



## → Curtis M. Dombek

**Partner**  
IT Tower  
Avenue Louise 480  
1050 Brussels

T: +32.(0)2.290.7902 (BR)  
/ +1.213.617.5595 (LA)  
cdombek@sheppardmullin.com

Curt Dombek is a partner in the Governmental Practice. Curt divides his time between the firm's Brussels and Los Angeles offices.

### Areas of Practice

Curt has practiced since 1983 in the field of international trade and regulation. He advises clients on civilian and military export controls, trade sanctions and blocking orders, customs matters, the Foreign Corrupt Practices Act (FCPA), the USA Patriot Act, Free Trade Agreements, CFIUS reviews of foreign investment in the United States, Made in USA and Buy American regulations, FAA and international regulation of unmanned aircraft and the anti-boycott regulations. He handles export control compliance and other international matters for multinationals in the telecommunications, computer hardware and software, aerospace and defense, automotive, energy, pharmaceutical, chemical, electronics and fashion and apparel industries.

Curt has designed international compliance programs and advised on complex questions of international compliance for companies with operations throughout the U.S. and the European Union as well as in Asia, Latin America and the Middle East. Assisting companies in complying with the detailed export controls on encryption and telecommunications technology is a significant part of his practice, as is the regulatory compliance relevant to cross-border R&D programs. He has significant experience with the regulation of emerging unmanned aircraft, UAS and eVTOL.

Curt has represented clients in many high-profile international trade cases. In Kuwait, he represented the Kuwait government in the preparation and submission of its Gulf War claims to the United Nations Compensation Commission. Curt has conducted many depositions and other investigative and discovery proceedings overseas and has represented domestic and foreign clients in ICC, LCIA and ad hoc arbitrations in Europe and the Far East as well as the U.S. He has addressed international conferences and published articles on a variety of international legal topics.

### Honors

- Appointed by the Secretary of Commerce in 2011 to the President's Export Council Subcommittee on Export Administration (PECSEA) as one of the industry representatives advising the administration on implementation of export control reform, working with the Undersecretary of Commerce, the Assistant Secretary for Export Administration and the Section Chiefs of the State Department Directorate of Defense Trade Control

- Appointed by the Secretary of Commerce in 2012 to the Regulations and Procedures Technical Advisory Committee (RPTAC) of the U.S. Department of Commerce, with responsibility for reviewing and advising the department on new export control regulations
- Appointed in 2021 to serve as Chair of the RPTAC Subcommittee on Multilateral Controls of the U.S. Department of Commerce.
- *Chambers*, International Trade Notable Practitioner
- Named by *Los Angeles Magazine* as one of the Southern California Super Lawyers during his years based in Los Angeles

## Experience

### Representative Engagements:

#### *Export Controls*

- Designed compliance program for design collaboration between Asia countries and the United States on new automotive technologies for one of the world's largest auto manufacturers
- Advised multiple international semiconductor companies on compliance with new MEU and Foreign Direct Product rules
- Advised multiple clients on compliance and structuring implications of the changes in export regulatory treatment of Hong Kong
- Advised numerous European companies on U.S, reexport and EU Dual Use regulations
- Advised clients in the United States, Europe and Asia on business implication and compliance issues raised by the Executive Orders targeting WeChat and TikTok
- Secured U.S. government approval for the export of test equipment for an Israeli aerospace program
- Advised on structuring of new Asian investment in a Middle Eastern satellite operator
- Secured EU approval for the export of test equipment on a South Korean aerospace program
- Secured approval of deemed exports for a new industrial furnace R&D program
- Defended a U.S. high-tech manufacturer in a highly publicized U.S. government export enforcement proceeding leading to dismissal of criminal charges
- Advised on export control compliance safeguards in an avionics joint venture for a new Chinese commercial jet program
- Conducted global export control review under EAR and ITAR for a multinational construction engineering firm
- Prepared global export compliance procedures for a multinational pharmaceutical manufacturer
- Advised an Asian satellite company concerning various ITAR compliance matters
- Advised a U.S. satellite company concerning subcontracting subject to ITAR and commodity jurisdiction requests
- Advised a U.S. laser manufacturer concerning export classification and licensing issues relating to Israel and China
- Prepared an export compliance program for EU R&D programs of a large, global telecommunications equipment manufacturer

