



MEGAN A. GAJEWSKI BARNHILL

Partner

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BIOGRAPHY

Megan Gajewski Barnhill counsels foreign and domestic clients on regulatory matters related to international business transactions. Specifically, Ms. Barnhill advises clients on regulatory issues related to international trade, including U.S. export controls, trade sanctions, antiboycott, and registration and reporting under the Foreign Agents Registration Act (FARA).

Ms. Barnhill regularly advises clients on issues related to U.S. export controls administered by the Department of State, Directorate of Defense Trade Controls, and the Department of Commerce, Bureau of Industry and Security. Ms. Barnhill has experience conducting due diligence reviews and compliance audits, drafting comprehensive compliance programs, drafting license and agreement applications, preparing commodity jurisdiction and classification requests, preparing voluntary disclosures, responding to government requests for information and administrative subpoenas, and assisting in day-to-day compliance with the International Traffic in Arms Regulations (ITAR), Export

Administration Regulations (EAR) and with export controls on nuclear activities and materials administered by the Department of Energy and the Nuclear Regulatory Commission.

In addition, Ms. Barnhill counsels clients on issues related to trade sanctions administered by the Department of the Treasury, Office of Foreign Assets Control (OFAC), including sanctions programs related to countries (e.g., Iran, Syria and Cuba) and against individuals and entities. Ms. Barnhill has assisted clients in preparing license applications and in responding to administrative subpoenas related to trade sanctions issues. She also advises clients on compliance with the antiboycott provisions administered by the Department of Commerce and the Department of the Treasury on companies' and individuals' registration and reporting obligations under the FARA.

Ms. Barnhill was a contributing author to [Financial Regulation: Emerging Themes in 2020](#) – an extensive collection of articles around the themes of supervision, governance, financial crime and investigations and digital.

AREAS OF FOCUS

- Data Centers & Digital Infrastructure

PROFESSIONAL AFFILIATIONS

- Virginia State Bar, International Practice Section, Board of Governors, Chair 2016-2020

COMMITTEE CONTENT

- Recruiting Committee

ADMISSIONS

- District of Columbia, 2009
- Virginia, 2008

EDUCATION

American University, J.D., *cum laude*, 2008

RELATED CAPABILITIES

- International Trade
- Securities Litigation and Enforcement
- Public Policy & Government Affairs
- National Security
- Aviation, Aerospace & Defense
- Corporate
- Investigations
- Litigation & Dispute Resolution
- Regulation, Compliance & Advisory
- ESG Governance, Compliance and Reporting
- Real Estate
- Oil, Gas & Sustainable Fuels
- Antitrust

RESOURCES

PUBLICATIONS

- "Sanctions and Anti-Corruption Enforcement in 2017: Lessons for the Pharma Industry in 2018 and Beyond," Bloomberg BNA, March 28, 2018
- "Does Your Risk Management Strategy Address U.S. Sanctions?," *Association for Financial Professionals*, Mar. 12, 2018
- Contributor, "Keep up with US economic sanctions," *Supply Management*, January 18, 2018
- "Roundtable: Sanctions Compliance & Enforcement," *Financial Worldwide Magazine*, March 2016 (Panelist)
- Contributor, *World Trade Controls Blog*, initiated by the International Chamber of Commerce, Belgium and Federation of Enterprises, Belgium
- "International Trade Due Diligence: Protecting the Value of Your Transaction," *Virginia Lawyer*, Vol. 61, April 2013 (co-authored with Susan Kovarovics, Michael Mellen and Christina Zanette)

SPEAKING ENGAGEMENTS

- Co-Presenter, "Managing EU/US Trade Controls During the Pandemic," ICC Webinar, June 17, 2020
- Co-Presenter, "Managing Your Risks: Considerations in this Global World," BCLP Phoenix In House Counsel Seminar, June 7, 2018
- Co-Presenter, "The Inter-play Between Sanctions and Anti-Corruption Compliance: Do Your Compliance Programs Work Together to Address Risks?" Webinar, May 8, 2018
- Co-Presenter, "When Your Partner/Subsidiary Does Not Prioritize Sanctions: How to Get Buy-in from your Non-U.S. Business Partners," ACI 11th Flagship Conference on Economic Sanctions Enforcement & Compliance, Washington, DC., April 26, 2018
- "Regulatory Risks of Doing Business with the United States: What You Need to Know," London, Nov. 6, 2017; Hamburg, Nov. 7, 2018; Frankfurt, Nov. 8, 2017
- Co-Presenter, "Export Control Reform Transition is Ending . . . Are You Ready?" Export Compliance Training Institute, November 12, 2015
- Co-Presenter, "Don't Be RWA'ed: Get Your Licensing Right the First Time," Export Compliance Training Institute, December 10, 2014
- Panelist, "Doing Business with the EU: What Virginia Companies and Their Lawyers Need to Know," June 25, 2014, Virginia CLE

RELATED INSIGHTS

News

Apr 24, 2025

BCLP Advises AMMO, Inc. on Sale of Manufacturing Assets to Leading Ammunition Maker Olin Winchester

Blog Post

Apr 08, 2025

How Should Companies Update Risk Factors and MD&A During a Global Trade War?

News

Apr 03, 2025

BCLP advises Terrestrial Energy Inc. in Milestone move to become first publicly traded molten salt nuclear reactor developer

Blog Post

Feb 11, 2025

Trump Issues Executive Order Freezing FCPA Enforcement and Investigations for 180 Days

News

Jan 02, 2025

BCLP Advises VOXX International Corporation on \$196 Million Sale to Gentex Corporation

News

May 30, 2024

BCLP White Collar Team obtains unprecedented resolution for Merck KGaA subsidiary

News

Jan 11, 2024

BCLP Guides TeleGuam Holdings on \$200 Million Strategic Investment Deal

Insights

Jun 16, 2023

Key takeaways from the United States - Australia Climate, Critical Minerals and Clean Energy Compact

News

Jun 14, 2023

Cross-firm BCLP team advises Wireless Telecom Group in merger with Maury Microwave