

## Peter E. Jeydel

Partner

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Pete helps clients navigate today's increasingly complex regulatory and enforcement environment at the intersection of national security, international trade, finance, and technology. He works with clients to identify innovative solutions to business problems arising from these often daunting and highly technical regulations, based on a clear understanding of the government's expectations and priorities.

### OVERVIEW

Leading the firm's Sanctions + Trade Controls team, Pete has deep experience in export controls, economic sanctions, and related areas. His practice includes regulatory counseling, compliance program development and enhancement, assistance with M&A and other complex transactions, responding to government inquiries, conducting internal investigations, advising on voluntary self-disclosures, and providing robust representation in civil and criminal enforcement actions. For example, Pete assists with obtaining authorizations for otherwise restricted trade and investment transactions, foreign national employees with access to export-controlled technology, and other common requirements. He advises on risk assessments, know-your-customer (KYC) and due diligence best practices, contractual safeguards, jurisdiction and classification determinations for potentially export-controlled products and technologies, and many other practical compliance steps. For non-U.S. companies, he offers clear insights on the extraterritorial reach of these U.S. laws, and how they can be enforced abroad. Pete also assists clients seeking removal from (or concerned about possible designation on) a variety of U.S. government sanctions lists, including the Specially Designated Nationals (SDN) list, the Entity List, and others.

Pete's experience covers the following areas in particular:

- The Export Administration Regulations (EAR), administered by the Commerce Department's Bureau of Industry and Security (BIS);
- The International Traffic in Arms Regulations (ITAR), administered by the State Department's Directorate of Defense Trade Controls (DDTC);
- The Part 810 nuclear export control regulations, administered by the Department of Energy's National Nuclear Security Administration (NNSA);
- The economic sanctions programs of the Department of the Treasury's Office of Foreign Assets Control (OFAC) and the Department of State;
- The Data Security Program (DSP), administered by the Department of Justice's National Security Division (*i.e.*, the Bulk Sensitive Personal Data and U.S. Government-Related Data regulations);
- The Foreign Corrupt Practices Act (FCPA);

- The Information and Communications Technology and Services (ICTS) program, also administered by BIS at Commerce;
- The BIS anti-boycott regulations;
- The munitions import regulations of the Department of Justice's Bureau of Alcohol, Tobacco, Firearms and Explosives (ATFE);
- The Department of the Treasury's Outbound Investment Security program and the Committee on Foreign Investment in the United States (CFIUS); and
- Anti-money laundering (AML) laws and regulations.

In these highly technical and sensitive areas, clients look to Pete for his practical, business-centric approach. His focus on each client's unique circumstances, including size, risk profile, and business priorities, allows him to provide tailored solutions to mitigate risk, while maintaining smooth global operations, and looking for opportunities to expand markets where possible. With an in-depth understanding of U.S. government policies and priorities, he guides clients on targeting the most critical risks they face, while seeking simplicity in lower-risk areas.

Pete represents clients in both heavily regulated industries and those that are historically less exposed to these issues, including aerospace and defense, technology, financial services, manufacturing and industrial, telecommunications, agriculture, health care and biotechnology, energy, metals and mining, and space. He has extensive experience with cross-border regulatory compliance matters involving Russia, China, Hong Kong, India, Ukraine, Cuba, Venezuela, Iran, Central Asia and the Caucasus, Myanmar (Burma), Lebanon, Syria, Libya, Iraq, Pakistan, Sudan, Afghanistan, Belarus, Yemen, Mexico, Colombia, Nicaragua, the Democratic Republic of the Congo, Zimbabwe, and others.

In his pro bono work, Pete advises nonprofit organizations on how to operate in sanctioned countries and similarly high-risk areas, including North Korea.