- Advised numerous semiconductor and electronics manufacturers on technical classification issues under Categories 3 and 5 of the CCL and EU Control List
- Counseled a Fortune 100 electronics company on a wide range of U.S., EU and Chinese encryption control issues
- Counseled a Fortune 100 aerospace company concerning civilian and military export control matters, including controls relating to encryption and composites
- Reviewed and implemented global TAA and MLA compliance for a U.S.-based services firm supporting foreign production of military aircraft components on numerous U.S. programs
- Performed a global review of military and civilian export compliance for a leading U.S. government contractor with thousands of employees in foreign locations
- Assisted a U.S.-based medical device manufacturer with worldwide export of products incorporating encryption features
- Represented a manufacturer of high-speed microprocessors in ITAR classification of specialized microprocessors
- Provided a series of civilian and military export control training programs to global telecommunications hardware and software manufacturers
- Advised various Fortune 500 companies in the electronics, aerospace and computer industries concerning export controls for joint ventures and subsidiary operations in China, including compliance with special U.S. export restrictions applicable to China
- Implemented a global export compliance system for a U.S. computer manufacturer
- Conducted a global export investigation for a U.S. telecommunications company involving the gathering of evidence and interviewing of witnesses in the U.S., Singapore, New Delhi, Amsterdam and Frankfurt
- Advised a Fortune 500 chemical company concerning export and technology transfer issues related to construction of a manufacturing facility in Brazil
- Obtained one of the first licenses for export and reexport of telecommunications equipment for Libya's mobile phone network following the end of U.S. Libyan sanctions
- Designed and implemented a global export and import compliance system for a U.S.-based telecommunications equipment manufacturer

#### *CFIUS, Cross-Border Transactions and Due Diligence*

- Secured CFIUS clearance for acquisition of U.S. defense sector electronics manufacturer by European public company in the defense sector
- Structured multiple foreign investment transactions based upon the new CFIUS rules concerning U.S.-based investment funds, TID businesses and real estate investment
- Secured CFIUS clearance for acquisition of U.S. telecom technology company by European government controlled telecom operator
- Secured CFIUS clearance for French fund's acquisition of a controlling interest in multinational defense systems manufacturer
- Resolved export, national security and OFAC compliance due diligence issues in numerous telecom, semiconductor and technology acquisitions involving Asia and the U.S.

- Advised on appropriate structuring of Asian investment in U.S. news organization
- Obtained U.S. State Department clearance for the sale of a satellite investment by a European investment company to an Asian sovereign fund
- Obtained U.S. State Department clearance for the complex international privatization of a satellite operator
- Formulated due diligence steps, sourcing strategies and supplier certifications for various U.S. issuers and their suppliers pursuant to the Conflict Minerals Rules issues by the SEC
- Led team structuring cross-border licensing of IP, including cost sharing agreements, and related business planning for a CAC40 multinational
- Successfully negotiated acquisition and export of German equipment from receivership of joint venture in China and import into the U.S. for U.S. importer
- Conducted transactional due diligence in China under the FCPA and local anti-corruption laws concerning the proposed Chinese joint venture partner of a U.S. pharmaceutical company
- Counseled a U.S.-based software company with respect to due diligence on international regulatory compliance for a series of global acquisitions
- Conducted export compliance due diligence for a U.S.-based telecommunications equipment manufacturer with respect to two global acquisitions
- Counseled a U.S. manufacturer of research chemicals in the formation of its Thai subsidiary and compliance with Thai regulations in the chemical industry
- Advised a large U.S.-based construction engineering company concerning a construction project in Libya

#### *Unmanned Aircraft*

- Successfully resolved aircraft certification and registration issues with the FAA concerning test flights of large UAS and eVTOL by U.S. subsidiary of Asia manufacturer
- Represented Asian manufacturer in negotiation of supply agreement for unmanned aircraft components for the U.S. market
- Advised multiple U.S. companies with respect to compliance with FAA COA waivers, operational limitations, manufacturing requirements and registration of large and small UAS

