



## → Reid Whitten

### Partner

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Reid Whitten works with clients around the world to plan, prepare and succeed in global transactions. He focuses on his clients' cross-border investments, particularly in the technology and aerospace sectors, helping clients navigate the international trade regulations that could disrupt their deals.

Reid is the Managing Partner of Sheppard Mullin's London office, practicing in international trade regulations and investigations. He shares his time serving clients out of the Washington, D.C. office. He is also Leader of the Sheppard Mullin CFIUS Team.

### Areas of Practice

In the areas of economic sanctions, export and defense exports, CFIUS, anti-corruption and tariffs, Reid supports clients in detecting and addressing potential compliance issues as well as conducting investigations and defending against enforcement actions. He also advises on U.S. anti-dumping, anti-money laundering and anti-boycott regulations.

Reid is a thought leader on cross-border business regulations. He lectures as an Adjunct Professor of Law at the *New College of the Humanities* in London, at the *Université Catholique de Lille*, in France and at *Wake Forest University* in the U.S., where he teaches courses on the law of international business. Reid is also a member of Chatham House, the UK's Royal Institute of International Affairs.

Reid writes and comments regularly and is called on by television news channels, international newspapers and trade publications to provide analysis on the latest changes to cross-border transactional regulations. He is the lead author and editor of *The CFIUS Book* and is the head of the firm's CFIUS Team. In addition, Reid conducts seminars on regulatory updates to industry groups in the U.S., France, Belgium, Spain and the UK.

Reid is fluent in French.

### Honors

- "Ones to Watch," *Best Lawyers*, 2024
- Top Advisor, *Foreign Investment Watch*, 2021
- Leading Lawyer - International Trade, *Chambers Global*, 2021-2025
- Washington D.C. Rising Star, *Super Lawyers*, 2013-2017

## Experience

### Representative Experience:

#### *U.S. Sanctions*

- Advised on completion of €500 million deal between EU security service provider and Iranian airport authorities for security services at Iranian airports in compliance with post-JCPOA sanctions
- Advised Italian finance and insurance bank on compliance with U.S. sanctions on Iran, Sudan and Russia
- Represented Nordic petrochemical company before the Department of Treasury and Department of Commerce with respect to ongoing projects in Iran caught in new U.S. regulations
- Advised Swiss aircraft and transportation service company with respect to managing Russian clients
- Investigated and defended Korean multinational bank in OFAC enforcement action related to Iranian accounts and obtained a decision of no criminal penalties
- Counseled multinational engineering firm on pipeline project in joint venture with Russia
- Designed compliance measures for satellite communications company to provide services to ships entering territorial waters of sanctioned countries
- Advised on successful acquisition by non-U.S. company of Singapore entity with Iranian supply chain in compliance with applicable U.S. regulations
- Performed compliance investigation for U.S. private equity company acquiring ownership of non-U.S. energy company with interests in Iran
- Designed in-house compliance capabilities for U.S. investment services company for its global web-based offerings

#### *White Collar Defense and Litigation*

- Defended U.S. multinational energy company in FCPA investigation by U.S. Justice Department (DOJ) and Securities and Exchange Commission (SEC) as well as foreign authorities
- Defended U.S. electronics distributor in enforcement action by U.S. Attorney's Office for Middle District of Florida resulting in civil disposition with no criminal charges
- Defended software company in investigation of sales to Iran under U.S. sanctions and export control regulations
- Led the internal investigation for a global bank into its OFAC sanctions compliance practices and defended against enforcement actions by DOJ, OFAC, SDNY and U.S. bank regulatory authorities
- Advised on the defense of FCPA investigation of Fortune 100 U.S. agricultural products company related to bribery allegations on three continents

#### *CFIUS*

- Represented French conglomerate on a €850 million strategic acquisition of a U.S. renewable energy company
- Represented UK defense manufacturer in acquisition of California aerospace company in two-stage transaction delaying trigger of mandatory CFIUS declaration filing

- Represented seller in auction sale of assets including real property proximate to U.S. Naval Base
- Coordinated with Sheppard M&A team to provide prospective advice on the CFIUS risk of dozens of prospective deals pre- and post-FIRRMA
- Represented French investors in acquisition of U.S. manufacturers of deep sea exploration and naval search and rescue equipment
- Represented seller in sale to Indian computing equipment manufacturer and obtained CFIUS clearance on behalf of both parties
- Represented U.S. entity in CFIUS submission in connection with sale to non-U.S. investment fund of critical infrastructure assets

### *Tariffs, Trade and Customs*

- Appeared with clients before U.S. Trade Representative committee on the imposition of Section 301 tariffs to present their cases for exemption from the tariffs
- Advised several U.S. manufacturers on submitting comments on and requesting exemptions from the imposition of Section 301 tariffs on products and components from China
- Successfully represented a U.S. manufacturer to the Korean Customs Service and obtained preferential treatment in Korea for that company's products under the Korea U.S. Free Trade Agreement
- Represented U.S. and Canadian petroleum shippers, natural gas shippers and pipelines in discussions with U.S. Customs and U.S. Census on regulatory interpretations

