



Chris Griner Partner

As Chair of Stroock's National Security/CFIUS/Compliance Practice Group, Chris Griner helps foreign and domestic companies negotiate the maze of government regulations involved in acquiring or investing in companies considered U.S. national security assets. He is widely recognized as a leader in the field of national security/CFIUS and played a key role in the development of the Foreign Ownership, Control or Influence ("FOCI") mitigation arrangements used by the U.S. government today.

Foreign and domestic companies across diverse industries turn to Chris for advice on all phases of the CFIUS process, from assessing potential areas of national security concern to preparing filings and working with the government to achieve favorable outcomes. He has handled transactions worth millions to multiple billions of dollars involving CFIUS or other national security obstacles and is renowned for structuring mitigation arrangements to obtain successful results.

Chris has been awarded many accolades, including the highest ranking by *Chambers Global* and as a *Washingtonian* "Star of the Bar." He has been invited by the U.S., British and Italian governments to address CFIUS and other regulatory aspects of foreign direct investment in the United States, and has been quoted in prominent publications including *The Financial Times*, *The Washington Post*, *The Deal*, *China Legal Review* and *American Law Daily*.

Prior to joining Stroock, Chris served as an attorney advisor in the Office of the General Counsel of the Department of Defense and is a Lieutenant Colonel, USAF, Retired. He is a certified pilot and enjoys flying his own plane on the weekends.

Representative Matters

- Representation of a German multinational corporation before CFIUS and the Directorate of Defense Trade Controls in connection with the German corporation's \$5 billion acquisition by a Chinese corporation, the largest acquisition of a German company by a Chinese investor, and the first Chinese corporate acquisition of a publicly traded German company.
- Hundreds of CFIUS reviews on transactions ranging in value from less than \$1 million to \$38 billion. FOCI mitigation arrangements in compliance with national industrial security regulations.
- Export control compliance matters before the Department of State and the Department of Commerce.

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Related Services

- Government Affairs
- Israel
- National Security / CFIUS / Compliance

Education

- J.D., Rutgers University School of Law - Camden, 1973
- B.A., Lehigh University, 1971

- Representation of a major Italian industrial group operating globally in aerospace, defense and security sectors; advice and counsel concerning CFIUS and U.S. national security regulatory approvals for acquisitions.
- Representation of the world's largest supplier of commercial airplane assemblies and components; advice and counsel on national security issues related to \$1.65 billion initial public offering and subsequent transactions.
- Representation of major British defense company in numerous acquisitions of U.S. national security contractors, including a \$1.8 billion acquisition.
- Representation of one of the world's leading aerospace and defense electronics companies; advice and counsel in CFIUS and national security issues related to strategic Foreign Direct Investment ("FDI") acquisitions in the United States.
- Representation of major Italian industrial group in the \$5.2 billion acquisition of a major U.S. defense contractor, requiring CFIUS approval.
- Representation of a major U.K. electronics firm before CFIUS in its acquisition of several U.S. defense businesses.

Honors & Awards

- *Law 360's* 2019 International Trade MVP
- *Chambers USA: America's Leading Lawyers for Business* and *Chambers Global: The World's Leading Lawyers for Business*
- *Washingtonian*, Star of the Bar
- *Super Lawyers*
- The Rutgers Law School's Arthur E. Armitage Sr. Distinguished Alumni Award
- World Affairs Council Founders Award, 2015

Memberships

- Member, Atlantic Council
- Director, Task Force on Foreign Investment, Trade Policy and Sectoral Review, Antitrust Section, American Bar Association
- Director, World Affairs Council
- Member, The District of Columbia Bar Association

Speeches & Events

- Panelist, "The Security of Defense Trade with Allies," The Atlantic Council, May 26, 2021
- Speaker, IDEEA'S Common Defense Network Interviews Series, Common Defense Network, April 9, 2021
- Chair, ACI's National Forum on FOCI, Washington, DC, July 14, 2020
- Speaker, "New CFIUS Regulations and Foreign Investment in US Real Estate," November 14, 2019
- Speaker, "FIRRMA: Foreign Investment Impact," November 13, 2019