#### *Made in USA & Buy American*

- Advised telecommunications systems operator on sector-specific Buy American standards and qualification of equipment
- Advised large manufacturer of personal computers on Buy American requirements applicable to federal agency procurements
- Formulated and vetted manufacturing flows of musical instrument manufacturer to comply with FTC requirements for unqualified and qualified Made in the USA marking
- Formulated Made in USA compliance system and compliant product markings for a television manufacturer distributing widely in the United States
- Advised numerous apparel companies in Asia, Europe and the Americas concerning labeling requirements and Made in USA marking issues
- Represented Asian manufacturer in negotiation of supply agreement for unmanned aircraft components for the U.S. market

- Advised multiple U.S. companies with respect to compliance with FAA COA waivers, operational limitations, manufacturing requirements and registration of large and small UAS

## *Customs and Free Trade Agreements*

- Successfully defended large automotive manufacturer in multi-year verification under the Korea-U.S. FTA
- Resolved various country of origin, classification and valuation cases involving automotive imports into the U.S., EU, South America and the Middle East
- Formulated corporate structures and manufacturing flows for qualification of North American automotive products under the new USMCA/TMEC
- Designed Korea-U.S. FTA compliance system for qualification and documentation of U.S. manufactured automotive products
- Formulated compliance procedures for origin qualification and marking of refrigeration products exported between Mexico, the U.S., Colombia and Brazil under applicable FTAs
- Advised U.S. electronics manufacturer concerning country of origin and related BAA/TAA qualification of products with complex sourcing of components from various countries
- Successfully defended a high-volume U.S. lumber importer in a customs enforcement matter leading to the dismissal of \$2 million in proposed penalties
- Successfully petitioned for relief of U.S. airline from customs penalty for alleged failure to declare entry of certain parts returned from foreign aircraft maintenance and repair station
- Designed airline customs import compliance procedures for initiation of service to new international destinations, including foreign repair stations
- Secured CBP headquarters reversal of proposed penalty relating to certain airline stores entering the U.S.
- Negotiated customs compliance provisions for various international aircraft sales and component supply agreements on behalf of a leading aircraft manufacturer
- Advised U.S. airline on WTO Agreement of Trade in Civil Aircraft and various FTA provisions on aircraft parts
- Handled country of origin qualification of solar manufacturer's products for use in U.S. projects
- Advised various U.S. importers concerning scope issues under AD/CVD orders
- Represented large Korean multinational in negotiations with the U.S. government concerning NAFTA qualified production of electrical components in Mexico
- Advised the U.S. subsidiary of a Japanese electronics manufacturer concerning the NAFTA certification of products assembled in Mexico with components manufactured in a number of Asian countries
- Represented large U.S. retailer in various customs seizure cases
- Advised solar and electronics manufacturers concerning FTZ qualification and operational issues
- Counseled the U.S. subsidiary of a multi-billion dollar consumer and luxury brands company concerning first sale rules, buyer's agent agreements and other customs compliance issues
- Prepared a global analysis of relative FTA and Customs benefits of alternative manufacturing flows for the manufacture and assembly of electronics components in China, Mexico and the U.S. for ultimate export to various countries in Latin America, Europe and Asia
- Designed and implemented a global import compliance system for a U.S.-based telecommunications equipment manufacturer

- Prepared a global analysis of customs duty and other indirect tax savings opportunities based upon alternative sourcing of components for a British consumer products company
- Implemented a global import compliance system for a U.S. computer manufacturer
- Conducted an internal customs investigation in Singapore, Cyprus and Latin America for Swiss-based consumer products company