### *Foreign Corrupt Practices Act*

- Represented U.S. energy company in a multi-national anti-bribery and FCPA investigation conducted in coordination between U.S. and Ghanaian authorities
- Defended U.S. energy company in FCPA investigation by U.S. Justice Department (DOJ) and Securities and Exchange Commission (SEC)
- Conducted internal investigation of FCPA red flag reports related to sales by U.S. oil field equipment manufacturer from its agent in South America
- Designed FCPA and Chinese anti-corruption compliance program for the Chinese operations of U.S. Fortune 100 electronics company
- Advised on internal FCPA investigation of Fortune 100 U.S. agricultural products company related to bribery allegations on three continents
- Counseled non-U.S. automotive company on developing and implementing compliance program and training

### *Export Controls*

- Applied for and obtained one of the first export licenses under revised sanctions regulations that permitted a U.S. company to send good to Cuba to support a clean-water initiative in that country
- Completed a company-wide ITAR compliance audit for the U.S. facilities of a global materials manufacturer and obtained a closed matter with no penalty or further action from The Directorate of Defense Trade Controls (DDTC)
- Executed an ITAR review for a U.S. aerospace and defense manufacturer, integrating the compliance policies of two merged companies and reporting to regulators on the same

- Completed a review of EAR control compliance for a second-market microchip distributor pursuant to an FBI subpoena and negotiated closure of the investigation with significant reduction in penalties as a result of compliance improvements and cooperation
- Represented major U.S. consulting firm in internal investigation relating to the inadvertent export of controlled technical data
- Counseled Fortune 100 aerospace company concerning civilian and military export control matters, including controls relating to encryption and composites
- Represented non-U.S. multinational chemical manufacturer in obtaining licenses for the export of controlled chemicals for medical research
- Advised multiple U.S. research universities on technology and deemed export issues related to non-U.S. campuses, students and faculty
- Represented global automotive company establish and deploy export compliance processes, agreement language and training to U.S. and non-U.S. personnel
- Defended U.S. electronics distributor in enforcement action by U.S. Attorney's Office for Middle District of Florida resulting in civil disposition with no criminal charges
- Represented Non-U.S. multinational manufacturer obtain licenses under ITAR for sharing controlled technical data to produce protective equipment for the U.S. military

## *Litigation and Other*

- Prepared a petition for certiori to the U.S. Supreme Court for a suit to protect the civil rights of immigrant detainees
- Defended the District of Columbia in a civil suit against 32 DCPD officers for damages related to the service of a warrant on a murder suspect
- Defended the District of Columbia in a civil suit against doctors at public hospitals who had performed free clinic care for patients underserved areas
- Served as judicial clerk for the U.S. District Court for the Western District of Virginia

## *Pro Bono*

- Represented the widows of U.S. veterans in efforts to obtain benefits from the U.S. Veterans Administration

## Articles

- Tips to Avoid Discrimination When Hiring for Export Controls Jobs  
*Bloomberg Law*, 06.20.2023

## Television Commentary

- "Tariffs are now policy and not a negotiating tactic, says Sheppard Mullin's Whitten," *CNBC*, March 4, 2025
- "U.S. Treasury Secretary Yellen Wraps Up 4-Day Visit to Beijing," *CNBC*, July 10, 2023
- "U.S.' Blinkin to Meet Chinese President Xi Jinping," *CNBC*, June 19, 2023
- "Chinese Balloon Over the U.S. was a Diplomatic Test, Lawyer Says," *CNBC*, February 6, 2023

- "Iran Captures UK Vessel," *Sky Business News*, July 22, 2019
- "Huawei Blocked," *Sky Business News*, May 20, 2019
- "U.S. Crackdown on Huawei," *UK National News*, May 20, 2019
- "North Korea Sanctions," *Sky Business News*, June 12, 2018

## Books

- Editor and Lead Author, *Foreign Direct Investment Controls - A Global Perspective*, WorldECR, December 19, 2022
- Author, *World Encryption Controls*, WorldECR, March 1, 2021
- Editor and Lead Author, *The CFIUS Book: Second Edition*, WorldECR, May 1, 2020
- Editor and Lead Author, *The CFIUS Book*, WorldECR, December 1, 2018

## Blog Posts

### Antitrust Law Blog

- "Top 12 EU Legal Developments to Watch in 2017," January 23, 2017

### Blockchain and Cryptocurrency: Law of the Ledger

- "Money Laundering and High-Value Art: Treasury's Study Discusses Financial Crimes and NFTs," March 2, 2022

### Cannabis Law Blog

- "Clearing the Air: FinCEN Guidance May Help Banks Find Their Way in the Field of Hemp Financing," July 17, 2020

### Corporate & Securities Law Blog

- "New Outbound Investment Restrictions Affect China, Semiconductors, Artificial Intelligence, and Quantum Computing," August 11, 2023

### FCC Law Blog

- "UPDATE: National Security Meets Teenage Dance Battles: U.S. Increases Pressure on ByteDance Sale of TikTok," August 17, 2020
- "FIRRMA Takes Form as CFIUS Enacts a New Pilot Program Targeting 'Critical Technologies'," October 11, 2018
- "Expanding CFIUS: New Law Strengthens And Slows Investment Review," August 17, 2018

### FDA Law Blog

- "Personal Protective Equipment & Ventilators: How FDA Is Increasing Supply for the US Healthcare System," March 30, 2020

