

Judith Alison Lee

Partner

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Washington, D.C.

Judith Alison Lee is a partner in the Washington, D.C. office. Ms. Lee practices in the areas of international trade regulation, including USA Patriot Act compliance, Foreign Corrupt Practices Act, economic sanctions and embargoes, export controls and CFIUS. Ms. Lee also advises on issues relating to virtual and digital currencies, blockchain technologies and distributed cryptolegders.

Ms. Lee was selected by *Chambers Global: The World's Leading Lawyers for Business* as an international leading lawyer for USA International Trade: Export Controls and Economic Sanctions from 2016 – 2024. *Chambers and Partners* also selected Ms. Lee as a Leading International Trade Lawyer in 2007 – 2024 in its *Chambers USA: America's Leading Lawyers for Business Guide* and she is listed in the *Best Lawyers in America®* guides for 2006 – 2024 for International Trade and Finance Law. She is included in *The International Who's Who of Trade and Customs Lawyers* for 2009 – 2013, *The International Who's Who of Business Lawyers 2012*, and *Who's Who Legal Thought Leaders: USA 2024* guide. Ms. Lee is included in *Euromoney's 2018 and 2020 Best of the Best USA Expert Guides* as one of the world's top 30 practitioners of international trade law, as well as in their 2007 and 2008 "Guide to the World's Leading International Trade Lawyers," U.S. Section. In 2006, Ms. Lee was named by the *Washington Business Journal* as one of the Best Lawyers in the Washington, D.C. area for International Trade and Finance Law and has been named continually over the years by *The Washington Post* as one of Washington D.C.'s *Super Lawyers*, and by *Washington Post Magazine* in 2014 as a Top Attorney. Ms. Lee was chosen by the Ethisphere Institute as one of two of the 2013 "Attorneys Who Matter" in the field of Trade/Export Compliance, on the basis of counsel "who are best prepared to handle any issue around their particular specialty." As well, she has won individual awards for Blockchain Technology Sector Lawyer of the Year in Washington, DC for the last seven years, *Corporate USA Today* and *Global 100*, and in 2021 from *Legal 100*. She also won these awards from a number of other publications including *M&A Today*, *Corporate International Magazine*, and *Global Law Experts*. Most recently, Ms. Lee was recognized by *Foreign Investment Watch* in its "Top Advisors 2023" list of leading global CFIUS experts.

Ms. Lee is a member of *Law360's* International Trade Editorial Advisory Board. She is also a 2019 member of the Editorial Committee for *Financier Worldwide Magazine*. In addition, she was a member of the 2018 Conference Advisory Board of the American Conference Institute, and she previously served on the Export Controls Advisory Board for ACI. Ms. Lee served as a Chair of the International Sales Subcommittee on Export Controls, Sanctions and Anti-Corruption of the International Bar Association and currently serves as an officer of the IBA's International Sales Committee. Ms. Lee is the past Co-Chair of the American Bar Association's Committee on Export Controls and Embargoes, and is a past chair of the American Bar Association Customs Law Committee. Ms. Lee was appointed by the Chief Judge of the Court of International Trade to that court's Rules Advisory Committee and Jurisdiction Committee. She is also a past member of the Board of Directors of the Customs and International Trade Bar Association. Ms. Lee is a member of



Capabilities

International Trade
Administrative Law and Regulatory Practice
National Security

Credentials

Education

College of William & Mary - 1987 Juris Doctor
Mount Holyoke College - 1984 Bachelor of Arts

Admissions

Virginia Bar
District of Columbia Bar

the Bars of Virginia and the District of Columbia. Ms. Lee received her law degree in 1987 from the Marshall-Wythe School of Law at the College of William and Mary and her bachelor of arts in 1984 from Mount Holyoke College, where she studied Chinese and politics. In 1983 and 1984, she attended Donghai University in Taiwan, where she studied Chinese language, culture and politics. Ms. Lee is an enrolled member of the Choctaw Nation of Oklahoma. She is a member of Gibson, Dunn & Crutcher's Diversity Committee, and was one of 10 appointed members of the ABA's Coalition on Racial and Ethnic Justice.

