

## Rebecca Ross

### Special Counsel

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Export Controls and Economic Sanctions

International Anti-Corruption/FCPA

National Security

CFIUS

Government Contracts

CooleyREG

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Rebecca Ross concentrates her practice in international trade, national security and anti-corruption compliance and enforcement matters. She counsels foreign and domestic companies, investors and underwriters regarding the sanctions regulations administered by the US Department of the Treasury's Office of Foreign Assets Control (OFAC), the Export Administration Regulations (EAR) administered by the US Department of Commerce's Bureau of Industry and Security (BIS), the International Traffic in Arms Regulations (ITAR) administered by the US Department of State's Directorate of Defense Trade Controls (DDTC), the US Foreign Corrupt Practices Act (FCPA) and other anti-corruption laws, and national security reviews conducted by the Committee on Foreign Investment in the United States (CFIUS).

Rebecca has worked with hundreds of clients ranging from startups to multinational public companies in the technology, semiconductor, healthcare and life sciences, defense, aviation, financial, investment banking, venture capital and other industries. Her practice covers all aspects of compliance and enforcement, including counseling, compliance program design and implementation, training, risk assessments and audits, transactional and third-party diligence, export classification and jurisdictional analyses, licensing and opinion work, internal investigations, voluntary disclosures, and responding to governmental inquiries and enforcement actions.

Rebecca has particular experience advising clients regarding the encryption controls under the EAR and the applicability of US export and sanctions laws to software deployment, cloud computing (including Software as Service (SaaS) solutions) and offshore development.

She routinely works with Cooley's other practice groups to provide coordinated, interdisciplinary and business-focused advice on complex matters. She also works with foreign counsel worldwide to advise clients on matters covering multiple jurisdictions.

## Education

The George Washington University Law School  
JD, 2006

Davidson College  
BA, 2000

## Admissions & Credentials

District of Columbia

New York

## Rankings & Accolades

Chambers USA: International Trade: Export Controls & Economic Sanctions – Nationwide (2022 – 2024)