

# Jane C. Dempsey

COUNSEL

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Jane Dempsey has extensive experience in international trade law. Before joining Polsinelli, she worked for ten years at the International Trade Commission in the Office of the General Counsel and, before then, eight years at the U.S. Department of Justice in the National Courts Section of the Commercial Litigation Branch. During her nearly two decades of government service, she provided legal advice on complex trade remedies issues and drafted injury opinions in numerous antidumping and countervailing duty investigations, safeguard investigations and five-year reviews spanning a wide range of industries. She also served as lead counsel for the International Trade Commission and the Department of Justice, successfully litigating trade cases before the U.S. Court of International Trade, U.S. Court of Appeals for the Federal Circuit, the World Trade Organization and the North American Free Trade Agreement (the predecessor to the United States-Mexico-Canada Agreement) binational panel.

With her deep understanding of the trade statute and administrative proceedings before the government agencies, Jane provides strategic counsel to clients in diverse industries to ensure they stay in compliance with U.S. laws and regulations while mitigating potential risks. She also handles trade disputes before the government agencies and related appeals to the U.S. courts.

## Education

- The George Washington University Law School (J.D., *with honors*)
  - Notes Editor, The George Washington University International Law Review
- Yale University (B.A., *with distinction*)

## Bar Admissions

- District of Columbia
- Virginia

## Court Admissions

- U.S. Supreme Court
- U.S. Court of Appeals, Federal Circuit

## Capabilities

- International Trade
- International
- Trade Law Remedies
- Customs

- U.S. Court of Federal Claims
- U.S. Court of International Trade

## Memberships

- Customs and International Trade Bar Association (CITBA)
  - Board of Directors, 2020-2022
  - Vice-Chair of Trade Remedies Committee, 2019-2020

## Publications

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April 17, 2026

**IEEPA Refund Portal Opens on April 20: What Importers Should Know About Filing, Timing and Liquidity Options**

April 14, 2026

**CBP to Launch Phase One of CAPE for IEEPA Refunds on April 20**

April 3, 2026

**Trump Administration Resets Section 232 Metals Tariffs, Retaining 50% Duties on Most Primary Metals and Imposing Tiered Full-Value Duties on New Product Groupings**

April 3, 2026

**Trump Administration Expands Section 232 Tariffs to Patented Pharmaceuticals and APIs**

April 2, 2026

**Updates on the IEEPA Refund Process and Section 232 Derivative Content Value Calculations**

March 18, 2026

**USTR Initiates New Multi-Country Section 301 Investigations**

March 9, 2026

**CIT Suspends Prior Order Requiring Immediate Refunds of IEEPA Duties**

March 5, 2026

**CIT Orders Refund of IEEPA Duties on “Any and All” Unliquidated Entries**

February 23, 2026

**Post-SCOTUS Tariff Reset: Trump Replaces IEEPA Duties with Temporary Section 122 10% Import Surcharge, Likely to Increase to 15%**

February 20, 2026

**U.S. Supreme Court Strikes Down IEEPA Tariffs; Trump Announces Replacement Tariffs: What Importers Should Do Now to Seek Refunds and Secure Supply Chains**

February 13, 2026

**President Trump Announces Trade Framework with India**

January 20, 2026

**Trump Administration Adopts a Dual-Track Approach to Restore U.S. Semiconductor Manufacturing Leadership**

January 16, 2026

**CBP Guidance Regarding Section 232 Dutiable Metal Content Valuation**

December 17, 2025

**CIT Denies Preliminary Injunction in IEEPA Tariff Litigation, Reaffirming its Authority to Order Reliquidation**

November 18, 2025

**New Tariff Exemptions Announced for Agricultural Products**

November 14, 2025

**President Trump Secures Multiple New U.S.-Asia Trade Deals and Foreign Investment Commitments**

November 12, 2025

**Lower Tariffs Take Effect Under New China Trade Deal**

October 22, 2025

**New National Security Tariffs on Trucks, Truck Parts and Buses Take Effect Nov. 1**

October 3, 2025

**U.S. Imposes New Section 232 Tariffs on Timber, Lumber and Derivative Wood Products**

September 25, 2025

**U.S. Implements EU Tariff Rate Adjustments on Aircraft and Parts, Autos and Parts, Generic Pharma and More**

September 18, 2025

**Administration Opens Process to Expand Section 232 Duties to Additional Steel and Aluminum Derivative Products and Automobile Parts**

September 11, 2025

**The U.S. Supreme Court Will Soon Decide the Fate of President Trump's Tariffs**

September 3, 2025

**False Claims Act: DOJ Doubles Down on Duty Evasion Outside the Traditional Trade Enforcement Scheme**

August 22, 2025

**United States and European Union Add Commitments to Trade Framework**

August 7, 2025

**New 25 Percent Additional Tariffs on Imports from India**

August 5, 2025

**Reciprocal Tariffs Take Effect August 7**

July 31, 2025

**Multiple Trade Deals Reached as August 1 Deadline Nears**

July 31, 2025

**New National Security Probes on Imports of Polysilicon and Drones**

July 31, 2025

**New 40% Tariffs on Imports from Brazil into the U.S.**

July 31, 2025

**New Section 232 Tariffs Formalized on Copper Imports**

July 8, 2025

**Deadline for New Country-Specific Reciprocal Tariff Rates Delayed to August 1, With Some Rate Increases Scheduled**

May 29, 2025

**Court Strikes Down Fentanyl and Reciprocal Tariffs, but Appeals Court Temporarily Stays Impact**

May 13, 2025

**U.S. Launches National Security Investigation Into Aircraft and Jet Engine Imports**

May 13, 2025

**United States and China Announce Temporary 115 Percent Reduction in Tariffs While Trade Discussions Continue**

April 16, 2025

**New Section 232 Trade Investigation on Imports of Processed Critical Minerals and Their Derivative Products Could Result in Trade Actions Later This Year**

April 15, 2025

**New Section 232 Trade Investigations on Pharmaceutical and Semiconductor Imports Could Lead to Tariffs Mid-Year**

April 10, 2025

**Increase of Certain Reciprocal Tariffs Paused, While China Duties Ratchet Higher**

April 3, 2025

**New "Reciprocal" Tariffs Announced, Effective Starting April 5 for Nearly All Countries and Sectors**

March 27, 2025

**New U.S. Import Tariffs on Certain Automobiles and Parts**

March 27, 2025

**Potential New U.S. Import Tariffs on Countries Importing Venezuelan Oil**