Selected Speaking Engagements:

- Webcast interview by T. Rowe (Reuters Legal News), *NewsExposure.com*, Report on the impact of US- and EU-imposed sanctions on Russia from the perspective of attorneys serving corporate clients affected by sanctions and countermeasures, May 26, 2022.
- Panelist on Gibson Dunn Webcast, "New U.S. Export Controls on Military End Use and End Users in China: How Do They Affect Chinese Companies and Their Customers/Suppliers?" July 16, 2020.
- Moderator for Thomson Reuters Supply Chain Digitization Conference on the panel, "Flash-Forward: Opportunity & Transformation Around the Digital Supply Chain," May 19, 2020.
- Speaker at Financier Worldwide's [roundtable](#) on sanctions and compliance enforcement, March 2020, Washington, D.C.
- Speaker at Consumer Brands Association's panel, "Tariffs, Trade Deals, and Changing Rules: An Update on the Landscape of International Trade," February 26, 2020, Rancho Mirage, CA
- Moderator for Regulators Panel at ACI Financial Crime Executive Roundtable on the topic, "Government Regulators Weigh In on Financial Crime Enforcement," September 30, 2019.
- Appearance on [BNN Bloomberg](#), "Can Trump order American companies to leave China? Trade lawyer says yes." August 27, 2019.
- Appearance on [Wisconsin Public Radio](#), "Can President Trump Bar American Companies From Doing Business in China?" August 26, 2019
- Appearance on [CNBC](#) concerning Presidential authority and trade war with China. August 26, 2019.
- Speaker on [podcast](#) for The Compliance and Ethics Blog on the topic of "The New OFAC Compliance Guidance," July 23, 2019.
- Speaker at ACI's DC Flagship Economic Sanctions Enforcement and Compliance Conference for the "Women in International Trade and Compliance Networking Session," May 3, 2019, Washington, DC.
- Speaker on panel at American Conference Institute's National Forum on Insurance Regulation, "OFAC Compliance Update: The Latest Developments and Enforcements, Keeping in Line with Heightened Regulation and Avoiding Costly Economic Sanctions," March 12, 2019, New York.
- Speaker at Financier Worldwide's [roundtable](#) on sanctions compliance and enforcement, March 2019, Washington, DC.
- Appearance on online news clip concerning sanctions on Russia and the Trump Administration, for [Newsy](#), July 13, 2018.
- Speaker at ACI's Hong Kong Summit on Economic Sanctions Compliance and Enforcement on the panel, "What is Permissible and How to Minimize Risks," May 30, 2018, Hong Kong.
- Speaker at ABA's 2018 Blockchain Technology, Digital Currency and ICO National Institute on the panel, "Blockchain Innovation and Opportunity," April 27,

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2018, New York.

