ArentFox Schiff LLP
Attorneys

Angela M. Santos

PARTNER AND CUSTOMS PRACTICE LEADER

Angela counsels clients on compliance with federal regulations involving the importation of merchandise and forced labor and leads the firm's Customs Practice, Forced Labor Task Force and co-leads the Fashion & Retail group.



Industries

Consumer Products
Fashion & Retail Law

Practices

International Trade & Investment
— Customs & Import Compliance
— Forced Labor & Global Supply Chains

International

Australia

Education

Brooklyn Law School, JD, 2010

Boston University, BS, Business Administration, International Management, Cum Laude, 2003

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Angela helps companies identify business solutions and structure their transactions to facilitate the importation of merchandise, ensure regulatory compliance, minimize duties, and eliminate Customs penalty exposure. She is especially knowledgeable in the field of fashion, consumer products, and electronics imports and has assisted many prominent brands and fashion houses. Her experience allows her to comprehensively advise fashion and retail companies on the issues specific to their industry.

Angela leads the ArentFox Schiff Task Force designed to assist clients with navigating forced labor developments and import restrictions. She helps clients identify and mitigate the risk of forced labor in their supply chains. Angela works with companies to ensure that all regulatory requirements are observed and that policies and procedures are in place to prevent the use of forced labor in the production of their products. Angela responds to Customs questionnaires and prepares petitions for the release of merchandise detained in connection with forced labor Withhold Release Orders. Angela helps clients to stay up to date on new developments, such as the Uyghur Forced Labor Prevention Act, and government enforcement measures in the space.

**Not admitted in Massachusetts. Admitted in New York and New Jersey only. Practicing under the supervision of Massachusetts Bar members.*

Client Work

Angela advises clients across a wide range of industries on the rapidly evolving tariff and trade policy landscape, providing strategic counseling on compliance, tariff mitigation, and the recovery of tariff refunds. A strong advocate on behalf of clients, she regularly engages with US government agencies and legislative stakeholders to secure tariff relief through administrative proceedings, public comment processes, and direct policymaker engagement. Angela has particular experience counseling clients, including metal fabricators, equipment industry groups, and industrial manufacturers, on Section 232 national security duties imposed on steel, copper and aluminum imports. She regularly guides manufacturers, importers, and downstream users of metals through the strategic planning necessary to manage the impact of these duties on their supply chains.

She advises clients on compliance issues involving rules governing the importation of merchandise issued by US Customs and Border Protection (Customs) and other government agencies (including the Fish and Wildlife Service, Consumer Product Safety Commission, Food and Drug Administration, Federal Trade Commission, the Department of Commerce, and the US Trade Representative). She represents importers, manufacturers, agents, Customs brokers, freight forwarders, bonded warehouses, and trading companies in various industries such as fashion, consumer products, electronics, food and drug, and cosmetics.

Angela helps clients manage Customs audits, respond to Customs inquiries and investigations, secure the release of detained or seized goods, mitigate or eliminate Customs penalties, and submit prior disclosures, where necessary. She has represented clients in False Claims Act investigations, FBI and ICE investigations, and in litigation in the Court of International Trade.

She advises clients on the development of internal import compliance programs and manuals to reduce the risk of Customs liability. Angela routinely counsels clients regarding country of origin determinations, proper marking, correct tariff classification, valuation, duty recovery, bonded warehouse applications, and duty-free store requirements. She has extensive experience in duty savings programs including Free Trade Agreements, First Sale, and Buying Agency. In addition, she assists clients in mitigating the effects of the Section 301 tariffs by obtaining successful exclusion requests and identifying alternative manufacturing scenarios and duty savings avenues. She conducts Customs due diligence for mergers and acquisitions. Angela also guides clients through the US Customs-Trade Partnership Against Terrorism application and verification process.

Previous Work

Prior to joining ArentFox Schiff, Angela was a partner at an international boutique law firm dedicated to the Customs and Trade practice. She also worked in Finance at an Energy Trading Software company prior to her legal career.

Professional Organizations

- Co-chair of the New York State Bar Association (NYSBA) International Section – Trade Committee
- Customs and International Trade Bar Association
- International Compliance Professionals Association

Publications, Presentations & Recognitions

Angela's publications include:

- "Navigating the Complexities of Forced Labor Laws," *ArentFox Schiff's 2026 Guide for Global Businesses*, February 2026
- "Navigating the Complexities of Forced Labor Laws," *ArentFox Schiff's 2025 Guide for Global Businesses*, February 2025
- "Trump, Trade and Tariffs Tariffs Tariffs! How the Second Trump Administration's Trade Policy Could Affect the Fashion and Retail Industry," *Retail Touchpoints*, December 2024
- "Navigating the Complexities of Forced Labor Laws," *ArentFox Schiff's 2024 Guide for Global Businesses*, February 2024
- "Will AI save fashion supply chains?" *Just Style*, August 2023
- "Lessons to Be Learned In Canada: Biden Administration Enforcement of the Forced Labor Provisions In the USMCA," *Customs & International Trade Newsletter*, Thomson Reuters, June 2021

