

Annie Froehlich

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Export Controls and Economic Sanctions

International Anti-Corruption/FCPA

National Security

CFIUS

Workplace Investigations

CooleyREG

Annie principally advises clients on matters implicating various export control and trade and economic sanctions regimes, including the Export Administration Regulations (administered by the US Department of Commerce's Bureau of Industry and Security), International Traffic in Arms Regulations (administered by the US Department of State's Directorate of Defense Trade Controls), and sanctions programs administered by the US Department of the Treasury's Office of Foreign Assets Control. She leverages significant law firm and in-house experience counseling US and non-US clients in a wide variety of industry sectors regarding regulatory compliance; determining product classifications; securing licensing and other rulings; advising on high-stakes transactional matters and post-acquisition integration; conducting investigations; and interfacing with government regulators to secure positive outcomes. Annie routinely coordinates with Cooley lawyers in other practice areas to provide comprehensive, best-in-class support for complex matters.

While serving as the director and senior counsel for sanctions and export at Carrier Corporation, Annie managed the company's enterprise-wide sanctions/export compliance program, developed and implemented bespoke policies and procedures, evaluated and adopted compliance tools, conducted risk assessments and audits, supported acquisition activity and strategy, and lead training for personnel worldwide. In that role, she developed a deep appreciation for the myriad complexities and challenges of day-to-day compliance, particularly for large multinational companies whose activities typically trigger jurisdiction under multiple regulatory regimes, and honed her skills at delivering practical, risk-based and understandable guidance that can be efficiently implemented.

Annie began her career with Latham & Watkins, where she most recently practiced as a counsel in the firm's export controls, economic sanctions & customs group. Her experience at Latham includes general litigation and white collar investigations work.

Throughout her legal career, Annie has demonstrated a commitment to service through pro bono matters, including representation of nonprofit human rights and aid organizations, as well as immigrants, refugees and children. Outside her practice, Annie serves as a nonresident senior fellow for the Atlantic Council, focusing on US export controls. She also regularly participates in industry conferences as an expert in sanctions and export issues.

Education

University of Virginia School of Law

JD,

Stanford University

BA,

Admissions & Credentials

District of Columbia

Massachusetts

Memberships & Affiliations

Atlantic Council, Nonresident Senior Fellow

Association of Women in International Trade