### Fintech Blog

- "Treasury's Study Discusses Financial Crimes and NFTs," February 23, 2022

## French Desk Blog

- "Foreign-owned companies operating in the United States must file a 5 year survey with the U.S. Department of Commerce by May 31, 2023 (for paper filings) and June 30, 2023 (for electronic filings)," May 3, 2023
- "USTR Suspends Tariffs on Certain French Luxury Goods: A Potential Shift in Trade Talks," January 27, 2021
- "Reform of Foreign Investment in the U.S.: France and Other Allied Countries Might be Exempt," July 13, 2018

## Global Trade Law Blog

- "Striking Russian Oil and The Ripple Effects," October 31, 2025
- "Not Your Usual Monday: BIS Adopts 50 Percent Rule for Entity List, MEU List & Related EAR Controls," September 29, 2025
- "Keeping an EAR Out for Syria: BIS Reduces Export Controls," September 9, 2025
- "Unpacking the U-Turn: What the Syria Sanctions Repeal Really Means," July 22, 2025
- "A Time Machine and a Bag of Hammers: U.S. Tariffs are not Over," July 9, 2025
- "Syria-ous Changes for Middle East Business? The United States, UK, and Europe Relax Sanctions on Syria," May 30, 2025
- "Big State, Big Scrutiny: Texas Steps into the Foreign Investment Review Arena," May 28, 2025
- "Throwing Away the Toaster: Where AI Controls Are Now and May be Heading," May 16, 2025
- "A Roadmap for Export Controls? Project 2025 and the Future of U.S. Exports – Part III," April 25, 2025
- "A Roadmap for Export Controls? Project 2025 and the Future of U.S. Exports – Part II," April 24, 2025
- "A Roadmap for Export Controls? Project 2025 and the Future of U.S. Exports – Part I," April 23, 2025
- "Who is Stacking the Chips: U.S. Commerce Department Launches Section 232 Investigation into Semiconductor Imports," April 16, 2025
- "Blockading the Ports: U.S. Imposes 10% Global Tariff; Higher Reciprocal Tariff Rates by Country," April 3, 2025
- "The First Wave: U.S. Imposes Tariffs on Canada (or not?), Mexico (or not?), and China (well, yeah, probably so)," February 5, 2025
- "The Impact of Trump's Tariffs on the Wine Industry: Past and Future," January 13, 2025
- "The Persistence of (High Bandwidth) Memory: Semiconductor Manufacturing Equipment and Korean Semiconductor Manufactures Face Harsher Restrictions Under New HBM Rules," December 23, 2024
- "Ticket to Ride – The Commercial Space Activity Exception and Space Tourism: Reduced Export Controls Ease Cross-Border Collaborations (Part IV of IV)," November 20, 2024
- "At Long Last, Final Rule for Outbound Investment Regulations Published," October 30, 2024
- "The Benefits of Friends: Removing Space Export Controls for Allies (Part III of IV)," October 29, 2024

- "The Commercial Industry Gets More Space: Reduced Export Controls Ease Cross-Border Collaborations (Part II of IV)," October 24, 2024
- "Space Rules, or . . . Space Rules!: Reduced Export Controls Ease Cross-Border Collaborations (Part I of IV)," October 22, 2024
- "Banks Do Export, Too: New BIS Guidance Tags Financial Firms with Export Compliance Responsibilities," October 15, 2024
- "A (r)AUKUS Discussion in the Space Industry," September 16, 2024
- "BIS Summer Update: Essential Reading for Your Next Beach Trip!" July 15, 2024
- "Commerce Updates Boycott Requester List," July 15, 2024
- "Proposed Outbound Investment Regulations: Understanding the New Restrictions on U.S. Outbound Investments in Artificial Intelligence (AI), Semiconductors, and Quantum Computing," June 25, 2024
- "OFAC Tightens Russia Sanctions; BIS Cracks Down on Diversion," June 12, 2024
- "Walking the Tightrope: EU's Sanctions Enforcement Directive Puts Violators on Notice," May 21, 2024
- "Say SoL Long to Short Limits: Doubling Down on the Sanctions Statute of Limitations," May 6, 2024
- "China Semiconductor Export Regulations, Episode V – Updates and Corrections to the Advanced Computing and Semiconductor Regulations," April 10, 2024
- "E(U)xterritoriality of EU Sanctions: The No Russia Clause," March 28, 2024
- "Protective Packaging: The EU's Economic Security Package Changes the Landscape in Global Technology Controls," February 5, 2024
- "Should You Be Concerned About Foreign Entities of Concern?," January 11, 2024
- "Carrot and Stick Export Controls: U.S. Export Controls Give Benefits to Allies," December 12, 2023
- "The Semiconductor Moment," December 5, 2023
- "Binance's Paper Compliance Program Crumples Under OFAC Scrutiny in Largest OFAC Settlement in History," November 27, 2023
- "China Semiconductor Export Regulations, Episode IV – "Technological Containment" – U.S. Semiconductor Restrictions Aim to Align Allies with U.S. Policy," November 15, 2023
- "China Semiconductor Export Regulations, Episode III – What a Difference a Year Makes," October 20, 2023
- "Reverse CFIUS Unveiled: Focus on China, Semiconductors, Artificial Intelligence, and Quantum Computing," August 11, 2023
- "The EU's 11th Sanctions Package: The Long(er) Arm of the Law," June 23, 2023
- "Everything but the Kitchen Sink (and Maybe That Too!): New Export Controls on Russia Cover Whole Categories of Low-Level Commercial Electronic and Mechanical Equipment," May 24, 2023
- "Watching the Detectives: Export Control Enforcement Trends Upward," May 19, 2023
- "Don't Let the Government Name, Shame, and Fine You – Export Controls Do NOT Excuse Hiring Discrimination," April 25, 2023

