



## Dana Watts

### COUNSEL

dwatts@milchev.com  
(202) 626-5875

#### PRACTICES

Business and Human Rights  
Customs & Import Trade  
False Claims Act Litigation  
International Trade Remedies

#### EDUCATION

- J.D.  
University of Kansas Law  
School  
2010
- B.B.A.  
Pittsburg State University  
2001

Dana Watts focuses her practice on customs law. She assists clients with all aspects of import compliance, including prior disclosures, ruling requests, forced labor issues, import manuals and policies, Trusted Trader programs, merger and acquisition-related due diligence, and World Trade Organization issues. She regularly advises clients on classification, country of origin, marking, free trade agreements and other special duty provisions, value determinations, first sale analyses, right to make entry, temporary importations under bond, Chapter 98, foreign trade zones, and Sections 301/232/201 issues. She has represented clients in litigation before the U.S. Court of International Trade and has litigated multiple "reverse" False Claims Act actions involving customs. Ms. Watts also has experience with a wide variety of international trade issues, including sanctions, export controls, national security reviews before the Committee on Foreign Investment in the United States, and Section 337 litigation. Ms. Watts is a licensed U.S. Customs Broker.

#### REPRESENTATIVE ENGAGEMENTS

- Helped facilitate an eight-figure "reverse" False Claims Act settlement for a multinational industrial engineering company involving allegations of customs duty evasion.
- Advised a large U.S. consumer of an African agricultural commodity on import issues related to forced labor allegations and potential supply chain disruption.
- Assisted a pharmaceutical company with a complex prior disclosure to U.S. Customs and Border Protection involving customs value, country of origin, marking, and free trade agreement eligibility. Many value issues were specific to the pharmaceutical industry, such as the dutiability of payments related to co-promotion agreements and intellectual property royalty payments.
- Drafted customs compliance documents for a large foreign multinational company in advance of its initial public offering. Documents included the Code of Conduct, model representations and warranties for contracts, global policies, and entity-specific procedures.
- Advised a food product manufacturer on country of origin and marking requirements for a large number of products under both a free trade agreement and normal substantial transformation and marking rules.
- Drafted and filed classification ruling requests for clients in the automotive and electronics industries.

#### GOVERNMENT EXPERIENCE

- Intern, Office of the U.S. Trade Representative, 2009

#### AFFILIATIONS

- Member, Women in International Trade

- Member, Customs and International Trade Bar Association
- Board Member, Jana's Campaign

## **ADMISSIONS**

### **Bar Admissions**

- District of Columbia
- Kansas

### **Court Admissions**

- United States Supreme Court
- United States District Court for the District of Colorado
- United States Court of Appeals for the Federal Circuit
- United States Court of International Trade