

## Stephen F. Propst

Partner

Washington, D.C.

### Biography

Stephen Propst helps clients in navigating complex issues under U.S. export control and economic sanctions regulations. He brings industry sector knowledge and a commitment to practical, business-focused solutions to his client relationships.

Stephen is a recognized thought leader on economic sanctions issues. In 2011, he published a groundbreaking legal analysis regarding the authority of the President to modify the sanctions against Cuba. The paper, which was released at a forum at The Brookings Institution and presented to senior government officials, provides the legal analysis supporting President Obama's historic changes to the U.S. embargo against Cuba announced in December 2014.

Stephen has a wealth of experience advising clients regarding a full range of regulatory issues under the International Traffic in Arms Regulations (ITAR), the Export Administration Regulations (EAR), and the sanctions regulations administered by the Treasury Department's Office of Foreign Assets Control (OFAC). He has developed and implemented trade compliance programs, drafted Technical Assistance Agreements and export license applications, prepared commodity jurisdiction and classification requests, conducted internal compliance reviews, and drafted voluntary



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### Practices

International Trade and Investment  
Space and Satellite

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### Industries

Aerospace, Defense, and  
Government Services  
Consumer  
Automotive and Mobility  
Education  
TMT  
Energy and Natural Resources

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### Areas of focus

disclosures.

Stephen has particular strength in advising telecommunications industry clients, including satellite manufacturers and operators, network equipment manufacturers, and telecommunications service providers. He also works extensively with clients in the areas of aircraft, automotive, software development, chemicals, medical products, and higher education.

Stephen serves as the Co-Chair of the Hogan Lovells Touch program, the firm's global matched charitable giving campaign. He is also member of the Board of Directors of Gifts for the Homeless, a non-profit charitable organization that donates money and clothing to benefit the homeless in the Washington, D.C. area.

## Representative experience

Assisting manufacturer of communications equipment in obtaining U.S. government approval for export of network infrastructure equipment to Cuba.

Assisting a leading U.S. aerospace and defense company in auditing export control and economic sanctions compliance programs.

Counseling a European aircraft manufacturer on U.S. de minimis rules in connection with incorporation of U.S. components into European-made aircraft.

Assisting a cruise ship operator in obtaining U.S. government authorizations to operate a vessels between the U.S. and Cuba for authorized travelers.

Assisting an international communications services provider in conducting a cyber intrusion review and filing U.S. Government disclosures.

Assisting a European company with an internal compliance review and voluntary disclosure related to U.S. sanctions against Iran.

Export Controls

Sanctions

Technology Transfer, Deemed Exports, and University Based Fundamental Research

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## Education and admissions

### Education

J.D., University of Virginia School of Law, 1998

M.P.P., Duke University, 1998

B.A., Princeton University, 1992

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Assisting leading U.S. universities regarding sponsored research and export control issues.

Assisting an aircraft finance company in obtaining ITAR export and brokering authorizations related to international aircraft leasing arrangements.

## Awards and rankings

- International Trade: Export Controls & Economic Sanctions (Nationwide), Recognised Practitioner, *Chambers USA*, 2017-2018
- Dispute Resolution: International Trade, *Legal 500 US*, 2008, 2014-2019
- Export Controls and Sanctions, Highly Commended, *WorldECR*, 2018
- Dispute Resolution: Corporate Investigations and White-Collar Criminal Defense, *Legal 500 US*, 2019

## Latest thinking and events

- Hogan Lovells Publications
  - Proposed additions of chemical families to Schedule 1 of Chemical Weapons Convention and BIS requests for comments from chemical, biotechnology and pharmaceutical companies *International Trade Alert*
- Hogan Lovells Publications
  - U.S. moves towards (but stops short of) complete embargo on Venezuela *International Trade Alert*
- Hogan Lovells Publications
  - OFAC update: Final interim rule amending the reporting, procedures, and penalties regulations (RPPR) and Freedom of Information Act (FOIA) disclosures *International Trade Alert*
- Hogan Lovells Publications
  - U.S. Sanctions regulator outlines expectations for Global Sanctions Compliance: impact on Private Equity
- Hogan Lovells Publications

## Memberships

Member, American Association of Exporters and Importers (AAEI)

Member, American Bar Association (ABA)

Member, Aerospace and Defense Industries Committee, ABA

Member, Export Controls and Economic Sanctions Committee, ABA

Member, Section of International Law, ABA

Member, Sanctions Subcommittee, U.S. Department of State's Advisory Committee on International Economic Policy

Member, Society for International Affairs

Member, Board of Directors, Gifts for the Homeless

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## Bar admissions and qualifications

District of Columbia

Maryland

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## Accolades

"Clients say that Stephen Propst's 'thoroughness is most impressive,' and that 'his ability to master the details of a transaction and convey them in writing is top-notch.'"

*Legal 500 US*

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- Trump administration further tightens U.S. travel restrictions to Cuba *International Trade Alert*
- Hogan Lovells Publications
  - OFAC outlines expectations for global sanctions compliance *International Trade Alert*