- "U.S. Outbound Investment Restrictions Are Becoming a Reality," March 9, 2023
- "Breaking the Link – New Developments on U.S. Licenses for Exports to Huawei," March 1, 2023
- "Friday Development: New Sanctions and Export Controls to Address Russia's Ongoing Aggression in Ukraine (Including the use of Iranian UAVs)," February 27, 2023
- "Tightening the Cordon – U.S. Restricts Licensing Policy and Adds Allies to Technology Controls," February 8, 2023
- "New Year, New Development: Fewer Industries May be Affected by Proposed Outbound Investment Controls (Reverse CFIUS)," January 19, 2023
- "Potential Sanctions for Alleged Intellectual Property Theft on the Horizon?," January 19, 2023
- "The New Containment: How the Semiconductor Industry Came to Be at the Heart of the Technological Cold War," December 21, 2022
- "Will We Ring in the New Year with Outbound Investment Restrictions?," December 21, 2022
- "China Semiconductor Regulations, Episode II – The Curious Case of the American in a Chinese Chip Company," December 7, 2022
- "Myanmar Sanctions – A Last Resort Against a Non-Cooperating Country," October 21, 2022
- "OFAC Issues Sanctions Compliance Guidance for Instant Payment Systems," October 11, 2022
- "China Semiconductor Export Regulations, Episode I – Counting Your Chips Carefully," October 11, 2022
- "Further Export Controls on Semiconductor Technology for China coming this Week," October 5, 2022
- "Technology to Iran: OFAC Lifts Certain Iran Sanctions In Response to Protests in Iran," September 27, 2022
- "Commerce Department Adds Guardrails Against Stockpiling of Certain Solar Cells and Modules During Temporary Waiver of AD/CVD Duties," September 27, 2022
- "First-Ever Executive Order on CFIUS Highlights Biden's National Security Priorities," September 20, 2022
- "Treasury Department Seeks to Coordinate Globally on Crypto Regulation," August 2, 2022
- "Reverse CFIUS? S I ? New outbound investment review process becoming more likely," July 7, 2022
- "Is the U.S. solar industry ready to prove its panels aren't made with Uyghur forced labor?," June 28, 2022
- "Introduction of internet-related Russia trade sanctions in the UK," June 9, 2022
- "President Biden Suspends AD/CVD Duties on Solar Cells and Modules from Cambodia, Malaysia, Thailand, and Vietnam," June 9, 2022
- "The Crypto Enthusiast and The Regulator: What OFAC is, Could Be, and Should Be Doing to Regulate CryptoCurrencies," June 3, 2022
- "Additional Import and Export Restrictions in Response to Russia's Aggression in Ukraine," April 13, 2022
- "U.S. and Allies Impose Additional Severe Costs on Russia for Atrocities in Ukraine," April 6, 2022
- "Crypto and Russia Sanctions: A Primer and Survival Guide For Crypto Companies," March 17, 2022
- "U.S., UK and EU Sanctions Over the Donetsk People's Republic (DNR) and Luhansk People's Republic (LNR) Regions of Ukraine," February 25, 2022
- "Russian Risk: Transactions with Russian Banks and Exports to Russia Create Greatest Exposure Under New EU and UK Ukraine-Related Sanctions," February 25, 2022

