



# Doreen M. Edelman

Partner Chair, Global Trade & Policy

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As chair of Lowenstein Sandler's Global Trade & Policy team, Doreen Edelman is ranked the 2021 "Top Advisor" by *Foreign Investment Watch* for her Committee on Foreign Investment in the United States (CFIUS) work. She is well known for her in-depth knowledge of trade policy and of the CFIUS as well as her years of counseling clients with questions about import and export, Office of Foreign Assets Control (OFAC) sanctions, and related M&A deal diligence.

Doreen's global trade and policy experience leads clients to creative solutions not only to minimize supply chain and compliance risks but also to enhance and protect global and government contract sales from national security concerns, government enforcement actions, and investigations. Her 30 years of practice in D.C. make her an excellent strategic partner for compliance guidance, internal regulatory reviews, and strategic planning. She focuses on both commercial/technology- and defense-related export controls and prepares regulatory filings and disclosures for imports, exports, and OFAC sanctions.

Import matters include classification, valuation, and country-of-origin issues; Section 301 filings; and Buy American Act (BAA) and Trade Agreements Act (TAA) reviews for qualification of government contract clients' items as U.S.-made. Export matters include compliance with the Bureau of Industry and Security (BIS) and the Directorate of Defense Trade Controls (DDTC) export control regulations as well as U.S. anti-boycott requirements, the Foreign Corrupt Practices Act (FCPA), and global anti-corruption requirements. Doreen also represents companies with disclosures to OFAC, conducts internal investigations, and ensures clients understand how to comply with OFAC's Specially Designated Nationals list and the ever-evolving sanctioned-countries programs limiting business transactions with, for example, Syria, Iran, Cuba, North Korea, Russia/Crimea, and Venezuela.

High-profile international clients seek Doreen's advice on the intersection of U.S trade policy and national security on business transactions and on how to proactively mitigate CFIUS, OFAC, and other government program concerns. Doreen's comments are often sought by major business news outlets and publications, including CNN, Bloomberg, *The Wall Street Journal*, and *The Hill*.

# **HONORS & AWARDS**

- > Foreign Investment Watch: Top Advisors (2020-2021)

  Doreen M. Edelman named to Top Advisors List: 2020 & 2021; ranked #1 in 2021; recognizing lawyers providing legal advice on national security reviews of foreign investments in the LLS and abroad
- > AV Preeminent Peer Review Rated: LexisNexis Martindale-Hubbell (2012-2018)
- > Washington, D.C., Super Lawyers: International Law (2012-2018)

# **NEWS & INSIGHTS**

## **Publications**

> November 19, 2021

"Take Note: Address Global Trade Issues Early in Your Negotiations To Avoid Liability and Costs (Yes, This Applies to You).," Global Trade Doreen M. Edelman, Abbey E. Baker

> November 2, 2021

"Tips for Managing Supply Chain Trade Issues in 2021," Supply & Demand Chain Executive Doreen M. Edelman, Christian C. Contardo

> November 1, 2021

**"Key Business Considerations for U.S. Global Trade Policy,"** *Risk Management* Doreen M. Edelman, Abbey E. Baker, Christian C. Contardo

> October 21, 2021

"Startups Need a Grasp of U.S. Trade Controls," CFO

Doreen M. Edelman, Abbey E. Baker

#### > October 6, 2021

## "USTR Announces New Narrow Exclusion Renewal Process for Section 301 Tariffs," Global Trade & Policy Client Alert

Doreen M. Edelman, Andrew Bisbas

## August 23, 2021

## "The Tightrope of Biden's Global Trade Policy," Industry Today

Doreen M. Edelman, Christian C. Contardo

#### > August 17, 2021

## "CFIUS: Most Common Questions Asked and Answered," Lowenstein Sandler LLP

Doreen M. Edelman, Abbey E. Baker, Christian C. Contardo

## > June 22, 2021

## "Is Your Startup Running Afoul of Domestic Trade Controls?," Built In

Doreen M. Edelman, Abbey E. Baker

#### > May 5, 2021

#### "CFIUS doesn't mean Chinese companies can't invest in the US," TechNode

Doreen M. Edelman, Laura Fraedrich, Christian C. Contardo

## > April 14, 2021

## "USTR Proposes Increased Duties on Variety of Products; Companies Can Seek Relief," Global Trade & Policy Client Alert

Doreen M. Edelman, Laura Fraedrich, Christian C. Contardo

#### > March 31, 2021

## "2020 and Q1 2021 Developments and Annual Compliance Checklists," Investment Management Client Alert

Scott H. Moss, Brian A. Silikovitz, Rachel Ingwer, Mary J. Hildebrand CIPP/US/E, Andrew E. Graw, Doreen M. Edelman, Megan Monson, George Danenhauer, Andrew Bisbas, Christian C. Contardo,

#### > March 30, 2021

#### "Are you subject to US economic sanctions?," The Times of Israel

Doreen M. Edelman, Dotan Barnea, Abbey E. Baker, Christian C. Contardo

#### > February 25, 2021

# "Refunds of Some Section 301 Chinese Duties May Be Available," Global Trade & Policy Client Alert

Doreen M. Edelman, Zarema A. Jaramillo, Laura Fraedrich, Christian C. Contardo

## > January 7, 2021

## "Hypersonics Illustrate Supply Chain Vulnerabilities," National Defense

Doreen M. Edelman, Abbey E. Baker, Christian C. Contardo

## December 31, 2020

## "Beware of paying that ransomware threat," Security

Doreen M. Edelman, Kathleen A. McGee, Christian C. Contardo

## > December 4, 2020

# "The SEC Identifies Common Investment Adviser Compliance Program Deficiencies Consistent With Deficiencies Recognized by Other Regulators Overseeing Investment

## Advisers," Investment Management and Global Trade & Policy Client Alert

Scott H. Moss, Doreen M. Edelman, , Christian C. Contardo

#### > November 13, 2020

## "How to Avoid a U.S. Importer's Costly Trade-Compliance Error," SupplyChainBrain

Doreen M. Edelman, Andrew Bisbas

#### > November 9, 2020

## "Compliance Matters: What Executives Should Know About International Shipments," PARCEL

Doreen M. Edelman, Abbey E. Baker, Christian C. Contardo

## > October 30, 2020

## "Hypersonics Race Raises National Security Concerns for U.S. Businesses," Bloomberg Law

Doreen M. Edelman, Abbey E. Baker, Christian C. Contardo

#### > October 27, 2020

## "Financial Service Providers Must File Foreign Financial Services Transactions With BEA Before October 30," Global Trade & Policy Client Alert