## *Economic Sanctions, USA Patriot Act and Anti-Boycott Compliance*

- Successfully resolved issues with OFAC concerning telecommunication operations relating to various countries in Africa, Europe, Asia and Latin America subject to economic sanctions
- Provided global compliance training and anti-boycott compliance program for one of the world's largest pharmaceutical companies
- Successfully resolved Exim Bank sanctions compliance disclosures for an Asian aerospace customer of a U.S. manufacturer
- Successfully defended a UK-based multinational professional services firm in a U.S. sanctions investigation
- Advised international clients with respect to the Iran Threat Reduction Act, Comprehensive Iran Sanctions, Accountability and Divestment Act, EU Council Regulations and other new U.S. and EU measures relating to Iran and Syria
- Counseled multinational telecommunications services providers in Asia and Latin America concerning the latest U.S. and multilateral sanctions affecting telecommunications operations relating to Iran, Burma, North Korea, Syria and Cuba
- Counseled one of the world's largest offshore drilling companies concerning a variety of international financial, contractual, management and staffing issues related to compliance with U.S. economic sanctions
- Designed appropriate USA Patriot Act due diligence procedures, representations and warranties for a Middle Eastern financial institution with U.S. real estate investments
- Counseled one of the world's largest oilfield services companies on issues relating to compliance with U.S. economic sanctions relating to Libya
- Designed, implemented and provided personnel training for a global economic sanctions compliance program for a U.S.-based real estate services firm
- Conducted an internal investigation, voluntary OFAC disclosure and settlement of charges (for less than 1% of maximum penalty exposure) for an internet-based provider of travel reservations services
- Successfully represented a U.S.-based research chemicals company and its Canadian subsidiary in a Canadian dispute relating to compliance with the U.S. Cuban sanctions and Canada's Foreign Extraterritorial Measures Act
- Prepared foreign sovereign immunity defense for a Japanese state-owned company in a U.S. economic sanctions investigation
- Defended one of the largest U.S. banks in a Treasury Department sanctions enforcement case leading to favorable settlement of proposed penalties
- Defended a European manufacturer in one of the largest U.S. government anti-boycott investigations ever conducted
- Counseled multinationals in the telecommunications, cosmetics and paper pulp industries with regard to the anti-boycott regulations and the reporting of boycott-related requests

## *Foreign Corrupt Practices Act*

- Conducted an FCPA investigation involving Ecuador, Peru and Venezuela on behalf of the U.S. oil and gas subsidiary of one of Japan's largest corporations
- Conducted a global FCPA investigation for a multinational consumer products company with the gathering of evidence and interviewing of witnesses in Asia, Europe and Latin America
- Conducted an FCPA investigation in Mexico on behalf of a Fortune 100 electronics manufacturer
- Counseled the U.S. subsidiary of a multi-billion dollar consumer and luxury brands company concerning FCPA issues, including design of a corporate FCPA compliance system
- Counseled a U.S. telecommunications software company with respect to FCPA compliance matters, including the design of its corporate compliance program and recurring FCPA training
- Advised a U.S.-based energy company concerning FCPA compliance issues in Australia, including analysis of Australia's counterpart to the FCPA
- Advised a U.S.-based chemical manufacturer concerning FCPA compliance issues arising in Southeast Asia
- Designed an FCPA and foreign anti-corruption law compliance program for Israeli-based manufacturer of security equipment
- Designed an FCPA compliance program for a leading French manufacturer and retailer of consumer products
- Designed an FCPA and Chinese anti-corruption compliance program for the Chinese operations of U.S. Fortune 100 electronics company

## *International Arbitration and Other Disputes*

- Represented an Asian electronics company in large scale ICC arbitration of claims with U.S. customer
- Represented a PRC based telecommunications equipment manufacturer in successful arbitration of claims against U.S. multinational relating to distribution of products in Latin America
- Represented U.S.-based retailer in successful resolution of claims for unauthorized use of IP by Chinese licensee
- Successfully defended U.S. purchaser with respect to claims arising from import of non-conforming agricultural products from China
- Lead counsel for U.S. pharmaceutical manufacturer in an ICC arbitration with its Jordanian joint venture partner; case settled for less than 5% of the amount claimed
- Successfully defended and prevailed on counterclaim for U.S. telecommunications company in an ad hoc London arbitration arising from operations in Kuwait
- Successfully defended one of the world's largest hotel companies against claims in an LCIA arbitration brought by its Dubai business partner
- Counsel to State of Kuwait in United Nations Compensation Commission proceedings concerning claims of Kuwait government Ministries against Iraq, with primary responsibility for claims concerning the Kuwait Emergency Reconstruction Office, Prisoners of War and the Ministries of Health, Finance and Foreign Affairs
- Litigated more than a dozen aviation liability cases under the Foreign Sovereign Immunities Act involving various state-owned airlines
- Negotiated and resolved disputes with suppliers in China, Italy, Japan, Korea, the United Kingdom and other jurisdictions on behalf of Fortune 100 aerospace manufacturer