Angela's presentations include:

- "Navigating the New Trade and Tariff Landscape," NYSB International Section 2026 Global Conference in Buenos Aires, October 21, 2026
- "Trade and Compliance: A Panel Discussion," Gemini Members Association, September 30, 2026
-

”Policy, Trade, Tariffs, Credits: From Solar 1 to 232 and Everything in Between ,” Solar Manufacturing USA 2026, September 22, 2026

- “Executive Order on Strengthening Customs Enforcement: What Retail Importers Need to Know,” Retail Industry Leaders of America Meeting, July 7, 2026
- “Understanding Global PV Module Supply to the US,” PV ModuleTech Conference, June 16, 2026
- “Forced Labor Enforcement Update,” American Apparel & Footwear Association Social Responsibility Committee Meeting, June 4, 2026
- ”Tariffs, Transfers, and Tensions: Valuation in a Global Trade Overview, ” ABA International Law Section’s Annual Conference, May 14, 2026
- “The Tariff Judgment - What Do German Companies Need to Know ,” The New York State Bar Association Webinar, March 13, 2026
- “US Tariff Update,” The Canadian Apparel Federation Webinar, February 25, 2026
- ”USMCA 2026 Review: Advancing North American Integration or Risking Shared Economic Decline,” American Bar Association International Law Section: The Americas Conference, January 27, 2026
- “Trade Developments,” National Retail Federation: Joint Trade / Supply Chain Committee Meeting, January 12, 2026
- “Enforcing UFLPA & the US Forced Labor Status,” American Apparel & Footwear Association Social Responsibility Committee Meeting, November 5, 2025
- “2025 Annual Members Meeting,” Gemini Shippers Association, September 18, 2025
- “VIP Executive Summit,” Sourcing at Magic Conference, August 18, 2025
- “The policy landscape for buying modules in the US in 2025,” PV ModuleTech Conference, June 17, 2025
- “The Most Beautiful Word in the Dictionary is Tariff,” American Apparel & Footwear Association’s 2025 Global Supply Chain & Trade Conference, May 7, 2025
- “Understanding the New Tariff Landscape,” Retail Industry Leaders Association International Trade & Customs Committee Meeting, May 5, 2025
- “Navigating Regulations and Compliance Under the New Administration,” United States Fashion Industry Association Webinar, February 20, 2025
- “Forced Labor Enforcement & Developments,” National Retail Federation’s Joint Trade / Supply Chain Committee Meeting, January 13, 2025
- “Foreign Migrant Workers – Global Standards / Regulations,” American Apparel & Footwear Association, November 21, 2024
- “Navigating Evolving Import Compliance in the Solar Supply Chain,” Sinovoltaics Webinar, November 19, 2024
- “Traceability Under Pressure: Compliance Risks When Transforming Supply Chains,” Sourcing Journal Fall Summit, November 12, 2024
- “Greening supply chains - new legal challenges for a sustainable exploitation of raw materials,” International Bar Association Annual Conference, September 17, 2024
- “Assessing the supply-chain dynamics for US buying in 2024 & product offerings,” PV ModuleTech Conference, May 22, 2024
- “Forced Labor and the Uyghur Forced Labor Prevention Act Update 2024,” MEMA, March 22, 2024
- “Shareholders, Board of Director And Chief Officers’ Responsibility Due to Supply Chain Operations – Best Corporate Practices ,” International Bar Association’s Supply Chain Conference, March 21, 2024
- “The Fashion Industry - A Practical Case Study for Understanding ESG, with a Focus on the Supply Chain ,” International Bar Association’s ESG Conference, February 28, 2024
- “Outlook for 2024: Politics, Trade Policy, and Customs Issues for the Fashion Industry,” United States Fashion Industry Association’s Fashion Forward Seminar, February 8, 2024
-

"Forced Labor and the Uyghur Forced Labor Prevention Act: What Automotive Companies Need to Know," Automotive Industry Action Group (AIAG) Webinar, November 21, 2023

