Holland & Hart



PRACTICES

Export Controls, Economic Sanctions, and Customs
International Services
Government Investigations and White Collar Defense
FCPA and Anti-Corruption
Business Litigation
CFIUS and National Security
Cross-Border Transactions

INDUSTRIES

Fitness and Outdoor Recreation
Pet Care

EDUCATION

University of Denver College of Law, J.D., 2002
Order of St. Ives

Syracuse University, M.B.A., 1985

State University of New York at Buffalo, B.A., 1983

BAR ADMISSIONS

Colorado
New York

David Glynn

Of Counsel

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David Glynn has recognized expertise in conducting detailed internal investigations and audits related to export controls, trade sanctions, and Customs laws.

Working with clients in the development, drafting, and implementation of compliance programs in various areas of federal regulatory law, he utilizes his extensive experience in export management systems and import compliance programs to help his clients achieve their goals.

With significant experience in federal regulation of international business with a focus in export controls, trade sanctions, and Customs compliance matters, David represents international and domestic companies in complex civil and criminal investigations involving the Departments of State, Commerce, Treasury, Justice, and Customs and Border Protection.

He also drafts license applications, commodity jurisdiction requests, technical assistance agreements, registration statements, encryption item review requests, export and trade sanctions voluntary disclosures, Customs Ruling Requests, Customs Prior Disclosures, Customs seizure responses, Customs penalty petitions, duty preference assessments, and performs export/trade sanctions and import audits.

David assists clients with Committee on Foreign Investment in the United States (CFIUS) counseling, transaction reviews, filings, and National Security Agreement mitigation plans.

David has studied law in the emerging markets of China and Brazil, and has completed additional training in International Marketing, and is a licensed U.S. Customs broker.

CLIENT RESULTS

Representative Matters

Over twenty-five voluntary and directed disclosures and other investigations before the Departments of State, Commerce, and Treasury.

Conducted a Department of State directed audit pursuant to a Consent Agreement of a U.S. integrated circuit manufacturer.

Conducted two Department of State directed audits of 21 U.S. laboratory and manufacturing locations of European aircraft parts producer.

A publicly traded, multi-national service firm with respect to the export of ITAR controlled data and services related to nuclear weapons testing

facilities.

A publicly traded global communications equipment company internal investigation of past violations related to valuation and commodity classification and preparation of a comprehensive voluntary self-disclosure to U.S. Customs and Border Protection.

A multinational manufacturer of motion and fluid control technologies investigation and Prior Disclosure to U.S. Customs and Border Protection related to valuation, classification, and origin errors.

A world leader in essential oils and wellness solutions with respect to investigation of importation of Iranian origin products and disclosure to U.S. Customs and Border Protection and the Office of Foreign Assets Control.

A large sporting goods manufacturer with respect to an Antidumping investigation of forged hatchets from China and disclosure to U.S. Customs and Border Protection.

A medical products importer investigation of commodity classification and visa/quota compliance, preparation, and submission of a comprehensive Prior Disclosure to U.S. Customs and Border Protection.

A large on-line travel services company with respect to Office of Foreign Asset Control (OFAC) sanctions.

A sports equipment manufacturer with respect to unlicensed exports of controlled carbon fiber material to China.

A United Kingdom satellite manufacturer with respect to State Department licensing for reexport of ITAR-controlled items.

A sports outerwear company with respect to a Customs and Border Protection Focused Assessment audit.

Multi-national corporations in developing compliance programs and implementation of on-line training in various areas of federal regulatory law.

A major U.S. chemical manufacturer investigation of NAFTA origin certificate inquiries and validation methodologies used for certification.

PUBLICATIONS

"BIS Restricts Remote Access to Advanced AI Chips Located in Foreign Data Centers," *Export Controls Update* , November 25, 2026

"Energy Alert: Restrictions on Foreign Produced Bulk-Power Systems Coming Soon," *Import Controls Update*, September 10, 2026

"New FCC Restrictions on Foreign Power Inverters," *Import Controls Update*, July 31, 2026

"USTR Seeks Comments on China Tariffs – Your Input Could Reduce

Your Import Costs," *Tariff Update* , June 11, 2026

"High Court Reins In Executive Tariff Power: What the IEEPA Ruling Means for Your Business," *Tariff Update*, February 20, 2026

"BIS Expands End-User Controls through Adoption of 50 Percent Rule," *Export Controls Update*, October 3, 2025

"IEEPA Tariffs Invalidated by Federal Appeals Court," *Tariff Update*, September 4, 2025

"The Tariffs Keep on Coming," *Tariff Update*, April 3, 2025

"Tariff Turmoil: What U.S. Companies Need to Know ," *Tariff Update*, March 10, 2025