- Speaker, "Special Briefing: FIRRMA Effects on Foreign Real Estate Investors," November 12, 2019
- Co-chair and speaker, "The Annual Aerospace & Defense Acquisitions Roundtable," Washington, DC, April 29, 2019
- Co-chair and Keynote Speaker, ACI's National Forum on FOCI, Washington, DC, April 23, 2019
- Speaker, "CFIUS and FOCI Roundtable," November 30, 2018
- Co-chair and Speaker, "The Annual Aerospace & Defense Acquisitions Roundtable," Washington, DC, April 24, 2018
- Speaker, "FDI in the US," 4th Industrial Revolution for Education Forum, Darussalem, Brunei, March 21, 2018
- Speaker, "Navigating CFIUS for Chinese Investors," Understanding China, New York, NY, January 18, 2018
- Keynote Speaker, "Recent and Emerging Developments Impacting FOCI Risks," ACI's National Forum on FOCI, Washington, DC, December 6, 2017
- Speaker, "Panel Discussion on the Current State of CFIUS," Elevation, New York, NY, September 14, 2017
- Panelist, "New Global Industrial Partnerships," ComDef 2017: Realigning Priorities in an Uncertain Era, Washington, DC, September 6, 2017
- Speaker, "Sharpening Outside Directors' & Proxy Holders' Roles," Defense Security Service Foreign Ownership, Control or Influence Conference, U.S. Patent & Trade Office, Alexandria, VA, July 21, 2017
- Presenter, "Defense Security Service Industry Roundtable," Quantico, VA, June 23, 2017
- Moderator, "Foreign Investment and National Security in the Age of Trump," Stroock Government Relations Leadership Forum Series, New York, NY, June 15, 2017
- Speaker, "U.S. Regulatory Landscape," U.S. Embassy Brussels, Brussels, Belgium, October 20, 2016
- Speaker, "U.S. Regulatory Landscape," U.S. Chamber of Commerce, Milan, Italy, June 15, 2016
- Panelist, "North America-Europe Industrial Partnerships: Landscape | M&A," ComDef 2016: Developing Enduring Partnerships, Villepinte, France, June 14-15, 2016
- Speaker, "U.S. Regulatory Landscape," GICAT, Paris, France, June 13, 2016
- Speaker, "The Annual Aerospace & Defense Acquisitions Roundtable," Washington, DC, April 19, 2016
- Speaker, "CFIUS Annual Report," Atlantic Council Forum on The Regulation of M&A Among U.S. Defense Companies, Washington, DC, March 7, 2016
- Speaker, Special Briefing for Embassy of the United Kingdom, Washington, DC, February 26, 2016

- Speaker, Aerospace States Association and Department of Commerce's National Aerospace Foreign Direct Investment (FDI) Expo, Los Angeles, CA, October 26-28, 2015
- Speaker, U.S. Legal Implications of Foreign Direct Investment for Chinese CEO's, Washington, DC, September 23, 2015
- Speaker, Investing in the US National Security Arena/FDI, U.S. Consulate, Milan, Italy, June 24, 2015
- Panelist, Next Generation Dialogue on Industry and Defense: Globalization versus the Culture of National Security, Washington, DC, April 30, 2015
- Panelist, "National Security Regulatory Requirements Facing Foreign Companies in the United States," Opportunities for UK Technology Companies in the US Defense Market, UK Embassy, London, February 24, 2015

Publications

- Co-author, Bankruptcy Can Trigger CFIUS Review, *Stroock Client Alert*, May 10, 2021
- Co-author, "New Year, New NISPOM," *Stroock Client Alert*, February 24, 2021
- Co-author, "CFIUS Initiatives Signal Opportunities for Some Foreign Investors," *Stroock Client Alert*, February 4, 2021
- Co-author, "NID Requirements Further Liberalized for NTIB Countries," *Stroock Client Alert*, December 1, 2020
- Co-author, "Déjà vu All Over Again: Biden's CFIUS Should Feel Familiar," *Stroock Client Alert*, November 23, 2020
- Co-author, "Foreign Investments in the U.S. Insurance Industry Are Subject to Potential Review by the Committee on Foreign Investment in the United States," *Stroock Client Alert*, October 23, 2020
- Co-author, "This Week: New Rules Affect Mandatory CFIUS Filings and Export Controls," *Stroock Client Alert*, October 13, 2020
- Co-author, "Foreign Investments in the U.S. Insurance Industry are Subject to Potential Review by the Committee on Foreign Investment in the United States," *Stroock Client Alert*, September 30, 2020
- Co-author, "Tick-Tock, TikTok: CFIUS Indicates Time May Be Running Out for Chinese Ownership of TikTok," *Stroock Special Bulletin*, August 4, 2020
- Co-author, "Bipartisan Legislation Could Open Foreign Supply Chains to New Scrutiny," *Stroock Special Bulletin*, July 13, 2020
- Co-author, "Proposed CFIUS Regulations May Shortcut Filing Requirements for Investors From Allied Countries," *Stroock Special Bulletin*, May 27, 2020
- Co-author, "Treasury Takes a Cut: CFIUS Filing Fees Begin This Week," *Stroock Special Bulletin*, April 29, 2020
- Co-author, "Foreign Ownership, Control, or Influence: FOCI Review Now Reaches DOD Unclassified Contracts and Subcontracts," *Stroock Special Bulletin*, April 16, 2020

