

Snell & Wilmer



T. Troy Galan

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Main Bio

Troy Galan advises domestic and foreign clients on matters at the intersection of national security and international trade, with an emphasis on international transactions, government contracting, and related government and internal investigations. He counsels clients on the Committee on Foreign Investment in the United States (CFIUS), export controls, economic sanctions, foreign anti-corruption, and customs regulations. Leveraging his deep understanding of these practice areas, Troy assists industries such as defense, aerospace, and advanced technology companies in maneuvering the compliance requirements associated with government contracts, awards, and grants.

Previously, Troy served as a senior member of the legal team overseeing one of the largest corporate monitorships in U.S. history as part of a Department of Justice and Bureau of Industry and Security (BIS) settlement agreements.

Troy serves on Snell & Wilmer's Export Compliance Committee and is a regular contributor to the firm's International Industry group's [Global Connection](#) newsletter.

CFIUS

Troy's national security practice focuses on advising a wide range of clients, from multinational corporations to emerging companies, in navigating the regulatory aspects of foreign investments, such as complex M&A deals and startup funding. He assists buyers and sellers in understanding and mitigating the risks associated with investments, acquisitions, divestments, transfers, and other corporate transactions.

He has experience analyzing pre-transaction risks, conducting due diligence reviews, negotiating agreements, preparing voluntary and mandatory filings to the Committee, and responding to CFIUS inquiries.

Export Controls, Economic Sanctions, & Foreign Anti-Corruption

Troy evaluates jurisdiction, classification, and licensing requirements under the International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR), and Office of Foreign Assets Control (OFAC). He also prepares license applications, commodity jurisdiction (CJ) requests to the Department of State, and commodity classifications to the Department of Commerce.

By conducting risk assessments of business operations, Troy assists clients in establishing or enhancing policies, procedures, and assessing compliance programs for adherence to international trade regulations such as the Foreign Corrupt Practices Act (FCPA). He also provides guidance on "know-your-customer" and due diligence best practices to negotiate agreements and contractual safeguards for transactions of all sizes. Additionally, Troy frequently provides training on these compliance areas.

Customs

Troy advises clients on complying with Customs and Border Protection (CBP) regulations and resolving customs violations. He has experience representing importers and exporters during CBP inquiries, responding to notices of violation, and related administrative proceedings.

Troy also counsels clients regarding country of origin analyses and tariff and duty determinations. As part of his customs practice, he assists clients in requesting CBP rulings, seeking beneficial tariff treatment for onshoring and nearshoring operations, and establishing Foreign Trade Zones in the United States.

U.S. Government Contracts

With his experience in foreign investments and other international trade matters, Troy counsels clients on key regulatory and compliance requirements under the Federal Acquisition Regulations (FARs) and Defense Federal Acquisition Regulation Supplement (DFARS) related to U.S. Government bids, contracts, and other federal funding opportunities.

Troy also helps clients in compliance matters involving the Buy American Act, Free Trade Agreements Act, Buy America regulations, and related procurement agreements involving foreign supply chains.

Government and Internal Investigations

Troy's experience as a former senior member of the legal team responsible for one of the largest corporate monitorships in U.S. history uniquely qualifies him to assist clients in handling U.S. Government enforcement cases. With extensive experience preparing confidential reports for federal law enforcement agencies, he provides clients with valuable insights to resolve violations and mitigate penalties while addressing business and national security concerns.

Finally, Troy has experience in overseeing internal investigations for multinational corporations. Having led internal inquiries and legal audits across Asia, Europe, Latin America, and the Caribbean, he assists companies in aligning with U.S. laws and regulations. Troy's approach emphasizes the importance of thorough internal investigations while minimizing disruptions to day-to-day operations and unwanted publicity.

Representative Transactions

CIFUS

- Assisted biopharmaceutical development company in responding to CFIUS inquiries involving Middle East joint venture.
- Represented electric battery company in securing Series A investment from multinational oil and gas company and negotiating joint venture agreement with European battery manufacturer.
- Advised Australian landfill biogas company in acquisition of U.S. subsidiary.
- Assisted U.S. Government software provider in its sale to private equity firm.

Exports

- Appointed by State Attorney's General Office as outside counsel to develop and maintain an international purchase agreement.
- Secured TAA authorizing manufacturer of printed circuit boards (PCBs) for defense applications to expand its supply chain to a multi-country operation.

- Counseled an international nonprofit organization focused on warzone relief efforts on compliance matters involving operations in Ukraine and Sudan.

International Trade

- Assisted golf equipment manufacturing company in establishing an export compliance program and negotiating international supplier agreements.
- Counseled international luxury hotels holding company in revamping its FCPA compliance program.
- Represented Canadian diamond company in validating its compliance program to maintain U.S.-based banking operations.

U.S. Government Contracts

- Counseled various semiconductor-related entities in development agreement negotiations with state and local jurisdictions.
- Represented nonprofit hospital network in PPP loan appeal resulting in the overturning of a \$10 million denial of forgiveness.

Investigations

- Assisted international nonprofit organization in conducting review of export, sanctions, and FCPA compliance for worldwide operations.
- Counseled Canadian food conglomerate in responding to a CBP inspection.
- Assisted medical equipment manufacturer company in dual United States/Germany investigation of Russian sanctions violation.
- Represented national staffing company in a PPP loans False Claims Act investigation.

