

# STEVEN C. EMME

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## PROFESSIONAL EXPERIENCE

### **Akin Gump Strauss Hauer & Feld - Washington, DC**

*Senior Counsel*

(Jan. 2017 - Present)

Counsel clients on compliance with U.S. export controls and sanctions, including the Export Administration Regulations, International Traffic in Arms Regulations, and regulations administered by the Office of Foreign Assets Control

- Advise clients, particularly in the semiconductor industry, on the evolving export control restrictions related to China, including controls related to Huawei and other sanctioned entities, military end users, and Hong Kong
- Manage firm's preparation and submission of license applications involving Huawei, which includes overseeing associates and paralegals handling dozens of applications valued at over \$40 billion
- Provide guidance on potential controls on emerging and foundational technologies
- Review products for potential critical technology to address mandatory filing requirements for inbound investment with the Committee on Foreign Investment in the United States
- Conduct export control investigations and draft voluntary disclosures to the Departments of Commerce and State
- Assisted client in managing its U.S. export control compliance operations by traveling to client site and meeting with legal, contracts, procurement, logistics, supply chain, human resources, information technology, and finance teams
- Construct export compliance policies and procedures
- Assist companies with compliance with Department of State consent agreements
- Analyze product and technology jurisdiction and classifications under export controls, including encryption reviews
- Conduct training on export control compliance and international trade topics
- Conduct international trade due diligence for mergers and acquisitions

### **U.S. Department of Commerce, Bureau of Industry and Security - Washington, DC**

*Senior Advisor to the Assistant Secretary for Export Administration*

(Dec. 2011 - Jan. 2017)

Supported the creation and implementation of the Obama Administration's Export Control Reform (ECR) initiative

- Co-drafted regulations implementing ECR, including initial framework and implementation rule and various U.S. Munitions List category rules; participated in interagency ECR Task Force
- Managed agency's participation in the Office of Inspector General's review of ECR preparedness, which included reviewing draft responses to questions, handling employee interviews, and overseeing compilation of data responsive to requests
- Developed agency's outreach and educational materials on ECR; provided responses for and briefed various stakeholders on ECR, including other U.S. government agencies, foreign governments, congressional staffers, academic organizations, and private sector groups
- Reviewed and argued agency positions on escalated commodity jurisdiction cases before the Department of State; reviewed commodity classification appeals and draft agency determinations

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- Led agency effort to overhaul support document requirements for license applications, including drafting proposed and final rules
- Reviewed and provided comments on a number of Department of Commerce, State, and Justice draft regulations revising the Export Administration Regulations, International Traffic in Arms Regulations, and U.S. Munitions Import List, respectively; reviewed and provided comments on Department of State draft responses to General Correspondence requests and State Department website guidance
- Reviewed draft talking points, remarks, and congressional testimony for the Under Secretary and Assistant Secretary; participated in government and private sector outreach events on export controls
- Reviewed draft provisions of international trade agreements

### **Baker Hostetler, LLP** - Houston, TX

*Associate Attorney, International Trade Group*

(Mar. 2009 - Dec. 2011)

Counseled clients on compliance with U.S. export controls, sanctions, and import requirements

- Conducted internal reviews on export compliance and drafted voluntary disclosures to the Departments of Commerce, State, and Treasury
- Assisted organizations in classifying items under the Commerce Control List and U.S. Munitions List
- Drafted commodity jurisdiction and classification requests to the Departments of State and Commerce, respectively
- Crafted and modified trade compliance programs; trained organization employees on understanding and complying with exports controls and sanctions
- Researched issues related to import laws and regulations, such as classifications, country of origin, and marking requirements
- Drafted petitions to Customs and Border Protection regarding import issues

### **U.S. Department of Commerce, Bureau of Industry and Security** - Washington, DC

*Export Policy Analyst, Regulatory Policy Division*

(Jan. 2007 - Mar. 2009)

Drafted regulations and advisory opinions amending and interpreting the Export Administration Regulations

- Drafted original advisory opinion analyzing export control requirements for cloud computing
- Drafted regulatory initiative under National Security Presidential Directive 55 to establish intra-company license exception
- Served as agency contact for deemed export questions and policy reforms
- Coordinated and negotiated clearance of regulations with the Departments of Defense and State
- Participated in formulating agency response to National Academies report on national security controls on science and technology
- Advised Department of Defense on amending Defense Federal Acquisition Regulation Supplement
- Spoke at seminars across the country on U.S. export control laws

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**Lucie, Scalf & Bougher** - Macomb, IL

*Associate Attorney*

(Jan. 2006 - Nov. 2006)

- Counseled local government units on complying with state requirements on raising tax revenue
- Conducted real estate transactions and represented landlords and tenants in property disputes
- Researched legal issues and drafted complaints, motions, resolutions, bylaws, and contract provisions

## **EDUCATION AND BAR ADMISSIONS**

**University of Minnesota Law School** - Minneapolis, MN

J.D., *cum laude*, 2005; Honors in Legal Writing

Studied at Uppsala University Faculty of Law in Uppsala, Sweden

**University of Illinois** - Urbana-Champaign, IL

B.S. in Economics and Minor in International Studies, *with Highest Honors*, 2002

University Honors/Bronze Tablet ■ Mead Family Endowed Scholar ■ Chancellor's Scholar

Studied at Nevsky Institute of Language and Culture in St. Petersburg, Russia

## **Admitted to Practice Law**

Washington, DC

Texas (Inactive)

Illinois (Inactive)