



## Tony Busch

Associate

Washington, DC  
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**Tony is a national security-focused international trade lawyer who advises companies how to contend with complex export controls, economic sanctions, and investment restrictions arising from an increasingly contentious global regulatory landscape.**

Tony counsels clients on compliance with the Export Administration Regulations, the International Traffic in Arms Regulations, nuclear export controls, and Office of Foreign Assets Control (OFAC) economic sanctions. Tony's experience is particularly strong in the areas of software and encryption, aerospace and aviation, government contracting, and materials processing. Other matters Tony handles include Antiboycott Regulations compliance, critical technologies and mandatory declaration determinations necessary for Committee on Foreign Investment in the United States (CFIUS) analysis, and Foreign Trade Regulations compliance.

In corporate deals, Tony identifies transactions that may trigger CFIUS Part 800 mandatory disclosure obligations, Defense Counterintelligence and Security Agency Foreign Ownership, Control, and Influence reporting requirements, and Directorate of Defense Trade Controls (DDTC) 60-day notice requirements, and guides clients and corporate teams through fact-finding, analysis, and any necessary disclosure, reporting, or notice requirements.

Tony's services include interfacing on clients' behalf with regulatory agencies such as the Bureau of Industry and Security, DDTC, OFAC, and CFIUS, preparing sanctions delisting petitions, performing self-classification analysis, preparing license applications and classification requests, managing voluntary self-disclosures of past violations,

drafting compliance policies, and performing international trade compliance due diligence for mergers, acquisitions, and other corporate transactions.

Tony began his practice in federal government contracting, investigations, and False Claims Act litigation and is thus particularly sensitive to the needs of clients doing business with the government or subject to government investigation. Prior to his legal career, Tony served as counterterrorism analyst.

## Recent Experience

Crowe LLP's Carveout Sale of its Health Care Consulting Business

Winston Represented MCE Holdings in Its Acquisition of Nova Hydraulics

EFC International's Acquisition of Inventory Sales Co.

## Activities

- American Bar Association, International Law Section, Vice Chair (Year-In-Review) of Export Controls and Economic Sanctions Steering Committee
  - District of Columbia Bar
  - National Association of Muslim Lawyers
  - Society for International Affairs
  - Washington State Bar Association
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## Credentials

### EDUCATION

Tony received his J.D. from the Washington University in St. Louis School of Law in 2016 where he was a staff editor of the *Global Studies Law Review*. He received his B.S. in business administration, *cum laude*, from the University of South Carolina, Darla Moore School of Business in 2009. While an undergraduate student, Tony studied Arabic abroad in Syria, Jordan, and Egypt through Boren and Rotary scholarships.

### ADMISSIONS

- District of Columbia
- Maryland
- Washington

## Related Insights & News

### PUBLICATIONS

- ["FinCEN and BIS Expand SAR Guidance for Export Control Evasion, as General Prohibition Ten Looms Large,"](#) Global Trade & Foreign Policy Insights, Co-Author, Nov. 8, 2023

- ["CFIUS's Annual Report Spells Trouble for Dealmakers,"](#) *Financier Worldwide*, Co-author, Oct. 2023
- ["U.S. Announces New Restrictions on Outbound Investments to China,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Aug. 30, 2023
- ["CFIUS – A Growing Quagmire for Cross-Border Deals: Takeaways from CFIUS's Annual Report for 2022,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Aug. 7, 2023
- ["Congress Ramps Up Investigations of U.S. Venture Capital Firms Investing in Chinese Companies,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Jul. 28, 2023
- ["China Places Export Controls on Raw Materials Used in Semiconductor Manufacturing,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Jul. 9, 2023
- ["U.S. Sanctions and Export Controls Against Russia and FinCEN Alert,"](#) *Global Trade & Foreign Policy Insights*, Co-author, May 25, 2023
- ["BIS to Host Brain-Computer Interface Conference – Feb. 16 & 17, 2023,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Feb. 7, 2023
- ["Semiconductors Trade Update: Macau, IFR Comment Period, and CHIPS Funds,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Jan. 26, 2023
- ["BIS Imposes New Controls Targeting China's Semiconductor and Advanced Computing Industries,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Oct. 13, 2022
- ["Winston's Thoughts on President Biden's New CFIUS Executive Order,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Sept. 22, 2022
- ["Department of Commerce Announces CHIPS for America Webinar Series,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Sept. 20, 2022
- ["BIS Proposes Automated Peptide Synthesizers for Section 1758 Critical Technology Controls,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Sept. 19, 2022
- ["BIS Expands Information Sharing Authorization to Members of Standards Settings Organizations, and Requests Comments,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Sept. 14, 2022
- ["More Updates from Commerce for the Semiconductor Industry,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Sept. 13, 2022
- ["The CHIPS Act Creates a New, CFIUS-Like, Outbound Investment Review Process for the Semiconductor Industry,"](#) *Global Trade & Foreign Policy Insights*, Co-author, Aug. 22, 2022
- "President Biden Issues Executive Order Banning U.S. Imports of Russian Origin Oil, Gas, and Coal," *Global Trade*, Mar. 13, 2022
- "U.S. Government Signals that Increased Sanctions and Export Controls Will Likely Follow if Russia Invades Ukraine," *Global Trade*, Feb. 12, 2022
- "OFAC Sanctions Four Ukrainian Officials for Acting on Russia's Behalf; Additional Russia Sanctions Could Follow," *Global Trade*, Jan. 30, 2022
- "BIS Delays Implementation of New Cybersecurity Items Interim Final Rule," *Global Trade*, Jan. 26, 2022
- "DHS Requests Comments to Inform Implementation of the Uyghur Forced Labor Prevention Act," *Global Trade*, Jan. 24, 2022
- "BIS Requests Comments from Information and Communications Technology (ICT) and Semiconductor Supply Chains on Supply Chain Vulnerabilities," *Global Trade*, Oct. 20, 2021
- "U.S. Government Imposes Sanctions and Issues Joint OFAC/BIS Telecommunications Fact Sheet to Support Cuban Protests," *Global Trade*, Sept. 1, 2021

