

## Aaron M. Gothelf

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### Global Trade Compliance Attorney

**Innovative, adaptable, seasoned senior-level professional. Experienced as pragmatic, technology-oriented global trade compliance executive, lawyer, and business counselor with twenty years in-house progressive experience in top multinational corporations.**

#### Expertise

Anti-boycott	Denied Party Screening	INCOTerms®	Supply Chain Security
CFIUS	Economic (OFAC) Sanctions	Internal Investigations	Tariff Classification
Contract Clauses	Export Control (US & EU)	International Contract Negotiations	Trade Policy
C-TPAT / AEO / ISA	FCPA	ITAR	Trade Remedies
Customs Law	Foreign Trade Zones	M&A and JV Due Diligence	Training
Deemed Export	Free Trade Agreements	Origin Determination	Valuation

#### Experience And Accomplishments

##### **General Electric, Washington, D.C. | Executive Counsel, International Trade Compliance 2015-Present**

- Lead a global team of lawyers and trade compliance specialists.
- Counsel on international trade policy, tools, customs legal matters, internal investigations, M&A due diligence including CFIUS support, import and export classifications, trade remedies, contract negotiations, and denied party screening.
- Serve as the primary lawyer for the GE Customs Center of Excellence; strategize and plan duty-savings opportunities.
- Act as a primary point of contact for government investigations and inquiries involving international trade.
- Surface cost-saving opportunities. Drive automation and process improvements in trade compliance through cooperation with IT to develop advanced machine-learning tools. Implement various software packages (Smartsheet, Box, iManage).

##### **Accomplishments**

- Reduced internal trade compliance investigations cycle time by 75%.
- Successfully navigated customs duty cases to save US\$10M annually.
- Successfully resolved a complex ICE investigation and US Customs audits.
- Received 2019 GE Government Affairs Pinnacle Award for mitigating impact of “trade war” on company.

##### **Executive International Trade Counsel – GE Power 2013-2015**

- Established a formal international trade compliance program for GE Power, a \$30bn segment of GE. Managed global staff of 3 compliance professionals.
- Lead lawyer responsible for GE Power’s global export control, economic sanctions, and customs compliance.
- In 2015 added responsibility as lead customs lawyer for all segments of GE.
- Advisor to senior leaders on international trade compliance. Worked with segment and business lawyers, leaders and managers to implement an export control compliance program.
- Served as focal point for communications with US and non-US governments, including customs focused assessments, voluntary disclosures, rulings, audits, licensing, and commodity jurisdiction requests.
- Supported disclosures within the EU and Latin America, US Depts. of Commerce, State, Treasury (OFAC), and Customs.
- Conducted and supported internal and external audits and investigations globally of alleged violations of trade compliance laws and corporate policies, including associated FCPA issues.
- Developed policy, procedure and guidance for managing US, EU, and other national economic sanctions programs against Russia, Iran, and others. Prepared and provided international trade compliance training and materials to employees.

##### **Accomplishments**

- Obtained multi-million-dollar duty savings for Power Segment.
- Successfully integrated Alstom acquisition into GE Power international trade compliance program.
- Created series of 5-minute international trade education videos subsequently adopted by all GE segments.
- Integrated GE Power trade compliance program into centralized shared service.

##### **Tyco International, Washington, D.C. (now Johnson Controls) | Senior International Trade Counsel 2008-2013**

- Responsible for worldwide import-export compliance. Company had annual revenue of \$17 billion, approximately 110,000 employees, hundreds of subsidiaries and affiliated legal entities, and business activity in more than 100 countries.
- Mitigated enterprise-wide trade compliance risks, assured awareness and commitment of resources and staffing. Drafted international trade compliance section of Tyco’s Guide to Ethical Conduct and corporate compliance standards.

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- Conducted subject matter M&A due diligence including support of CFIUS filings, internal investigations of allegations of international trade laws and corporate compliance policy violations, including associated FCPA issues.
- Provided legal guidance and expertise on all import, customs, export, export controls matters, and related FCPA issues.
- Created and maintained policies, tools and templates, including company-wide international trade compliance policy, Export Controls, US Customs, and Global Customs Manuals.
- Drafted templates for self-assessments, powers of attorney, routed transaction sample letters, end-use statements, M&A checklist and sample contract clauses.

### Accomplishments

- Created public corporate position statement on business with sanctioned countries.
- Presented to Tyco's Board of Directors on international trade compliance risks for Flow Control segment risk reviews.
- Successfully navigated corporate-wide exit from business in Iran after sanctions imposed in 2010.
- Prepared Flow Control segment's trade compliance program in advance of acquisition by Pentair.
- Successfully resolved 2 US Customs audits.

### BP America, Inc., Warrenville, IL | Group Counsel and Manager, US Customs

2002-2008

- Responsible for US import compliance.
- Lead counsel for customs issues in the Americas region for upstream, downstream, pipeline and retail segments.
- Promoted in May 2007 to a leadership role in a global customs delivery team managing a staff of 5 responsible for all US import regulatory compliance activities and import operations for Refining and Production businesses.
- Worked with Tax senior management and Procurement & Supply Chain Management group on contract negotiation, federal tax planning and cost-saving initiatives. Managed budget for group.
- Drove automation and modernization into compliance tools including teaming on developing new web-enabled FTZ software with an outside vendor, and leveraged SharePoint to collect and analyze trade compliance data.
- Advised, counseled and represented BP North American businesses in all aspects of customs and trade matters.
- Navigated BP into the US Importer Self-Assessment (ISA) program as the first oil major.

### Accomplishments

- Successfully helped create first commercial web-based FTZ software for petroleum industry with external partner.
- Resolved multimillion-dollar import controversies in favor of the company against US Customs & Border Protection.
- Lead Americas Tax Dept. Health Safety, Security & Environment team to deliver on corporate health and safety goals.

### Motorola, Inc., Schaumburg, IL | Senior Global Trade Specialist

2000-2002

- Responsible for US import compliance, support of global import compliance, and Motorola Corporate import operations.
- Directed internal reviews by outside counsel and consultants. Solved global trade problems globally for the company.
- Created and supported global customs database; awarded Corporate Compliance Award.

### Barnes, Richardson & Colburn, Chicago, IL | Associate Attorney

1998-2000

### Expeditors Consulting Services, LLC, Seattle, WA | Senior Consultant

1996-1998

### O'Donnell, Byrne & Williams (merged with Clark Hill), Chicago, IL | Law Clerk

1994-1996

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### Professional Affiliations

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- American Association of Exporters and Importers (AAEI). Vice-Chair for Membership (2016-present). [www.aaei.org](http://www.aaei.org)
- Coalition for Excellence in Export Compliance (CEEC). Founding member. [www.ceecbestpractices.org](http://www.ceecbestpractices.org)
- Frequent speaker at seminars and conferences including the ABA, AAEI, International Compliance Professionals Association (ICPA), American Conference Institute (ACI), Marcus Evans, and C-5 (European) conferences.

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### Bar Admissions, Licenses, and Education

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Illinois Bar • Admitted 1996, Attorney Number 6237197  
Washington, D.C. Bar • Admitted 2015, Attorney Number 1025623  
Licensed U.S. Customs Broker • Issued 1996, License Number 15315  
DePaul University College of Law • LL.M Taxation 2009, J.D. 1996  
University of Illinois at Urbana • B.A. (With Distinction) 1993