- "Russian Risk: Transactions with Russian Banks and Exports to Russia Create Greatest Exposure Under New U.S. Ukraine-Related Sanctions," February 25, 2022
- "U.S., UK and EU Sanctions Over Putin's Recognition of Breakaway Ukraine Regions," February 22, 2022
- "EU Bans Whitening Food additive E171 as of January 1, 2022," December 21, 2021
- "A Ruble Without a Cause: What Economic Sanctions on Russia May Mean for Your Business and Global Finance," December 15, 2021
- "Does Your Trade Policy Support Your Company's Values?," October 8, 2021
- "Clean Energy's Messy Problem II: The Solar Industry, Its Suppliers, and the Complex Task of Combatting Forced Labor," August 12, 2021
- "Clean Energy's Messy Problem: The Solar Industry, the U.S. Government, and the Complex Task of Combatting Forced Labor," July 23, 2021
- "Anti-Forced Labor Measures Turn Up the Heat on Chinese Solar Equipment Suppliers," June 25, 2021
- "Counterpunch: China Adopts Landmark Anti-Sanctions Statute to Stop U.S. Sanctions Effects Overseas," June 23, 2021
- "Looking Ahead on China: Engaging in Strategic Compliance through Geopolitical Analysis," June 10, 2021
- "President Biden Issues a New...ish Ban on Certain Chinese Investments," June 10, 2021
- "CFIUK Comes to Life: The National Security and Investment Act 2021," May 20, 2021
- "U.S. Imposes Sanctions Measures Targeting Myanmar Military Government," March 11, 2021
- "CFIUK: The United Kingdom Introduces a New Mechanism for Foreign Direct Investment Screening," December 17, 2020
- "The Next Four Years in International Business," December 16, 2020
- "The Next Four Years of FCPA Enforcement: What to Expect From the Biden Administration," November 19, 2020
- "Lend Me Your EARs: CFIUS Makes Export Controls a Trigger for Mandatory Filings," October 14, 2020
- "CFIUK? The UK Brings Heavier Scrutiny to Its Foreign Investment Reviews," October 14, 2020
- "Certainties and Uncertainties Under China's New Unreliable Entity List," September 22, 2020
- "Executive Orders on Pause: WeChat and TikTok Bans Temporarily Suspended," September 21, 2020
- "China Expands Technology Export Controls: Fighting back on TikTok and Putting Your R&D at Risk," September 2, 2020
- "Export Control HR Pitfalls To Avoid When Hiring," September 2, 2020
- "A Trade War on Two Fronts: U.S. Considers More Tariffs on European Goods," July 2, 2020
- "CFIUS UPDATE ISSUE – Well I Do Declare: Mandatory Declarations Everywhere," May 29, 2020
- "CFIUS UPDATE ISSUE – CFIUS Scrutiny in Biotech: The Ekso Case and the Eye of the Terminator," May 29, 2020
- "Huawei Whack-A-Mole: The U.S. Takes Another Swing at the Chinese Semiconductor Industry," May 19, 2020
- "Sick without Symptoms: How Multi-Million Dollar Customs Issues are Ailing U.S. Companies Without Warning," May 6, 2020

- "UPDATED: China Trade War Scorecard: Keeping Track of Tariffs," January 16, 2020
- "Chasing Huawei: BIS May Change the Rules of the Game to Target One Player," December 18, 2019
- "CFIUS Proposes Rules to Implement FIRRMA," September 20, 2019
- "A Chinese Export License to Get a Smart Phone? Tech-Tonic Changes in World Export Controls," August 19, 2019
- "China Trade War Scorecard: Keeping Track of Tariffs," August 19, 2019
- "Hua-Wait a Minute: Entity Designation Affects Non-U.S. Manufacturers' Exports to China Tech Giant," May 21, 2019
- "INTERNATIONAL TECH INVESTMENT ISSUE – Threats to Technology Investment from Global Politics: How to Succeed as Borders Tighten," April 10, 2019
- "INTERNATIONAL TECH INVESTMENT ISSUE – Investments With Borders: CFIUS-Style Foreign Investment Review Goes Global," April 10, 2019
- "INTERNATIONAL TECH INVESTMENT ISSUE – A Wave of Export Regulation to Hit US Technologies," April 10, 2019
- "Clear for More Takeoffs: Now is the Time to Have Your Voice Heard on New Satellite and Launch Regulations," March 19, 2019
- "The New Suits of Havana: How Non-U.S. Companies May Soon Be Sued for Their Business in Cuba," March 19, 2019
- "Comment Deadline Extended: Export Controls on Emerging Technologies," December 11, 2018
- "The Little Regulation That Will Make a Big Change in How You Do Business: Department of Commerce to Establish New Export Controls on Emerging Technologies," November 19, 2018
- "CLIENT ALERT: Iran Sanctions Are Back On: Can Business Continue?" November 5, 2018
- "Expanding CFIUS: New Law Strengthens And Slows Investment Review," August 17, 2018
- "Life in the Fast Lane: CFIUS-Free Investments, if You're From the Right Country," August 7, 2018
- "Of Course You Know, This Means War: A Strategic Update on the Trump Trade War," August 7, 2018
- "Stuck in the Middle With You: EU Blocking Statutes, Iran Sanctions, and the Thousands of Businesses Caught In Between," August 7, 2018
- "On FIRRMA Ground: Congress to Restrict Foreign Investment and Expand Export Controls," June 28, 2018
- "Your Way-Too-Early Guide to North Korean Investment: Big Opportunities, Big Risks, and the Regulatory Guidance to Identify Both," June 7, 2018
- "Client Alert: Iran Sanctions Return," May 11, 2018
- "The Great Wall Against China: Washington's Barriers to a Wave of Capital from the Far East," April 12, 2018
- "Chips on Their Shoulders: CFIUS Intervenes in Broadcom's Hostile Takeover Bid for Qualcomm," March 8, 2018
- "Lurches, Leaps, Feints, and Flops: Movements Without Motion in Russian Sanctions Policy," February 8, 2017
- "2018 EU Trade, Regulatory and Competition Trends," February 8, 2018
- "Seeking foreign investors for your tech startup? Congress says, "not so fast." January 10, 2018