## **REPRESENTATIVE MATTERS**

- Counseling a U.S.-based manufacturing company on export controls and sanctions matters arising throughout its global business, including assisting with numerous voluntary self-disclosures, and guiding large-scale reevaluations of product classifications both internally and through commodity jurisdiction and classification (CJ and CCATS) requests.
- Guiding a U.S. company in seeking what may be the first ever OFAC authorization to import state-produced commodities from a particular embargoed country into the U.S.
- Assisting civil nuclear power companies in compliance with U.S. export controls applicable to the industry.
- Helped obtain a DOJ declination and no action from BIS following criminal and civil investigations into suspected export control violations by a U.S.-based global electronics company.
- Conducted a global ITAR audit of a major European aerospace company's commercial and defense-related businesses.
- Counseled a China-based global technology company on complex U.S. export controls and sanctions issues, and other national security regulatory matters.
- Provided a comprehensive U.S. export controls and sanctions risk assessment and compliance program gap assessment to a publicly traded, U.S.-based vehicle manufacturer.
- Helped close an acquisition of a large, UK-based global satellite and maritime technology company that had been held up due to highly complex sanctions issues.
- Identified critical export control issues in a U.S.-based technology company's proposed acquisition of a non-U.S. entity with high-risk business in China.
- Advised U.S. and global private equity and other fund managers on regulatory and geopolitical issues and trends.
- Advised a U.S.-based hedge fund on sanctions compliance considerations in seeking large-scale new business

opportunities relating to Venezuelan debt instruments.

- Assisted a large Latin American mining company in developing and implementing an enhanced sanctions and export controls compliance program and in evaluating and managing high-risk global transactions.
- Assisted a U.S. video surveillance company in assessing and addressing supply chain risks relating to parties subject to export controls and sanctions restrictions.
- Advised a U.S. telecommunications company considering a variety of ambitious business activities in and related to Cuba on economic sanctions and export control issues.
- Helped a Southeast Asian energy company obtain OFAC authorizations for large-scale projects with a U.S.-sanctioned partner.
- Advised a Bahraini company on managing risks while seeking to extricate itself from complex relationships with sanctioned parties.
- Assisted a Canadian company in obtaining OFAC and BIS licenses for medical equipment sales to Cuba.
- Advised U.S.-based entities on ITAR brokering issues in connection with supplying U.S. partner forces.
- Represented a Myanmar-based individual and related business entities seeking removal from OFAC's SDN list.
- Represented individuals sanctioned by OFAC under the Kingpin Act for alleged money laundering activities in Lebanon and South America and obtained their removal from the SDN list.
- Represented a UAE-based individual in seeking removal from the SDN list following allegations relating to the oil and shipping sectors.
- Counseled a major European oil and gas company with large investments in an embargoed country with both day-to-day and strategic U.S. legal compliance issues.
- Advised a Southeast Asian food company on sales to Iran in compliance with sanctions.
- Helped conduct anti-corruption investigations involving mining activities in Pakistan, Indonesia, and the Democratic Republic of the Congo, and related resolution proceedings with the SEC and DOJ.
- Advised a large emerging U.S. defense contractor on anti-corruption and EAR / ITAR (including Part 130) issues in expanding into new markets and acquiring new entities.
- Advised a UK-based emerging defense contractor on U.S. market entry considerations relating to export controls.

## AWARDS

- Honors, Capital Pro Bono Honor Roll, D.C. Access to Justice Commission and the D.C. Bar Pro Bono Center (2025)
- *Legal 500 U.S.*, Rising Star, International Trade: Customs, Export Controls and Economic Sanctions (2023-2024)
- *Legal 500 U.S.*, Rising Star, Dispute Resolution: International Trade (2021-2022)
- Exceptional Civilian Service Award, U.S. Department of Defense (2009)
- Joint Civilian Service Commendation Award, U.S. Transportation Command (2009)

## TOP AREAS OF FOCUS

- International
- Sanctions + Trade Controls
- White Collar Litigation + Investigations

## ALL AREAS OF FOCUS

- Business Litigation
- CFIUS
- Foreign Corrupt Practices Act (FCPA)
- International
- Sanctions + Trade Controls
- Tariff + Trade Task Force
- White Collar Litigation + Investigations