- Lead counsel in London arbitration of claims against the Indian government arising from Insat 1-D launch pad accident, reported in *McDonnell Douglas Corp. v. Union of India*, [1993] 1 Lloyd's Rep. 48
- Defended the launch vehicle manufacturer in litigation arising from unsuccessful deployment of Westar VI and Palapa B-2 satellites by the U.S. Space Shuttle, reported in *Appalachian Ins. Co. v. McDonnell Douglas Corp.*, 262 Cal. Rptr. 716 (1989)
- Counsel to several U.S. multinationals concerning arbitration terms under CIETAC, HKIAC, ICC, LCIA and UNCITRAL rules

## Articles

- Co-author, "World Encryption Controls"  
*WorldECR*, 2021
- Co-author, "The CFIUS Book"  
*2018 (1st ed.), 2020 (2nd ed.) World ECR*, 05.2020
- Co-authored chapter, "U.S. Export Controls and the Cloud"  
*Cloud Computing Legal Deskbook*, 2013 Edition, Thomson Reuters Westlaw  
*Thomson Reuters Westlaw*, 11.2013
- Compliance Issues with the New SEC Reporting and Disclosure Requirements Under the Iran Threat Reduction and Syria Human Rights Act of 2012  
*Bloomberg BNA*, 12.12.2012
- "Loosening Satellite Export Controls"  
*Law360*, 05.04.2012
- "'Buy American' And Solar Devices – DOD Clarification"  
*Law360*, 02.21.2012
- "Early Steps Toward a Streamlined Export Control System"  
*WorldECR*, 12.22.2011
- "The Proposed 2011 Reforms for Parts and Components and the New Definition of "Specially Designed": A Divine Comedy or a Tragedy Indeed?"  
*Practising Law Institute*, 12.2011
- "Taking Early Steps Toward Streamlined Export Control"  
*Law360*, 11.29.2011
- "The Twilight Zone of International Arbitration," 21 *Litigation* 42, American Bar Association, 1995
- "Implication of the Proposed Product Liability Fairness Act for Commercial Space Launches," *Proceedings of the Annual International Bar Association Conference*, Paris, 1995
- "Harmonizing Allocations of Risk for Commercial Space Activities," *Proceedings of the Inaugural Conference of the Inter-Pacific Bar Association*, Tokyo, 1991
- "Can *Erie v. Tompkins* Survive in Zero Gravity? The Case for a Federal Common Law of Space," *Proceedings of the Annual International Bar Association Conference*, New York, 1986

## Antitrust Law Blog Posts

- "The European Commission Adopts a Proposal for a Regulation on Foreign Subsidies Distorting the Internal Market," May 14, 2021



## Corporate & Securities Law Blog Posts

- "Appellate Court Issues Opinion on SEC's Conflict Minerals Rule," April 15, 2014
- "Navigating the SEC's Recent Conflict Minerals Rules: Threading the Needle Through Complex Controls and Procedures and Complying with New Disclosure Requirements," September 21, 2012

