



Guillermo S. Christensen

Partner

Washington DC
+1.202.778.9095

Guillermo.Christensen@klgates.com

OVERVIEW

Guillermo Christensen is a partner and a former CIA officer and diplomat. He is a national security law practitioner, focusing on cybersecurity and data protection, export controls and sanctions and national security reviews of mergers, acquisitions, and investments. Prior to joining K&L Gates, Guillermo was the office managing partner in D.C. for another law firm.

Guillermo combines his experience as a former CIA officer, a diplomat with the US Mission to the OECD in France, and an attorney to shape and inform the advice he provides to clients on enterprise risks involving cybersecurity, national security, and complex international business matters. He has overseen many serious cybersecurity incidents, including ones involving nation state threat actors and organized criminal groups employing ransomware. His cybersecurity work covers assessing risks, building effective cybersecurity programs, counseling boards and leadership teams, and managing incidents and breaches. Guillermo's work includes training lawyers and security experts, for example, as an instructor at the FBI CISO Academy in Quantico, where he has taught on the legal issues around incident response to hundreds of Chief Information Security Officers.

Drawing on his national security background, Guillermo counsels clients in dealing with economic sanctions and embargoes administered by the Office of Foreign Assets Control (OFAC) and export controls via the Commerce Department, including complex technology matters involving China. His work in national security-related mergers, acquisitions, and investments includes those requiring review by the Committee on Foreign Investment in the United States (CFIUS). In the CFIUS context, Guillermo has worked in particular on high-technology, defense sector and critical infrastructure deals involving China, Russia, the Middle East, and Europe.

Guillermo has also represented clients in complying with complex international investigations around the Foreign Corrupt Practices Act (FCPA) and OFAC investigations and voluntary disclosures. His investigations work is reinforced by his international network, his practical experience in intelligence collection and analysis, and deep technical knowledge around data collection and analytics. He has investigated matters in South America, Africa, Asia, and the Middle East involving companies operating in the energy, high-technology, defense, and transportation sectors. He also advises companies on the adequacy of internal controls and compliance policies and has set up compliance programs from the ground up for companies expanding into international markets, including training programs and board-level market entry advice.

PROFESSIONAL BACKGROUND

Before becoming a lawyer, Guillermo served as an intelligence officer with the CIA for 15 years in international and US assignments. His experience included inter-agency roles with the Departments of Defense and State, the FBI and several national intelligence fusion centers. In 2001, Guillermo was selected by the CIA Director to serve as the National Intelligence Fellow to the Council on Foreign Relations in New York, a position designated for an officer on the cusp of senior leadership within the US intelligence community. He was subsequently accepted as a life member of the Council on Foreign Relations. Guillermo's national security work has been recognized by the State Department (Meritorious Award for Contributions to the Balkan Peace Process) and the CIA (multiple awards).

Guillermo is an adjunct professor at Georgetown University Law Center, teaching students a course of "AI Skills for Lawyers" and has lectured at universities in Qatar, Mexico City, Kuwait, and in the United States. He also teaches at the FBI's CISO Academy in Quantico Virginia.

He is a founding member of the DC Metro Chapter of the Private Directors Association, a founder and board member of the National AI and Cybersecurity Information Sharing Association (NAIC-ISA), and a board member of the Association of US Cyber Forces (AUSCF).

Guillermo is active with the Hispanic National Bar Association (HNBA) and the Latino Executive Network (LEN).

An immigrant from Argentina, Guillermo has lived and worked in Latin America, Africa, the Middle East, and Europe.

PROFESSIONAL / CIVIC ACTIVITIES

- Advisor, NetDiligence Latin America Cyber Risk Summit
- Advisor, Council for Intelligence Issues (CII)
- Law360 2023 Cybersecurity & Privacy Editorial Advisory Board
- Life Member, Council on Foreign Relations
- Risk Advisor with the Risk Assistance Network Exchange (RANE)
- Co-President, DC Metro Chapter, Private Directors Association
- Hispanic National Bar Association
- Leadership Council on Legal Diversity, 2016 Baker Botts Fellow
- International Association of Privacy Professionals
- Association of Former Intelligence Officers
- The OSS Society
- Central Intelligence Retirees Association

- Private Sector Member, Department of Homeland Security and Director of National Intelligence Analytic Exchange Program 2019-2020 (Geopolitical Cyber Threats) and 2020-2021 (Cyberlaw)