## **PROFESSIONAL/COMMUNITY INVOLVEMENT**

- Planning Committee, International Law Section, American Bar Association, 2023-2024
- Vice chair, Export Controls and Economic Sanctions Committee, International Law Section, American Bar Association, 2015
- U.S. Department of Defense, Office of the Under Secretary for Policy, 2006-2009

## **EDUCATION AND CERTIFICATIONS**

### **EDUCATION**

- Georgetown University Law Center, J.D., *magna cum laude*, 2012, articles editor, *Georgetown Journal of International Law*; CALI Award for top grades in corporate finance and international trade & the WTO
- Princeton University, A.B., 2006, Woodrow Wilson School of Public and International Affairs

### **BAR ADMISSIONS**

- District of Columbia
- Virginia

### **LANGUAGES**

- French
- Spanish
- Arabic

## **SPEAKING ENGAGEMENTS**

- "Cross Border Life Sciences Distribution Agreements: A Trade Compliance Playbook," Troutman Pepper Locke, March 18, 2026.
- "Foreign Filing Licenses: Key Considerations, First Filing Requirements, Design Patent Unique Issues, Export Controls," Strafford Webinar, February 24, 2026.
- "US-China Trade War: Redefining the US-China Relationship," World Salon, November 5, 2025.
- "Data Dilemmas: Unpacking the DOJ's New Bulk Data Security Program With a Byte of Industry-Specific Insight," Troutman Pepper Locke Webinar, October 22, 2025.
- "Digital Transformation: Technology's Role in Export Controls Compliance," BDO USA, August 21, 2025.
- "OFAC Compliance: Meeting Evolving U.S. Sanctions Requirements, Minimizing Risk of Sanctions," Strafford Webinar, August 13, 2025.

- “Legal Developments in National Security, Trade and Technology under President Trump,” State Bar of Georgia, May 8, 2025.
- [“China, Russia and the Interplay of Export Controls and Sanctions: The Biggest, Most Enduring Compliance and Enforcement Risks Confronting Canadian Industry,”](#) ACI – US Export & Reexport Compliance For Canadian Operations, January 24, 2024.
- “Foreign Direct Product rules in the spotlight: new and updated regulations, and unprecedented enforcement,” [WorldECR Export Controls and Sanctions Forum](#), Washington, D.C., October 16, 2023.
- “Foreign Filing Licenses: Key Considerations, First Filing Requirements, Design Patent Unique Issues, Export Controls,” Strafford Webinar (2022 and 2023).
- [“Navigating US Export Controls on Encryption Products,”](#) WorldECR Webinar, November 4, 2021.
- “A Walking Tour of OFAC and the Primary US Economic Sanctions Laws and Regulations,” com OFAC/Sanctions Essentials Seminar, Miami, FL, June 15, 2018.
- “An Overview of Iran, Russia, Cuba, Venezuela OFAC Sanctions Regimes,” com OFAC/Sanctions Essentials Seminar, Miami, FL, June 15, 2018.
- “Lessons from Recent OFAC and BIS Cases,” SanctionsAlert.com Sanctions Risk Management Symposium, New York, NY, September 19, 2017.
- “OFAC and BIS: How They Work Together and How Regulatory and Criminal Powers are Applied,” SanctionsAlert.com Sanctions Risk Management Symposium, New York, NY, September 18, 2017.
- “2016 US Sanctions Year in Review,” ABA Section of International Law, Washington, D.C., February 14, 2017.
- “2015 US Sanctions Year in Review,” ABA Section of International Law, Washington, D.C., February 2, 2016.