## Global Trade Law Blog Posts

- "Breaking the Link – New Developments on U.S. Licenses for Exports to Huawei," March 1, 2023
- "Friday Development: New Sanctions and Export Controls to Address Russia's Ongoing Aggression in Ukraine (Including the use of Iranian UAVs)," February 27, 2023
- "A Closer Look at the Recent USMCA Automobile Disputes Panel Decision," February 15, 2023
- "The Trend of Production Moving from China to Mexico – Regulatory and Practical Considerations: Zai Jian Zhongguo, Bienvenidos a México," May 17, 2022
- "Legislatures Can Free App Developers from Platform Providers' Mandates to Use Their In-App Purchasing Systems Without Violating WTO Principles," August 31, 2021
- "The EU – U.S. Sanctions Dilemma: The Advocate General of the European Court of Justice Weighs in," May 26, 2021
- "The European Commission Adopts a Proposal for a Regulation on Foreign Subsidies Distorting the Internal Market," May 17, 2021
- "A New Era of Export Controls Begins in the EU: The Revised EU Dual-Use Export Controls to Promote Human Rights," May 14, 2021
- "The European Commission Adopts White Paper on Foreign Subsidies – A Trend Towards Protectionism on a Global Level?" August 21, 2020
- "Huawei Whack-A-Mole: The U.S. Takes Another Swing at the Chinese Semiconductor Industry," May 19, 2020
- "The Emerging Landscape for Export Controls on Autonomous Vehicle Technology," April 8, 2020
- "Modernizing NAFTA: The United States-Mexico-Canada Trade Agreement," January 17, 2020
- "Comment Deadline Extended: Export Controls on Emerging Technologies," December 11, 2018
- "The Little Regulation That Will Make a Big Change in How You Do Business: Department of Commerce to Establish New Export Controls on Emerging Technologies," November 19, 2018
- "The New NAFTA: the United States-Mexico-Canada Agreement (USMCA)," October 2, 2018
- "Client Alert: Iran Sanctions Return," May 11, 2018
- "2018 EU Trade, Regulatory and Competition Trends," February 8, 2018
- "Retrenchment on Cuban Sanctions; The Search for a Middle Ground," November 17, 2017
- "Dinner Table Conversation: How an Offhand Comment May Signal a Shift in the Global Trade of Semiconductors," June 22, 2017
- "The Undoing Project – Why NAFTA Can't Be Undone, But Can Be Re-Done," January 31, 2017
- "Top 12 EU Legal Developments to Watch in 2017," January 23, 2017

- "The Baby and the Bathwater: The Department of Commerce's Bureau of Industry and Security (BIS) Intrusion and Surveillance Software Export Licensing Proposal," July 17, 2015
- "Implementation Day: Do the Rules Let You Play in the New Ballgame for Business in Iran?" July 16, 2015
- "New EU Rules on Disclosure of Ultimate Beneficial Owners," June 24, 2015
- "U.S. Authorizes Targeted Sanctions Against Overseas Cyber Threats," April 3, 2015
- "Add Importers to Those Facing Expanding Whistleblower Claims under the False Claims Act," March 5, 2015
- "Mandatory Reporting of Foreign Direct Investments in the U.S.," December 19, 2014
- "EU Strengthens Economic Sanctions Against Russia," September 18, 2014
- "New "Beast" Rules Lessen the Export Control Burden," May 7, 2013
- "All Together Now: A New Joint Definition of 'Specially Designed'," July 11, 2012
- "Opportunities in the New U.S.-Colombia Free Trade Agreement," June 7, 2012
- "Proposed Easing of Satellite Export Controls Could Benefit U.S. Satellite Industry," May 1, 2012
- "A Surprise Turn on the SEC's Winding Road to the Dodd-Frank "Conflict Minerals" Rule," February 21, 2012
- "EU's New Sanctions Target Iran's Oil Industry," January 30, 2012
- "EU Imposes New Economic Sanctions on Syria," January 30, 2012

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

- "New Rules Governing Remote Identification of Unmanned Aircraft," January 27, 2021
- "Add Importers to Those Facing Expanding Whistleblower Claims Under the False Claims Act," March 24, 2015
- "Free(er?) Trade - US, EU and Canada Quibble Over Market Access and Domestic Preferences," August 15, 2013
- ""Buy American" and Photovoltaic Devices - Interim Rule Issued by DoD," February 13, 2012
- "Early Steps Toward a Streamlined Export Control System: Proposed Changes to the ITAR and EAR," November 16, 2011
- "Proposed Rule Details Major Changes to U.S. Export Controls," August 4, 2011
- "Proposed ITAR Rule To Relax ITAR Licensing For Components Incorporated Into Commercial Products," March 16, 2011
- "New Sanctions Block Continuing Performance Of Libyan Government Contracts In Addition To Targeting Col. Qadhafi's Assets," March 16, 2011
- "New Defense Authorization Act Imposes Buy American Act Mandate for Photovoltaics," January 18, 2011
- "Amendment of Federal Sentencing Guidelines Calls for Updating of Compliance Policies," July 12, 2010
- "New Encryption Export Rules Relax Regulatory Burden For Many End-Products But Also Raise Many New Questions," July 12, 2010
- "BIS Issues New Export Controls on Millimeter Wave Security Equipment, Software and Technology," April 9, 2010
- "Administration to Expedite Encryption Reviews and Amend ITAR Citizenship Definition," March 19, 2010