- "Navigating US and Global supply Chain Sustainability Legislation," Xplore Sustainability Conference, November 8, 2023
- "An Update on US and Canada Forced Labor Regulations and Enforcement," National Retail Federation Webinar, October 24, 2023
- "Building an Ethical Supply Chain," Bloomberg's Sustainable Business Summit, October 5, 2023
- "Forced Labor Prevention," MEMA Sustainability Summit, August 15, 2023
- "Forced Labor and the Uyghur Forced Labor Prevention Act: What Automotive Companies Need to Know," Automotive Industry Action Group, June 21, 2023
- "How to Prepare for New Canada, Mexico, and US Forced Labor and Supply Chain Due Diligence Laws," ArentFox Schiff Webinar, June 7, 2023
- "Why You Need to Pay Attention to the Uyghur Forced Labor Prevention Act," MEMA, February 15, 2023
- "Forced Labor Compliance Update," National Retail Federation 2023: Retail's Big Show, January 16, 2023
- "Uyghur Forced Labor Prevention Act (UFLPA) What's New?" Retail Industry Leaders Association International Trade & Customs Committee Meeting, October 26, 2022
- "Uyghur Forced Labor Prevention Act- What Every Retailer Needs to Know," National Retail Federation Webinar, July 13, 2022
- "No Sector Untouched: A Conversation on the Potential Impacts of the Uyghur Forced Labor Prevention Act," Height Capital Markets Expert Conference Call, June 28, 2022
- "Are You Prepared for Uyghur Forced Labor Prevention Act (UFLPA) Implementation? ," ArentFox Schiff Webinar, June 27, 2022
- "Hot Trade Topics Affecting Your Clients," New York State Bar Association 2022 Summer Conference, June 22, 2022
- "Forced Labor and Enforcement of the Uyghur Forced Labor Prevention Act (UFLPA)," Retail Industry Leaders Association Webinar, May 24, 2022
- "Supply Chain Due Diligence is Here to Stay: What Fashion Brands Need to Know ," USFIA and ArentFox Schiff Webinar, February 16, 2022
- "Legal Issues in Ethical and Sustainable Fashion Sourcing," US-Mexico Chamber of Commerce, October 5, 2021
- "Is There Forced Labor and Trafficking in Your International Supply Chain? What International Companies Need to Know," The New York State Bar Association and ArentFox Schiff, June 16, 2021
- "Compliance and US Law," The ZHAW School of Management and Law and New York State Bar Association, May 10, 2021
- "The Legal Consequences of Supply Chain Decisions: Slavery, Trafficking, and the Changing Legal and Regulatory Obligations Affecting Corporations Operating Internationally," The Committee on Corporate Counsel of the New York State Bar Association's International Section, April 12, 2021
- "Customs and Import 101," Society for International Affairs (SIA), March 31 - April 1, 2021
- "All Things China 2020 Trade Considerations," Ocean Air, October 2020

In The News

Angela is regularly quoted by industry publications and news outlets.

- America at 250: Can the US Get the World to Join Its Forced Labor Fight?, Women's Wear Daily, July 1, 2026
- US Companies Shamed by Trump Tiptoe Into Tariff-Refund Race, Bloomberg, May 23, 2026
- Fashion Confronts the Realities of Tariff Refunds, Vogue Business, May 11, 2026
-

How Fashion Is Getting Tariff Refunds, Vogue Business, April 7, 2026

- Fashion's New Trade Reality, Vogue Business, February 23, 2026
- How Brands Can Navigate Tariff Unpredictability in 2026, Vogue Business, January 22, 2026
- Trump Signals Imminent Supreme Court Appeal to Protect Tariffs, The New York Times, September 2, 2025
- Navigating US module procurement in uncertain times, PV Tech, June 13, 2025
- As Trump's tariffs face legal challenge, here are some of his other trade policy options, CBS News, May 30, 2025
- De Minimis Ban Alters Fate of 1.4 Billion Packages Annually, Sourcing Journal, April 5, 2025
- How a global trade war could rewire the way fashion operates, Vogue Business, March 10, 2025
- U.S.-China trade war hits small and midsize businesses especially hard, The Washington Post, February 11, 2025
- De minimis disrupted: The fallout for fashion, Vogue Business, February 10, 2025
- Trump Tariff Exemptions Uncertain as Companies Seek Safety Valve, Bloomberg Law, February 6, 2025
- How US tariffs would hit beauty, Vogue Business, January 20, 2025
- Low Prices, Human Costs: Has Online Retail Crippled the Ethical Supply Chain?, SupplyChainBrain, June 26, 2024
- Washington's Xinjiang Fix, The Wire China, December 31, 2023
- Mexico, Canada Not as Aggressive on Forced Labor Bans, but Expect More, Lawyers Say, International Trade Today, June 7, 2023
- Feds seize nearly $1 billion in goods tied to forced labor, CNBC, April 17, 2023
- Is Canada About To Get Another Forced Labor Law?, Sourcing Journal, January 27, 2023
- What Retail Really Wants from the Uyghur Bill: "You Really Have to Guess What the Issue Is", Sourcing Journal, March 11, 2022
- What Jane Fonda Really Thinks of New York's Fashion Act, Sourcing Journal, February 22, 2022
- As Forced Labor Scrutiny Grows, Industry Needs to React, Sourcing Journal, January 2022
- The Uyghur Forced Labor Prevention Act is Law. Now What?, Sourcing Journal, December 23, 2021
- Canada Seizes First Shipment Over Forced-Labor Suspicions, Sourcing Journal, November 18, 2021
- Textile & Apparel Industry Targeted by Financial Crime, World Textile Information Network, September 20, 2021
- U.S. Steps Up Enforcement on Apparel Imports Over Forced Labor in Xinjiang, WWD, July 7, 2021
- CBP Not Inclined to Release List of Suppliers Using Forced Labor Under Regional WROs, International Trade Today, June 17, 2021
- Arent Fox Establishes Team to Address Forced Labor Risks, Assess Supply Chains, International Trade Today, May 13, 2021

Bar Admissions

New Jersey
New York

Court Admissions

US Court of International Trade