## PUBLICATIONS

- Co-author, [“FDIC Proposes Bank Secrecy Act and Sanctions Standards for Stablecoin Issuers,”](#) *Financial Services Blog*, June 2, 2026.
- Co-author, [“New Cuba Sanctions Raise Risks For Foreign Banks, Cos.,”](#) *Law360*, May 14, 2026.
- Co-author, [“Senate Banking Set to Mark Up the CLARITY Act: What to Watch in Tomorrow’s Hearing,”](#) *Financial Services Blog*, May 13, 2026.
- Co-author, [“GENIUS Act AML and Sanctions Rules for Stablecoin Issuers: A Few Surprises but Broadly as Expected,”](#) *Financial Services Blog*, May 5, 2026.
- Co-author, [“Red Card From OFAC: Civil Penalty for Private Secondary School Highlights Sanctions Risks in Education,”](#) *Troutman Pepper Locke*, February 27, 2026.
- Co-author, [“Financial Services Industry 2025 Digital Assets Year in Review,”](#) *Troutman Pepper Locke*, February 5, 2026.
- Co-author, [“The Risk of Voluntary Self Disclosure: Takeaways From the Exyte BIS Settlement,”](#) *Troutman Pepper Locke*, January 27, 2026.
- Co-author, [“CFIUS 2026 Kickoff: A Three-Event Countdown Reshaping Foreign Investment Risk,”](#) *Troutman Pepper Locke*, January 21, 2026.
- Co-author, [“US-Venezuela Oil Reset: Sanctions, State-Directed Crude Sales, and What Comes Next for the Industry,”](#) *Troutman Pepper Locke*, January 9, 2026.
- Co-author, [“Beyond the 50 Percent Rule: OFAC’s Recent Private Equity Enforcement Action Shows Why Ignoring Indirect Sanctions Risk Can Be Costly,”](#) *Troutman Pepper Locke*, January 7, 2026.
- Co-author, [“Implications of the Arrest of Nicolás Maduro for US OFAC Sanctions on Venezuela,”](#) *Troutman Pepper Locke*, January 6, 2026.
- Co-author, [“Preparing For What DOD Cybersecurity Audits May Uncover,”](#) *Law360*, October 9, 2025.
- Co-author, [“Dissecting the Nuances of BIS’s New Affiliates Rule,”](#) *Troutman Pepper Locke*, October 3, 2025.
- Co-author, [“Government Contractors and the Fall 2025 Government Shutdown: Risk Management and Best](#)

Practices,” *Troutman Pepper Locke*, October 2, 2025.