Doreen M. Edelman, Abbey E. Baker

#### > October 16, 2020

"How An Effective Trade Compliance Program Saves Money," Industry Today

Doreen M. Edelman, Andrew Bisbas

#### > September 15, 2020

## "Internet Businesses Are Targeted by OFAC for Sanctions Violations: How to Reduce Risk," Homeland Security Today

Doreen M. Edelman, Abbey E. Baker, Christian C. Contardo

#### > July 30, 2020

## "Compliance Program "Must Haves" for Doing Business Abroad," Lowenstein Sandler LLP

Doreen M. Edelman

#### > July 17, 2020

## "DOE's Recent RFI Specifies "Foreign Adversaries" - What Does It Mean?, " Global Trade & Policy Client Alert

Doreen M. Edelman, Abbey E. Baker, Christian C. Contardo

#### > July 8, 2020

## "U.S. Companies Required to Report Foreign Investments: BEA's Little-Known Reporting Requirements," Lowenstein Sandler LLP

Doreen M. Edelman, Abbey E. Baker

## > July 3, 2020

## "Feds reach into real estate deals extended in name of national security," Real Estate Weekly

Doreen M. Edelman, , Abbey E. Baker, Christian C. Contardo

## > June 22, 2020

## "Opportunities for Technology Companies to be Matched with Investors by Department of Defense," Homeland Security Today

Doreen M. Edelman, Abbey E. Baker, Christian C. Contardo

## > June 9, 2020

## "U.S. Government Issues Updated Sanctions Warning," American Journal of Transportation

Doreen M. Edelman, Zarema A. Jaramillo, Christian C. Contardo

#### > May 15, 2020

# "U.S. Government Issues Updated Sanctions Warning to Maritime Shipping Community; Recommends Best Practices to Mitigate Risk," Global Trade & Policy Client Alert Doreen M. Edelman, Zarema A. Jaramillo, Christian C. Contardo

> May 5, 2020

## "Section 301 Tariff Update: USTR Now Accepting List 3 Exclusion Extension Comments," Global Trade & Policy Client Alert

Doreen M. Edelman, Zarema A. Jaramillo, Andrew Bisbas

#### > April 27, 2020

## "DOD Seeks to Match Investors With Technology Companies," Global Trade & Policy Client Alert

Doreen M. Edelman, Abbey E. Baker, Christian C. Contardo

#### > April 27, 2020

## "CFIUS - What Is It & What Effect Does It Have on Foreign Investors?," Lowenstein Sandler LLP

Doreen M. Edelman, Abbey E. Baker, Christian C. Contardo

## > April 24, 2020

## "Devil in the details for COVID-19 duty deferral," Journal of Commerce

Doreen M. Edelman, Andrew Bisbas

## > April 20, 2020

## "New 90-Day CBP Duty Deferral Option," Global Trade & Policy Client Alert

Doreen M. Edelman, Andrew Bisbas

## > April 10, 2020

## "Significant Criminal Conviction Illustrates Importance of Experienced Sanctions Counsel," White Collar Criminal Defense Client Alert

Doreen M. Edelman, Rachel Maimin, Abbey E. Baker, Christian C. Contardo

## > March 30, 2020

# "Tips For Cos. Confronting Pandemic Impact On Global Trade," Law360

Doreen M. Edelman, Zarema A. Jaramillo, Christian C. Contardo

## > March 24, 2020

# $\hbox{"U.S. Regulators Focus on Compliance Efforts in Enforcement Decisions Involving International Companies,"} \textit{Global Trade}$

Doreen M. Edelman, Zarema A. Jaramillo

## > March 16, 2020

# "Beyond Coronavirus: How to Prepare Your Business for the Pandemic Era," Lowenstein Sandler Client Alert

Lynda A. Bennett, Doreen M. Edelman, Steven S. Rogers

> March 5, 2020

## "Did 'Silicon Valley' Get CFIUS Right? Can It Really Ruin Everything?," Legaltech News

Doreen M. Edelman, Abbey E. Baker

> February 21, 2020

# "Finally, Case Law to Support Substantial Transformation Test Resulting in U.S. Country of Origin for API," Global Trade & Policy Client Alert

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> February 19, 2020

## "Cryptocurrencies Are Now a Target of OFAC Economic Sanctions," Legaltech News

Doreen M. Edelman, Kathleen A. McGee, Abbey E. Baker

> January 13, 2020

# "U.S. Investment Firms' Stakes in Non-U.S. Companies Lead to Sanctions Violations and OFAC Penalties," Global Trade & Policy Client Alert

Doreen M. Edelman, Andrew Bisbas

> November 7, 2019

## "INSIGHT: Comprehensive Compliance Programs Key to Mitigating Risk of Potential Violations of Antitrust Laws, OFAC Sanctions, FCPA," Bloomberg Law

Doreen M. Edelman, Zarema A. Jaramillo

> October 15, 2019

## "Government Expands Focus on Effective Compliance Programs," Lowenstein Sandler LLP

Doreen M. Edelman, Zarema A. Jaramillo

> October 8, 2019

## "OFAC Introduces Reporting Rule That Applies to All U.S. Companies," Global Banking & Finance Review

Doreen M. Edelman, Zarema A. Jaramillo

> September 18, 2019

#### "Regulators Double Down on Compliance Scrutiny," CFO

Doreen M. Edelman, Zarema A. Jaramillo

> September 12, 2019

## "USTR Requests Comments on Modifications to Section 301 Tariffs," Global Trade & Policy Client Alert

Doreen M. Edelman, Zarema A. Jaramillo, Andrew Bisbas

> September 4, 2019

## "Time Is Running Out to File for Section 301 List 3 Exclusion Requests: Timeline and Alternative Options," Global Trade & Policy Client Alert

Doreen M. Edelman, Zarema A. Jaramillo, Andrew Bisbas

> August 30, 2019

## "INSIGHT: U.S. Sanctions Against Venezuela Affect Any Company Doing Business There," Bloomberg Law

Doreen M. Edelman, Abbey E. Baker

> August 14, 2019

## "Commentary: How private equity shops can adapt to the new CFIUS rules," Pensions & Investments

Doreen M. Edelman, Steven E. Siesser

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# $\hbox{"What Artificial Intelligence Companies Must Know to Comply with New Export Policies,"} \ Legal tech \ News$