- "In-fo' a CFIUS Review: The Expanding Power of CFIUS through Data Security Scrutiny," January 10, 2018
- "The Waiting Game: When, Why, and How to File with CFIUS in a New Era of Investment Scrutiny," December 12, 2017
- "The Future of CFIUS: Perhaps Not So Happy a New Year," December 12, 2017
- "CFIUS for Europe? New Screening of Foreign Direct Investments in Europe," December 12, 2017
- "Today, President Trump Decertified the Iran Deal and Announced Tougher Sanctions on Iran," October 13, 2017
- "Growing Pains for Expanding Tech Companies: Uber Investigated for FCPA Violations," September 14, 2017
- "The United States Munitions List: When Guns Come Off of the ITAR," September 14, 2017
- "Section 301: The Trade Law You May Not Know Well that Could Shock Industries," August 17, 2017
- "One Year From Now, You May Be Out of Iran: Trump Administration Policy and the Timeline for Snapback," August 1, 2017
- "In the Chaos of (Trade) War, Where Does Your Company Find Peace?" August 1, 2017
- "Dinner Table Conversation: How an Offhand Comment May Signal a Shift in the Global Trade of Semiconductors," June 22, 2017
- "Oh, Hadn't You Heard? You're Violating French Law Right Now! France Gets *Serieuse* about Anti-Corruption," June 22, 2017
- "Predicting the Unpredictable: Foreign Investment Under the Trump Administration," March 15, 2017
- "The Undoing Project – Why NAFTA Can't be Undone, but Can be Re-Done," January 13, 2017
- "The Table Flip: Trump, the Iran Nuclear Deal, and American Business," December 7, 2016
- "Those Three Little Words: OFAC's Subtle Language Shift Could Create Sweeping Change on Iran Investment," October 10, 2016
- "Layover in Tehran: United States Authorizes Carriers to Land Civil Aircraft in Iran," August 17, 2016
- "The Morning After: Waking up to Brexit and Its Impact on Your Business," June 24, 2016
- "Flying the Too-Friendly Skies? Europe Opens Routes for Sanctioned Iran Airline," June 9, 2016
- "New Business Opportunities in Iran! But Who Will Be Your Banker? Non-U.S. Banks Hesitant to Process Lawful Iran Transactions...and for Good Reason," April 20, 2016
- "The Day of North Korea Sanctions: the UN Imposes the Toughest North Korea Sanctions Yet While OFAC and State Designate More North Korean Entities," March 3, 2016
- "EU-US Privacy Shield: Brace Yourself . . . or Maybe Not," March 3, 2016
- "US and EU Iran Sanctions Lifted: How to Proceed in the Aviation Sector?" January 20, 2016
- "Airplanes, Pistachios, and a New Burger Joint in Tehran: What Changes for the United States Under Lighter Iran Sanctions," January 20, 2016
- "The Trans Pacific Partnership and the Auto Industry: Will Six Thousand Pages Pave the Way for Increased Exports?" November 12, 2015
- "Keep Your Frenemies Close: Proposed China Sanctions and the Price of Escalation," September 17, 2015
- "Implementation Day: Do the Rules Let You Play in the New Ballgame for Business in Iran?" July 16, 2015

- "The Broader Problem: European Bank Creates an Easy Catch for the Long Arm of U.S. Jurisdiction," April 1, 2015
- "Read the Directions Carefully Before Playing: State Department Releases Military Drone Export Guidance," March 5, 2015
- "Change Your Entire Energy Export Policy Using This One Weird Trick! BIS "Clarifies" Short Supply Controls to Make Oil Exporting Easier," January 15, 2015
- "A New Latitude: Charting a Course for Cuba," December 17, 2014
- "Military Electronics Export Reform: Let the Chips Fall Where They May," December 4, 2014
- "ECR Episode XI: Rewriting the Guide to the Galaxy – Satellites Passed to Commerce Control," November 6, 2014
- "Bulletin: Commerce Department Statistics on the First Year of Export Control Reform," October 16, 2014
- "ECR Episode IX: The Export Control Reform Turns One – What are Your Plans for the Big Celebration?" October 9, 2014
- "Shelter from the Coming Storm: Anti-Corruption Compliance in European Public Procurement," July 15, 2014
- "BNP Paribas and La Résistance: Why Compliance is not Capitulation and Cooperation Could Save an Economy," June 12, 2014
- "ECR Episode IX – Serving up the Third Round: The Next Wave of Export Control Reform Takes Effect on July 1, 2014," June 12, 2014
- "Just the TTIP. A Review of the Transatlantic Partnership Agreement One Year After It Is Introduced to America," February 6, 2014
- "ECR Episode VIII: New Rules for the New Year," January 8, 2014
- "ECR Series Episode VII: Livin' in a Materials World – Changes to USML Category XIII," November 13, 2013
- "ECR Series Episode V: Revisions to Naval Vessel and Military Vehicle Controls – A Regulatory Sea (and Land) Change," September 5, 2013
- "Export Control Reform Series Episode I: The Basics – Five Points to Remember about Export Control Reform," July 11, 2013
- "Export Control Reform Series Episode II: The First Change – Reevaluating your ITAR Aircraft Parts," July 11, 2013
- "\$8 Million Penalty for Weak ITAR Compliance: How the Price of Maintenance Beats the Cost of Repair," May 7, 2013
- "Gentlemen, Start Your Engines: The Race for Riches in U.S. –EU Trade Begins with a Mandate from the European Commission," April 2, 2013
- "Streamlining the System: More Baby Steps Toward Reducing Export Compliance Burdens," April 2, 2013
- "Pay Attention to the Man Behind the Curtain: The Mysterious Methods to CFIUS Approval," March 8, 2013
- "Is China Getting Serious or Redirecting Responsibility? New guidance on Chinese Anti-Bribery Enforcement," February 14, 2013
- "Foreign Investment in Burma: Resolutions for Business in a Very New Year," January 9, 2013
- "Stumbling Block or Stepping Stone? Companies Face the Choice: Trip Over the SEC's New Reporting Requirements or Use them to Launch Strong and Effective Compliance Measures," September 27, 2012

