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Related Services

- Government Contracts
- National Security / CFIUS / Compliance

Education

- J.D., The American University, 2009; Member, *The Modern American Magazine*
- B.A., University of Virginia, 1997

Shannon Reaves

Partner

Shannon Reaves is a partner in the National Security/CFIUS/ Compliance group of Stroock's Washington, DC office. He focuses his practice in the areas of cross border transaction reviews before the Committee on Foreign Investment in the United States (CFIUS); industrial security, including Foreign Ownership, Control or Influence (FOCI) mitigation matters before the U.S. Departments of Defense and Energy; and export control compliance.

Mr. Reaves represents clients in pre-CFIUS filing analysis, CFIUS reviews and investigations and advising companies regarding FOCI mitigation/negation compliance issues and major defense industry acquisitions. Mr. Reaves routinely negotiates FOCI mitigation/negation arrangements, including Special Security Agreements, Proxy Agreements, Security Control Agreements and FOCI Board Resolutions. He has also represented clients in hundreds of CFIUS reviews, has conducted industrial security due diligence for transactions and has investigated export control violations.

Prior to joining Stroock, Mr. Reaves was an attorney with a major international law firm, where he also focused on national security, CFIUS, and compliance issues.

While at the American University Washington College of Law, Mr. Reaves was a judicial intern for Judge Gerald Bruce Lee in the U.S. District Court of the Eastern District of Virginia.

Representative Matters

- Representation of a German multi-national corporation before CFIUS and the Directorate of Defense Trade Controls (DDTC) in connection with the corporation's \$5 billion acquisition by a Chinese corporation, the largest acquisition of a German company by a Chinese investor, and the first Chinese corporate acquisition of a publicly traded German company.
- Representation of a multinational chemical company before CFIUS and with respect to FOCI mitigation relating to a \$75 billion business combination with another entity.
- Representation of foreign creditors to U.S. defense contractors going through bankruptcy, including required filings and negotiation of risk mitigation controls.
- Representation of large UK defense contractor in reorganization efforts for its US businesses, streamlining compliance requirements, consolidating FOCI mitigation, and reducing duplicative costs.

- Representation of private equity investor to structure control of portfolio companies to limit FOCI mitigation restrictions.
- Representation of a multinational pharmaceutical company before CFIUS with respect to a \$62 billion acquisition.
- Representation of a foreign pension fund before CFIUS in connection with various multi-billion dollar transactions.
- Over 100 Exon-Florio reviews before CFIUS for acquisitions ranging in value from multi-billion dollar transactions to deals for less than \$1 million.
- Established numerous FOCI mitigation arrangements in compliance with national industrial security regulations.
- Representation of major corporations operating globally in aerospace, defense and security sectors; advice and counsel concerning U.S. national security regulatory approvals for acquisitions, including export control compliance matters before the Department of State and the Department of Commerce.
- Representation of the world's largest supplier of commercial airplane assemblies and components; advice and counsel on national security issues.
- Representation of a multinational information and analytics company in connection with national security matters.
- Representation of a company engaged in research, development and production of launch vehicles and rocket systems in connection with national security matters

Honors & Awards

Mr. Reaves has been recognized by *Chambers USA: America's Leading Lawyers for Business* as an "Associate-to-Watch" for his work in the practice area of International Trade: CFIUS Experts.

Speeches & Events

- Speaker, Washington College of Law, International Trade and Investment Law Society, November 20, 2020
- Speaker, "CFIUS Background and Considerations: Real Estate," November 18, 2020
- Speaker, "New CFIUS Rules: Key Takeaways," November 12, 2020
- Speaker, "The Interplay of FOCI and the New Proposed CFIUS Regulations," ACI's National Forum on FOCI, Washington, DC, July 14, 2020
- Panelist, "Buyer AND Seller Beware - New Regulations Expand the Scope and Powers of CFIUS Over FDI Deals," DC Bar Event, April 28, 2020
- Panelist, ACI's National Forum on FOCI, Washington, DC, July 14, 2020
- Speaker, "New CFIUS Regulations and Foreign Investment in US Real Estate," November 14, 2019
- Speaker, "FIRRMA: Foreign Investment Impact," November 13, 2019