Doreen M. Edelman, Matt Savare

> July 16, 2019

## "What the Changes to CFIUS Mean for Foreign Investment," Global Trade & Policy Client Alert Update

Doreen M. Edelman

June 17, 2019

## "Key Takeaways From Six Months Into New Mandatory CFIUS Pilot Program," Global Trade & Policy Client Alert

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> June 13, 2019

## "More "Emerging Technologies" Now Require an Export Review," Global Trade & Policy Client Alert

Doreen M. Edelman

> April 23, 2019

## "How Can PE and VC Investors Mitigate Risk in an Unpredictable Trade Environment?," Global Trade & Policy Client Alert

Doreen M. Edelman, Abbey E. Baker, Andrew Bisbas

> April 19, 2019

"Startups Have To Care About Violating U.S. Sanctions Laws, Too," Crunchbase News

Doreen M. Edelman, Abbey E. Baker

> Spring 2019

## "Attention Private Equity and Venture Capitalists: Do You Know How to Manage Investment Portfolio Trade Risks?," The Journal of Private Equity

Doreen M. Edelman, Abbey E. Baker

> February 21, 2019

## "Congress Calls on USTR to Initiate China Import Exclusion Process for List 3," Global Trade & Policy Client Alert

Doreen M. Edelman, Abbey E. Baker, Andrew Bisbas

> January 12, 2019

## "U.S. tech startups face new government controls in 2019," VentureBeat

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November 15, 2018

## "Update: China Tariffs," Global Trade & Policy Update

Doreen M. Edelman

November 14, 2018

## "What the Changes to CFIUS Mean to Foreign Investment," Global Trade & Policy Client Alert

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> August 29, 2017

## "Foreign Investors Should Not Let Fear of CFIUS Limit Investment in US Manufacturers," IndustryWeek

Doreen M. Edelman

> July 27, 2017

## "Why Trump's North Korea sanctions make business with China tricky," The Hill

Doreen M. Edelman

> May 24, 2017

## "A stronger NAFTA will boost US economic power against China," The Hill

Doreen M. Edelman

> March 25, 2017

## "Think the United States has weak sanctions on Iran? Think again.," The Hill

Doreen M. Edelman

> February 24, 2017

## "4 smart ways to improve NAFTA," The Hill

Doreen M. Edelman

> January 27, 2017

## "Who really benefits from free trade? American companies and workers.," The Hill

Doreen M. Edelman

> June 29, 2016

## "How to Sleep Soundly and Avoid Bribes: Mitigating Chinese and American Corruption Risk in the Context of EB-5," EB5 Investors Magazine

Doreen M. Edelman, Andrew Bisbas

> May 25, 2016

## "Understanding the Do's and Don'ts of Iranian Investments in the United States," EB5 Investors Magazine

Doreen M. Edelman, Abbey E. Baker, Andrew Bisbas

> May 5, 2016

#### "Aviation: Are Cuba and Iran Really Open for Business?," Global Trade

Doreen M. Edelman, Abbey E. Baker

> April 20, 2016

## "Opportunities for U.S. Businesses and Travelers from Changes to U.S. Cuba Regulations," Global Trade

Doreen M. Edelman, Andrew Bisbas

## In the Media

> November 19, 2021

In **TIME, Doreen M. Edelman**, partner and Chair of Lowenstein's **Global Trade & Policy** group, and senior counsel **Laura Fraedrich** discuss the impact of sanctions on Cuba-based organizations and businesses that have been locked out of online services such as file transfer sites, social media managers, cloud services, development apps, video calling, and education platforms. Edelman explains that the complicated trade restrictions and inconsistent history of U.S.-Cuba relations discourages U.S. companies from finding workarounds for clients located there. She says: "I've worked with a lot of clients over the years who take a very conservative approach and decide they don't want to run that risk. [Startups especially are] not going to want to pay for legal fees for stuff like this, so they'll just follow the embargo and be done with it." Fraedrich adds that the U.S. Treasury

Department's Office of Foreign Assets has lately been more "targeted at people who are in or have been in the government; ...you really wonder why we couldn't go to something like that for Cuba to mitigate some of these secondary and tertiary effects."

## > November 10, 2021

In **Supply Chain Management Review**, **Doreen M. Edelman**, partner and Chair of Lowenstein's **Global Trade & Policy** practice, and **Laura Fraedrich** address the recent rollback of tariffs on steel and aluminum imports, and the potential impact on supply chain challenges. Edelman advises companies "to stay engaged and hands-on. Make sure paperwork and advanced CBP filings are in order. Contact everyone in the import supply chain to ensure your products are a priority known to all parties in the import chain. Ensure your classifications, markings, and country of origins representations are accurate, complete, and don't trigger CBP questions."

Fraedrich says that the lifting of these tariffs "will help U.S. manufacturers be more competitive in the world market while at the same time helping the EU steel and aluminum manufacturers maintain their production. The move also reinforces the Biden Administration's vow to re-engage our allies in bilateral and multilateral negotiations on commercial issues to create a more unified front related to threats from countries such as China and Russia. This deal may be the beginning of similar deals for other countries and deeper negotiations with the EU on trade issues."

## > October 5, 2021

Foreign Investment Watch interviews Doreen M. Edelman, partner and Chair of the firm's Global Trade & Policy group and number one on the company's Top Advisors 2021 list, about President Joe Biden's approach to China, the latest governmental trade appointments, a possible U.S. investigation into Chinese subsidies under Section 301 of the U.S. trade law, and other government actions that target China. "One example is Section 889 of the National Defense Authorization Act, which prohibits any U.S. government agency from buying or doing business with any company that uses telecom equipment that uses components from one of the targeted Chinese companies," Edelman says. "These are broad provisions with the focus being to ostracize China." She adds, "I don't think either side wants ... [a trade war] because of the market implications, and Biden has pledged to be more multilateral in his approach. Let's hope that the ongoing bilateral discussions are substantive, and the new appointees can get engaged quickly."

Edelman continues: "U.S. business and consumers were, and are, the victims of the Section 301 tariffs. No one thought they would last this long. More tariffs would not be prudent. ... The silver lining I see is that trade regulations and tariffs are now issues that senior management can take advantage of to optimize their business if they really understand their options. It is critical to every company's growth strategy."

