



## → Mario Andres Torrico

### Associate

2099 Pennsylvania Avenue, N.W.  
Suite 100  
Washington, DC 20006-6801

T: +1.202.747.2652

F: +1.202.747.3824

mtorrico@sheppardmullin.com

Mario Torrico is an associate in the Government Contracts, Investigations, and International Trade Practice Group in the firm's Washington, D.C. office.

### Areas of Practice

Mario focuses his practice on compliance counseling, investigations, and cross-border transactional work concerning international trade matters including customs, trade remedies, export controls, economic sanctions and embargoes, the Foreign Corrupt Practices Act (FCPA), and other areas of international trade law.

Prior to entering the private sector, he served as an International Attorney-Advisor at the U.S. Department of Commerce, International Trade Administration (ITA). While there, Mario advised the ITA on WTO agreements, foreign bribery (e.g., FCPA, OECD Antibribery Convention, UN Convention against Corruption, the UK Bribery Act, and more), preference programs (e.g., GSPs, AGOA, CBI), and other areas of international trade law.

Mario served as a judicial law clerk for the Connecticut Superior Court where he conducted legal research on civil matters (e.g., Connecticut Unfair Trade Practices Act, sovereign and statutory immunity, governmental immunity, and gender and pregnancy discrimination). As a law clerk with the U.S. Trade Representative, Office of the General Counsel, Mario prepared memoranda of law on articles 11 and 19 of the Agreement on Subsidies and Countervailing Measures and supported the Interagency Trade Enforcement Center (ITEC) with research and analysis. Mario also served as a law clerk for the Federal Trade Commission, Office of International Affairs, assisting attorneys in prosecution of cases involving fraud by international corporate defendants.

## Experience

### Customs

- Advised a recycling and compounding company on the origin of its goods under the USMCA.
- Represented several companies in the Court of International Trade challenging the legal validity of the Section 301 List 3 and 4 tariffs.
- Advised a radar technology company on Harmonized Tariff Schedule (HTS) classification as well as on Section 301 duties and products exclusion requests.
- Prepared and obtained Section 301 exclusion extensions on behalf of multiple clients.
- Advised a Belgian chemicals company on a CBP request for information involving products imported under the General System of Preferences program.

- Prepared and obtained a Section 301 exclusion request on behalf of a major U.S. city concerning a sculpture made by a world-renowned artist.
- Prepared and submitted on behalf of a major manufacturer and servicer of power sources and other equipment in the energy market a section 301 exclusion request for lithium-ion batteries.
- Researched and drafted memoranda of law for senior Department of Commerce policy officials and political appointees on international trade matters, including Section 232 and customs classifications.
- Attended the World Trade Organization's Trade Facilitation Committee meeting as member of the U.S. delegation.
- Advised the U.S. and Foreign Commercial Service on issues concerning international commercial disputes involving U.S. exporters and foreign governments/companies, export promotion assistance, and commercial diplomacy requests.

## **Trade Remedies**

- Successfully opposed the imposition of tariffs or quotas on a global crane manufacturing company in connection with a Section 232 investigation on the imports of mobile cranes.
- On behalf of a Japanese nuclear utility, successfully obtained Commerce Department approval for a reexport transaction of uranium material in connection with the Suspension Agreement on Uranium from the Russian Federation.
- Represented a Canadian province in AD/CVD proceedings concerning certain softwood lumber products from Canada.
- Assisted a Chinese manufacturer of solar energy equipment products in preparing and filing a separate rate application in connection with a DOC anti-dumping order.

## **Export Technology Transfer Controls**

- Performed trade related due diligence regarding export controls issues for a U.S.-based location and data technology companies in connection with a merger.
- Advised a major U.S. energy company on local export laws and data localization laws concerning cloud computing in various foreign countries.
- Assisted a company that provides technology systems and services to investment firms on the EAR classification of its software products; annual self-classification reporting requirements; and deemed export rules.
- Advised a leading consumer electronics company on the EAR classification of its software and applications.