- Speaker, "Special Briefing: FIRRMA Effects on Foreign Real Estate Investors," November 12, 2019
- Speaker, "The Annual Aerospace & Defense Acquisitions Roundtable," Washington, DC, April 29, 2019
- Speaker, "CFIUS and FOCI Roundtable," November 30, 2018
- Speaker, "The Annual Aerospace & Defense Acquisitions Roundtable," Washington, DC, April 19, 2016
- Speaker, Special Briefing for Embassy of the United Kingdom, Washington, DC, February 26, 2016

Publications

- Co-author, "New Year, New NISPOM," *Stroock Client Alert*, February 24, 2021
- Co-author, "CFIUS Initiatives Signal Opportunities for Some Foreign Investors," *Stroock Client Alert*, February 4, 2021
- Co-author, "NID Requirements Further Liberalized for NTIB Countries," *Stroock Client Alert*, December 1, 2020
- Co-author, "Déjà vu All Over Again: Biden's CFIUS Should Feel Familiar," *Stroock Client Alert*, November 23, 2020
- Co-author, "Foreign Investments in the U.S. Insurance Industry Are Subject to Potential Review by the Committee on Foreign Investment in the United States," *Stroock Client Alert*, October 23, 2020
- Co-author, "This Week: New Rules Affect Mandatory CFIUS Filings and Export Controls," *Stroock Client Alert*, October 13, 2020
- Co-author, "Foreign Investments in the U.S. Insurance Industry are Subject to Potential Review by the Committee on Foreign Investment in the United States," *Stroock Client Alert*, September 30, 2020
- Co-author, "Tick-Tock, TikTok: CFIUS Indicates Time May Be Running Out for Chinese Ownership of TikTok," *Stroock Special Bulletin*, August 4, 2020
- Co-author, "Bipartisan Legislation Could Open Foreign Supply Chains to New Scrutiny," *Stroock Special Bulletin*, July 13, 2020
- Co-author, "Proposed CFIUS Regulations May Shortcut Filing Requirements for Investors From Allied Countries," *Stroock Special Bulletin*, May 27, 2020
- Co-author, "Treasury Takes a Cut: CFIUS Filing Fees Begin This Week," *Stroock Special Bulletin*, April 29, 2020
- Co-author, "Foreign Ownership, Control, or Influence: FOCI Review Now Reaches DOD Unclassified Contracts and Subcontracts," *Stroock Special Bulletin*, April 16, 2020
- Co-author, "Is There a New Sheriff in Town?" *Stroock Special Bulletin*, April 10, 2020
- Co-author, "An Old Law for the New War: Defense Production Act Not Just for Government Contractors," *Stroock Special Bulletin*, April 2, 2020
- Co-author, "Mapping Risk: New CFIUS Tool for Real Estate Investors," *Stroock Special Bulletin*, March 31, 2020