## > September 21, 2021

In a video interview for **SupplyChainBrain**, **Doreen M. Edelman**, Chair of the firm's **Global Trade & Policy** practice, discusses the Biden administration's "holistic" approach to the Buy America Act, noting that—while the legislation is 70 years old— "this is the first time they are actually looking at changing the content requirements and making a larger differential in the benefit of purchasing domestic over foreign products." For manufacturers of all commercial products (not just defense), Edelman says, "The companies that are going to be successful are the ones that understand their supply chain. ... There is no short cut in doing it." She continues: "The Biden administration is not trying to make it just U.S.-oriented; [they are saying] we want to work with our best trading partners. If you work with us on national security, as a result, you may get a trade preference. It all goes hand in hand."

## > July 24, 2021

In **Foreign Investment Watch, Doreen M. Edelman**, Chair of the firm's **Global Trade & Policy** group, and **Christian C. Contardo** discuss a recent report by the Defense Critical Supply Chain Task Force and its recommendations for building U.S. supply chain resilience, including the possibility of requiring companies to disclose foreign capital they receive from adversaries. Edelman says, "I am advising companies, not just technology and defense providers, to focus on their supply chain." Regarding the possibility of creating an inclusionary process that exempts "trusted partners" from CFIUS requirements, Edelman predicts "a formal or informal loosening of the requirements for trusted partners," despite the fact that these relationships are always subject to "a fact specific transaction review." Contardo observes that these recommendations "are in addition to voluntary incentive-based supply-chain security programs such as the Department of Defense Trusted Capital program, [which] matches vetted capital providers to U.S. businesses working with the DoD in key technology sectors as a way for the businesses to raise necessary funding to grow without risking investment from countries of concern to the DoD."

## > June 27, 2021

**Doreen M. Edelman**, Chair of the firm's **Global Trade & Policy** group, speaks to **Foreign Investment Watch** about preemptive disclosures of nonnotified CFIUS transactions involving SPACs, where companies state that they will not be submitting a declaration with CFIUS unless they are requested to do so. Edelman calls this approach "a proactive, low risk way to let regulators know that the CFIUS process was not ignored or flouted." She adds that "by making this statement to the SEC, at least it's on record somewhere that the parties carefully reviewed the transaction for national security concerns" (*subscription required to access article*).

Foreign Investment Watch recently ranked Edelman as number one on its Top Advisors 2021 list of lawyers who provide legal advice concerning national security reviews of foreign investments in the United States and abroad

# > January 11, 2021

**Doreen M. Edelman** is interviewed on the podcast **FCPA Compliance Report** on why every compliance professional needs to be ready to comply with CFIUS and where CFIUS may be headed under the Biden administration. Edelman urges parties to a transaction to considerlying before closingary factors that could trigger CFUIS scrutiny, such as how the technology in question will be classified for exports, who are the ultimate beneficiaries, and possible exit strategies.

#### > January 4, 2021

In an article in **Tax Notes Federal** discussing the Biden administration's likely approach to trade issues, **Doreen M. Edelman** says she does not foresee any immediate removal of section 301 tariffs against China in the near future: "I think ... [President Biden is] ... going to look at them. I don't think he's going to come in and immediately remove them in an executive order." Regarding the ongoing dispute between the United States and the EU about Boeing-Airbus, Edelman state that "the administration will likely push for negotiations to get 'back on track with the EU' as part of a move toward multilateralism."

#### > January 3, 2021

**Doreen M. Edelman**, Chair of the firm's **Global Trade & Policy** group, discusses in **Law360** anticipated trade issues for the incoming administration, such as the digital service tax programs increasingly imposed in Europe that are stirring controversy among Silicon Valley companies. "Digital taxes will also be discussed [with the EU], and the Biden administration will want to be part of a multilateral deal," Edelman predicts. "Biden likes to make all sides appreciate the deal, which may be difficult."

**Doreen M. Edelman** speaks to **Radio Free Asia** about the **recent advisory from OFAC** related to high-value artwork. She notes that OFAC's restricted parties list and country prohibitions are not limited to a particular industry, but the agency is aware that the art industry has been failing to run compliance screenings on its transactions; she also predicts an increased use of sanctions in the future to protect U.S. national security.

## > September 14; September 16-17, 2020

Lowenstein's representation of independent private equity firm NexPhase Capital, LP in the sale of Insurance Technologies, LLC to private equity firm Thomas H. Lee Partners is noted in Business Wire, Cision PR Newswire, citybizlist, TheStreet, Bloomberg Law, and the Global Legal Chronicle. The Lowenstein deal team included Christopher C. Henry, Michael Walutes, Zarema A. Jaramillo, Doreen M. Edelman, Jack Sidorov, Megan Monson, Matthew Tippy, Amanda C. Lutick, and Michael T. Melchiorre. View Lowenstein's news announcement about this transaction.

## > September 4, 2020

Lowenstein's representation of **Traub Capital**, an investment firm specializing in building value in consumer companies using its unique combination of strategic, operational, and financial expertise, in the company's purchase of MANA Products, a premier beauty contract manufacturer based in Long Island City, New York, is noted in the **Global Legal Chronicle**. The Lowenstein deal team included **Michael A. Brosse**, **Lauren M. Troeller**, **Lowell A. Citron**, **Doreen M. Edelman**, **Darren Goodman**, **Ted Hunter**, **Marc S. Kurzweil**, **Gavin J. Rooney**, **Jeffrey M. Shapiro**, **Michael Walutes**, **James C. Shehan**, **Norman W. Spindel**, **Daniel A. Suckerman**, **David Toma**, **Stuart S. Yusem**, **Abbey E. Baker**, **Eric Jesse**, **Stacey C. Tyler**, **Naomi D. Barrowclough**, **Matthew P. Hintz**, **Manali Joglekar**, **Kimberly E. Lomot**, **Kathleen A. McGee**, **Megan Monson**, **Zachary L. Berliner**, **Christian C. Contardo**, **Mark S. Heinzelmann**, **Amanda C. Lutick**, Michael T. Melchiorre, **Joshua A. Rabinovits**, **Stephen Tanico**, **Jenna-Marie Tracy**, Joseph Mignone, and Keith Janowitz. **View Lowenstein's news announcement about this transaction**.

