



## **ALEXIS EARLY**

Partner Washington

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### **BIOGRAPHY**

Alexis Early helps clients navigate complex business challenges related to the cross-border flow of goods, software, technology, funds, and investment capital. She counsels clients on sanctions, export controls, anti-money laundering, and Committee on Foreign Investment in the United States (CFIUS) matters. Her 360-degree guidance considers legal, regulatory, policy, and political risk factors while providing business-friendly solutions.

Clients state that she "has prioritized a deep understanding of our business, including its many nuances and complexities and uses that knowledge to deliver risk-based advice tailored to our commercial reality." (Chambers USA)

Alexis advises US and foreign-based multinational clients in information technology/telecom, financial services and insurance, energy and infrastructure, aerospace and defense, emerging

technologies, food and agriculture, shipping and logistics, and education/humanitarian sectors across a broad range of transactions, including:

- Transactional: Represents US target companies, investors and strategic buyers, and US and foreign funds in a range of transactions, including fund formation, venture capital and private equity, and strategic and public company M&A. Conducts diligence, advises clients on structuring deals to mitigate regulatory risk, and navigates regulatory processes, including CFIUS reviews of inbound foreign investment, CFIUS and foreign ownership control and influence (FOCI) mitigation negotiations, and outbound investment screening.
- Compliance: Advises US and foreign clients on the development, implementation, and
  maintenance of international trade compliance under export controls (Export Administration
  Regulations and the International Traffic in Arms Regulations), economic sanctions (Office of
  Foreign Assets Control, State Department, and United Nations), antiboycott regulations, and
  anti-money laundering and counter-financing of terrorism regimes (Financial Crimes
  Enforcement Network).
- **Enforcement**: Conducts sensitive internal assessments of US and foreign companies and financial institutions, provides licensing guidance, assists clients in the preparation and submission of voluntary and directed disclosures, and engages in penalty negotiations with US government agencies.
- Public Policy: Collaborates with clients, trade associations, and industry leaders to engage in
  dialogue with government officials, draft legislation, propose regulatory solutions, and
  advance adoption by the Executive Branch and Congress. Experience advising foreign
  sovereigns and private sector entities and implementing strategic advocacy campaigns
  related to international trade and multilateral trade agreements, defense cooperation, energy
  security, foreign assistance, and immigration.
- Multijurisdictional Coordination: Leads and coordinates multi-country teams that provide
  multijurisdictional guidance to clients, such as advocating to US, UK, and EU authorities to
  harmonize aspects of their Russia sanctions regulations and advising clients on other
  countries' CFIUS-style multijurisdictional foreign direct investment (FDI) reviews triggered by
  multi-country deals.

#### CIVIC INVOLVEMENT & HONORS

- Chambers USA, International Trade: CFIUS Experts
- Chambers Global, International Trade: CFIUS Up & Coming

- Legal 500, International Trade & National Security: CFIUS Next Generation Partner
- Washington Business Journal "40 Under 40"
- Washingtonian DC's Top Lawyers: National Security
- American Bar Association, Business Law Fellow
- Leadership Council on Legal Diversity, Pathfinder

Alexis is a co-founder of Women in CFIUS. Her insights regularly appear in *The Wall Street Journal, The Financial Times, Reuters, The Washington Post*, and other major publications. She serves on the Wellesley Business Leadership Council, the Washington College of Law Advisory Council on Business Law, and as a director of SMYAL, DC's largest organization supporting LGBTQ youth. She has volunteered as an elections monitor in the United States and internationally and advises clients and pro bono partners on the rule of law, human rights, and LGBTQ issues. In law school, Alexis was the founding Editor-in-Chief of American University's *Business Law Review*, the first comprehensive business law journal in Washington, DC.

#### PROFESSIONAL AFFILIATIONS

- American Bar Association, Business Law Section
- LGBTQ+ Bar Association

#### **ADMISSIONS**

- District of Columbia, 2013
- New York, 2012

#### **EDUCATION**

- American University, J.D., 2011
- Wellesley College, B.A., with distinction, 2005

#### RELATED CAPABILITIES

- Aerospace & Defense
- Corporate
- Energy Transition

- Healthcare & Life Sciences
- Higher Education
- International Trade
- Investigations
- Infrastructure
- National Security
- Public Policy & Government Affairs
- Real Estate
- Regulation, Compliance & Advisory
- Sports, Media & Entertainment

## **EXPERIENCE**

- Represented multiple clients in investigations conducted by the House China Select Committee, including Ivy League university, a technology manufacturer, and a semiconductor company.
- Advised a Fortune 25 telecom company on all aspects of its international trade compliance, including navigating many case-of-first-impression matters under Russia sanctions and China-related export controls, resulting in innovative licensing strategies and industry-wide regulatory victories.
- Guided dozens of transactions involving foreign investment in sensitive US businesses through the complex CFIUS notification, mitigation, and non-notified review processes, including Australasia's 2022 M&A Deal of the Year.
- Counseled a global healthcare organization and US government contractor through export controls and sanctions internal investigations and agency enforcement proceedings.
- Developed the sanctions, anti-money laundering, and counter-terrorism finance compliance processes for multiple financial institutions and fintech companies with Middle East footprints.
- Advised a major global semiconductor manufacturing company on multiple aspects of its trade compliance program, including export controls licensing, sanctions compliance, and combating trade secret theft, as well as advocating for broader policy solutions on Capitol Hill.

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