- “New Executive Order Authorizes Imposition of Additional Sanctions on the Government of Belarus and Certain Sectors of the Belarusian Economy,” Global Trade, Aug. 27, 2021
- “US Government Adds 4 Military-Connected Entities in Burma to Entity List and Sanctions 22 Burmese Individuals,” Global Trade, Jul. 31, 2021
- “U.S. Adds Chinese Entities to BIS Entity List and Updates Xinjiang Supply Chain Business Advisory,” Global Trade, Jul. 30, 2021
- “BIS Implements New Burma Export Controls and Adds Four Entities to the Entity List,” Global Trade, Mar. 19, 2021
- “BIS Updates Hong Kong Recordkeeping FAQs Consistent with Removal of Hong Kong from EAR Country Chart,” Global Trade, Mar. 4, 2021
- “Biden Issues Executive Order to Review Critical Supply Chains,” Global Trade, Mar. 3, 2021
- “9th Circuit Skeptical of Government Interlocutory Appeal of Unprecedented Denial of Motion to Dismiss Qui Tam Case,” 6 *Pratt’s Government Contracting Law Report* 117, 139, 2020
- “New DOJ Guidance for Companies Considering Voluntarily Self-Disclosing Potentially Criminal Export Control and Sanctions Violations,” The National Law Review, Dec. 27, 2019

## **SPEAKING ENGAGEMENTS**

- 12th Annual U.S. Export Controls Year-in-Review, American Bar Association (ABA), Webinar Speaker, Feb. 16, 2023
- “Overview of New Sweeping US Sanctions and Export Controls Against Russia,” Product Liability Advisory Council (PLAC), Webinar Speaker, Mar. 10, 2022

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## **WEBINAR**

International Trade 2023 Year In Review and Predictions for 2024

JANUARY 4, 2024

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## **BLOG**

FinCEN and BIS Expand SAR Guidance for Export Control Evasion, as General Prohibition Ten Looms Large

NOVEMBER 8, 2023

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## **ARTICLE**

CFIUS’s Annual Report Spells Trouble for Dealmakers

OCTOBER 2023

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## **RECOGNITIONS**

Winston Attorneys Named to 2022 Capital Pro Bono Honor Roll

SEPTEMBER 6, 2023

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## **BLOG**

U.S. Announces New Restrictions on Outbound Investments to China

AUGUST 30, 2023

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## BLOG

CFIUS – A Growing Quagmire for Cross-Border Deals: Takeaways from CFIUS’s Annual Report for 2022

AUGUST 7, 2023

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## BLOG

Congress Ramps Up Investigations of U.S. Venture Capital Firms Investing in Chinese Companies

JULY 28, 2023

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## BLOG

China Places Export Controls on Raw Materials Used in Semiconductor Manufacturing

JULY 10, 2023

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## BLOG

U.S. Sanctions and Export Controls Against Russia and FinCEN Alert

MAY 25, 2023

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## SPEAKING ENGAGEMENT

Tony Busch Speaks at ABA’s 12th Annual U.S. Export Controls Year-In-Review Event

FEBRUARY 16, 2023

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## BLOG

BIS to Host Brain-Computer Interface Conference – Feb. 16 & 17, 2023

FEBRUARY 7, 2023

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## BLOG

Semiconductors Trade Update: Macau, IFR Comment Period, and CHIPS Funds

JANUARY 26, 2023

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# Capabilities

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International Trade

Compliance Programs

Government Investigations, Enforcement & Compliance

Mergers & Acquisitions

Private Equity

Financial Services Transactions & Regulatory

Technology, Media & Telecommunications

Financial Services

Maritime & Admiralty

Energy

Infrastructure

Cryptocurrencies, Digital Assets & Blockchain Technology