## **FCPA and Anti-Corruption**

- Prepared FCPA training materials for employees of a U.S.-based beverage company with operations in areas prone to corruption.
- Attended OECD Working Group on Bribery meetings, which is charged with monitoring implementation and enforcement of the OECD-Antibribery Convention, as member of the U.S. delegation.
- Performed FCPA due diligence of a multinational company, including by screening third parties and identifying "red flags."

## Articles

### Global Trade Law Blog Posts

- "OFAC Enforcement Impacts NFTs: As Crypto Enforcement Ramps Up to Combat Ransomware, Robust Compliance is Key," November 16, 2021
- "Sanctions Compliance for Crypto: OFAC Issues Guidance Targeting Virtual Currency Industry," October 21, 2021
- "Exclusions 2.0. The USTR Announces a New Section 301 Exclusion Process for Chinese Products," October 8, 2021
- "ESG, Global Trade, and Forced Labor: Aligning Compliance with Company Values," September 22, 2021
- "First OFAC Sanctions Against a Cryptocurrency Exchange: Could the Designation of SUEX Signal an Enforcement Trend to Combat Cybercrime?," September 22, 2021
- "Clean Energy's Messy Problem II: The Solar Industry, Its Suppliers, and the Complex Task of Combatting Forced Labor," August 12, 2021
- "Beyond TikTok and WeChat: How Biden's New EO Could Impact Foreign-Owned Apps," June 11, 2021
- "Looking Ahead on China: Engaging in Strategic Compliance through Geopolitical Analysis," June 10, 2021
- "President Biden Issues a New...ish Ban on Certain Chinese Investments," June 10, 2021
- "Russia Russia Russia! The Biden Administration Imposes Tough Sanctions on Russia," April 15, 2021
- "Forced Labor and Supply Chains: A Complete Ban on Goods from Xinjiang or Additional WROs on the Horizon?" March 19, 2021
- "U.S. Imposes Sanctions Measures Targeting Myanmar Military Government," March 11, 2021
- "JCPO-Wait-A-Minute: How New Talks Between the U.S. and Iran Could Revive the Iran Nuclear Deal," March 11 2021
- "Friend or Foe? The DOC Issues New Interim Rule on Transactions Involving Information and Communication Technology or Services ("ICTS") and Foreign Adversaries," January 27, 2021
- "CBP Stops More Imports Under Forced Labor Rules (Cotton a Jam, Part II)," January 27, 2021
- "Knock knock: Section 301 Tariffs on Vietnamese Products Could Soon be at Your Front Door," January 11, 2021
- "USTR Grants New Section 301 Exclusions and Extends Existing Exclusions for Certain Chinese Medical Products," January 8, 2020
- "Don't Pop the Bubbly Just Yet: Potential Duty Increases for Importers Starting January 1," December 23, 2020
- "Cotton a Jam: CBP Withholds Cotton Product Shipments Under Forced Labor Rules," December 16, 2020

### Labor and Employment Law Blog Posts

- "New Labor Obligations Contained In USMCA Present Risks for Covered Employers," April 28, 2021

## Podcasts & Webinars

Nota Bene Podcast Episode 131: U.S. Sanctions Against Russia: Valid or Ineffective Economic Policy? with Fatema Merchant and Mario Torrico  
06.23.2021

## Practices

Government Contracts, Investigations & International Trade  
CFIUS: Foreign Investment in the U.S.  
ESG and Sustainability  
Exports and Export-Related Controls  
Foreign Corrupt Practices Act (FCPA)  
International Reach  
International Trade and Investment  
Latin America  
Sanctions

## Industries

Aerospace & Defense  
Cannabis  
Transportation

## Education

J.D., The George Washington University Law School, 2017  
M.A., Clark University, 2013  
B.A., Central Connecticut State University, 2010, *magna cum laude*

## Admissions

Washington, D.C.  
U.S. Court of Appeals for the Federal Circuit  
U.S. Court of International Trade

## Languages

Portuguese  
Spanish