- Co-author, "COVID-19, CFIUS and the Defense Production Act," *Stroock Special Bulletin*, March 26, 2020
- Co-author, "CFIUS Filing Fees: Proposed Rule Announced," *Stroock Special Bulletin*, March 5, 2020
- Co-author, "New Decade, New CFIUS: New Rules Expand CFIUS Reach Into Non-controlling Investment and Real Estate," *Stroock Special Bulletin*, January 22, 2020
- Co-author, "Breaking News: Final CFIUS Regulations Published by Treasury," *Stroock Special Bulletin*, January 13, 2020
- Co-author, "CFIUS and Foreign Investment: 2020 Brings Changes to U.S. National Security Regulations," *Stroock Special Bulletin*, January 6, 2020
- Co-author, "Outside Director/Proxy Holder Requirements Are Changing," *Stroock Special Bulletin*, October 15, 2019
- Co-author, "Real Estate Transactions Impacted by New CFIUS Regulations," *Stroock Special Bulletin*, September 23, 2019
- Co-author, "Long-awaited CFIUS Regulations Published for Comment," *Stroock Special Bulletin*, September 18, 2019
- Co-author, "Key CFIUS Concerns for Funds," *Stroock Special Bulletin*, September 12, 2019
- Co-author, "CFIUS Clarifies Its Investment Funds Exceptions (Via Additions to Its FAQs for the Critical Technology Pilot Program)," *Stroock Special Bulletin*, July 10, 2019
- Co-author, "Feddo Senate Confirmation Hearing Heralds New Era of Leadership for CFIUS," *Stroock Special Bulletin*, June 6, 2019
- Co-author, "NID Requirement Will End Sooner than Anticipated for Some Entities," *Stroock Special Bulletin*, April 25, 2019
- Co-author, "The New Reality: CFIUS Now Able to Impact Deal Timelines during a Government Shutdown," *Stroock Special Bulletin*, January 23, 2019
- Co-author, "New Rules for New Deals: What You Need to Know About the CFIUS Pilot Program," *Stroock Commentary*, December 4, 2018
- Co-author, "Treasury Pilot Program Requires CFIUS Declarations for All Qualifying Investments," *Stroock Special Bulletin*, October 10, 2018
- Co-author, "CFIUS Reform Flies, But With Clipped Wings," *Stroock Special Bulletin*, July 26, 2018
- Co-author, "CFIUS Reform Easily Passes Senate," *Stroock Special Bulletin*, June 19, 2018
- Co-author, "The Elephant in the Room," *Stroock Special Bulletin*, December 4, 2017
- Co-author, "Four Things You Need to Know About the CFIUS Reform Legislation," *Stroock Special Bulletin*, November 8, 2017
- Co-author, "Some Secret and Not-So-Secret Findings in the CFIUS Annual Report," *Stroock Special Bulletin*, September 29, 2017

- Co-author, "New Reporting Requirements For Foreign Travel and Foreign Contacts by Government Contractors," *Stroock Special Bulletin*, July 17, 2017
- Co-author, "Second Helpings: New Legislation Would Give Agriculture and HHS Secretaries Seats at the CFIUS Table," *Stroock Special Bulletin*, March 21, 2017
- Co-author, "The National Industrial Security Program Directive: Some Hits, Some Runs, Some Errors," *Stroock Special Bulletin*, February 13, 2017
- Co-author, "NISPOM Amendments Affect All Cleared Contractors," *Pratts Government Contracting Law Report*, September 2016
- Co-author, "NISPOM Amendments Affect All Cleared Contractors," *Stroock Special Bulletin*, May 25, 2016
- Co-author, "China On Top: China Dominates CFIUS Reviews for Third Year in a Row," *Stroock Special Bulletin*, February 19, 2016
- Co-author, "What Real Estate Cos. Need To Know About CFIUS Reviews," *Law360*, January 5, 2016
- Co-author, "CFIUS and The Waldorf Astoria," *Stroock Special Bulletin*, December 21, 2015
- Co-author, "FOCI Mitigation Update: DSS Moves to a Risk-Based Approach and the NID Process Sees Incremental Improvement," *Stroock Special Bulletin*, November 23, 2015
- Co-author, "How DOD Is Streamlining National Interest Determinations," *Government Contracts, Aerospace & Defense and Public Policy Law360*, February 24, 2015
- Co-author, "New DoD Policy Seeks to Streamline National Interest Determination Process," *Stroock Special Bulletin*, February 12, 2015
- Co-author, "2014 Regulatory and Compliance Ups and Downs - Developments of Interest to Foreign Investors and Others in the National Security Sector," *Stroock Special Bulletin*, January 26, 2015
- Co-author, "New Rule Requires Reporting Foreign Investment in U.S. Businesses and Real Estate: Reporting Deadline for 2014 is January 12, 2015," *Stroock Special Bulletin*, December 18, 2014
- Co-author, "For Companies Operating Under Approved FOCI Mitigation Plans: A Shared Services Plan Checkup Can Avoid Unnecessary Costs," *Stroock Special Bulletin*, August 5, 2014

Admitted To Practice

District of Columbia

Virginia