SPEAKING ENGAGEMENTS

- Speaker, "Ransomware: To Pay or Not to Pay," Forbes Technology Council, 4 April 2024
- Guest, "Navigating Geopolitical Risk with Guillermo Christensen, Partner at K&L Gates," Center For Strategic & International Studies, 18 March 2024
- Speaker, "Cyber and Class Actions Litigations are on the Rise," The PLUS Cyber Symposium webinar, February 2024
- Speaker, "Emerging Risks for Private Companies...and How the Board Can Help Alleviate Them," May 2023
- Speaker, "Cryptocurrencies and Ransomware; DEFCON29 Cryptovillage," August 2021
- Speaker, "Ransomware con Guillermo Christensen (Spanish Podcast), El Monero Podcast," August 2021
- Speaker, "Cryptocurrencies and Ransomware; DEFCON29 Cryptovillage," August 2021 Speaker - "Ransomware con Guillermo Christensen (Spanish Podcast), El Monero Podcast," August 2021
- Panel Moderator, "Liability for Companies in Cyberbreaches," Tortora Brayda Institute, June 23, 2021
- Panelist, "Cybersecurity & Law: Emerging Legal Precedents that Directors Need to Know," Private Directors Association Webinar, 10 June and 22 June 2021
- Panelist, "Hot Topics," Tortora Brayda Institute, 26 May 2021
- Speaker, "OFAC Ransomware Advisory," ABA Export Controls Committee Webinar, 16 March 2021
- Speaker, "Cybersecurity Risk for Boards," RANE and NASDAQ Virtual Conference, 3 December 2020
- Panelist, "Ephemeral Messaging: Balancing the Benefits and Risks," Wickr and Driven Webinar, 8 June 2020
- Panelist, Congressional Roundtable, "Understanding the Cyber Threats and Actors Exploiting the COVID-19 Crisis," U.S. House of Representatives Committee on Financial Services, 28 May 2020
- Speaker, "Inside the Firm: COVID-19 and the National Security Implications," Litera TV, 22 May 2020
- Keynote, "Cybersecurity Threats to Utility Infrastructure," Indiana State Bar Energy Section Annual Conference, Bloomington, IN, 11 September 2019
- Speaker, "GDPR, CCPA and More: A Connected World Accelerates the Privacy Discussion," RealComm Annual Conference, Nashville, TN, 13 June 2019
- Speaker, "Gone with the Wind: Your Security Walls are Down," Government Finance Officers Association, Los Angeles, CA, 22 May 2019
- Moderator, Panel on Developing an Effective Cyberpolicy for the United States, Council on Foreign Relations International Fellowship Conference, New York, NY, 3 May 2019

- ABA GPSolo Annual Conference, Cybersecurity and Law Firms, New York, NY, 2 May 2019
- Panelist, Ephemeral Messaging and E-Discovery Challenges Panel, ABA 13th Annual National Institute on E-Discovery, Chicago, IL, 26 April 2019
- Panelist, “5G Technology and Security Challenges,” Conecta Mexico 2019, Mexico City, Mexico, 4 April 2019
- Keynote, Cybersecurity and FinTech, eShow Mexico 2019, Mexico City, Mexico, 3 April 2019
- “The Current Challenges Facing Mexico in Cybersecurity,” Interview with Ana Maria Salazar, El Financiero Television Show, 2 April 2019
- “Cybersecurity Challenges to Critical Infrastructure,” Houston Compliance Exchange, 7 March 2019
- Keynote, “Private-Public Sector Cybersecurity Cooperation” – Qatar National Bank 5th Annual Cybersecurity Forum, Doha, November 2018
- Speaker, “Cybersecurity Fundamentals for Companies” – Overseas Security Advisory Committee, Doha, November 2018
- Speaker, “Spycraft and the Hacker Mindset” – DRI Cybersecurity Conference, Chicago, IL, September 2018
- Speaker, “International Cooperation in Corruption Investigations, Buenos Aires, Argentina
- Speaker, “Legal Privilege in Cross-Border Investigations,” Corporate Parity 3rd Annual Anti-Corruption Conference, Amsterdam, The Netherlands, May 2018
- Speaker, “Spy Craft: Nation-state Cyber Threats and Managing Enterprise Risks,” Hispanic National Bar Association Corporate Counsel Conference, March 2018
- Speaker, “Fireside Chat on Cybersecurity and Global Risks,” Control Risks RiskMap 2018 Conference, January 2018
- Moderator, “Protecting Attorney Client Privilege During a Data Breach Investigation,” Insecurity 2017 Conference, November 2017
- Moderator and Speaker, “Cyber Breaches: What General Counsels Need to Know About Detection and Response,” Brown Rudnick Cyber Conference, November 2017
- Speaker, “Cybersecurity: What Compliance Officers Need to Know,” Houston Compliance Counsel Exchange, October 2017
- Panelist, “Cybersecurity Risk and Insurance,” Hispanic National Bar Association Annual Convention, September 2017
- “Law Firms and Data Security,” Sedona Conference Working Group 11, September 2017
- Panelist, ABA Section of International Law, Data Security in the Panama Paper Context, April 2017
- Speaker, “China's New Cybersecurity Law,” SINET ITSEF Palo Alto Conference, March 2017
- Panelist, “Law Firm Data Security,” Sedona Conference Working Group 11, January 2017

