 500* and *Expert Guides*, Kay is known for helping large and small clients understand, comply with, and weather the investigation storms associated with the complicated set of US laws and regulations governing US exports and non-US re-exports of goods, software, services, and technology, and US economic sanctions. Kay is a member of the ArentFox Schiff Data Center Legal Solutions task force.

Kay also counsels clients on the Committee on Foreign Investment in the United States (CFIUS) and its expanded authority under the Foreign Investment Risk Review Modernization Act (FIRRMA). She advises both investors and target companies on transactions involving critical technology, and sensitive personal data, including mergers and acquisitions, venture capital investments, and private equity transactions. She advises clients on the regulatory implications of various transactions and regularly prepares filings for CFIUS review. She also advises clients on the new export controls on emerging and foundational technologies, as mandated by the Export Control Reform Act of 2018 and how they intersect with CFIUS's jurisdiction. More recently, she has advised clients in US Department of Commerce investigatory and rulemaking proceedings under Information and Communications Technology and Services (ICTS) Executive Orders. She also has experience advising clients on issues involving trade agreements, including World Trade Organization (WTO) agreements.

Some of Kay's recent engagements:

Assist in submitting comments in ICTS rulemaking proceeding

Lead auditor in International Traffic in Arms Regulations (ITAR) audits conducted pursuant to the Directorate of Defense Trade Controls (DDTC) of the Department of State consent agreement/directed disclosures

Expert witness on ITAR and economic sanctions issues in international arbitrations

Advisor to non-US companies responding to US criminal and civil government inquiries related to non-US trade in dual-use goods/services with US embargoed countries, including Russia and China

- Conduct global reviews of Fortune 500 companies' export and import compliance programs and provide training to those companies
- Provide counseling and investigative experience and assistance in voluntary and directed disclosures to a wide range of industries

Client Work

Kay has significant experience in export control matters, including advising clients on US and international laws relating to the export and import of defense articles, services, and technologies, as well as dual-use goods and technologies, and nuclear equipment and technologies. She regularly represents clients before the Bureau of Industry and Security (BIS) of the Department of Commerce, the DDTC of the Department of State, and the Office of Foreign Assets Control (OFAC) of the Department of Treasury. She is experienced in the management and resolution of:

- Licensing
- Commodity jurisdiction and classification requests
- Internal and external audits
- Voluntary and not-so-voluntary disclosures
- US government investigations

Kay has particular industry knowledge in the areas of:

- Defense
- Consumer products
- Aircraft/aerospace/space including satellites and other spacecraft
- Medical devices
- Agriculture and Agricultural Technology
- Telecommunications and encryption & security and cyber products
- Software of all kinds
- Semiconductors and semiconductor production & test equipment
- Other electronics & computers and memory
- Crime control
- Freight forwarding
- Security services
- Oil, oilwell services, and petroleum exploration
- Global positioning and surveying
- Industrial manufacturing products

Kay also advises clients regarding compliance with anti-corruption laws, including the FCPA, and assists in internal and US government investigations relating to the FCPA and commercial bribery. More recently, Kay has advised clients on compliance with US customs-related laws and regulations administered by the Customs and Border Protection (CBP).

Previous Work

Kay formerly was an associate and partner from 1989 to 2005 with Coudert Brothers LLP.

Professional Activities

Kay is a member of the American Bar Association (ABA), Section of International Law and Practice, and has twice served as Co-chair of the ABA Export Controls & Economic Sanctions Committee. She is also a member of the New York State Bar Association.

Publications, Presentations & Recognitions

Kay has been recognized by *Chambers USA* as one of the nation's leading International Trade: Export Controls & Economic Sanctions lawyers. Kay has also been recognized as a leading international trade practitioner by *Legal 500, Expert Guides,* and *Who's Who Legal*.

Kay's recent publications include:

- Co-author "Foreign Trade Law," *Heidelberg Commentary, CF Müller* (2024).
- Co-editor "International Guide to Export Controls and Economic Sanctions," 2nd Edition: American Bar Association (2023).
- Co-author, "Five takeways on the DDTC's new ITAR OGLs for Australia, Canada and the UK ," *Export Compliance Manager: Issue 26* (2022).
- Co-author, "Foreign Trade Law," *Heidelberg Commentary, CF Müller* (2020).
- Co-author, "The Chaotic World of U.S. Economic Sanctions in 2018: A Summary of the Main Changes and Key Takeaways," *PLI Current: The Journal of PLI Press*, (2019).
- Co-author, "*Sturm* and Lots of *Drang*: The First Year of Economic Sanctions Under the Trump Administration," *The Current: The Journal of PLI Press*, (2018).
- Co-editor, "ABA Handbook of Export Controls & Economic Sanctions," (2013).
- Co-author, "The More Than You Ever Wanted to Know about Iran Sanctions Chart: Key prohibitions of ITRSHRA, CISADA, NDAA, the Iran Sanctions Act, Executive Orders, and Much More," *Practicing Law Institute (PLI) Coping with U.S. Export Controls,* (2012).
- Co-author, "The Arab Spring and OFAC's Targeted Sanctions," *PLI Coping with U.S. Export Controls,* (2011).
- Author, "International Trade Considerations in International Joint Ventures," *Joint Ventures in the International Arena*, Second Edition, (2010).
- She has also been quoted in various publications, including *Washington Lawyer.*

