

# CLIENT ALERT

## This Month in International Trade - January 2016

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*This news bulletin is provided by the International Trade Group of Crowell & Moring. If you have questions or need assistance on trade law matters, please contact [John B. Brew](#) or any member of the [International Trade Group](#).*

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## **SANCTIONS / FINANCIAL CRIME / EXPORT CONTROL**

### **Iran Deal 'Implementation Day': What it Means for U.S. and Non-U.S. Business**

On Saturday, January 16, the United States and European Union formally suspended or relaxed a series of 'nuclear-related' sanctions on Iran after the International Atomic Energy Agency (IAEA) verified to the United Nations that Iran had undertaken the nuclear suspensions to which it agreed in the Joint Comprehensive Plan of Action (JCPOA) on [July 14, 2015](#).

For key aspects of the several hundred pages of new regulations, guidance, and policy positions announced by the U.S. and EU, please see [Crowell's Client Alert](#).

*For more information, contact: Alan W.H. Gourley, Carlton Greene, Cari Stinebower, Chris Monahan, Charles De Jager, Dj Wolff*

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### **Cuba Policy: U.S. Further Eases Sanctions**

On January 27, 2016, the Office of Foreign Assets Control (OFAC) and the Commerce Department's Bureau of Industry and Security (BIS) published in the Federal Register amendments to the Cuban Assets Control Regulations (CACR) and the Export Administration Regulations (EAR) respectively, furthering relax the existing U.S. sanctions on Cuba, supplementing those previously announced on [December 17, 2014](#) and implemented [January 16](#) and [September 21, 2015](#).

For detailed information on the change, please see [Crowell's Client Alert](#).

*For more information, contact: Alan W.H. Gourley, Carlton Greene, Cari Stinebower, Chris Monahan, Charles De Jager, Dj Wolff*

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### **2015 Corruption Perception Index Released by Transparency International**

On January 27, Transparency International (TI) released its [2015 Corruption Perception Index](#) providing a relative assessment of the challenges in doing business throughout the world.

Although noting that corruption remained rife globally, TI emphasized that more countries improved their scores than declined. A notable, but not unexpected exception was Brazil, which declined seven spots with a five-point drop in its score in light of the Petrobras and other on-going corruption scandals.

Furthermore, over two-thirds of the countries have an index score below 50 on the 100 point scale TI uses, with 100 being perceived as very clean. Only two had scores of 90 or above, with Finland taking New Zealand's place in that category.

*For more information, contact Alan W. H. Gourley, Cari Stinebower, Addie Cliffe*

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### **Switzerland Introduces Tougher AML, Anticorruption measures – sort of**

Switzerland has yielded to international pressure by passing a series of measures to ensure compliance with the recommendations of the inter-governmental Financial Action Task Force (FATF). Although some of the measures entered into force last July, the core modifications became effective January 1. These revisions modify Switzerland's Penal Code and Anti-Money Laundering Law to ensure, among other changes, that tax fraud be treated as a predicate crime for money laundering and to force financial institutions to report suspicious tax evasion in amounts greater than 300,000 Swiss Francs owed to foreign authorities.

While the modifications are seen as a step forward in reducing money laundering, they have also been criticized for being overly broad and likely ineffective. The thresholds in the regulations are still extremely high to ensure a meaningful reduction in money laundering. For example, in the European Union a cash transaction of more than 15,000 Euros (\$16,400) must comply with EU anti-money laundering provisions, whereas in Switzerland cash payments of up to 100,000 Swiss Francs (\$98,000) can still be made without reporting or customer due diligence obligations.

To strengthen its anticorruption laws, especially in light of last year's FIFA scandal, Switzerland modified its Penal Code to introduce provisions criminalizing corruption. As these new measures were not contested by popular initiative, the law will now come into effect on a date to be decided by the Swiss Federal Council. Once in force, authorities will automatically be able to investigate corrupt practices without the need for a private complaint. However, the amendment is reserved for serious offenses, as minor infractions will still only be pursued based on a private complaint.

In addition, Switzerland has also introduced bills aiming to eliminate the option for companies to deduct bribes from their taxes and offering extensive protection to whistleblowers.

*For more information, contact: Charles De Jager, Mariana Pendas*

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### **New ID Requirement for Cash Buyers of High-End Manhattan, Miami Real Estate**

On January 13, the Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) announced that it has issued Geographic Targeting Orders (GTOs) for Manhattan and Miami-Dade County, temporarily requiring certain U.S. title insurance companies to identify and report natural persons who use legal entities to acquire high-end residential properties without external financing.

