



## → Jonathan Wang

### Associate

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Jonathan Wang is an associate in the Governmental Practice in the firm's Washington D.C. office.

### Areas of Practice

His primary areas of practice are in compliance counseling, investigations, public policy, and cross-border transactional work involving export controls, including the International Traffic in Arms Regulations (ITAR) and Export Administration Regulations (EAR); customs and imports; economic sanctions and embargoes, the Foreign Corrupt Practices Act (FCPA); antidumping and countervailing duties (AD/CVD); and the Committee on Foreign Investment in the United States (CFIUS).

Jonathan also maintains an active pro bono practice aiding small businesses in Washington D.C.

Prior to Sheppard Mullin, Jonathan served in the Administrative Office of the U.S. Courts, Legislative Affairs Office while attending law school at night. He also served as an intern for the U.S. Air Force Judge Advocate General's Corps and was a research assistant for the Georgetown Law Journal Annual Review of Criminal Procedure.

Jonathan's investigative experience comes from his time before law school as a researcher for the South Carolina Democratic Party where he investigated political candidates.

### Honors

Top Author, *JD Supra* Readers' Choice Awards, 2024

### Experience

#### Export Controls

- Successfully obtained a Bureau of Industry and Security (BIS) export license to China for a U.S. semiconductor manufacturing company
- Conducted an enterprise-wide ITAR and EAR compliance program review for a major U.S. defense contractor
- Conducted an internal investigation into export control violations for a major U.S. defense contractor
- Advised a Chinese audio chip company on complying with U.S. person semiconductor export control regulations

- Advised on export control classification for unmanned surface vehicle manufacturer; chip manufacturer; wearable health tracker manufacturer; aircraft parts manufacturer; and international non-profit organization
- Assist in a U.S. university's internal investigation on export control violations
- Performed due diligence enabling aircraft antenna company to be acquired by an aerospace and electronics company
- Advised luxury goods manufacturer on exporting certain goods to Russia
- Draft export control service agreement language for a global staffing contractor
- Advised satellite communications company on the export of certain items on behalf of U.N. activities

## **Customs**

- Successfully reduced gaming company's flagship product from a 7.5% duty rate to a 0% duty rate
- Successfully assisted in amending CBP tariff classification ruling for beverage dispensers on behalf of a food and beverage manufacturer
- Prepared and submitted a prior disclosure and protest for global water control systems and plumbing solutions company resulting in successful refunds
- Assisted in the mitigation of a wood packaging material penalty for an office furniture manufacturer
- Advised health equipment manufacturer on Harmonized Tariff Schedule (HTS) classification for wearable health tracker
- Advised office furniture manufacturer on customs valuation for firmware
- Advised exercise equipment company on the appropriate country of origin for certain items
- Advised fire and safety equipment company on duty drawbacks allowing for refunds on those duties
- Drafted forced labor training slide deck on behalf of Chinese manufacturer
- Analyzed potential preferential treatment under United States-Mexico-Canada Agreement (USMCA) for certain exercise equipment
- Assisted a leading produce supplier respond to a Customs and Border Protection (CBP) seizure notice

## **Sanctions**

- Advised communications company on Russia sanctions for the export of certain services and contract risks and provide mitigating solutions
- Advised technology company on the export of certain Internet of Things (IoT) products to Russia
- Advised satellite communications company on engaging with a Russian entity
- Advised multinational bank on compliance with Myanmar sanctions
- Assisted in drafting Russia sanctions employee handbook for multinational bank
- Advised information technology services company on compliance with Iran sanctions

## **Foreign Corrupt Practices Act (FCPA)**

- Advised Chinese company on scenarios where FCPA jurisdiction may apply

## Trade Litigation

- Assisted bottling company in AD/CVD proceedings concerning certain PET resin
- Drafted summary judgment motions on behalf of global energy solutions company in a tariff classification lawsuit

## Additional Experience

- Drafted and submitted a voluntary self-disclosure to the Census Bureau for potential violations of Foreign Trade Regulations on behalf of an aircraft antenna company

## Articles

### Books

- Co-author, GSA Schedule Handbook: International Trade Compliance for MAS Contractors Chapter

### Corporate & Securities Blog

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

### Global Trade Law Blog

- "China Semiconductor Export Regulations, Episode V – Updates and Corrections to the Advanced Computing and Semiconductor Regulations," April 10, 2024
- "Department of Commerce Initiates Investigation into Chinese-Made "Connected Vehicles": Potential Prohibitions on Certain Information and Communications Technology and Services," March 12, 2024
- "Guidance to Foreign Companies on Export Controls and Sanctions: Departments of Commerce, Treasury, and Justice Issue Tri-Seal Compliance Note on Foreign Based Persons' Obligations to Comply with U.S. Sanctions and Export Control Laws," March 7, 2024
- "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
- "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
- "Biden Veto Maintains Solar Tariff Moratorium," May 19, 2023
- "Watching the Detectives: Export Control Enforcement Trends Upward," May 19, 2023
- "OFAC Finds Digital Assets Trading Platform in Violation of Sanctions," April 4, 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
- "Potential Sanctions for Alleged Intellectual Property Theft on the Horizon?," January 19, 2023

- "China Semiconductor Regulations, Episode II – The Curious Case of the American in a Chinese Chip Company," December 7, 2022
- "OFAC Continues Focus on Virtual Currency Industry with Announced Settlement with Payward, Inc.," November 29, 2022
- "China Tariffs: Opportunity to Request Modifications," November 17, 2022
- "Bribes, Bitcoin and Obstruction: DOJ Announces Charges Against Chinese Agents for Trying to Impede Investigation of Huawei," October 27, 2022
- "China Tariffs: USTR Requests Comments for Review of Section 301 Tariffs," October 17, 2022
- "OFAC Announces Hefty Settlement with Virtual Currency Exchange / Hosted Wallet Services Provider," October 11, 2022
- "OFAC Issues Sanctions Compliance Guidance for Instant Payment Systems," October 11, 2022
- "U.S. and Allies Impose Additional Russia Sanctions After Sham Annexations," October 6, 2022
- "Commerce Department Adds Guardrails Against Stockpiling of Certain Solar Cells and Modules During Temporary Waiver of AD/CVD Duties," September 27, 2022
- "DOJ Issues Report on Efforts to Combat Digital Asset Criminal Activity and Announces Designated Prosecutors to Support," September 27, 2022
- "Novel Sanctions Against Business-Related Services Connected to Russia and Additional Export Restrictions," May 11, 2022
- "Additional Import and Export Restrictions in Response to Russia's Aggression in Ukraine," April 13, 2022
- "The Uyghur Forced Labor Prevention Act: Congress Finally Takes Action," December 16, 2021
- "Sanctions Compliance for Crypto: OFAC Issues Guidance Targeting Virtual Currency Industry," October 21, 2021

## Events

Advanced Topics in Customs Compliance Conference 2023  
Omni Hotel Houston Galleria, Houston, Texas, 02.10.2023

## Memberships

Member, Society of International Affairs

## Practices

Governmental Practice

CFIUS: Foreign Investment in the U.S.  
Foreign Corrupt Practices Act (FCPA)  
International Trade and Investment  
Exports and Export-Related Controls  
Sanctions and Anti-Money Laundering  
White Collar Defense and Corporate Investigations  
Public Policy and Government Affairs  
False Claims Act  
Government Contracts  
Imports  
International Reach  
Supply Chain Management

## Industries

Government Business

## Education

J.D., Georgetown Law, 2021, *Order of the Coif, magna cum laude*

B.A., University of California, Berkeley, 2013

## Admissions

District of Columbia