"Trump Administration Imposes Tariffs on China; Temporarily Postpones Tariffs on Canada and Mexico," *Tariff Update*, February 6, 2025

"SEIA Standard Available for Public Comment through November 4," *Import/Export Update*, November 1, 2024

"Guidance on Extension of Statute of Limitations for Civil and Criminal Violations of Sanctions Authorities ," *OFAC Update*, July 26, 2024

"CFIUS Proposed Rule Aims to Strengthen Penalty and Enforcement Measures ," *CFIUS Update*, April 23, 2024

"Custom Law Committee 2020 Year in Review," *American Bar Association*, December 2020

"Do you know where your supply chain was last night?," *ColoradoBiz*

"New Export Control Certification Requirement for Employment Visas," *Holland & Hart News Alert*, 1/12/2011

"Treasury Department Quintuples Maximum Civil Penalty for Trade Sanction Violations," 6/13/2006

"Customs Law," *The International Lawyer, Vol. 41, Number 2, p. 185*, Summer 2007

SPEAKING ENGAGEMENTS

"International Traffic in Arms Regulations," *World Trade Center Denver Training*, April 8 - 9, 2026

"Legal Considerations for BESS Supply Chain," *EUCI Supply Chain Contracts for Utilities Training*, Denver, CO, March 18, 2026

"Export Compliance, Obligations and Risk Mitigation," *World Trade Center Denver*, March 11, 2026

"Import Compliance Concepts," *World Trade Center Denver*, February 11,

2026

"U.S. Import Tariff Update," *Utah Tax Conference 2025*, November 19, 2025

"International Traffic in Arms Regulations," *World Trade Center Denver*, April 9 & 10, 2025

"Trade Update," *ECMC Global Logistics Conference*, Washington, D.C., April 2, 2025

"Commodity Jurisdiction," *2025 Annual ICPA Conference*, March 11, 2025

"Commodity Jurisdiction," *2024 ICPA Annual Conference*, March 1, 2024

"Import Compliance Concepts," *World Trade Day Denver*, April 26, 2023

"The Russia – Ukraine Conflict: Managing Risk in Uncertain Times," *Holland & Hart Webinar*, March 2, 2022

"HTSUS Classification - a GRI Review," *International Compliance Professionals Association (ICPA) Conference 2022*, 02/28/2022

"ITAR and the EAR: US Trade Controls Compliance in Europe, Pre-Conference Workshop," *C5 Group, Co-Presenter with Candace Goforth*, London, UK, January 2017

"ITAR Compliance," *Rocky Mountain World Trade Center Institute*, Denver, CO, April 5, 2016

"Import Compliance," *Rocky Mountain World Trade Center Institute*, Denver, CO, March 2016

"Import Compliance," *Rocky Mountain World Trade Center Institute*, Denver, CO, March 2016

"OFAC: U.S. Treasury Department Sanctions and Regulatory Requirements," *U.S. Commercial Service and World Trade Center Utah*, Salt Lake City, UT, December 2015

"Export Licensing," *International Compliance Professionals (ICPA) Annual Conference*, Fort Worth, TX, March 2015

"Hot Topics for Export Compliance Professionals," *U.S. Commercial Service and World Trade Center Utah*, Salt Lake City, UT, September 16, 2014

"Academia and Related Export Controls," *U.S. Commercial Service and World Trade Center Utah*, Salt Lake City, UT, September 2014

"Trade Sanctions, Commercial, Dual-use and Defense Article Export Controls," *Holland & Hart Seminar*, Boise, ID, June 2014

"ITAR Training," *Rocky Mountain World Trade Center Institute*, Denver,

CO, April 2014

"Workshops for Export Compliance Professionals," *U.S. Commercial Service and World Trade Center Utah*, Salt Lake City, UT, November 2013

"U.S. Trade Sanctions: Challenges for Compliance," *International Compliance Professionals Association (ICPA) Fall Conference, Co-Presenter*, Dallas, TX, October 2013

"Writing a TCP," *International Compliance Professionals Association (ICPA) Annual Conference*, Honolulu, HI, March 2013

"Investigations, Disclosures and Dealing with Mandated Corrective Actions in the Aftermath of Violations," *Rocky Mountain Export Compliance and Enforcement Forum*, Denver, CO, October 2012

"Export Law – Regulatory Compliance," *World Trade Center Denver China Business Series – Doing Business with China*, Denver, CO, July 2012

"ITAR Training," *Rocky Mountain World Trade Center Institute, Full Day ITAR Program*, Denver, CO, June 2012

"U.S. Export Controls Overview for Contracting Professionals," *National Contract Management Association Acquisition Training, Pikes Peak Chapter*, Colorado Springs, CO, June 2012