#### > August 20, 2020

**Doreen M. Edelman** speaks to **The Deal** about the national security challenges raised for any American corporation buying TikTok's U.S. business. "The devil will be in all the details, and that will be something important for other companies to watch," she says, adding that "[w]ith the Trump administration fearful that Beijing mines personal information for espionage, blackmail and stolen identities, a ban on foreign access to user data is likely." She warns that CFIUS mitigation for this transaction may be necessary: "There will have to be separate servers, locations will not be in China, [and] there will be different policies and procedures that will affect the U.S. company."

#### > August 15, 2020

**Doreen M. Edelman** comments in **Business Insider** on the risks for venture capital firms under the Trump administration's increased scrutiny of foreign investment, as illustrated by the executive order banning TikTok in this country and ordering its parent ByteDance to undo a years-old merger that led to the app's expansion around the world. "I don't feel that enough of the venture companies and the [private equity] backed companies in tech and data understand that this ... could be a real issue," she says. She explains the broad reach of the Committee on Foreign Investment in the United States (CFIUS), which can not only review but also force changes to deals closed long ago. "There's no time limit," she says. There is also no requisite size for a company to come under CFIUS review. "There's no de minimis," Edelman continues. "There's no lower threshold." (subscription required to access article)

## > August 2, 2020

**Doreen M. Edelman** is interviewed by **Foreign Investment Watch**, a publication focused on the intersection of national security and foreign investment, which recently named her one of its **top ten advisors** in 2020. Edelman discusses the reasons why a CFIUS review is critical for startups, private equity, and venture fund companies, and she looks at the new real estate provisions of FIRRMA, which cover "not just investment in a U.S. business with real estate but also leases, purchased land, and concessions." She also addresses the Trusted Capital Program, a Department of Defense program that matches prescreened investors with companies working on technology or products of national security interest. Finally, Edelman looks at reporting obligations under the International Investment and Trade in Services Survey Act, which requires all U.S. businesses to file reports identifying foreign direct investment that results in a foreign entity owning or controlling 10 percent or more of a U.S. businesse.

## > June 17, 2020

**Doreen M. Edelman** discusses the increase in CFIUS filing requirements and regulatory scrutiny that private equity firms face for deals involving foreign capital in **Fundfire**. She notes the reputational impact for companies in addition to the risk of civil and criminal penalties. Edelman says, "[If] you cannot find a way to mitigate with the U.S. government and unwind your deal to a certain extent to reduce the national security issue, you can have to divest, or the foreign party could have to divest from the U.S. business. ... It's just time, money, and embarrassment." (subscription required to access article)

## > May 29, 2020

**Dealreporter** spoke to **Doreen M. Edelman** about a new Treasury Department proposal that will clarify when inbound investors of U.S. critical technologies need to make a mandatory filing with CFIUS. She says this will narrow the definition of transactions covered by the Foreign Investment Risk Review Modernization Act, making it less "fuzzy" and subjective. She adds that the "same analysis that parties have used to determine whether they are subject to export controls will help them determine whether their CFIUS filings are mandatory or not." (subscription required to access article)

## > May 28, 2020

Lowenstein's representation of **PeakSpan Capital** in an investment transaction in which PeakSpan, Morgan Stanley Expansion Capital, and others invested more than \$42 million in Ecwid is noted in the **Global Legal Chronicle**. The Lowenstein team was led by **Anthony O. Pergola** and **Juan B. Soto** and included Ifat Lipman, Joon Hwan Kim, and **Serena Ward**, with support from **Darren Goodman**, **Eric Jesse**, **Leah Satlin**, **Sophia Mokotoff**, and the firm's **Global Trade & Policy** team (led by **Doreen M. Edelman**), among others. **View Lowenstein's news announcement about this transaction**.

## > May 27-28, 2020

Aircall's \$65 million Series C funding round, the result of an international team from Osborne Clark (including Lowenstein Sandler) advising DTCP's Venture and Growth Fund II, is noted in TechCrunch, Inside Intercom, Business VoIP, Venture Capital Journal, SiliconANGLE, Silicon Republic, and VentureBeat. (The Lowenstein team was led by Anthony O. Pergola and Alex D. Leibowitz, along with Matthew W. Stichinsky and Jenna-Marie Tracy, and the firm's Global Trade & Policy team (led by Doreen M. Edelman), among others.) View Lowenstein's news announcement about this transaction.

**Doreen M. Edelman** is quoted in **The Wall Street Journal**'s article on calls to delay or roll back tariffs during the COVID-19 pandemic, which are currently being determined on a case-by-case basis. She notes: "Having a tariff that is intended to punish China, but is being paid for by middle-America consumers who may currently be out of work, seems unfair at best and counterproductive." (subscription required to access article)

## > March 17, 2020

In **Tax Notes**, **Doreen M. Edelman** comments on requests made by U.S. trade groups asking the Trump administration to remove section 301 tariffs in light of the financial uncertainty surrounding the coronavirus pandemic; she notes that exclusions alone may not be sufficient to help U.S. businesses. "These tariffs were intended to hurt China, but trade policy experts knew when the announcement was made that the administration was mixing apples and oranges," she says. "The companies were to 'take one for the team' and take the long view that the policy to alienate China was a good policy. The effect of the virus on retail companies will put the icing on the cake for retail companies."

## > February 25; March 10, 2020

In *Corporate Counsel* (February 25, 2020), Doreen M. Edelman, Chair of Lowenstein's Global Trade & Policy group, discusses why GCs of financial services companies focused on cryptocurrency, payment systems, mobile banking, and insurance-related technologies need to understand the new changes in regulations governing reviews by the Committee on Foreign Investment in the United States [CFIUS] of foreign investment transactions. She says, "This is such an expanded group of companies because the way CFIUS looks at this now is like this is an episode of 'Homeland,'" adding that "something else GCs ought to know is that the risk may be bigger for the buyer than the seller. It depends on how the agreement is written and what the investment is." Edelman adds, "Also, there is no *de minimis* on this. If it is a \$3 million investment, you still have to consider CFIUS." She remarks that if she were an in-house lawyer, "I would want to have [the transaction] reviewed initially and get something in writing that I had someone review it and tell me what my risks are if I don't file, or why I don't need to file [for a CFIUS review] in case the government comes knocking on the door later." Furthermore, another *Corporate Counsel* article (March 10, 2020) by global trade lawyers from Kirkland & Ellis references Edelman and Abbey E. Baker's piece, "Did 'Silicon Valley' Get CFIUS Right? Can It Really Ruin Everything?," where they observe how the HBO show's writers misunderstood how CFIUS actually functions.