- "Stay Tuned for Implementation of Ancillary Cryptography Changes Adopted by December 2009 Wassenaar Plenary Session," March 12, 2010

## Latin American Blog Posts

- "Does the USMCA Mean What It Says? The Disputes Panel Hearing on the Auto Core Parts Rules of Origin," August 18, 2022
- "The United States-Mexico-Canada Agreement – Paving the Way for a Cross-Border Fintech Sandbox," May 27, 2020
- "NAFTA Renegotiation Goes Live," May 19, 2017
- "A Surge In Populism: Dangers To Transnational Trade In The Americas And Reasons For Hope," August 18, 2016
- "New EU Rules on Disclosure of Ultimate Beneficial Owners," June 15, 2015
- "OFAC Issues Cuban Asset Control Regulations focused on the U.S. Financial Sector," January 15, 2015
- "Mexico Added to UK Open General License for Export Controls Following Wassenaar Accession," August 20, 2012
- "Opportunities in the Upcoming U.S.-Colombia Free Trade Agreement," May 8, 2012
- "Increasing Level of Seizures by U.S. Customs," July 29, 2011
- "USCIS Makes Important Changes to I-129 Petition for Foreign Workers Effective December 23," December 17, 2010
- "First Sale Rule Survives in the United States," October 22, 2010
- "Increased Opportunities for Foreign Investment in Brazil Also Bring Increased Risk for FCPA Violations," March 25, 2010

## Life Sciences Law Blog Posts

- "Court of International Trade Ruling Provides Tariff Relief for Cell Culture Bioreactors," January 18, 2012

## Retail Trend Spotter

- "Will U.S. Customs Seize Your Presumptively Illegal Apparel? Compliance with the Uyghur Forced Labor Prevention Act," June 27, 2022

## Books

The CFIUS Book: Second Edition  
05.2020

## Media Mentions

'Buy American' Drug Decision Opens Door to Foreign Supplies  
*Bloomberg Law*, 02.18.2020

2018 EU Competition & Regulatory Trends  
*Sheppard Mullin EU Competition Alert*, 01.24.2018

Zes Trump-lessen voor Belgische bedrijven  
*De Tijd*, 02.03.2017

Q&A With Sheppard Mullin's Curt Dombek  
*Law360*, 03.08.2013

"Sheppard Mullin Lures Trade Guru From Bryan Cave"  
Partner Curtis Dombek joins Sheppard Mullin.  
*Law360*, 01.05.2010

## Speaking Engagements

- Faculty, American Conference Institute ITAR Bootcamp, San Diego, 2013 and 2017
- Faculty, "Defense Exports" SMI, Amsterdam 2012-2016, Rome, 2017
- "Wassenaar Intrusion Software Regulations," Coalition for Responsible Cybersecurity and BSA: The Software Alliance, Brussels, 2016
- Faculty, American Conference Institute EAR Bootcamp, Chicago and San Diego 2013
- Faculty, American Conference Institute Export Controls Compliance, Washington 2013
- Faculty, "Coping with Export Controls," Practising Law Institute, Washington, D.C., 2011, 2012 and 2013
- Class instructor, "International Regulatory, Trade & Dispute Issues," China National Petroleum Council Beijing, 2010
- Panelist, "Reexporting from China," China Summit on Export Controls Compliance, Beijing, 2010
- Lecturer, "FCPA Workshop: Preventing Corruption," Sheppard Mullin's & Control Risks' joint conference, Los Angeles and Shanghai, 2010
- "Legal Compliance in International Sales," San Diego, 2009
- "Compliance with US and PRC Anti-Corruption Laws," Los Angeles and Shanghai, 2008
- "Compliance with Encryption Export Controls," Los Angeles-based webinar, 2008
- "The Perennial Problem of U.S. Encryption Controls," World Customs Organization Conference, Brussels, 2008
- "Global FCPA Compliance," Shanghai, 2007
- "Encryption Export Compliance," Seattle and St. Louis, 2007
- "Export Compliance in the Semiconductor Industry," Chicago, 2006
- "Foreign Corrupt Practices Act," joint program with KPMG and the U.S. DOJ, Los Angeles, 2005
- "Export Compliance in the Telecommunications Industry," New York, Amsterdam, Denver, Frankfurt, Miami, New Delhi and Singapore, 2005
- "Avoiding Legal Pitfalls in International Sales and Marketing," Phoenix, 2005
- "FCPA Compliance in the Energy Sector," St. Louis, 2004
- "FCPA Compliance and Internal Audits," New York, 2004