For details on this new rule, which takes effect on March 1, please see [Crowell's Client Alert](#).

*For more information, contact: Cari Stinebower, Carlton Greene, J.J. Saulino*

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### **Updated EU Export Control List Now in Force**

On December 25, 2015, an updated EU list of strategic military and dual-use items requiring export authorization entered into force. The changes to the EU export control regime introduced by Commission Delegated Regulation 2015/2420 in part aim to protect the competitiveness of the covered EU export industries by reflecting the latest scientific, technological, industrial, and commercial developments.

The new control list implements over 100 amendments made by multilateral regimes in 2014, principally under the Wassenaar Arrangement and the Missile Technology Control Regime. The changes relate in particular to the control of machine tools, avionics technology and aircraft wing-folding systems, spacecraft equipment, and civil unmanned aerial vehicles, as well as the decontrol of certain encrypted information security products.

*For more information, contact: Charles De Jager, Chris Monahan*

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### **TRADE AGREEMENT AND INVESTMENT UPDATES**

#### **TPP Formally Signed; Legally Scrubbed Text Released**

The twelve countries of the Trans Pacific Partnership formally signed the agreement on February 4, during a meeting of trade ministers, including U.S. Trade Representative Michael Froman, in New Zealand. The final, legally scrubbed English version of the agreement was released by New Zealand on January 25.

The formal signing and release of the final text clears the way for U.S. ratification of the agreement, though the timeline will depend on the Obama Administration's strategy for getting the agreement through Congress. According to Trade Promotion Authority procedures, the Administration must submit the final text of the agreement to Congress 30 days prior to the submission of any implementing legislation. The submission of implementing legislation will also likely be accompanied by the official International Trade Commission (ITC) report on the impact of TPP on the U.S. economy, which could be released by May 18 or earlier. The ITC completed a three-day hearing on the impact of TPP on January 15.

Congress does not appear to be in a hurry to vote on the treaty. House Ways and Means Committee Chairman Kevin Brady (R-TX) and Senator Orrin Hatch (R-UT), the Senate Finance Committee Chairman, both stressed the need for the President to be willing to work out Congressional concerns with TPP.

*For more information, contact: Paul Davies, Dj Wolff, Evan Yu*

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## Multilateral Climate Accord Reached, Several Forecast Increasing Linkage with International Trade Law & Policy

On December 12, 2015, nearly 200 signatory parties to the United Nations Framework Convention on Climate Change (UNFCCC) concluded the Paris Agreement ([found here](#)), a landmark international climate accord that will have lasting impact on global commerce and investments. The question that industry is now asking is *how* will the accord's "bottoms-up" approach to emissions abatement be implemented under existing and future legal infrastructure. We may need to look no further for an example than the ongoing negotiations and collateral tariff liberalization issues associated with clean energy and environmental goods.

The Paris Agreement states an ambitious (nonbinding and vague) goal for all nations to reduce anthropogenic greenhouse gas (GHG) emissions in a manner to halt the increase in global average temperature to "well below" 2 degree Celsius. That goal will be individually pursued according to each party's (again, nonbinding) plan to reduce GHGs – known as its Nationally Determined Contribution (NDC). An NDC is comprised of policies (backed by implementing laws and regulations) to mandate, deliver or incentivize GHG emission reductions in one or more industrial sectors. Under Article 6, countries will be able to cooperate and form regional or multilateral "carbon clubs" to link NDCs, develop market mechanisms, and potentially establish harmonized "low carbon" tariff adjustments.

The International Energy Agency has also estimated that achievement of the pledged NDCs will collectively require a monumental level of public and private sector investment in projects, goods and services (\$16.5 trillion). To spur the level of investment necessary, several industry and trade groups have begun to argue for new financial reforms to align financial markets with multilateral climate goals. For now, international climate law will slowly trend toward a pre-World Trade Organization (WTO) General Agreement on Tariffs and Trade (GATT) model of international governance, relying heavily on a sector-by-sector approach to GHG emissions abatement throughout the supply chain.

That trend already aligns with trade policies related to clean energy technologies, goods and services. For example, on December 29, Proclamation 9384 of December 23, 2015 was [published in the Federal Register](#), modifying the Harmonized Tariff Schedule to lower tariffs on certain environmental goods as of January 1, 2016. This is in line with the Asia-Pacific Economic Cooperation (APEC) economies, who affirmed to do the same by the end of 2015.