Kay's recent speaking engagements include:

- "Compliance Best Practices – Industry Perspectives," Practising Law Institute's Coping with US Export Controls and Sanctions 2025, December 12, 2025
- "Sanctions & Blocking Statutes – Managing Terrorism, Geopolitics and the Movement of Goods & Services Globally," Inter-Pacific Bar Association Annual Meeting and Conference, April 24, 2025
- Co-Chair: "14th Annual Advanced Forum on Global Export Controls," American Conference Institute, February 25-26, 2025
- "Compliance Best Practices – Industry Perspectives," Practising Law Institute Conference, Coping with US Export Controls and Sanctions, December 10, 2024
- "Detangling Export Controls and Economic Sanctions: Surprising New Lessons," Canadian Council on International Law Annual Conference, November 7, 2024
- "Future of US-Allied Cooperation on Export Controls and Sanctions," Society for International Affairs' 2024 Fall Advanced Conference, October 29, 2024
- "Semiconductors and Military Applications: New and Surprising Lessons for Interpreting and Applying 15 CFR Part 744 of the EAR," Canadian Institute's US Export & Reexport Compliance For Canadian Operations Conference, January 25, 2024
- "Compliance Best Practices – Industry Perspectives," Practising Law Institute Conference, Coping with US Export Controls and Sanctions, December 15, 2023
- Moderator: "Enforcement Landscape Update," Society for International Affairs' 2023 Fall Advanced Conference, October 23, 2023
- "Advanced Scenarios: MEU, MIEU, and CCMC — The 3 Biggest Grey Areas and How to

Address Them," American Conference Institute's 5th Conference on US-China Trade Controls, October 13, 2023

- "China – Surprising New Lessons for Complying with Sanctions and Export-Controls on Dual-Use Technology-and the Impact of Modern Warfare on AI and Tech Innovation, " C5's Conference: European Forum on Global Economic Sanctions, June 1, 2023
- "EAR & OFAC Controls," Export Compliance Training Institute Live Seminar, May 11-12, 2023
- "The Latest on Putting MEU and MIEU Requirements into Action: Hidden Lessons for Updating Compliance and Licensing Practices," Export & Reexport Compliance for Canadian Operations Conference, January 31, 2023
- "A Deep Dive Into MEU, MIEU and CCMC Rules: Unpacking New Enforcement Risks, and the Hidden Lessons for Updating Export Compliance and Licensing Practices," ACI's US-China Trade Controls Conference, October 11, 2022
- "Should I stay or should I go now: Navigating global sanctions on Russia," International Bar Association (IBA) Webinar, October 4, 2022
- "New Ransomware Advisory and Handling Cyberattacks," ABA International Law Section, Export Controls & Economic Sanctions Committee, March 16, 2021
- "Deemed Exports and Technology Transfers," ACI's Passport to Proficiency Series on the Export Administration Regulations, November 2 - December 2, 2020
- "Export controls as an efficient tool in trade policies," the European Association of Trade and Investment Controls and Compliance Attorneys' Trade & Investment Controls Webinar Series, October 28, 2020
- "Foreign Direct Product Rule as applied to Huawei," ACI's US - China Trade Controls Conference, Online Conference, October 22, 2020
- "The Lengths and Limits of License Requirements and Exceptions: Navigating the Grey Areas of License CIV, Anticipated APR Changes and the Foreign Direct Product Rule," ACI's US - China Trade Controls Conference, Online Conference, August 13, 2020
- "Recent Changes to the EAR," CITBA Export Controls Committee Panel, Webinar, August 11, 2020
- "The Impact of New Export Controls on International Supply Chains," European Association of Trade and Investment Controls and Compliance Attorneys, Webinar, May 13, 2020
- "The Impact of COVID-19 on International Trade," American Bar Association Section of International Law's International Trade Committee, Webinar, April 20, 2020
- "Deemed Reexport and Third Country Nationals: Reconciling the ITAR and EAR with Canadian Human Rights Laws and Privacy Laws," US Export & Re-Export Compliance for Canadian Operations, Toronto, Canada, January 28 - 29, 2020
- "EU Investment Screening framework," Studio Legale Padovan's Conference on Russia & Iran Sanctions, Internal Compliance Programs, Investment Controls, and Brexit, Rome, Italy, June 21, 2019
- "BIS and Emerging Technologies Controls: What's Next?," American Bar Association, Washington, DC, March 11, 2019
- "Trade Talk: US Sanctions, Export Controls, and Other Trade Tools," Association of Women in International Trade (WIIT), Washington, DC, March 5, 2019
- "Staying Compliant with Rapidly Changing Economic Sanctions: How to Strengthen Your Compliance Program to Avoid Potential Sanctions Landmines," ACI's 11th Industry Forum on International Technology Transfers, Cloud Computing & Deemed Export Compliance, Washington, DC, February 6 - 7, 2019
- "Staying Compliant with US Sanctions for US Relating to US Origin Parts and Foreign Persons," ACI's US Export & Re-Export Compliance for Canadian Operations, Toronto, ON, January 29 - 30, 2019
- "Year in Review – Sanctions and Export Controls in the First Half of the Trump Administration," The Practicing Law Institute's (PLI) Coping with US Export Controls and Sanctions, December 13, 2018
- "Navigating Business Between Russia and North America in a High-Risk Sanctions Environment," Canadian Association of Lawyers with Russian Eurasian Interests (CALREI), Toronto, Canada, December 3, 2018
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"US Government Trade Control Seminar: ITAR & EAR Compliance & Enforcement," Pittsburgh Technology Council Seminar, Pittsburgh, PA, April 25, 2018