- "OFAC Authorizes the Exportation of Financial Services to and New Investment in Myanmar," August 17, 2012
- "ALERT – Changes Coming to Europe's Dual-Use Export Regulations," July 11, 2012
- "OFAC's (Very) Long Arm: GAM Settlement May Illustrate the ITR's Expanding Reach," June 7, 2012
- "A Man Overboard Will Not Sink the Ship: How Robust FCPA Compliance Can Keep a Company Out of Hot Water Even When An Executive is Neck Deep," May 1, 2012
- "Proposed Easing of Satellite Export Controls Could Benefit U.S. Satellite Industry," May 1, 2012
- "On The List, Off The Menu: How 5 Major ITAR Shippers Disappeared," March 14, 2012
- "Risk Mitigation and the Jolly Roger: The Multinational Regulatory Compliance Challenges of Fighting Pirates," February 21, 2012
- "Even the Bagman: Foreign Agent Sentenced to Thirty Month Prison Term for FCPA Violations," January 17, 2012

## **Government Contracts, Investigations & International Trade Blog**

- "Government Procurement: November and December 2013 and January 2014 Federal Register Update," January 21, 2014
- "Aiming for a Moving Target: Bad and Good News on Changing Iran Sanctions," December 9, 2011
- "Early Steps Toward a Streamlined Export Control System: Proposed Changes to the ITAR and EAR," November 16, 2011
- "Mind Your Own Businesses: UK Court Decision May Signal Pushback On Extraterritorial Enforcement of US Trade Laws," October 24, 2011
- "Prison Time and Export Controls: University Professor's Case Illustrates Dangers of Ignoring Export Compliance," October 24, 2011
- "Syria Update: Significant New Sanctions Imposed," September 19, 2011
- "California and Florida Lead Trend of New State-Level Iran Sanctions," June 16, 2011
- "Federal Judge Upholds DOJ's Expansive Application Of FCPA," May 10, 2011

## **Organizational Integrity Group Blog**

- "Open Research, Foreign Finance, and a University's Mission," June 14, 2021

## **U.S. Legal Insights for Korean Businesses Blog**

- "Coal Hard Facts: North Korea Sanctions Remain in Place and Remain a Risk," August 9, 2018

## **Media Mentions**

Ask a Trade Lawyer, Regulatory Risks And Tariffs  
*Votes & Verdicts* podcast, *Bloomberg Intelligence*, 09.17.2025

Votes & Verdicts: Ask a Trade Lawyer, Regulatory Risks And Tariffs  
*Bloomberg*, 09.16.2025

BIS 50% Rule: What Would it Mean for Businesses

*Dow Jones*, 07.17.2025

Pharmaceutical Tariff Exemption Is No End to Cost Threat

*Law360*, 04.08.2025

US Puts Banks in Crosshairs of Export Control Regime

*Global Trade Review*, 10.16.2024

Top Biden advisor Jake Sullivan's trip to China is 'routine diplomacy,' trade lawyer says

*CNBC International*, 08.26.2024

BIS Disclosure Policy Changes Viewed as Helpful but Questions Remain

*International Trade Today's Export Compliance Daily*, 02.20.2024

EU Investment Plans Play To US Nat'l Security Concerns

*Law360*, 01.26.2024

Biggest Trade Policy Moves Of 2023: Year In Review

*Law360*, 12.20.2023

## Speaking Engagements

- "The New Containment: Technological Perimeters and Global Divides," US Trade Controls Compliance in Europe Conference, March 20, 2024
- Co-Presenter, "Fundamental Challenges: Trade Compliance in University and Research Setting," WorldECR, November 18, 2021
- Co-Presenter, "Establish Your U.S. Compliance System: A Strategic View from China and the United States," China Intellectual Property Magazine, October 21, 2021
- "Briefing: Key Changes in EU AML and US Sanction Regimes," Bird & Bird Program on Anti-Money Laundering and U.S. Sanctions, London, September, 2018
- "Foreign Corrupt Practices Act," In-House Counsel Forum, Seoul, November, 2016
- "Inside Washington: Law, Development and Diplomacy," ABA-UNDP International Legal Resource Center (ILRC), July 24, 2013
- Panelist, "ITAR and EAR Compliance Review and Investigations: Conducting Internal Audits and Determining Whether to Disclose Potential Violations to Mitigate Penalties," Strafford Webinar, June 26, 2013
- Panel Chair and Moderator, "Navigation without Maps: The Young Lawyer and the New Industry of International Anti-Bribery Compliance and Investigation," ABA International Fall Meeting, October, 2012
- "Pathways to International Law," ABA Section of International Law
- Panelist, George Washington Law School, March 10, 2011
- Panelist, Catholic University, Columbus School of Law, October 18, 2011
- Panelist, University of Baltimore School of Law, November 3, 2011
- Panelist, International Law Student Association-Jessup Competition Finals Conference, March 30, 2012

- Panelist, ABA International Section Spring Meeting, April 17, 2012
- Panelist, ABA International Legal Education Summit, October 19, 2013