#### > February 13, 2020

**Doreen M. Edelman**, Chair of the firm's **Global Trade & Policy** group, addresses the risks for U.S. dealmakers posed by the new rules implemented by the Committee on Foreign Investment (CFIUS) in an article in **The Deal**. The February 13<sup>th</sup> implementation of the Foreign Investment Risk Review Modernization Act, or FIRRMA, extends the authority of the Committee in ways that will impact "[t]ech startups, private equity firms, hedge funds, C-suite executives and other stakeholders," says Edelman, warning that "transactions could be jeopardized if parties don't fully understand the new regulatory regime adopted by the Treasury Department, which oversees the nine-member government panel." She adds that stakeholders must carefully classify their products and technologies; in "some cases, tech companies may not realize they have Chinese investment that could attract the committee's attention or may wrongly assume that a small stake isn't a concern."

#### > January 9-14, 2020

Lowenstein's representation of **PVH Corp.** [NYSE:PVH] in its definitive agreement to sell its Speedo North America business to Pentland Group for \$170 million in cash is highlighted in **Law360**, **Bloomberg Law**, **Retail Dive**, **Financial News**, and the **Global Legal Chronicle**. The Lowenstein deal team included **Marita A. Makinen**, **Andrew P. Erdmann**, **Doreen M. Edelman**, **Andrew E. Graw**, **Darren Goodman**, **Mary J. Hildebrand**, **Matt Savare**, **Michael Walutes**, **Jeffrey M. Shapiro**, **Jack Sidorov**, **Abbey E. Baker**, **Manali Joglekar**, **Justin Gindi**, **Sophia Mokotoff**, Nicole Rae Morales, **Bryan Sterba**, and **Vikram Paul**. The PVH team included Mark Fischer, Jeffrey Hellman, and Meredith Felz (Legal), along with Dana Perlman and Lina Yoo (In-house Deal Makers). (*subscription required to access certain content*) **View Lowenstein's news announcement about this transaction**.

## > January 1, 2020

**Doreen M. Edelman** contributes her 2020 predictions on potential legal issues in international trade in **Law360**. She notes that the Commerce Department has still not developed guidance on a rule, announced in 2018, on which "emerging and foundational technologies" are subject to export controls. She warns that, to date, many owners and developers of, and investors, in technology such as artificial intelligence, 3-D printing, quantum computing, and robotics "have not focused on export control requirements for these technologies. ... Thus, these companies must quickly learn when export controls apply" to them to ensure compliance. (subscription required to access article)

#### > November 18-26, 2019

Lowenstein's representation of **The Estée Lauder Companies Inc.** in its acquisition of the shares that the company does not already beneficially own in Have & Be Co. Ltd., the Seoul-based, global skin care company behind Dr. Jart+ and men's grooming brand Do The Right Thing, is noted in **Mergers & Acquisitions**, **Yahoo! Finance**, **Digital Commerce 360**, **PYMNTS.com**, the **Global Legal Chronicle**, **The Deal** (article; deal listing), **Law360**, **Business Wire**, **Bloomberg**, and **The Beauty Influencers**. Led by partner **Marita A**. **Makinen**, the Lowenstein deal team includes **Gina M**. **Seong**, **Darren Goodman**, **Doreen M**. **Edelman**, **Mary J**. **Hildebrand**, **Matt Savare**, **Michael Walutes**, **Jack Sidorov**, **Abbey E**. **Baker**, **Kate Basmagian**, **Manali Joglekar**, **Taryn E**. **Cannataro**, **Sophia Mokotoff**, **Carly S**. **Penner**, **Bryan Sterba**, and **Matthew Tippy**. (subscription required to access article) **View Lowenstein's news announcement about this transaction**.

# > November 11; November 14, 2019

Lowenstein Sandler's representation of ZMC in its investment in CommentSold, Inc. is noted in *The PE Hub Network, Business Wire*, Financial News, and the Global Legal Chronicle. The Lowenstein team included Steven E. Siesser, Lesley P. Adamo, Elisia M. Klinka, Darren Goodman, Julie Levinson Werner, Anita L. Chapdelaine, Nicole Rae Morales, Nicole Stefanelli, Megan Monson, Eric Jesse, Sophia Mokotoff, Carly S. Penner, Bryan Sterba, Manali Joglekar, Mark P. Kesslen, Daniel A. Suckerman, Kimberly E. Lomot, and Doreen M. Edelman. *View Lowenstein's news announcement about this transaction*.

## > September 12, 2019

**Doreen M. Edelman** provides unattributed commentary in a **Wall Street Journal** article on how U.S regulators may halt a \$36.6 billion takeover of London Stock Exchange Group PLC by Hong Kong Exchanges & Clearing Ltd., which made an unsolicited oer on Wednesday, September 11, 2019. The London exchange is subject to regulations by several U.S. regulatory agencies, including by the Securities and Exchange Commission, the Commodity Futures Trading Commission, the Financial Industry Regulatory Authority, and the Committee on Foreign Investment in the U.S. According to Edelman, who regularly advises clients on CFIUS compliance and the risks associated with cross-border M&A and investment transactions, "There will be significant U.S. government concern about the security of data and influence of capital flows that could result from the transaction." (subscription required to access article)

## > August 13, 2019

The Los Angeles Times quotes Doreen M. Edelman, chair of Lowenstein Sandler's Global Trade & Policy group, in its story on President Donald Trump's delay of tariffs on

cellphones, laptops, toys, shoes, and clothes made in China until after the winter holidays. Edelman says, "This gives breathing room for the retailers and U.S. companies," adding that the three-month delay will still not give companies enough time to find alternative suppliers outside of China. "We've got clients that have specialized, high-end sculptures and ornaments being hand-painted from mountain communities in China that have been doing this for years. ... You just can't pick that up and move that to another country." The story also appeared in the **York Dispatch** and the **Dothan Eagle**.