- Speaker, “Cybersecurity Threats to Critical Infrastructure,” St. John's University School of Risk Management, November 2016
- Speaker, “Cybersecurity Challenges to Public Utilities,” Conference for the American Public Power Association, October 2016
- Speaker, St. John's University Conference on Geopolitical Risk and Cybersecurity, October 2015
- Moderator, Closing Plenary Panel on Technology, Council on Foreign Relations Conference on Diversity in International Relations, 2014
- Presenter, “Cyber Crimes, Ethics & Social Media,” Hispanic National Bar Annual Conference, September 2013
- Moderator, “Forecasting the Future: Social Media as an Intelligence Tool,” Council on Foreign Relations, February 2012
- Speaker, “Data Governance and US Policy,” IBM Data Governance Conference, Talleyrand Center, 2011

EDUCATION

- J.D., Georgetown University Law Center, 2005
- M.S.F.S., Georgetown University School of Foreign Service, 1990
- B.A., American University, 1988

ADMISSIONS

- Bar of District of Columbia
- Bar of New York
- Bar of Virginia

THOUGHT LEADERSHIP *POWERED BY HUB*

- 25 April 2024, “Under the Wire” CLE Seminar-Navigating International Waters: Cross-Border M&A, International Arbitration, and Construction Disputes
- 21 March 2024, President Biden Issues Executive Order Restricting Bulk Transfers of Sensitive Personal and US Government-Related Data
- 15 March 2024, Biden Administration Takes Actions to Bolster Maritime Cybersecurity in the US Maritime Domain
- 1 February 2024, Twelfth Annual “Under the Wire” CLE Webinar

- 3 January 2024, DOJ, FBI, and SEC Provide Guidance for Delay Requests Relating to Disclosure of Cybersecurity Incidents Under Form 8-K
- 15 December 2023, US Government Highlights Sanctions and Export Control Obligations to Improve Compliance and Prevent Evasion
- 3 November 2023, President Biden Issues Wide-Ranging Executive Order on Artificial Intelligence
- 27 October 2023, US Government Revises Comprehensive Export Controls on Semiconductors and Semiconductor Manufacturing Equipment
- 19 October 2023, OFAC Imposes First Sanctions for Russian Oil Price Cap Violations
- 19 October 2023, United States Eases Sanctions on Venezuela
- 15 August 2023, United States Imposes Unprecedented Outbound Investment Controls Focused on China
- 15 August 2023, Complying With FinCEN's Beneficial Ownership Reporting Rules Under the Corporate Transparency Act
- 11 August 2023, CFIUS Proposal Underscores Risks in Foreign Real Estate Acquisitions in the United States
- June 2023, Generative AI - Legal, Policy, and Ethical Considerations
- 16 June 2023, Biden Administration Seeks Input on AI Risks and Opportunities
- 12 June 2023, May 2023 Accolades
- 6 June 2023, Russia-Related Export Controls Continue to Escalate
- 19 May 2023, Secure Software Regulations and Self-Attestation Required for Federal Contractors
- 2 May 2023, US Government to Penalize Failures to Disclose Possible Export Control Violations and Incentivize Reporting of Others' Violations
- 21 October 2022, U.S. Government Imposes Significant New Export Controls on Semiconductor, Semiconductor Manufacturing Equipment, and Supercomputer-Related Transactions Involving China and Chinese Entities

