

CFIUS Advisory

77 Meridian advises foreign investors, U.S. businesses, boards, and transaction counsel on CFIUS risk, filing strategy, mitigation, and ongoing obligations.

Not every foreign investment requires a CFIUS filing or mitigation. CFIUS and DCSA/FOCI are distinct regimes; a CFIUS matter does not automatically require FOCI mitigation.

Our CFIUS advisory framework

01 ASSESS

Determine CFIUS exposure

Analyze jurisdiction, filing requirements and the national-security risks associated with the investor, U.S. business, technology and transaction.

02 STRATEGIZE

Shape a practical transaction plan

Evaluate deal structure, diligence, potential vulnerabilities and mitigation options. Determine whether a declaration, notice or no filing is appropriate.

03 ENGAGE

Navigate review and dialogue

Guide engagement with CFIUS, inquiries and mitigation discussions, or provide independent assessments alongside transaction counsel.

04 SUSTAIN

Implement governance and compliance

Where mitigation is imposed, implement safeguards, required reporting, audits and ongoing oversight. Otherwise, avoid unnecessary structures.

How 77 Meridian helps

Transaction assessment and advisory

Independent diligence, risk analysis, deal planning and mitigation strategy where appropriate.

Distinct legal representation

Independent counsel for transaction parties or counterparties, coordinating with lead counsel as appropriate.

Third-party audit and monitoring

Review CFIUS compliance, identify gaps and report under approved oversight arrangements.

National-security governance

Board, national-security official and remediation support, subject to required approvals and independence.

Why 77 Meridian

Government insight

Senior DOJ National Security Division, NSC and ODNI experience.

Independent judgment

Transaction-specific analysis, counsel, and oversight without a one-size-fits-all answer.

Senior-led execution

Principals and senior professionals personally handle client work.

“Identify the national-security risk before it becomes a closing condition.”

DJ Rosenthal

FOUNDER AND PRINCIPAL | NATIONAL SECURITY LEGAL COUNSEL

Former DOJ National Security Division | National Security Council | U.S. Intelligence Community
Former Co-Chair, Kroll CFIUS Advisory Practice

DISCUSS A CFIUS OR MITIGATION MATTER

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