#### > August 7-9, 2019

Lowenstein Sandler's representation of Thailand's leading global chemical company, Indorama Ventures (IVL), in its \$2.1 billion acquisition of Huntsman's chemicals units was featured in numerous media outlets including *The Wall Street Journal* and *The Deal*, which highlighted *Nicholas San Filippo IV*'s role in the transaction and previous work with IVL since 2003. *The Nation Thailand* called the transaction "a game changing acquisition for IVL, its largest ever and one of the biggest by a Thai company in the last decade." The acquisition was also featured Bloomberg Law – Big Law Business, *The Deal*, The Associated Press, the *Global Legal Chronicle*, *Business Wire*, *citybizlist*, Bakersfield.com, The American Lawyer, and Law360. The Lowenstein Sandler deal team included Nicholas San Filippo IV, Sam E. Khan, Stuart S. Yusem, Nicholas G. Mehler, Christine Osvald-Mruz, Doreen M. Edelman, Brian Silikovitz, Norman W. Spindel, Mark S. Heinzelmann, Mitchell McDonald, Megan Monson, Sami Najib, Sunita Patel, Alex H.Rosenthal, and Niral T. Shah. The Valence Group acted as exclusive financial adviser to IVL, and KPMG provided financial due diligence support. (*subscription required to access certain content*) View Lowenstein's news announcement about this transaction.

## > July 12-19, 2019

Longtime firm client Tower International's (NYSE: TOWR) acquisition by private equity-owned Autokiniton Global Group, in a \$900 million deal expected to close in September or October, is reported in Crain's Detroit Business, *The PE Hub Network, Automotive News, InvestorsHub, Law360, Smart Business Dealmakers, Mergers & Acquisitions*, and the Global Legal Chronicle. (Lowenstein deal team: Peter H. Ehrenberg, Andrew E. Graw, Lowell A. Citron, Marita A. Makinen, Jeffrey Blumenfeld, Jack Sidorov, Jeffrey M. Shapiro, Elisia M. Klinka, Justin Gindi, Kate Basmagian, Daniel C. Porco, Matthew A. Weston, Erica Perlmutter, Robert Bee, Sabrina Cua, Brian A. Silikovitz, Kristin V. Taylor, Katie R. Glynn, Nicholas G. Mehler, Doreen M. Edelman, Lynda A. Bennett, Megan Monson, Michael B. Himmel, and Norman W. Spindel) View Lowenstein's news announcement about this transaction.

#### > June 14, 2019

**Doreen M. Edelman**, Chair of the **Global Trade & Policy** group, is quoted in a **Fortune** article on the effects of the ban of Huawei, the Chinese telecommunications company, on U.S. businesses. She explains that "technology as defined in the export regulations can't be sold to Huawei without a license ... Companies have to figure out how to change their supply chains or customer base or what they manufacture and sell."

#### > May 18, 2019

**Doreen M. Edelman** is quoted in *Business Insider* in an article discussing five key questions U.S. tech startups should ask before forming a relationship with a foreign investor. Edelman begins with assessing the company's industry, noting that there may be regulations against foreign investments designed to prevent foreign governments from accessing technology or intellectual property that may be harmful to U.S. national security. Next, she poses the question of whether the startup's technology could be used by the defense sector in the future. Should this occur, the U.S. government may force the foreign investor to divest from the company, opening the startup up to financial hardship. Edelman goes on to analyze the investor itself, explaining that startup founders need to pay attention to the location of the investor—i.e., whether they are based in a country that is a friend or foe to the U.S. and being mindful of the shifting geopolitical landscape. Her fourth question advises founders to consider the amount of information they would be required to share with the foreign investor, noting that allowing access to too much information may create issues for the company. Finally, Edelman proposes the topic of the startup's board, affirming that giving up a board seat to a foreign investor may further complicate the process. She explains that founders who wish to give an investor a seat on the board will be required to go through the CIFIUS process even if they are not mandated to file.

## > April 2, 2019

**Doreen M. Edelman** is quoted in the *International Business Times* discussing the delay of a trade deal between the United States and China. Edelman suggests that the suspension could be due to the conflicting goals of the President and Congress.

## > December 10-December 17, 2018

**Doreen M. Edelman** is featured in a two-part *FCPA Compliance Report* podcast (**December 10**; **December 17**, **2018**) discussing the Committee on Foreign Investment in the United States (CFIUS). In part one, Edelman highlights the recent increase in non-compliance penalties, the development of national security measures due to disruptive technologies, and the expansion of CFIUS jurisdiction to companies purchasing non-controlling investments in U.S. companies. In part two, Edelman discusses the requirements for mandatory fillings under the CFIUS Pilot Program.

## > December 6, 2018

**Law360** quotes **Doreen M. Edelman** in an article discussing the arrest of Huawei Technologies CFO Meng Wanzhou. Meng's arrest came amid U.S.-China trade negotiations that have triggered stock market uncertainty. Edelman notes the consequences U.S. businesses could face if Meng's prosecution stalls the negotiations' progress, and she advises clients to "continue planning along a worst-case scenario for the long term." (subscription required to access article).

#### > December 4, 2018

**Doreen Edelman** is quoted in **Law.com** in an article discussing President Trump and China's Xi Jinping's recent agreement to a 90-day truce in the trade war. Edelman notes that it is a difficult situation for companies to prepare for and states that she advises clients to diversify their supply chains and have a plan of action in the event higher tariffs are implemented. (*This article also appeared in Corporate Counsel, Yahoo! Finance, The American Lawyer International, and the New York Law Journal.*) (*subscription required to access certain content*)

## > November 27, 2018

**Doreen M. Edelman** is quoted in a *Corporate Counsel* article discussing a possible meeting between President Trump and China's Xi Jinping at the G20 Summit and the potential impact on U.S. companies' dealings with China. Edelman notes the present international trade climate and states that she advises clients to be prepared for anything in the shortand long-term.

> October 25-November 5, 2018

The Washington Post, The American Lawyer, Global Trade Review, Bloomberg Law – Big Law Business, Law360, The National Law Journal, the New Jersey Law Journal, International Trade Today, The Deal, TXF, and citybizlist highlight the launch of Lowenstein's Global Trade & Policy practice in the firm's Washington, D.C. office and the arrival of Doreen M. Edelman (practice chair), Abbey E. Baker, Andrew Bisbas, and Megan C. Bodie. The Global Trade & Policy practice will provide U.S.-based clients, foreign clients, and foreign-owned U.S. companies with compliance and policy development services. Areas of emphasis will include import tariffs and classifications, OFAC regulations and sanctions, CFIUS review protocols, and export controls. (subscription required to access certain content)

> September 6, 2017

Doreen M. Edelman discusses U.S. sanctions against South Sudan in Foreign Policy.