- Speaker at ACI's 11th Flagship Conference on Economic Sanctions Enforcement and Compliance on the panel, "Expanded Role of Congress: How CAATSA Will Participate in Future Economic Sanctions Regulations," April 25, 2018, Washington, DC.
- Speaker at German-American Lawyers' Association's Annual M&A Practice Group Conference on the panel covering CFIUS and latest developments of US investment control regulations, including the recently proposed U.S. Foreign Investment Risk Review Modernization Act (FIRRMA), Frankfurt, Germany, March 2, 2018.
- Speaker on podcast for Thomson Reuters on the topic, "The Technology of Blockchain & Cryptocurrencies," Feb. 13, 2018.
- Speaker at ACI's NY Forum on Economic Sanctions on the panel, "Are Companies Revising Their Strategy in Light of the Trump Administration Trade Policy Priorities?," Dec. 5, 2017, New York.
- Speaker at HalfMoon Education Inc.'s conference on "Bitcoin and Other Cryptocurrencies: Bitcoin as a Payment Method," Arlington, VA, November 16, 2017.
- Speaker at seminar hosted by Association of Certified Anti-Money Laundering Specialists (ACAMS), VA Chapter, on "Personal Liability: Understanding the Risk and Deploying a Sound Mitigation Strategy," Oct. 23, 2017, Williamsburg, VA.
- Presider for Council on Foreign Relations Roundtable on "Economic Sanctions Under the Trump Administration," May 11, 2017, Washington DC.
- Speaker at ACI's AML & OFAC Compliance for the Insurance Industry conference, on the panel "OFAC Enforcement Case Studies, Jan. 19, 2017, New York.
- Speaker on panel for International Law Seminars' Technology Law Conference on the topic, "Anticipating Issues Arising from New Applications and Technologies: The Implications of Blockchain Technologies and Distributed Cryptolegders," Dec. 2, 2016, Seattle WA.
- Speaker at American Conference Institute's National Export Controls Forum on Technology Transfers, Cloud Computing & Deemed Exports, on the topic, "Technology Transfers, Deemed Exports and Economic Sanctions: What Should Be Keeping You Up at Night?," October 18, 2016, Washington, DC.
- Preside at Council on Foreign Relations Corporate Roundtable Program on topic, "Doing Business in Iran," May 12, 2016, Washington, DC.
- Speaker at American Conference Institute's *Emerging Payment Systems* conference on the topic, "Digital, Virtual, and Crypto Currencies: Assessing and Overcoming the Regulatory and Compliance Challenges Relating to Bitcoin and Its Brethren, and Evaluating the Long-Term Viability of Such Currencies," March 31, 2016, Chicago.
- Speaker at American Conference Institute's *AML & OFAC Compliance for the Insurance Industry*, on the panel, "Developing and Implementing Best Practices to Avoid Sanctionable Activity," January 20, 2016, New York.
- Speaker at PLI's annual *Coping with U.S. Export Controls*, on the panel, "The Sanctions Landscape: Update and Prospects," December 17, 2015.
- Speaker at American Conference Institute's *Advanced Legal, Regulatory, and Compliance Forum on Cross-Border Global Payments and Technologies*, on the panel, "AML/OFAC Restrictions with Cross-Border Payments: Avoiding Regulatory Scrutiny by Strengthening Your Compliance Program, Establishing an Effective Know Your Customer Program, and a Closer Look at the Growth of Personal Liability Enforcement Actions Against Compliance Professionals," November 20, 2015.

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- Speaker on panel at American Conference Institute's National Forum on Crypto, Virtual & Digital Currency and Payment Systems, "Money Laundering, AML, and OFAC Considerations for Crypto, Virtual and Digital Currencies," June 25, 2015.
- Moderator for panel at American Conference Institute's National Forum on Prepaid Card Compliance, "Federal Regulatory and Enforcement Insights on Evolving Initiatives in the Prepaid Card Industry," May 28, 2015.
- Speaker at American Conference Institute's AML & OFAC Compliance for the Insurance Industry on the topic, "Ensuring Compliance and Avoiding Sanctions in an Uncertain and Shifting Landscape regarding Russia, Iran, and Other Known and Potential Hotspots," January 20, 2015, New York.
- Speaker at American Conference Institute's Economic Sanctions Boot Camp on the topic, "Beyond the Looking Glass: When You Should Block a Transaction, Terminate a Relationship or Look Back to Review Previously Processed Transactions," December 3, 2014, New York.
- Moderator for panel at American Conference Institute's Forum on Virtual & Digital Currency and Payment Systems on the topic, "Lessons Learned from Recent Law Enforcement Actions," November 20, 2014, New York.
- Speaker at ACI's Prepaid Card Conference on the topic, "Given How AML and OFAC Laws Are Trending, How Do Banks, MSBs and Other Financial Institutions Develop, Implement and Maintain an Effective AML and OFAC Compliant Prepaid Card Program in Today's Landscape?," October 6, 2014, Chicago.
- Speaker at Anti-Money Laundering Enforcement Roundtable at American Conference Institute's AML and Reinsurance Conference, July 29, 2014, New York.
- Speaker at ACI's Virtual Currency Conference on the topic, "Developing Federal Legal and Regulatory Framework Governing Digital & Virtual Currency Landscape," June 24, 2014, Chicago.
- Speaker at ACI's Advanced Forum on *Economic Sanctions Enforcement & Compliance*, on the topic "When and How to Submit Voluntary Disclosures: Review of Recent Settlements Arising after a Voluntary Disclosure was Made," May 1, 2014.
- Speaker at ACI's 9th National Forum on Prepaid Card Compliance on the topic, "Given How AML and OFAC Laws are Trending, How do Banks, MSBs and Other Financial Institutions Develop, Implement and Maintain an Effective AML and OFAC Compliant Prepaid Card Program," January 30, 2014, Washington, DC.
- Speaker at ACI's 4th Annual Forum on AML & OFAC Compliance for the Insurance Industry on the topic, "Complying with Iranian Sanctions at Both the State and Federal Levels," January 21, 2014, New York.
- Speaker at American Conference Institute's Asia Summit on Economic Sanctions Compliance and Enforcement, speaking on the "Explosion of US Sanctions Enforcement Against Foreign Entities and Individuals," December 5, 2013, Singapore.
- Speaker on panel discussion co-hosted by the Women's Bar Association of DC and the Customs Lawyers Association on: "Importing Copyrighted Works from Abroad in the Shadow of *Kirtsaeng v. John Wiley & Sons*," October 1, 2013, Washington, DC.