- Co-author, “What to Expect When the New CMMC Final Rule Hits Defense Acquisitions on November 10,” *Troutman Pepper Locke*, October 1, 2025.
- Co-author, “Trump Administration’s Landmark Report on Digital Assets,” *Troutman Pepper Locke*, September 18, 2025.
- Podcast, “Navigating the GENIUS Maze: Sanctions and AML Adventures in Crypto,” *The Crypto Exchange*, September 16, 2025.
- Co-author, “Limited Relaxation of US Export Controls on Syria Leaves Many Restrictions in Place,” *Troutman Pepper Locke*, September 2, 2025.
- Author, “Export Control Transparency Act: Words of Caution,” *Troutman Pepper Locke*, August 20, 2025.
- Podcast, “Under the Radar: DOJ’s Data Security Rules and Their Impact on Payments Companies,” *Payments Pros – The Payments Law Podcast*, August 5, 2025.
- Co-author, “M&A and Global Compliance Lessons From OFAC’s Settlement With Key Holding,” *Troutman Pepper Locke*, July 14, 2025.
- Co-author, “With Additional Syria Sanctions Relief, Risks Remain,” *Troutman Pepper Locke*, July 3, 2025.
- Co-author, “Major OFAC Penalty for US Venture Capital Fund – Key Takeaways,” *Troutman Pepper Locke*, June 16, 2025.
- Co-author, “US Lifts Most Sanctions on Syria,” *Troutman Pepper Locke*, May 29, 2025.
- Co-author, “Navigating Change: First 100 Days Under the Trump Administration,” *2025 Digital Asset Developments*, May 28, 2025.
- Co-author, “Review Risk Is Increasing for Foreign Real Estate Developers,” *Law360*, May 27, 2025.
- Co-author, “DOJ’s Data Security Program Is Blurry on Audits, Recordkeeping,” *Bloomberg Law*, May 22, 2025.
- Co-author, “New “Fast-Track” Announced for Foreign Investment Approval,” *Troutman Pepper Locke*, May 20, 2025.
- Co-author, “Crude Crimes: Treasury Warns on Oil Smuggling and Money Laundering,” *Troutman Pepper Locke*, May 8, 2025.
- Author, “The Least Known Risk in the Energy Sector: The “ICTS” National Security Rules,” *Troutman Pepper Locke*, May 5, 2025. Republished in *Pratt’s Energy Law Report*, Vol. 25-10, November-December 2025.
- Co-author, “DOJ’s Latest Guidance on the Data Security Program – What’s New?,” *Troutman Pepper Locke*, April 16, 2025.
- Co-author, “US Modifies Reciprocal Tariff Rates,” *Troutman Pepper Locke*, April 11, 2025.
- Podcast, “Navigating 2025: Trends in OFAC and DOJ Enforcement for Digital Assets,” *The Crypto Exchange*, April 8, 2025.
- Co-author, “New DOJ National Security Division Data Security Rules Take Effect on April 8: Is Your Organization Exposed?,” *Troutman Pepper Locke*, April 3, 2025.
- Co-author, “Trump Administration’s First Export Control Action – Reading the Tea Leaves,” *Troutman Pepper Locke*, March 27, 2025.
- Co-author, “Unprecedented “Secondary Tariffs” for Oil Trade With Venezuela,” *Troutman Pepper Locke*, March 27, 2025.
- Co-author, “OFAC Recordkeeping Requirement Extended to 10 Years,” *Troutman Pepper Locke*, March 24, 2025.
- Co-author, “Foreign Influence in Universities Targeted by Trump Administration,” *Troutman Pepper Locke*, March 20, 2025.
- Co-author, “Financial Transactions Related to Russian Energy Now Prohibited: Expiration of OFAC General License 8L,” *Troutman Pepper Locke*, March 14, 2025.
- Co-author, “Latest Sanctions Developments: Venezuela, Russia, and Yemen,” *Troutman Pepper Locke*, March 10, 2025.

- Co-author, "Investment Reviews, Sanctions, Exports, and More: The Enforcement Outlook Under Trump," *Troutman Pepper Locke*, March 3, 2025.
- Co-author, "US Declares War on Cartels: Historic Terrorist Designations Reshape Sanctions Compliance Risks," *Troutman Pepper Locke*, February 24, 2025.
- Co-author, "Do You Know Where Your Data Is Going? On April 8, New National Security Rules Take Effect," *Troutman Pepper Locke*, February 18, 2025.
- Co-author, "Trump Pauses FCPA Enforcement: Implications for Corporate Compliance Strategies," *Troutman Pepper Locke*, February 18, 2025.
- Author, "Tornado Cash Whiplash – What’s Next for Sanctions?," *Troutman Pepper Locke*, February 4, 2025.
- Author, "Inside New Commerce Tech Restrictions: Mitigation Strategies," *Law360*, January 24, 2025.
- Author, "Inside New Commerce Tech Restrictions: Key Risk Takeaways," *Law360*, January 23, 2025.
- Co-author, "A Minefield in Russia’s Energy Sector: Biden’s Final Sanctions Act May be Game-Changing," *Troutman Pepper Locke*, January 16, 2025.
- Podcast, "Unpacking the Fifth Circuit’s Landmark Tornado Cash Decision," *The Crypto Exchange Podcast*, January 16, 2025.
- Co-author, "Drone Alert! BIS Seeks Comments From Industry on How to Secure the Unmanned Aircraft Systems Supply Chain," *Troutman Pepper Locke*, January 9, 2025.
- Author, "Ten Years on from ‘ECR’ – Insights on ‘Specially Designed,'" *Export Compliance Manager*, July 2023.
- Co-author, "Export Controls and Sanctions Compliance in the M&A Context (including the CFIUS Notification and Review Process)," ABA, *International Guide to Export Controls and Economic Sanctions, Second Edition*, June 2023.
- Co-author, "US Russia Sanctions Update: Mid-April-Early May," *WorldECR*, May 2022.
- Author, "A product of changing times: the US sets out its intrusion software rule," *WorldECR*, February 2022.
- Co-author, "OFAC Designates Nicaraguan Officials After ‘Sham Elections'" *WorldECR*, December 2021 – January 2022.
- Author, "New US Export Controls for Hackers and Cybersecurity Practitioners," *Export Compliance Manager*, November 21, 2021.
- Co-author, "OFAC’s new Afghanistan-related humanitarian licences: Opportunities and challenges," *WorldECR*, November 10, 2021.
- Co-author, "Inside Commerce’s New Cybersecurity Export Controls," *Law360*, October 29, 2021.
- Co-author, "US Export Controls on Encryption Products: Key Points for Tech CO’s," *Export Compliance Manager*, September 2021.
- Co-author, "Importing from China – Is Your Due Diligence Sufficient?," *WorldECR*, August 2021.
- "An ‘IEEPA-Free Zone’ for TikTok and other Chinese Mobile Applications," *ASIL Insights*, American Society of International Law, February 8, 2021.
- Co-author, "How Can Non-US Technology Companies Best Manage OFAC Risk?," *Export Compliance Manager*, March 2020.
- Co-author, "Information and Analysis on Legal Aspects of Procurement," *The Government Contractor*, April 10, 2019.
- "Coping with U.S. Export Controls and Sanctions 2019," *Practicing Law Institute* (Course Handbook Chapters 11, 13, 14, and 25).
- "EU Export and Sanctions Compliance Draft: A Good Start," *Law360*, October 31, 2018.
- Co-author, "United Nations Security Council Resolutions 2321, 2371, & 2375," *International Legal Materials*, December 1, 2017.
- "OFAC Takes Sanctions Jurisdiction Into Uncharted Waters," *Law360*, March 9, 2017.
- Co-author, "New DOJ Guidance Could be a Game Changer for Export Controls and Sanctions