## Events

Defence Exports Conference  
Hilton London Kensington, 09.22.2025

Navigating Tariffs: Retail Strategies in a Changing Trade Landscape  
Webinar, 02.27.2025

The Next Four Years of International Trade Regulations  
Webinar, 12.10.2024

Sanctions and Export Compliance in the UK Conference  
The Next 4 Years of International Trade Regulations  
London, UK, November 13-14, 2024

Chips, Data, Standards: Building a Competitive AI Economy  
12.08.2023

Third Thursday Emerging Company Webinar Series: What the Next Four Years of Trade Regulation will Bring for Emerging Companies  
Webinar, 12.17.2020

The Next Four Years in International Business: The Road Ahead After the U.S. Election  
Webinar, 12.03.2020

Invitation to Executive Orders Impacting Use of TikTok and WeChat in the U.S.  
Webinar, 08.19.2020

Global Compliance and Investigation Essentials  
Sheppard Mullin San Francisco, 04.30.2019

Defense Exports 2015  
Amsterdam, Netherlands, Fall 2015

## Memberships

- Chair, Young Lawyers Division, International Section, American Bar Association
- Member, Barreau de Bruxelles: Liste B – The Belgian bar for international lawyers practicing in Brussels
- Appointed Vice-Chair, Law Student, LLM and New Lawyer Outreach Committee, International Law Section, American Bar Association, August 2012 - August 2013
- Member, Europe Committee, International Law Section, American Bar Association
- Member, International Practice Section, Virginia State Bar Association

## Podcasts & Webinars

Navigating Tariffs: Retail Strategies in a Changing Trade Landscape  
02.27.2025

The Next Four Years of International Trade Regulations  
12.10.2024

French Insider Episode 37: Trump's Trade War: Tariffs and Their Impact on the Global Economy with Reid Whitten of Sheppard Mullin  
12.09.2024

Nota Bene Episode 169: The State of the Semiconductor Industry with Reid Whitten of Sheppard Mullin  
12.19.2023

Nota Bene Episode 167: New Restrictions on Investment in China with Michael Zhang and Reid Whitten of Sheppard Mullin  
08.24.2023

French Insider Episode 21: Between Warring Giants: How European Companies Can Navigate U.S.-China Tensions in Trade and Commerce with Reid Whitten  
04.28.2023

Nota Bene Episode 158: The U.S.-China Trade War: How It Started and Where It's Headed with Reid Whitten  
01.31.2023

The Legit Ledger Episode 5: Cryptocurrency Sanctions with Reid Whitten and Gabe Khoury  
07.12.2022

French Insider Podcast Episode 13: Additional Sanctions Against Russia: What Businesses Need to Know  
05.02.2022

Nota Bene Episode 152: The New Era of Government Trade and Market Control with Reid Whitten  
11.17.2021

Sheppard Mullin China Monthly IP Seminar – Oct. 2021: Establish Your U.S. Compliance System  
10.23.2021

French Insider Podcast Episode 1: What Businesses Should Know About International Trade Policies Under the New Administration with Reid Whitten  
06.01.2021

Nota Bene Episode 118: Exploring the International Trade Roadmap Ahead with Scott Maberry and Reid Whitten  
03.24.2021

Third Thursday Emerging Company Webinar Series: What the Next Four Years of Trade Regulation will Bring for Emerging Companies  
12.17.2020

The Next Four Years in International Business: The Road Ahead After the U.S. Election  
12.03.2020

Nota Bene Episode 85: Trade Wars - The Rise of Export Controls and the Impact on the Growth of Technology  
with Reid Whitten  
06.10.2020

Nota Bene Episode 62: The Intersection of Emerging Technologies, Foreign Investments, and Export Controls  
with Reid Whitten  
12.11.2019

## Practices

International Trade and Investment  
Exports and Export-Related Controls  
Sanctions and Anti-Money Laundering  
CFIUS: Foreign Investment in the U.S.  
Foreign Corrupt Practices Act (FCPA)  
White Collar Defense and Investigations  
International Reach  
France  
Technology Transactions  
ESG and Sustainability  
Français  
Government Contracts  
Governmental  
Imports  
Korea  
National Security  
Securities Enforcement  
Supply Chain Management

## Industries

Aerospace, Defense & Government Services  
Aviation  
Blockchain

Blockchain and Fintech  
Cannabis  
CFIUS: Foreign Investment in the U.S.  
Construction  
Emerging Company & Venture Capital  
Energy, Infrastructure and Project Finance  
ESG and Sustainability  
Fintech  
Healthcare  
Investment Management  
Life Sciences  
Open Source  
Private Equity  
Semiconductors  
Space & Satellite  
Telecom  
Wine

## Education

J.D., Wake Forest University, 2007, *Fletcher Scholar*, Editorial Staff, *Wake Forest Law Review*  
B.A., The College of William & Mary, 2002, *cum laude*

## Admissions

Commonwealth of Virginia  
District of Columbia  
U.S. District Court for the Western District of Virginia  
U.S. District Court for the Eastern District of Virginia  
U.S. Bankruptcy Court for the Eastern District of Virginia  
U.S. Court of Appeals for the Fourth Circuit  
Brussels, Belgium (B List)

## Additional Office

Washington, DC

## Languages

French