OTHER PUBLICATIONS

- "Biden Administration takes action to bolster maritime cybersecurity in the US maritime domain," *Safety4Sea*, 20 March 2024
- "US Government Revises Comprehensive Export Controls on Semiconductors and Semiconductor Manufacturing Equipment," *The Global Trade Law Journal*, March-April 2024
- "Complying With FinCEN's Beneficial Ownership Reporting Rules Under the Corporate Transparency Act," *Real Estate Finance Journal*, Winter 2023

- "Secure Software Regulations and Self-Attestation Required for Federal Contractors," *Pratt's Government Contracting Law Report*, September 2023

NEWS & EVENTS

- 8 September 2023, Controlling the Chaos: Challenges for GCs and Boards, Hosted by Hispanic National Bar Association
- 18 May 2023, Private Company Governance Summit 2023, Hosted by Family Business Magazine
- 7 December 2022, Board effects of the 2022 Lame Duck session : ZOOM MEETING, Hosted by PDA DC Metro chapter
- 10 October 2022, NetDiligence® Cyber Risk Summit, Hosted By NetDiligence®
- 3 August 2022, K&L Gates Adds Antitrust, Competition, and Trade Regulation Partner in Washington, D.C.

MEDIA MENTIONS

- Quoted, "Alphv ransomware gang claims it reported MeridianLink to SEC," *Tech Target and National Cyber Security*, 16 November 2023
- Quoted, "Firms Taking Cautious Approach To AI-Assisted Lobbying," *Law360*, 16 October 2023
- Quoted, "Cybersecurity and Geopolitical Concerns Are Rising as Private Company Risks," *Private Company Director*, 10 July 2023
- Quoted, "Sequoia Capital's split-off of China business spurred by Sino-U.S. rift," *Nikkei Asia*, 8 June 2023
- Quoted, "Ex-Fed Officials Scratching Heads After Defense Docs Leak," *Law360*, 14 April 2023
- Quoted, "Building bridges, inspiring and empowering communities," *Times Kuwait*, 4 February 2023
- Quoted, "An American expert in electronic security: the need to develop preventive measures to address electronic crimes," *KUNA.net.kw*, 27 January 2023
- Quoted, "Tapping into the Untapped: Mercedes Vazquez with Christy Watkins and Guillermo Christensen," *Spotify.com (Tapping into the Untapped)*, 27 January 2023
- Quoted, "The conflict in Ukraine has affected cybercriminals, too," *TheEconomist.com*, *FutureNews.tech*, and *YahooFinance.com*, 30 November 2022
- "Commentary on Ephemeral Messaging," The Sedona Conference Working Group 6 on International Electronic Information Management, Discovery and Disclosure (WG6), July 2021
- "Courts Should Use Encryption Technology to Stay Safe," *Bloomberg Law*, 26 April 2021
- "Self-Hosted Cryptocurrency Wallets Face New Privacy Hurdles," *Law360*, 5 January 2021
- "Indiana High Court Says Government Can't Unlock Your Phone," *Bloomberg Law*, 20 July 2020

- "Cyber-Criminals Revive W-2 Scams Ahead of Extended Tax Deadline," *Inside Indiana Business*, 22 June 2020
- "Does Your Cyber Policy Cover Funds 'Stolen' During Email Spoofing?" *Inside Indiana Business*, November 6, 2019
- "UK Litigation and Guidance Highlight Cybersecurity Risk," *Law360*, 10 January 2019
- "How Cellphone Chips Became a National-Security Concern," *WJS*, March 2018
- "Broadcom's Deal for Qualcomm is in Serious Jeopardy, and It Might Have to Abandon Its Bid and Come Back Later," *CNBC*, March 2018
- "For Equifax's Legal Team, Breach Likely to Bring Litigation Challenges, High Price Tag," *Law.com*, September 2017
- "Law360 Privacy/Consumer Protection Editorial Advisory Board," *Law360*, March 2017
- "As Hacking Incidents Rise, Cybersecurity to Remain a Priority under Trump," *The Street*, November 2016

AREAS OF FOCUS

- Antitrust, Competition, and Trade Regulation
- Data Protection, Privacy, and Security
- International Trade: CFIUS, Sanctions, and Export Controls
- U.S. National Security Law and Policy
- White Collar Defense and Investigations

INDUSTRIES

- Artificial Intelligence
- Cybersecurity and Privacy
- Digital Assets, Blockchain Technology and Cryptocurrencies
- Digital Health
- Health Care Sector
- Technology