- "Technology Transfers And Your Business: How to Infuse Your Export and Re-Export Compliance Program with Both U.S. and Canadian Rules for Cloud Computing and Encryption," 7th Industry Forum on US Export and Re-Export Compliance for Canadian Operations, Toronto, ON, January 29 - 31, 2018
- "The Sanctions Landscape: Updates and Prospects," The Practicing Law Institute's (PLI) Export Controls and Sanctions 2017 Conference, Washington, DC, December 14–15, 2017
- "Canadian and US Export Controls and Economic Sanctions: Key Steps for Mitigating Risk for Software and Technology Companies," IT.CAN Annual Conference, Toronto, ON, October 23–24, 2017
- American Forest & Paper Association (AF&PA) General Counsels Resource Committee Meeting, Washington, DC, September 27–28, 2017
- "Trump Trade Policy: Known Knowns and Known Unknowns," American Association of Exporters and Importers (AAEI) Healthcare Industries Committee (HIC) and Regulated Industries Committee (RIC) Seminar, April 27, 2017 (Washington, DC)
- "Assessing the Iran JCPOA, one year after Implementation Day: results and prospects for non-U.S. companies under the Trump Administration," Webinar, March 9, 2017
- "Focus on the Canadian Exemption: Biggest Missteps to Avoid when Applying the Latest Changes and Regulatory Guidance to Best Leverage ITAR 126.5," 6th Forum on US Export & Re-Export for Canadian Operations, Toronto, ON, February 1, 2017
- 6th Annual Economic Sanctions Boot Camp, New York City, NY, December 1-2, 2015
- "ITAR Compliance, Enforcement and Jurisdiction," Pittsburgh Technology Council – ITAR 2015 Conference, Pittsburgh, PA, November 11, 2015
- Presentation with Economic Sanctions at our 84th Annual National Conference, IE Canada, Toronto, Canada, October 29-30, 2015
- "ITAR," IE Canada Webinar, September 10, 2015
- "Being Export Compliant In A Cloud Environment," IE Canada Webinar, September 1, 2015
- "ITAR and EAR Harmonization Rule – Preparing Comments," American Bar Association Section of International Law and the Export Controls and Economic Sanctions Committee, Washington, DC, July 21, 2015
- Studio Legale Padovan Conference on the JCPOA, Italy, June 10, 2015
- "How to Determine What Is and Is Not 'Specially Designed': Concrete Examples of How to Interpret and Apply Different EAR and ITAR Definitions," ACI US Export and Re-Export Compliance for Canadian Operations, Toronto, Canada, January 28, 2015
- "International Law: From BNP Paribas to Kiev - Recent Developments in Export Controls and Economic Sanctions," Ontario Bar Association, Toronto, Canada, November 9, 2014
- "Lifting the Ban on US Oil Exports: Yes or No?" Arent Fox, Washington, DC, September 23, 2014
- "Export and Import Laws: Don't Get Complacent When Arent Fox Can Help You Stay Compliant," Arent Fox, San Francisco, CA, September 17, 2014
- "A Complete Guide to Navigating ITAR Brokering Rules: The Ins and Outs of How to Interpret and Apply Evolving Rules to Your US and Foreign Operations," ACI 17th Annual National Forum on Global Export Controls Compliance, Washington, DC, June 10, 2014
- "Sanctions Update on Russian and Ukraine," WBA International Law Forum, Washington, DC, May 24, 2014
- "Section 734.2(b) of the EAR: The Nuts and Bolts of Complying with the 'Deemed Export' Rule, Foreign National Screening and Form I-129 Requirements," ACI 4th Annual EAR Bootcamp, San Diego, CA, February 25, 2014
- "An Inside Look at The Evolving OFAC Licensing Process, Timeline and Criteria: How New, Tightened Sanctions Affect Your Chances of Approvals," ACI Economic Sanctions Bootcamp, December 4, 2013
- "Managing ITAR/Export compliance reform for defense electronics suppliers," Military Embedded Systems Webinar, November 12, 2013
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"Expansion of the Extraterritoriality of Iran Sanctions," C5 Advanced Forum on Economic Sanctions, Amsterdam, NL May 15, 2013