Publications

- Lee, Judith A., Smith, Adam M., Handler, Stephenie G., Syarief, Audi, Sewall, Samantha, "United States Expands Sanctions Authorization of Internet-Based Activities in Wake of Protests in Iran," NYU School of Law's Compliance & Enforcement blog, September 2022.
- Lee, Judith A., "Collateral Damage - US sanctions target the secondary market in

Russian stocks and bonds," *Financier Worldwide*, September 2022.

- Lee, Judith A., Malevanny, Nikita, Yi, Claire, "[Russia strikes back – countersanctions](#)," *Financier Worldwide*, June 2022
- Interviewed for "Russian roulette: the sanctions-compliance challenge," Cover Story, *Financier Worldwide Magazine*, June 2022
- Interviewed by D. Zhang (Gartner), "As Sanctions Go Global, Compliance Gets Complicated," *Gartner Business Quarterly*, May 2022
- Lee, Judith A., "Navigating Russia Sanctions Complexity," *Financier Worldwide*, December 2021
- Profiled in *Financier Worldwide*, "International Trade & Sanctions Power Players – Distinguished Advisors," November 2020 & December 2021
- Lee, Judith A., "[The digitising of central bank currencies among the major economies — the current landscape](#)," *Financier Worldwide*, September 2021
- Lee, Judith A., Syarief, Audi, Yi, Claire, "[United States sanctions against Myanmar's military conglomerates](#)," *Financier Worldwide* June 2021
- Lee, Judith A., and Davis, Candis L., "U.S. Moves to Secure the Bulk-Power System Against, 'Foreign Adversary' Threats," *Financier Worldwide*, December 2020
- Lee, Judith A., "Sanctions: Magnitsky Legislation and Tackling Human Rights Violations," *Risk & Compliance*, November 2020
- Profiled in *Financier Worldwide*, "International Trade & Sanctions Power Players – Distinguished Advisors," November 2020 & December 2021
- Lee, Judith A., Timura, Christopher, Pratt, R.L., Toussaint, Scott, "U.S. Export Controls: The Future of Disruptive Technologies," *NATO Legal Gazette*, Issue 41, October 2020
- Lee, Judith A., "Final CFIUS regulations come into effect: mandatory filing requirements," *Financier Worldwide*, April 2020
- Quoted in [NK Pro](#) article entitled, "Photos of Air China refueling in Pyongyang raise questions about supply-lines," December 16, 2019
- Lee, Judith A., Pratt, R.L., "Trump administration using a variety of measures to target Chinese tech companies," *Financier Worldwide Magazine*, October 2019
- Quoted in [New York Times](#) article entitled, "Trump Asserts He Can Force U.S. Companies to Leave China." August 24, 2019
- Quoted in [New York Times](#) article entitled, "Trump Ordered U.S. Companies to Leave China. Is That Possible?" August 24, 2019
- Lee, Judith A., Smith, Adam M., Roeder, Richard W., "[Gibson Dunn Discusses New EU Sanctions Framework Aimed at Cyber-Attack Threats](#)," *The Columbia Law School's Blog on Corporations and the Capital Markets*, June 25, 2019
- Lee, Judith A., Fernandez, Jose W., Timura, Christopher T., Connor, Stephanie L., Pratt, R.L., 'CFIUS Reform,' *Briefing Papers Second Series*, Thomson Reuters, October 2018
- Lee, Judith A., Mini-Roundtable, "Managing and Resolving Export and Import Disputes," *Corporate Disputes*, Oct-Dec. 2018
- Lee, Judith A., "Risk Management in the Cryptosphere: A Talk with Gibson Dunn's Judith Alison Lee," *Thomson Reuters*, September 2018
- Lee, Judith A., "Technology and Data Analysis for Global Sanctions Compliance," *Risk & Compliance*, July-Sept. 2018
- Lee, Judith A., "US-Government Committee CFIUS Could Become Even More Influential," *Börsen-Zeitung*, February 2018