- “Export Compliance in the Telecommunications Sector,” Los Angeles, 2000, London, 2002, Dallas, 2002, Raleigh, 2003, and Boston, 2004
- Panelist, “Are Global Antiterrorism Initiatives a Threat to International Commerce?” Annual Symposium of the Center for American and International Law, Dallas, 2004
- Presenter, “Aerospace and Defense: New Technologies and Commercialization Trends Raise New Legal Issues,” Federal Bar Association Conference, A Clear View to the Future of Technology, Los Angeles, 1999
- Presenter, “The State of the Law Governing Liability Among Launch Participants,” Practitioners’ Forum of the European Centre for Space Law, Paris, 1993

## Events

NAFTA Now the USMCA: What’s New in the U.S., Canada, and Mexico Trade Deal  
A Sheppard Mullin Webinar  
10.30.2018

Do you have a license for Cybersecurity?  
Cybersecurity, incident response, innovation and research under the new export control licensing rules  
06.08.2016

Defense Exports 2015  
Amsterdam, Netherlands, Fall 2015

EU: Aerospace, Defense and Security Implications of the US Export Control Reform  
Sheppard Mullin with Bird & Bird  
Bird & Bird, London, 11.14.2013

Lunch With Your Government Contracts Lawyer  
Satellite Export Control Update  
Sheppard Mullin Washington, D.C. office, 03.20.2013

2011 Emerging Export Control and International Trade Law Issues: CLE Program and Cabernets of the World  
Palo Alto Wine Networking Series  
The Palo Alto Office, 04.21.2011

Sheppard Mullin & Control Risks FCPA Workshop  
Preventing Corruption: Good Business Practices = Good Business  
05.12.2010

## Memberships

- Member, American Arbitration Association
- Member, London Commercial Bar Association
- Member, International Institute for Space Law

## Podcasts & Webinars

Nota Bene Episode 22: Exploring the Impact of Foreign Investment Controls with Curt Dombek  
02.06.2019

## Practices

Governmental Practice

CFIUS: Foreign Investment in the U.S.

False Claims Act

Foreign Corrupt Practices Act (FCPA)

Buy American

International Trade and Investment

International Reach

Israel

Korea

EU Competition and Regulatory

International Arbitration

Exports and Export-Related Controls

Government Contracts

Imports

Sanctions and Anti-Money Laundering

Supply Chain Management

## Industries

Aerospace & Defense

CFIUS: Foreign Investment in the U.S.

Life Sciences

Telecom

Transportation

Aviation

Government Business

Space & Satellite

## Education

J.D., Harvard Law School, 1983, *magna cum laude*

A.B., Harvard University, 1980, *magna cum laude, with highest honors*

## Admissions

California

Barreau de Bruxelles, B List

District of Columbia

Missouri

U.S. Supreme Court

U.S. Court of Appeals for the Eighth Circuit

U.S. Court for the Ninth Circuit

U.S. Court of Appeals for the District of Columbia

U.S. District Court, Central District of California

U.S. District Court, District of Columbia

U.S. Court of International Trade

## Additional Office

Los Angeles

## Languages

Dutch

French

German