As negotiations on a more comprehensive Environmental Goods Agreement proceed, we are likely to see increased connectivity between such tariff liberalization efforts, bilateral and multilateral investment treaties, and the development of broader carbon clubs emerging out of the Paris Agreement.

*For more information, contact: Cameron Prell, Ben Caryl*

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## New 'EU-U.S. Privacy Shield' Framework Replaces Safe Harbor for EU to U.S. Data Transfers

On February 2, negotiators reached a deal on a new framework governing the transfer of data from the European Union (EU) to the U.S. named the EU-U.S. Privacy Shield. This replaces the previous program known as the U.S.-EU Safe Harbor (Safe Harbor).

Safe Harbor was invalidated in October 2015 by the European Court of Justice (ECJ), but EU Member State data protection authorities (DPAs) agreed to hold off on widespread enforcement against companies utilizing Safe Harbor until January 31, 2016.

For full details on the new framework, please see Crowell's U.S.-EU Privacy Shield Client Alert.

On February 3, the EU's Article 29 Working Party (WP29), which consists of all 28 Member States' DPAs, announced EU-approved model contract clauses and Binding Corporate Rules will be allowed to continue while the WP29 reviews and analyzes the Privacy Shield. The party is expected to provide the European Commission (EC) an opinion in late March or early April. The EC is the authority that must formally adopt the new framework.

Please see Crowell's WP 29 Decision Client Alert for more information.

*For more information, contact: Jeffrey L. Poston, Evan D. Wolff, Jeane A. Thomas, Robin B. Campbell, Frederik Van Remoortel, Christopher Hoff, Lisa Weinert*

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## **EU Supports UN Effort to Increase Transparency in Treaty-Based Arbitrations**

On January 6, the European Commission (Commission) announced that the European Union (EU) will contribute 100,000 Euros to finance the United Nations Commission on International Trade Law (UNCITRAL) register of information and documents on Investor-State Dispute Settlement (ISDS). The publicly accessible register is intended to support the implementation of the UNCITRAL transparency rules for treaty-based arbitration.

As foreign direct investment is part of the EU common commercial policy, the Commission negotiates on both the liberalization and protection of investment on behalf of the EU in Free Trade Agreements, among other instruments.

In this context, it has become the policy of the Commission to use the UNCITRAL transparency rules as the basis for the relevant provisions of all EU trade and investment agreements currently under negotiation. It is also in keeping with the Commission's efforts to progressively harmonize under a comprehensive EU investment policy the many hundreds of investment treaties between individual EU Member States and third countries.

Given this patchwork of treaties, the Commission is keen to promote the principle of transparency. Its main arguments in this context are that publicizing the documents and opening the hearings of ISDS tribunals to civil society organizations increases their legitimacy and accountability, while making information publicly accessible promotes consistency and predictability necessary for investors, stakeholders, states, and investment tribunals.

The UNCITRAL transparency rules currently apply to all investment treaties concluded after April 1, 2014 using the UNCITRAL arbitration rules. However, their applicability could extend to disputes under existing investment treaties if the EU signs the UN Mauritius Convention on Transparency in Treaty-Based Investor-State Arbitration.

*For more information, contact: Charles De Jager, Ian Laird*

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## **South America Moves Closer to New Investor-State Dispute Resolution Center**

On January 19, members of the Union of South American Nations (UNASUR) met to negotiate the final details of an agreement establishing the creation of a regional dispute resolution center to replace the World Bank's International Centre for Settlement of Investment Disputes (ICSID). Reportedly, there is consensus on nearly 80 percent of the agreement, and the issues yet to be decided include the possibility of creating an appellate mechanism and issuing a list of arbitrators. Once the agreement is reached, it will be sent to UNASUR members for final approval.

UNASUR is an intergovernmental union composed of all 12 South American countries. The alternative dispute resolution center was originally proposed by Ecuador in 2009, and subsequently supported by Bolivia and Venezuela. Not coincidentally, these three are the only States that have denounced the ICSID Convention (in 2010, 2007 and 2012, respectively).

If implemented, it is unclear whether the new dispute resolution center will have an impact beyond the region. Several features of the proposed center have been the subject of debate, including the process for constituting independent and impartial arbitral tribunals, as well as the system for review and enforcement of arbitral awards. Further, the new center may conflict with legislation recently passed by some of its own supporters like Bolivia, which in 2015 promulgated a law requiring investment disputes to be settled in Bolivian courts.