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- Lee, Judith A., "Blockchain 101," "Blockchain and Distributive Technology-Legal Landscape," and "Non-Financial Applications for Distributed Ledger Technology," *Thomson Reuters*, June 2017
- Lee, Judith A., "Iran Sanctions Developments," *Financier Worldwide*, April 2017
- Lee, Judith A., Smith, Adam M., Spragens, Taylor J., Choy, Marisa S., "Gibson Dunn Discusses Trade Under Trump," *The CLS Blue Sky Blog*, December 2016
- Lee, Judith A., Steiner, Jeff, McKenzie, Dustin, "Legal Implications of Expanded Use of Blockchain Technology," *Financier Worldwide*, November 2016
- Lee, Judith A., Lance, Andrew A., Rudnick, Amy G., Connor, Stephanie L., Sherwood, Scott A., "Do Not Pass Go, Do Not Collect \$200: FinCEN Imposes Temporary Reporting Requirements on Title Insurance Companies for All Cash Luxury Real Estate Transactions in Manhattan and Miami," *The Real Estate Finance Journal*, *Thomson Reuters*, April 2016
- Lee, Judith A., Smith, Adam M., Aryanpour, Mehrnoosh, "Substantial Easing of Iran Sanctions Alongside Continued Limitations and Risks," *Financier Worldwide*, March 2016
- Lee, Judith A., West, Joseph D., Fernandez, Jose W., Farr, Andrea F., Handler, Stephenie, "A Dealmaker's Guide To National Security Implications Of Foreign Investment In U.S. Government Contractors," *Briefing Papers Second Series*, *Thomson Reuters*, June 2015
- Lee, Judith A., Long, Arthur, Southwell, Alexander, Steiner, Jeffrey, Handler, Stephenie, Wood, Zachary, "BitLicense Regulations Create Groundbreaking Hurdles," *Law360*, June 2015
- Lee, Judith A., Yan, Annie, "US Government Implements Historic Changes to Cuba Sanctions Regime," *Risk & Compliance*, April-June 2015
- Lee, Judith A., Southwell, Alexander H., Fernandez, Jose W., Handler, Stephenie G., Lorber, Eric, "Cybersecurity Sanctions: A Powerful New Tool," *Law360*, April 2015
- Lee, Judith A., Long, Arthur S., Steiner, Jeffrey L., Handler, Stephenie G., Wood, Zachary, "Blockchain Technology and Legal Implications of 'Crypto 2.0'," *The Bureau of National Affairs, Inc.*, March 2015
- Lee, Judith A., Long, Arthur S., McRae, Marcellus, Steiner, Jeffrey L., Handler, Stephenie G., "Bitcoin Basics: A Primer on Virtual Currencies," *Business Law International*, January 2015
- Lee, Judith A., West, Joseph D., Fernandez, Jose W., Yan, Annie, Gleich, Sarah B., "National Security Implications of Foreign Investment in U.S. Government Contractors/ Edition II," *Briefing Papers Second Series*, West Group - Thomson Reuters, March 2014
- Lee, Judith A., 'Bitcoin arrest shows risk of virtual currency,' *Los Angeles Daily Journal*, February 3, 2014.