> August 7, 2017

Doreen M. Edelman is quoted in Automotive News regarding NAFTA.

> July 27, 2017

Doreen M. Edelman is interviewed on CGTN regarding the Trump Administration's efforts to renegotiate NAFTA.

> July 17-21, 2017

Doreen M. Edelman discusses the Trump Administration's goals for renegotiating NAFTA in SupplyChainBrain and Washington Post.

> July 6, 2018

Doreen M. Edelman discusses the possibility of sanctions on Chinese companies doing business with North Korea in The Associated Press.

April 27, 2017

Doreen M. Edelman comments on the role of U.S. trade representatives in the Adam Smith Project.

> February 16, 2017

Doreen M. Edelman comments on how the President's trade policies might affect Tennessee in Nashville Business Journal.

> January 23, 2017

Doreen M. Edelman discusses U.S. export and military sales policies with Aviation Week & Space Technology.

> August 16, 2016

Doreen M. Edelman is quoted in Bidness Etc on the potential Boeing deal with Iran.

> June 26, 2016

Doreen M. Edelman is quoted in Hotel Management regarding the Cuban hotel industry.

> April 14, 2016

Doreen M. Edelman is quoted in Hotel Management about getting permission to do business in Cuba.

> September 23, 2014

Doreen M. Edelman is featured on LXBN-TV.

> March 11, 2013

Law360 interviews Global Trade & Policy chair Doreen M. Edelman in a Q&A.

# SPEAKING ENGAGEMENTS

- > Speaker, The New Normal How National Security Concerns Have Altered Global Business Practices, SobelCo and the New Jersey District Export Council, Webinar, November 9, 2021
- > Panelist, International Commerce in the Age of Covid, New Jersey District Export Council, Webinar, October 13, 2021
- > Speaker, **Legal Compliance for Emerging Cyber Technologies,** Women in Technology (WIT), Webinar, June 2, 2021
- > Panlist, Key Focus Areas to Strengthen Compliance and Meet Increased Regulator Expectations, American Conference Institute (ACI), Webinar, April 28, 2021
- > Panelist, Assessing FIRRMA's Impact on Investment Deals Involving Private Equity Funds, American Conference Institute (ACI), Webinar, April 21, 2021
- > Speaker, How to Strengthen Compliance within Your Competing Corporate Priorities, American Conference Institute (ACI); The Canadian Institute (CI), February 24, 2021
- > Panelist, Biden Administration's Impact on Trade and Antitrust Issue, Lowenstein Sandler LLP, Webinar, February 4, 2021
- > Speaker, Global Trade Under a Biden Administration: What Can You Expect?, TerraLex, January 13, 2021
- > Podcast guest, Doreen Edelman on CFIUS Under the Biden Administration, FCPA Compliance Report, Episode 532, January 11, 2021
- > Speaker, **Do you understand export controls, economic sanctions, and the CFIUS risks related to foreign investment?**, Lowenstein Sandler and Momentum, Webinar, December 1, 2020
- > Speaker, CFIUS Risks, Export Controls & Economic Sanctions, Lowenstein Sandler and EisnerAmper LLP, Webinar, November 10, 2020
- > Speaker, Lowenstein Sandler and ACC New Jersey's Virtual Cyber Day, Lowenstein Sandler and ACC New Jersey, October 7, 2020

- > Speaker, Evaluating CFIUS Risks In a Potential Opportunity and Positioning Your Company For an Easy CFIUS Process, Momentum Events, Webinar, August 11, 2020
- > Moderator, Shifts in Global Trade and Supply Chain Due in 2020, TerraLex, Webinar, June 2, 2020
- > Speaker, What Tech Companies and Investors Need to Know About CFIUS's New Foreign Investment Requirements, Lowenstein Sandler LLP, May 19, 2020
- > Speaker, CFIUS 101 for Technology Companies: What You Need to Know Now About New Foreign Investment Requirements, Lowenstein Sandler LLP, Webinar, March 26, 2020
- > Speaker, POSTPONED: A.C.E.S. Compliance Summit, Momentum, Washington, DC, March 17-18, 2020
- > Moderator, Women, Influence & Power in Law Conference, Women, Influence & Power in Law, <span>Washington, D.C.</span>, October 16-18, 2019
- > Speaker, Recent Developments in Global Trade, Terralex, Webinar, September 25, 2019
- > Speaker, Reducing Trade and Compliance Risks in a Volatile 2019, The National Chemical Credit Association (NCCA) September Quarterly Meeting, Charlotte, NC, September 19-20, 2019
- Speaker, Everything You Didn't Know You Need to Know About U.S. Trade Laws, Association of Corporate Counsel's 17th Annual All-Day CLE Conference, Whippany, NJ, September 20, 2019
- > Presenter, Reducing Trade and Compliance Risks in a Volatile 2019, National Chemical Credit Association, Sponsored by: ABC Amega Inc., Charlotte, NC, September 19, 2019
- > Speaker, Reducing Trade and Compliance Risks in a Volatile 2019, National Association of Credit Management, July 23, 2019
- > Speaker, Foreign direct investments in the USA and Europe: the changing scope of national security reviews, Osborne Clarke, London, UK, June 18, 2019
- > Speaker, Lowenstein Sandler Spring Alumni CLE Day, Lowenstein Sandler, Roseland, NJ, April 30, 2019
- > Speaker, A.C.E.S. Compliance Summit, Anti-Corruption, Anti-Bribery, Export Controls and Sanctions (A.C.E.S.), Washington, D.C., April 16, 2019
- > CFIUS for Compliance Professionals (December 10; December 17, 2018), FCPA Compliance Report Podcast, December 2018
- > Moderator and Presenter, Recent Developments Regarding Import Tariffs, CFIUS, Export Controls and Sanctions US, EU and Canada, TerraLex Webinar, December 4, 2018
- > Presenter, GCC: The Impact of the Current Trade Tariff Situation on Manufacturers, YPO, November 7, 2018

# **EDUCATION**

- > George Washington University Law School (J.D. 1987), with honors
- > George Washington University (B.A. 1984), with distinction

# **ADMISSIONS**

- > District of Columbia
- > Florida
- > Maryland
- > The Court of Appeals of Maryland
- > Florida Supreme Court
- > U.S. Court of International Trade
- > U.S. District Court for the District of Maryland
- > U.S. Court of Appeals for the District of Columbia Circuit