*For more information, contact: Ian Laird, Eduardo Mathison, J.J. Saulino*

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## **Government of Venezuela Declares Economic Emergency**

On January 15, Venezuela President Maduro declared a nation-wide "economic emergency" and issued a decree granting broader executive powers to intervene in the economy over a 60-day period. The emergency decree—which can be renewed for an additional 60 days—gives the President authority to limit access to currency, approve tax measures, and impose more government control on the private sector, including the power to order companies to "increase production levels."

A week after the announcement, the proposed emergency decree was rejected by the National Assembly's recently elected opposition majority on the argument that it contained the same policies of currency and price controls that caused the recession. However, by that time the decree had already been published in the Official Gazette and the government-controlled Supreme Tribunal of Justice had declared it constitutional, stripping away the Legislature's powers. Although the emergency decree appears to be in effect since its publication in the Official Gazette, it remains unclear whether the Executive will be able to implement it over the rejection by the Legislature.

The serious state of the economy is evidenced in part by the fact that just days before the issuance of the emergency decree, Venezuela's Central Bank reported annual inflation of 141 percent, the highest in the world. In addition, financial institutions have estimated Venezuela inflation potentially climbing to over 700 percent in 2016.

*For more information, contact: Ian Laird, Eduardo Mathison, J.J. Saulino*

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## CUSTOMS / IMPORTS / TRADE REMEDIES

### **Mexico Publishes List of Minimum Reference Prices for Textile and Apparel Imports**

On January 6, the Mexican Government published a new list of apparel and textile goods with "estimated prices." These prices are the minimum reference price goods ranging from raw materials to finished products may be imported into Mexico and is categorized by Harmonized Tariff Schedule classification number. The measure entered into force on January 18, 2016.

Shipments entered below these prices will be considered "undervalued" and would likely be subject to an investigation and potential penalties. If the parties to the transaction are related entities, this may also trigger larger questions as to the intercompany pricing (i.e., transfer pricing policy) behind the transactions as well. [The announcement is attached here \(in Spanish\).](#)

Although the use of reference and minimum prices to determine customs value is prohibited by Article 7 of the World Trade Organization (WTO) Customs Valuation Agreement, countries instead purport to use these prices as a reference or guideline, thereby are able to assert they do not determine the customs value of the imported merchandise.

The use of reference prices has been a point of contention between industry and customs authorities and is a growing topic of discussion within the WTO and World Customs Organization. Companies experiencing challenges with different customs authorities should consider in what capacity they can participate in this discussion.

*For more information, contact: Jini Koh*

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### **CBP Unable to Stop Challenge over AD/CVD on Chinese Solar Modules**

U.S. Customs and Border Protection (CBP) was [unable to stop a challenge in the U.S. Court of International Trade \(CIT\)](#) of the agency's decision to impose anti-dumping (AD) and countervailing duties (CVD) on solar modules from China according to an opinion made public Wednesday, January 13. Judge Claire R. Kelly denied CBP's motion to dismiss the challenge brought by Sunpreme Inc. indicating that the agency had overextended its authority.

The AD and CVD history for solar modules dates back more than three years. On December 7, 2012, the U.S. Department of Commerce (Commerce) published identical AD and CVD Orders covering crystalline silicon photovoltaic cells, whether or not partially or fully assembled into products. Sunpreme, an importer of solar modules composed in part by solar cells that utilize thin-film amorphous silicon, had been designating its entries of such merchandise as type "01" (for ordinary consumption) entries.

In early 2015, CBP investigated Sunpreme's imports and determined that they were included within the scope of Commerce's AD/CVD Orders. CBP then began rejecting Sunpreme's entries, requiring that it file them as type "03" for AD and CVD duties, and to deposit AD duties at the China-wide rate of 239.42 percent and CVD duties at the "all others" rate of 15.24 percent. Following objections by Sunpreme, CBP lowered the AD rate to the exporter-specific rate of Jiawei Shenzhen, 13.94 percent.



Although its scope inquiry was pending with Commerce, Sunpreme brought suit at the CIT on December 3, 2015, to challenge the collection of cash deposits and the suspension of liquidation as a result of CBP requiring Sunpreme to file its entries as type "03." Sunpreme later filed an application for a temporary restraining order and a motion for a preliminary injunction to prevent the Government from requiring payment of cash deposits on Sunpreme's entries of the disputed merchandise pending Commerce's determination.

The Government filed a motion to dismiss for lack of subject matter jurisdiction, or in the alternative, failure to state a cause of action arguing CBP's conduct did not constitute a reviewable final agency action.