- "Export Disclosures – When, Why, and How to Make Them," Association of Corporate Counsel (ACC) Western Pennsylvania Chapter Forum on Disclosures In The Import/Export Arena, Pittsburgh, PA, May 7, 2013
- "The Ins and Outs of Classifying Under Part 810 of DoE, Part 110 of NRC and the EAR," American Conference Institute (ACI) 3rd Annual Summit on Complying with Nuclear Export Controls, Washington, DC, March 19, 2013
- "When Software Development, Technical Support and Other Assistance Become ITAR-Controlled 'Defense Services' – When and How to Secure a TAA to Prevent Penalties and Uninterrupted Business," ACI Forum on International Technology Transfers and Deemed Export Compliance, San Francisco, CA, January 28, 2013
- "Case Studies — Hard Questions and Issues Encountered (Almost) Every Day," PLI's Coping with US Export Controls 2012, Washington, DC, December 10-11, 2012
- "Navigating the Foreign Corrupt Practices Act, Export Controls and Embargoes Maze: Key Issues Facing California Businesses," with Mary Carter Andrues and Stephen Larson, FCPA/Export Controls and Economics Roundtable, Ontario, CA, October 18-19, 2012
- "US Export Regulations Regarding Communications Intercept Equipment Software and Technology," ISS World Americas 2012, Bethesda, MD, October 12, 2012
- "Export Controls and the NISPOM," with Craig King, NCMS 48th Annual Training Seminar, Orlando, FL, June 12-13, 2012
- Expeditors Global Logistics Council, Seattle, WA, May 16, 2012
- The Practicing Law Institute's Coping with US Export Controls 2011, "Treasury Department Economic Sanctions: Winds of Change Across the Globe," Washington, DC, December 2011
- "Preventing Unauthorized Technology Transfers for Offshore Outsourcing of Manufacturing, R & D and Services: Tailoring Your Contracts and Global IT Space to the Level of Controlled Technology and Third Party Risk," American Conference Institute's 6th National Forum on International Technology Transfers and Deemed Export Compliance, Washington, DC, September 2011
- "Top 10 Export Compliance Tips," NDIA's International Trade for Defense, Aerospace and Technology Companies Program, Parker, CO, September 2011
- "The Fundamentals of ITAR Compliance in Practice: Key Concepts and Requirements Under the International Traffic in Arms Regulations," C5's ITAR Compliance in Europe Conference, Munich, Germany, June 15-16, 2011
- Singapore Summit on Export Controls Compliance, Singapore, October 2010
- "Determining ITAR Export Jurisdiction: How to Obtain a Commodity Jurisdiction (CJ)," C5's 3rd Annual ITAR Compliance in Europe, Munich, Germany, June 2010
- "Dealing with Unique Export Controls Issues Affecting Manufacturing, R & D and Repair Centers Overseas," ACI's National Forum on Export Controls, Washington, DC, May 2010
- American Conference Institute's ITAR Boot Camp, Orlando, FL, October 2009
- "ITAR and Other Export Issues from a Small Business Perspective," Military and Aerospace Electronics Forum, San Diego, CA, June 2009
- American Conference Institute's ITAR Boot Camp, San Diego, CA, February 2009
- US Commercial Service's Export Controls and Compliance Workshop, Pittsburgh, PA, October 2008
- "Obtaining Deemed Export Licenses, TAAs and MLAs: Key Requirements and Exceptions," Complying with Export Controls on International Technology Transfers, San Francisco, CA, September 2008
- American Conference Institute's 3rd National Forum on Export Enforcement & Investigations, Washington, DC, January 2008

Life Beyond the Law

Kay enjoys playing euphonium in local bands (Oktoberfests a specialty), gardening, motorcycle touring, and working out at her favorite gym.

Bar Admissions

District of Columbia

New York

Court Admissions

US Court of International Trade

US Court of Appeals, District of Columbia Circuit

US Court of Appeals, Federal Circuit

US Court of Appeals, 4th Circuit