- Co-author, "Is There a New Sheriff in Town?" *Stroock Special Bulletin*, April 10, 2020
- Co-author, "An Old Law for the New War: Defense Production Act Not Just for Government Contractors," *Stroock Special Bulletin*, April 2, 2020
- Co-author, "Mapping Risk: New CFIUS Tool for Real Estate Investors," *Stroock Special Bulletin*, March 31, 2020
- Co-author, "COVID-19, CFIUS and the Defense Production Act," *Stroock Special Bulletin*, March 26, 2020
- Co-author, "CFIUS Filing Fees: Proposed Rule Announced," *Stroock Special Bulletin*, March 5, 2020
- Co-author, "New Decade, New CFIUS: New Rules Expand CFIUS Reach Into Non-controlling Investment and Real Estate," *Stroock Special Bulletin*, January 22, 2020
- Co-author, "Breaking News: Final CFIUS Regulations Published by Treasury," *Stroock Special Bulletin*, January 13, 2020
- Co-author, "CFIUS and Foreign Investment: 2020 Brings Changes to U.S. National Security Regulations," *Stroock Special Bulletin*, January 6, 2020
- Co-author, "Outside Director/Proxy Holder Requirements Are Changing," *Stroock Special Bulletin*, October 15, 2019
- Co-author, "Real Estate Transactions Impacted by New CFIUS Regulations," *Stroock Special Bulletin*, September 23, 2019
- Co-author, "Long-awaited CFIUS Regulations Published for Comment," *Stroock Special Bulletin*, September 18, 2019
- Co-author, "Key CFIUS Concerns for Funds," *Stroock Special Bulletin*, September 12, 2019
- Co-author, "CFIUS Clarifies Its Investment Funds Exceptions (Via Additions to Its FAQs for the Critical Technology Pilot Program)," *Stroock Special Bulletin*, July 10, 2019
- Co-author, "Feddo Senate Confirmation Hearing Heralds New Era of Leadership for CFIUS," *Stroock Special Bulletin*, June 6, 2019
- Co-author, "NID Requirement Will End Sooner than Anticipated for Some Entities," *Stroock Special Bulletin*, April 25, 2019
- Co-author, "The New Reality: CFIUS Now Able to Impact Deal Timelines during a Government Shutdown," *Stroock Special Bulletin*, January 23, 2019
- Co-author, "New Rules for New Deals: What You Need to Know About the CFIUS Pilot Program," *Stroock Commentary*, December 4, 2018
- Co-author, "Treasury Pilot Program Requires CFIUS Declarations for All Qualifying Investments," *Stroock Special Bulletin*, October 10, 2018
- Co-author, "CFIUS Reform Flies, But With Clipped Wings," *Stroock Special Bulletin*, July 26, 2018
- Co-author, "CFIUS Reform Easily Passes Senate," *Stroock Special Bulletin*, June 19, 2018

- Co-author, “The Elephant in the Room,” *Stroock Special Bulletin*, December 4, 2017
- Co-author, “Four Things You Need to Know About the CFIUS Reform Legislation,” *Stroock Special Bulletin*, November 8, 2017
- Co-author, “Some Secret and Not-So-Secret Findings in the CFIUS Annual Report,” *Stroock Special Bulletin*, September 29, 2017
- Co-author, “New Reporting Requirements For Foreign Travel and Foreign Contacts by Government Contractors,” *Stroock Special Bulletin*, July 17, 2017
- Co-author, “Real Estate In the Crosshairs: Congressional Calls to Step Up Scrutiny of Foreign Investment,” *Global Banking & Finance Review*, June 21, 2017
- Co-author, “The National Industrial Security Program Directive: Some Hits, Some Runs, Some Errors,” *Stroock Special Bulletin*, February 13, 2017
- Co-author, “NISPOM Amendments Affect All Cleared Contractors,” *Pratts Government Contracting Law Report*, September 2016
- Co-author, “CFIUS Reviews are a Reality for More and More Cross-Border Transactions,” *California International Law Journal*, Summer 2016
- Co-author, “NISPOM Amendments Affect All Cleared Contractors,” *Stroock Special Bulletin*, May 25, 2016
- Co-author, “China On Top: China Dominates CFIUS Reviews for Third Year in a Row,” *Stroock Special Bulletin*, February 19, 2016

Admitted To Practice

- District of Columbia