Enforcement,” *Risk & Compliance*, January 11, 2017.

- Author, “Time to Finally End the Cuba Embargo,” *The Hill*, October 27, 2016.
- Co-author, “Inside DDTTC’s New Definitions of Export, Re-Export, Retransfer,” *Law360*, October 21, 2016.
- Co-author, “Iran: Still a Sanctions Minefield for Non-US Companies,” *WorldECR*, August 12, 2016.
- Co-author, “Offsets In International Defense Trade,” *Briefing Papers®*, Second Series, August 4, 2015.
- Co-author, “Export Control Reform Comes To Night Vision And Cameras,” *Law360*, May 29, 2015.
- Co-author, “Lessons From The Schlumberger Settlement,” *Law360*, April 17, 2015.
- “Sanctions, Sanctions Everywhere: Forging a Path through Complex Transnational Sanctions Laws,” *Georgetown Journal of International Law*, 2013.
- “Yoking the Bull: How to Make the FCPA Work for U.S. Business,” *Georgetown Journal of International Law*, 2012.

## **MEDIA COMMENTARY**

- Quoted, “5 Midyear White Collar Trends to Watch,” *Law360*, July 7, 2026.
- Quoted, “As CPI Scores Slump Globally, All Eyes Are on the U.S.,” *Anti-Corruption Report*, March 11, 2026.
- Quoted, “US Licences to Exploit Venezuelan Oil Not a ‘Rubber Stamp’,” *Global Investigations Review*, February 5, 2026.
- Quoted, “5 White Collar Enforcement Trends to Watch in 2026,” *Law360*, January 2, 2026.
- Quoted, “Trump’s 100% Tariffs Against Russia’s Trading Partners is Not the Real Seismic Shift,” *TradeWinds*, July 16, 2025.
- Quoted, “Industry Preparing for Tighter China Restrictions, Penalties as Questions Surround BIS Policy,” *Export Compliance Daily*, April 18, 2025.
- Quoted, “McKinsey Africa’s \$122M Settlement Highlights Local Content Law Risk,” *Anti-Corruption Report*, February 12, 2025.