Judge Kelly rejected both arguments. She believed Sunpreme's fight was with CBP, not Commerce, as it was CBP which had interpreted the scope of the orders, suspended Sunpreme's entries, and collected cash deposits based upon its own determination.

A review of Commerce's eventual determination would not grant relief from Sunpreme's current hardship. Furthermore, Judge Kelly said, "CBP lacks the authority to interpret ambiguous scope language in the orders." She also reaffirmed the legitimacy of Sunpreme's challenge stating CBP had taken a final action. "Here, CBP interpreted the scope language contained within those instructions to include plaintiff's products. Once CBP instructed plaintiff to enter its goods as subject to orders or be denied entry, it had completed its decision-making process," she said.

*For more information, contact: Frances Hadfield, Ade Johnson, Nicholas DeLong*

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## **Record Number of Antidumping, Countervailing Duty Petitions Filed in Jan**

### **Off-the-Road (OTR) Tires**

On January 8, Titan Tire Corporation and the United Steelworkers (USW) union filed antidumping (AD) and countervailing duty (CVD) petitions on low-priced imports of certain off-the-road (OTR) tires from China, India, and Sri Lanka. OTR tires covered by the petitions are used for vehicles on off-highway surfaces, including agricultural fields, forests, construction sites, factory and warehouse interiors, airport tarmacs, ports and harbors, mines, quarries, gravel yards, and steel mills

[Please click here](#) for more information from the U.S. International Trade Commission's (USITC) website.

### **Truck and Bus Tires**

On January 29, the USW also filed AD and CVD petitions on low-priced imports of truck and bus tires from China. The USW is the sole petitioner and represents domestic producers at Bridgestone Americas, Inc. and the Goodyear Tire & Rubber Company. The USITC will hold a public preliminary conference around February 19, in which interested parties (U.S. producers, importers, purchasers, and foreign producers/exporters) may testify and answer ITC staff questions about the truck and bus tire industry and market.

[Please click here](#) for more information from the USITC website.

### **Biaxial Integral Geogrid Products**

On January 13, Tensar Corporation filed AD and CVD petitions on low-priced imports of certain biaxial integral geogrid products from China. Covered biaxial integral geogrid products, also referred to as "homogeneous," "integral," "oriented," or "punched and drawn" geogrid, are made from an extruded polymer and used in demanding load-bearing earthwork construction applications, particularly road construction.

[Please click here](#) for more information from the USITC website.

### **Amorphous Silica Fabric**

On January 20, Auburn Manufacturing, Inc. filed AD and CVD petitions on low-priced imports of amorphous silica fabric (ASF) from China. Covered ASF is used to produce welding curtains, welding blankets, welding pads, or fire blankets.

[Please click here](#) for more information from the USITC website.

*For more information, contact: Daniel Cannistra and Benjamin Blase Caryl*

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### **Lacey Act Declarations to be Submitted Electronically Effective Feb. 28**

The Animal and Plant Health Inspection Service (APHIS) is among the first government agencies to successfully conclude its pilot project of the new International Trade Data System (ITDS) and will require Lacey Act declarations to be filed via the Automated Commercial Environment (ACE) beginning February 28, 2016.

President Obama issued an Executive Order in February 2014 directing the simplification of the import and export process for the trade community by implementing ITDS, a 'Single Window' for businesses to electronically submit trade-related documents via ACE. The concept allows for the efficient submission of U.S. Customs and Other Government Agency documents using one platform.

The coming months will see more agencies adopting this system.

*For more information, contact: Jini Koh, Wing Cheung*

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### **AGENCY ENFORCEMENT ACTIONS**

#### **Bureau of Industry and Security (BIS)**

- On January 7, [BIS renewed an order temporarily denying export privileges for 180 days](#) to 15 entities to prevent violations to the Export Administration Regulations (EAR). The entities are Mahan Airways, Pejman Mahmood Kosarayanifard, Mahmoud Amini, Kerman Aviation, Sirjanco Trading LLC, Ali Eslamian, Mahan Air General Trading LLC,

Skyco (UK) Ltd., Equipco (UK) Ltd., Mehdi Bahrami; Al Naser Airlines, Ali Abdullah Alhay, Bahar Safwa General Trading, Sky Blue Bird Group, and Issam Muhammad.

- On January 19, BIS denied export privileges for 180 days to five entities because evidence suggested their involvement in a scheme to re-export two Boeing 737s from Romania to Iran. The five are Af-Aviation and its director, Andy Farmer, Ribway Airlines Company Ltd., and two UK citizens who acted as brokers in the transaction.

