



Thomas Reynolds

Associate

tom.reynolds@dlapiper.com

Washington, DC

T: +1 202 799 4378

F: +1 202 799 5378

Thomas Reynolds focuses his practice in the area of U.S. international trade law, including export controls, sanctions, embargoes, import/customs, and foreign investment matters, and provides his legal counsel in compliance, transactional, policy and regulatory contexts.

Tom thrives in the technical review and advice involving the Harmonized Tariff Schedule of the United States (HTSUS), Commerce Control List (CCL), United States Munitions List (USML), customs valuation, licensing applications, and other matters.

When needed, Tom has also represented clients in penalty and disclosure situations in front of Customs & Border Protection (CBP), the Bureau of Industry and Security (BIS), the Office of Foreign Assets Control (OFAC), and the Census Bureau, as well as internal audits and the establishment of trade compliance policies and procedures.

Before joining DLA Piper, Tom practiced at boutique law firms in Chicago, focusing on litigation and international trade law.

- Regulatory and Government Affairs

- Technology
- Industrials

Spanish Portuguese
French

LANGUAGES SPOKEN

- Spanish
- Portuguese
- French

- Classify exports and imports based on HTSUS, CCL, and USML, including dual-use encryption items
- Consult on export license exceptions, general licenses, and file for export license and classification requests including License Exception ENC for software/technology companies
- Draft and file prior disclosures and voluntary self-disclosures of potential company violations with BIS, OFAC, Census, Directorate of Defense Trade Controls (DDTC) and CBP

- Manage trade-related due diligence in mergers and acquisitions
- Counsel on foreign investment and CFIUS considerations, including identification of critical technology in context of mandatory declarations
- Advise on Bureau of Economic Analysis (BEA) surveys of foreign direct investment into the United States, U.S. direct investment abroad, and transactions in selected services and intellectual property with foreign persons
- Able to manage Office of Antiboycott Compliance (OAC) antiboycott reviews for companies doing business in the Middle East or with boycotting countries
- Experience with internal and external audits, and establishing import and export compliance programs
- Evaluate proper customs business and compliance standards of companies importing goods into the United States, including valuation, transfer prices, country of origin, marking/labeling, and OGA/PGA import rules
- Construct mitigation framework for Section 301 and Section 232 duties

CREDENTIALS

Admissions

- District of Columbia
- Illinois

Education

- J.D., Chicago-Kent College of Law, Illinois Institute of Technology 2013
- B.A., Political Science & Religion, University of Florida 2009
magna cum laude

Courts

- Court of International Trade
- United States District Court for the Northern District of Illinois

Memberships

- Hispanic National Bar Association (HNBA)
- Hispanic Bar Association of the District of Columbia (HBA-DC)
- DC Area Phi Beta Kappa Association (DCPBK)

Additional Information

Tom has served in the following leadership roles:

- HNBA YLD regional representative
- Hispanic Lawyers Association of Illinois (HLAI) board member
- Chicago Bar Association (CBA) YLS board member

INSIGHTS

Publications

New wave of US sanctions targets Russian Duma, additional elites, defense entities; BIS extends export controls to more than 100 Russian aircraft

29 March 2022

Global Sanctions Alert

The latest sanctions affect all members of the Duma, Russian elites, bank executives and board members, and Russian defense firms, and BIS has extended export controls to certain Russian aircraft.

US government to implement multi-pronged export controls and sanctions measures against Cambodia

8 December 2021

The measures will take immediate effect.

Treasury releases 2021 Sanctions Review: Its key recommendations and their implications for the private sector

28 October 2021

Global Sanctions Alert

The Report puts into perspective recent Biden Administration sanctions while helping to forecast what will come.

Pro bono with purpose

15 October 2020

Strength and Impact Series

In the second video of the *Strength and Impact* series, associates Cara Vasquez, Tom Reynolds and Alberto Zacapa discuss their pro bono work for the firm and what motivated them to support Hispanic and Latino communities in the United States.

Are you ready for the USMCA? Customs-related takeaways on key changes from NAFTA

30 June 2020

Claiming USMCA duty advantages – practical considerations.

First emerging technologies identified and controlled for export in the EAR

26 June 2020

The designation also makes these a "critical technology," giving CFIUS jurisdiction over foreign investments in US businesses that engage with these items.

Update on the Executive Order prohibiting import and installation of bulk power system equipment sourced from a foreign adversary: DOE FAQs

8 June 2020

For those developing energy infrastructure projects in the US, addressing the uncertainties about the scope and expected implementation of the EO.

Commerce Department targets Huawei with additional export control restrictions

26 May 2020

The restrictions are another step in a series of US government measures to limit Huawei's access to US technology.

Events

- Moderator, "Import/Export in the Time of COVID-19 and Future Pandemics," *HNBA 2020 Corporate Counsel Conference & Annual Convention*, September 23, 2020

NEWS

DLA Piper advises Salesloft in its majority financing by Vista Equity Partners valued at US\$2.3 billion

5 January 2022

DLA Piper represented Salesloft, an Atlanta-based sales engagement software company, in the financing and acquisition of a majority stake in the company by Vista Equity Partners, valuing Salesloft at US\$2.3 billion.

DLA Piper advises Parsec in its US\$320 million sale to Unity

12 August 2021

DLA Piper is representing Parsec in its sale to Unity (NYSE: U) for US\$320 million.

New Perimeter hosts virtual training on special economic zones at the University of Pretoria

7 July 2021

New Perimeter recently conducted an online week-long training on special economic zones (SEZs) for the University of Pretoria in South Africa.

PRO BONO

Tom has represented clients in various immigration, education, and voting rights pro bono matters. He has advised Spanish-speaking clients on potential immigration avenues for relief, another client in special education matters, and a not-for-profit advocating for citizens' voting rights.