"Directorate of Defense Trade Controls (DDTC) Audits and Tips for Compliance Ready Programs," *24th Annual Export Control Coordinators Association, Idaho National Laboratory*, Idaho Falls, ID, April 2012

"U.S. Export Controls Overview for Contracting Professionals," *National Contract Management Association Meeting, Southeast Idaho Chapter*, Idaho Falls, ID, April 2012

"Import Violations, Investigations and Disclosures: What, When and How," *International Compliance Professionals Association (ICPA) Annual Conference, Co-Presenter with Andrew Gray*, Atlanta, GA, March 2012

"International Traffic in Arms Regulations: Avoiding Mishaps, Delays and Inadvertent Violations When Exporting from the U.S.," *Utah Governor's Office of Economic Development*, Salt Lake City, UT, December 6, 2011

"Federal Regulation of Technical Information: Practical Considerations for Sharing Information in UAS Research & Development," *Panel member, International Conference on Unmanned Aircraft Systems*, Denver, CO, 2011

"Self-Disclosures, Audits, and Internal Investigations," *International Compliance Professionals Association Compliance Conference, Co-presenter*, Phoenix, AZ, March 22, 2011

"Best Practices for Global Sourcing and Regulatory Compliance in a New Era," *Moderator and Program Chair, Spring Meeting, American Bar*

Association, New York, NY, April 2010

"The Fundamentals of ITAR Compliance: The International Traffic in Arms Regulation Demystified," *C5, ITAR Compliance in Europe*, Munich, Germany, December 2009

"Third Party Risks: Exchanging ITAR Data and Services," *American Institute of Engineers Defense Export Controls conference, Las Vegas, NV*, November 2009

"Principles of Importing: Importer Responsibilities, Reasonable Care Standard/Due Diligence, Fines, Penalties & Forfeitures, Customs Audit/Self-Review Programs, C-TPAT, and Country of Origin Rules," *Rocky Mountain World Trade Center Institute Presentation also given on March 4 & October 8, 2008, March 20 & October 9, 2007, May 25 & October 17, 2006*, Denver, CO

"Hot Topics: Changes & Trends at the State Department, Brokering, Voluntary Disclosures, Third-Country/Dual Nationals, D-Trade, & Merger & Acquisition Due Diligence and much more," *International Trade in Arms Regulations seminar, Salt Lake City, UT, also given in Colorado Springs, CO*, September 2008 & December 2008

"Intermediate International Traffic in Arms Regulations (ITAR): Doing Business in an ITAR World," *Rocky Mountain World Trade Center Institute*, Denver, CO, May 8, 2008

"What's So Reasonable About Reasonable Care," *International Compliance Professionals Association (ICPA) Annual Conference*, San Antonio, TX, March 2008

"Import Regulatory / Case Update," *Import Compliance & Enforcement Seminar*, Denver, CO

"Introduction to International Traffic in Arms Regulations (ITAR)," *Rocky Mountain World Trade Center Institute*, Denver, CO, October 11, 2007

"Keeping it Real - Protecting Your Brand from Trademark Counterfeiting," *Outdoor Industry Association Annual Rendezvous Conference*, October 2007

"Overview of ITAR Controls for Foreign Companies," *Consulate General of Canada aerospace industry seminar*, Colorado Springs, CO

"International Due Diligence & U.S. Import/Export Controls," *Colorado Bar Association 8th Annual Business Law Institute*, Vail, CO

"The Impact of Export/Import Control Laws on International Business," *NALS Region 8 conference*, Denver, CO

"U.S. Import Controls: Mergers & Acquisitions Due Diligence," *Holland & Hart LLP*, Denver, CO

"U.S. Import Controls: Outsourcing Issues," *Holland & Hart LLP*, Denver,

CO

"Common Mistakes to Avoid When Exporting From the United States," *German American Chamber of Commerce, Colorado Chapter*, Denver, CO

"International Legal Essentials: Government Regulation & Trade Law," *Rocky Mountain World Trade Center Institute*, Denver, CO

"International Trade Legal Issues: U.S. Export Controls," *University of Colorado-Denver and University of Denver graduate business schools*, 2005

"International Supply Chain Security: U.S. C-TPAT Program Overview," *Colorado Springs Office of International Affairs*, Colorado Springs, CO

RECOGNITION

- World Trade Center Denver, Outstanding Service Award, 2022
- Lexology and International Law Office, Client Choice Award, International Trade in Colorado, 2018

PROFESSIONAL AND CIVIC AFFILIATIONS

- World Trade Center Denver, Member, Board of Directors
- American Bar Association, Member
  International Law Customs Committee, Co-Chair, 2020 - present
- Colorado Bar Association, Member
- Denver Bar Association, Member
- New York Bar Association, Member
- Colorado GLBT Bar Association, Member