Education

- SMU Dedman School of Law (J.D.)
 - Jackson Walker Moot Court Competition, Best Speaker
 - American Constitution Society
 - Student Bar Association
- University of Southern California (B.A., Political Science)
 - Phi Theta Kappa Honors Society
 - Pre-Law Society
- Georgetown University (Law, Legislation and Politics Certificate)

Languages

- Spanish

Professional Memberships & Activities

- Snell & Wilmer's Export Compliance Committee

Representative Presentations & Publications

- "[Bribe or Gratuity? Supreme Court Narrows Federal Bribery Statute](#)," Co-Author, Snell & Wilmer Legal Alert (June 27, 2024)

- ["The ENFORCE Act: Bipartisan Efforts to Decouple from China Target AI Export Controls,"](#) Co-Author, Snell & Wilmer Global Connection Newsletter (June 25, 2024)
- ["OFAC's Reach: Shockwaves in Russia's Financial System and Global Trade,"](#) Co-Author, Snell & Wilmer Global Connection Newsletter (June 25, 2024)
- ["United States Government Doubles Statute of Limitations for Sanctions Violations,"](#) Co-Author, Snell & Wilmer Global Connection Newsletter (June 25, 2024)
- "International Trade Compliance," Co-Presenter, Snell & Wilmer CLE Webinar Series (June 4, 2024)
- Our CHIPS Act Opportunity, Panelist, Bloomberg Associates & City of Phoenix 2nd Community of Practice Convening (May 16, 2024)
- Exploring the Final Frontier: The Good, Bad and Ugly of Export Controls in Space, Panelist, University of Washington School of Law & the Space Law, Data, and Policy Program Space Course Series (April 2024)
- ["CHIPS for America: National Advances Packaging Manufacturing Program NOFO,"](#) Co-Presenter, Greater Phoenix Economic Council (March 19, 2024)
- ["United States Announces Largest Round of Sanctions Since the Start of Russia's War in Ukraine,"](#) Co-Author, Snell & Wilmer Legal Alert (March 6, 2024)
- ["CFIUS & Export Controls: The Foreign Investment Regulations Putting Buyers, Sellers, and M&A Practitioners at Risk,"](#) Co-Author, Snell & Wilmer Legal Alert (January 19, 2024)
- ["The Historic Shift in International Trade Regulation: Why National Security Is Now at the Forefront of Doing Business,"](#) Co-Author, Corporate Compliance Insights (December 18, 2023)
- ["CHIPS Act: NOFO - Semiconductor Materials and Manufacturing Equipment,"](#) Co-Presenter (November 6, 2023)
- ["Decoupling: A Closer Look at the Executive Order on U.S. Outbound Investments Into the Chinese Technology Sector,"](#) Co-Author, Snell & Wilmer Legal Alert (August 18, 2023)
- ["CHIPS Act Update: Expanded Funding Opportunity for Suppliers,"](#) Co-Author, Snell & Wilmer Legal Alert (August 15, 2023)
- ["Voluntary Self-Disclosures: Update on Federal Agencies' Efforts to Incentivize Self-Reporting Violations,"](#) Co-Author, Snell & Wilmer Legal Alert (July 28, 2023)
- ["CHIPS Act: Expanded Supply Chain Funding Opportunity,"](#) Co-Presenter, Greater Phoenix Economic Council (July 6, 2023)
- ["CHIPS Act Update: Preventing Improper Use of Funding & ACA Incentives,"](#) Co-Presenter, Greater Phoenix Economic Council (April 25, 2023)
- "CHIPS Act Opportunities: Eligibility and Required Steps Under the Notice of Funding Opportunity," Quoted, KTAR News (March 14, 2023)
- ["CHIPS Act Opportunities: Eligibility and Required Steps Under the Notice of Funding Opportunity,"](#) Co-Presenter, Greater Phoenix Economic Council (March 13, 2023)
- ["CHIPS Act Funding: Revamping U.S. Leadership in Semiconductor Manufacturing,"](#) Co-Author, Snell & Wilmer Legal Alert (March 6, 2023)
- "International Trade Regulatory Update," Presenter, Association of Corporate Counsel CLE (January 17, 2023)
- ["Pitfalls of Internal Investigations: Supreme Court Appeal Highlights Perils of Reliance on Consulting Firms,"](#) Co-Author, Snell & Wilmer Legal Alert (November 29, 2022)

- "[CFIUS Releases Guidance Concerning Enforcement and Penalty Actions](#)," Co-Author, S&W Legal Alert (November 15, 2022)
- "[DOJ Updated Corporate Criminal Enforcement Policies](#)," Co-Author, S&W Legal Alert (October 12, 2022)
- "[Enhanced Export Regulatory Enforcement](#)," Co-Author, Snell & Wilmer Global Connection Newsletter (July 18, 2022)
- "International Trade Compliance," Co-Presenter, Snell & Wilmer Virtual CLE Series (June 9, 2022)

Previous Professional Experience

- Stanton LLP, Associate (2019-2022)
- SMU Federal Taxpayers Clinic, Student Chief Counsel (2017-2018)
- U.S. Equal Employment Opportunity Commission, Law Clerk (2018)

Bar Admissions

- Arizona
- Texas

Court Admissions

- Supreme Court of Arizona
- Supreme Court of Texas
- United States Court of International Trade

Client News

- Snell & Wilmer Advises Federal Software Provider Integrated Data Services in Its Sale to Private Equity Firm Arlington Capital Partners