#### **Department of Justice (DOJ)**

- On January 6, FIMCO, an Iranian corporation, was sentenced to pay a \$100,000 criminal fine for conspiracy to evade export licensing requirements. The conspiracy involved an attempt to smuggle a dual-use item (one with military and civilian applications) into Iran.

#### **Office of Foreign Assets Control**

- On January 20, OFAC announced WATG Holdings, Inc. of Irvine, California, and its subsidiary, Wimberly Allison Tong and Goo (UK), Limited, agreed to pay \$140,000 to settle potential civil liability for apparent violations of the Cuban Assets Control Regulations. The subsidiary entered into a contract to perform architectural and design work for a hotel project in Cuba.

*For more information, contact: Edward Goetz*

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#### **CROWELL & MORING INVITES YOU TO A RECEPTION AT ICPA LAS VEGAS**

Please join Crowell & Moring for a Reception at the International Compliance Professionals Association's (ICPA) 2016 Annual Conference in Las Vegas on Monday, March 14 from 6 – 8 pm. [Please click here](#) for more information and to RSVP.

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#### **CROWELL & MORING WELCOMES**

**Barry Nemmers** is a senior counsel in Crowell's New York office and a member of the firm's International Trade Group. Barry comes to us from SAP, where he was assistant general counsel responsible for trade, customer licenses, antitrust, government affairs, M&A, IP, and government contracts.

Barry received his A.B. from Grinnell and his J.D. from Georgetown, where he was an editor of *Law & Policy in International Business*. Prior to joining SAP, he was a staff attorney for the American Association of Exporters and Importers (AAEI) and a trade attorney in private practice with major law firms. Barry also served on the AAEI Board and on the Board of the Customs and International Trade Bar Association (CITBA) for two years. We are pleased to welcome Barry to the International Trade Group and the firm.

## CROWELL & MORING ANNOUNCEMENTS

Crowell's "2016 Litigation & Regulatory Forecasts: What Corporate Counsel Need to Know for the Coming Year" is now available. They provide valuable insight and analysis to clients across a range of practices and industries.

Articles from the Forecasts can be accessed at [www.crowell.com/forecasts](http://www.crowell.com/forecasts), where you will also find updates throughout the year on webinar opportunities and other developments affecting key industries.

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## CROWELL & MORING SPEAKS

On January 7, **J.J. Saulino** spoke at a working conference hosted by the Hudson Institute entitled "Iran After the Deal: Open for Business or Business as Usual?"

On January 9, **Carlton Greene** spoke at the American Bar Association's 2016 Banking Law Committee Meeting in Washington, D.C. on a panel titled "AML/Sanctions Regulation and Enforcement Update."

On January 30, **Melissa Morris** was the keynote speaker at the Asia Business Conference sponsored by Duke's Fuqua School of Business in Durham, NC. The theme for the conference was "Asia: Embracing the New Normal." Melissa spoke about the Trans-Pacific Partnership agreement and its potential for reshaping trade and investment relations in the Asia-Pacific region.

On February 12, **Cheryl Falvey**, **Frances Hadfield**, and **Chahira Solh** will be speaking at the 2016 Fashion Law Conference at the Parsons School of Design in New York. Cheryl and Frances will be speaking on "The Regulatory Framework of Labeling and Disclosure," while Chahira will be discussing "Mergers/Acquisitions and Antitrust Considerations."

**Jini Koh** will be speaking at the 2016 Georgetown Law International Trade Update on February 26. She will be a panelist for "Behind the Scenes: Moot Customs Hearing."

On March 3, **Jeff Snyder** will be speaking at a program sponsored by the Women's Bar Association of DC on "Getting Published as a Practitioner." Jeff, who serves as the general editor of the Global Trade & Customs Journal, a Kluwer Law International publication, will discuss publication opportunities for practitioners.

**John Brew** and **Cari Stinebower** will be speaking at the International Compliance Professionals Association's (ICPA) 2016 Annual Conference. The conference is being held from March 13-16 in Las Vegas. On March 14, Cari will be providing an "Update on Global Sanctions" and John will be discussing the "Use of Statistical Sampling in Trade Compliance" on March 16.

**Jeff Snyder** will also be speaking on issues related to dispute resolution under the Trans Pacific Partnership (TPP) at the 26th Annual Meeting and Conference of the Inter-Pacific Bar Association in Kuala Lumpur on April 15.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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