



Angela M. Santos

PARTNER

Angela counsels clients on compliance with federal regulations involving the importation of merchandise and forced labor.



Industries

Consumer Products
Fashion & Retail Law

Practices

Environmental, Social, and Corporate Governance (ESG)
Export Controls & Economic Sanctions
International Arbitration & Dispute Resolution

Education

Brooklyn Law School JD, 2010
Boston University BS, Business Administration,
International Management, Cum Laude, 2003

Offices

New York

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Angela helps companies identify business solutions and structure their transactions to facilitate the importation of merchandise, ensure regulatory compliance, minimize duties, and eliminate Customs penalty exposure. She is especially knowledgeable in the field of fashion imports and has assisted many of the prominent brands and fashion houses. Her experience allows her to comprehensively advise fashion and retail companies on the issues specific to their industry.

Angela also has experience beyond the fashion industry. She has assisted a number of companies in the consumer products and electronics industries. Her experience in this area allows her to better serve clients and recognize key intersections with other aspects of her work.

Client Work

Angela advises clients on compliance issues involving rules governing the importation of merchandise issued by US Customs and Border Protection (Customs) and other government agencies (including the Fish and Wildlife Service, Consumer Product Safety Commission, Food and Drug Administration, Federal Trade Commission, the Department of Commerce, and the US Trade Representative). She represents importers, manufacturers, agents, Customs brokers, freight forwarders, bonded warehouses, and trading companies in various industries such as fashion, consumer products, electronics, food and drug, and cosmetics.

She helps clients manage Customs audits, respond to Customs inquiries and investigations, secure the release of detained or seized goods, mitigate or eliminate Customs penalties, and submit prior disclosures, where necessary. She has represented clients in False Claims Act investigations, FBI and ICE investigations, and in litigation in the Court of International Trade.

Angela leads the Arent Fox task force designed to assist clients with identifying and addressing forced labor risks in their supply chain. She helps clients identify and mitigate the risk of forced labor in their supply chains before goods are imported into the United States. Angela works with companies to ensure that all regulatory requirements are observed and that policies and procedures are in place to prevent the use of forced labor in the production of their products. Angela responds to Customs questionnaires and prepares petitions for the release of merchandise detained in connection with forced labor Withhold Release Orders.

Angela helps clients to stay up to date on new developments and government enforcement measures in the space.

Angela advises clients on the development of internal import compliance programs and manuals to reduce the risk of Customs liability. Angela routinely counsels clients regarding country of origin determinations, proper marking, correct tariff classification, valuation, duty recovery, bonded warehouse applications, and duty-free store requirements. She has extensive experience in duty savings programs including Free Trade Agreements, First Sale, and Buying Agency. In addition, she assists clients in mitigating the effects of the Section 301 tariffs by obtaining successful exclusion requests and identifying alternative manufacturing scenarios and duty savings avenues. She conducts Customs due diligence for mergers and acquisitions. Angela also guides clients through the US Customs-Trade Partnership Against Terrorism application and verification process.

Previous Work

Prior to joining Arent Fox, Angela was a partner at an international boutique law firm dedicated to the Customs and Trade practice. She also worked in Finance at an Energy Trading Software company prior to her legal career.

Professional Organizations

- Co-chair of the New York State Bar Association (NYSBA) International Section – Trade Committee
- Customs and International Trade Bar Association
- International Compliance Professionals Association

Publications, Presentations & Recognitions

Angela's publications include:

- "Lessons to Be Learned In Canada: Biden Administration Enforcement of the Forced Labor Provisions In the USMCA," *Customs & International Trade Newsletter*, Thomson Reuters, June 2021

Angela's presentations include:

- "Legal Issues in Ethical and Sustainable Fashion Sourcing," US-Mexico Chamber of Commerce, October 5, 2021
- "Is There Forced Labor and Trafficking in Your International Supply Chain? What International Companies Need to Know," The New York State Bar Association and Arent Fox, June 16, 2021
- "Compliance and US Law," The ZHAW School of Management and Law and New York State Bar Association, May 10, 2021
- "The Legal Consequences of Supply Chain Decisions: Slavery, Trafficking, and the Changing Legal and Regulatory Obligations Affecting Corporations Operating Internationally," The Committee on Corporate Counsel of the New York State Bar Association's International Section, April 12, 2021
- "Customs and Import 101," Society for International Affairs (SIA), March 31 - April 1, 2021
- "All Things China 2020 Trade Considerations," Ocean Air, October 2020

In The News

Angela is regularly quoted by industry publications and news outlets.

- Canada Seizes First Shipment Over Forced-Labor Suspicions , Sourcing Journal, November 18, 2021
- Textile & Apparel Industry Targeted by Financial Crime , World Textile Information Network, September 20, 2021.
- U.S. Steps Up Enforcement on Apparel Imports Over Forced Labor in Xinjiang , WWD, July 7, 2021.
- CBP Not Inclined to Release List of Suppliers Using Forced Labor Under Regional WROs , International Trade Today, June 17, 2021.
- Arent Fox Establishes Team to Address Forced Labor Risks, Assess Supply Chains , International Trade Today, May 13, 2021.

Bar Admissions

New Jersey

New York

Court Admissions

US Court of International Trade