



## David Llorente

DIRECTOR OF REGULATORY AUDIT

David has more than 18 years' experience advising US and foreign companies on international trade law matters.



### Industries

Beverage & Food

Consumer Products

Life Sciences

National Security

### Practices

Business Compliance & Integrity Monitorships

Food, Drug, Medical Device & Cosmetic

International Trade & Investment

— Customs & Import Compliance

— Export Controls & Economic Sanctions

### International

Asia

Canada

Europe

Latin America

### Languages

Spanish

French

Catalan

### Education

The George Washington University, BA, 2000

### Offices

Washington, DC

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David is an international trade professional and licensed US customs broker specializing in import compliance, export controls, economic sanctions, and anti-corruption matters. His work focuses on designing and managing audits, investigations, and compliance reviews predicated on a risk-based approach that leverages large and complex data sets to optimize effectiveness and efficiency.

He assists clients with developing, enhancing, and implementing trade compliance programs, automating trade-related activities, and integrating tools into existing company systems. David regularly trains companies' internal audit departments on trade-related areas.

David also attends agency and congressional meetings on behalf of clients, monitors regulatory and legislative issues, performs due diligence in merger and acquisition transactions, and assists clients with Foreign Corrupt Practices Act and False Claims Act matters.

He has worked with numerous industries including: textiles and apparel, automotive, consumer products, life sciences, and defense contractors.

\*David is not a member of the legal practice.

### Recent Work

- Managed the audit of a large Fortune 200 multinational company pursuant to a Consent Agreement with the Directorate of Defense Trade Controls (DDTC) of the Department of State.
- Conducted an import compliance analysis for a Fortune 500 company, enhanced policies and procedures, and developed trade audit tools, processes, and best practices.
- Successfully represented an automotive parts manufacturer selected for a Focused Assessment by US Customs covering classification, valuation, and free trade agreement special program claims.
- Represented multiple clients in Section 301 China tariff and Section 232 steel and aluminum tariff exclusion requests and applications for duty refunds from the US Government.
- Coordinated fact-finding, review, and production related to numerous administrative and criminal subpoenas from the US Department of the Treasury's Office of Foreign Assets Control (OFAC),

US Department of Commerce's Bureau of Industry and Security (BIS), and US Department of Justice (DOJ).

- Managed independent compliance testing of Anti-Money Laundering, Bank Secrecy Act, and OFAC statutes and regulations for the Crédit Agricole Independent Consultant selected by the New York State Department of Financial Services (DFS) following the bank's settlement with DFS, DOJ, Federal Reserve, OFAC, and the Manhattan District Attorney's Office.
- Advised on statistical analysis and data limitations for the Independent External Panel reviewing the New York Police Department's internal disciplinary process, practices, and policies.

## Client Work

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### Customs/Import Compliance

David covers a wide range of customs priority areas such as: tariff classification, valuation, entry procedures, duty preference programs eligibility (e.g. USMCA), reconciliation programs, duty drawback, bonded warehouses, foreign trade zones (FTZ), bond requirements, protests, rulings, customs penalties and mitigation, and other enforcement actions.

David has extensive experience in the areas of prior disclosures, risk analysis survey assessments (RASA), focused assessments, internal reviews, investigations, and compliance programs. David designs statistical sampling plans, analyzes import data for duty-saving opportunities, and provides training in the Automated Commercial Environment (ACE) portal. He also maximizes clients' business software for disclosures, investigations, and regulatory compliance.

David assists clients with enforcement of their intellectual property rights related to counterfeit and infringing merchandise when imported into the United States. He is well-versed in other government agency regulatory requirements as they are enforced by US Customs when crossing the border. David also has substantial experience in customs laws and regulations for a variety of international jurisdictions, e.g. the European Union, Canada, China, India, Mexico, and Brazil.

### Export Controls

David's export controls and economic sanctions experience includes assisting companies in a variety of industries with consent agreements, voluntary self-disclosures, subpoena responses, and internal investigations related to BIS, DDT, and OFAC. David also designs and assists clients with the implementation of compliance programs.

## Life Beyond the Law

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In his free time, David enjoys hiking DC trails, learning languages, and spending time with his dog Avery.