

## Capabilities

Debevoise's market-leading sanctions compliance & enforcement practice helps clients identify and mitigate the compliance and business risks of U.S., UK, and E.U. trade and economic sanctions and investigate and address potential violations. The team draws on extensive experience in private and public sectors and advises companies operating in a wide range of industries and jurisdictions as well as leading financial industry associations. Our attorneys work together across offices and practice groups to support our clients' global business operations.

Our team assists clients with structuring their transactions, contracts and third-party relationships to comply with applicable sanctions/export controls laws and mitigate risks. We regularly assist clients with sanctions due diligence on a wide variety of corporate transactions and with devising and implementing compliance programs and internal controls to guard against and detect sanctions risks.

If a potential sanctions issue is identified, we assist with investigation and remediation process and advise clients on their reporting obligations and exposure vis-a-vis enforcement authorities and regulators. Drawing on the vast experience of Debevoise premier investigations and white collar defense practice, the team regularly represents clients before U.S., UK, and E.U. enforcement authorities and regulators, including criminal and administrative enforcement actions and contentious regulatory examinations, as well as civil litigation.

Ranked as a Band 1 firm worldwide for Corporate Crime & Investigations and Investigations & Enforcement (International & Cross-Border)

*Chambers Global, 2023*

## Depth and Breadth

The Debevoise team works collaboratively across offices around the world. We have leading lawyers who advise on sanctions, export controls, foreign investment and related issues in our Hong Kong, London, New York, and Washington, D.C. offices. Our practice draws on the experience of members of the firm's Banking, Financial Institutions, Litigation and White Collar & Regulatory Defense practices. Among our sanctions specialists are alumni of the U.S. Justice and Treasury Departments. The team includes lawyers fluent in Russian, Spanish, French and Mandarin, among other languages.

The depth of the practice means that we are able to build the right teams for the task at hand, from a lean partner-led team focused on a discrete issue to a large team for a highly complex and business-critical sanctions investigation or diligence matter.

# Experience

Recently, Debevoise has assisted clients in:

## CORPORATE TRANSACTIONS

- addressing Russia-related sanctions adopted in the U.S., E.U., and UK
- responding to a steady increase of U.S. sanctions and export-related restrictions targeting China
- conducting due diligence on counterparties for purposes of sanctions and anti-money laundering compliance
- obtaining licenses for transactions that would be otherwise restricted

## COMPLIANCE

- horizon scanning for new sanctions developments and areas of greatest risk
- drafting, revising, and implementing sanctions compliance policies and procedures (including with respect to compliance programs that address U.S. and non-U.S. requirements)
- conducting sanctions compliance assessments (including with respect to the structuring of compliance in multinational organizations)
- providing sanctions training, for both front-line employees and boards of directors

## ENFORCEMENT

- conducting internal investigations regarding potential criminal and civil sanctions violations and other sanctions compliance issues
- responding to regulatory and law enforcement inquiries regarding U.S., UK, and E.U. sanctions matters
- representing clients in enforcement matters brought by the U.S. Justice Department, the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC"), the UK Office of Financial Sanctions Implementation ("OFSI"), U.S. federal banking regulators, and the New York Department of Financial Services, among others
- advising clients in the context of voluntary self-disclosures before OFAC and OFSI

## Representative Matters

The **Alavi Foundation** in an asset forfeiture jury trial under U.S. sanctions laws and a simultaneous bench trial for turnover of assets under the Terrorism Risk Insurance Act.

An **Eastern European company** in an investigation into potential violations of Crimea embargo.

A **U.S. payments company** regarding enhancements to its global sanctions compliance program and its dealings with OFAC, including applying for licenses, responding to subpoenas, and submitting voluntary self-disclosures of potential sanctions violations.

The **Securities Industry and Financial Markets Association (SIFMA)** regarding implications for its members of new U.S. sanctions.

A **Russia-focused private equity group** to address the impact on its business operations of the new sanctions adopted by the U.S., E.U., and the UK against Russia.

A significant **supplier of certain critical commodities** in its outreach to U.S. and E.U. government authorities regarding sanctions-related issues.

An **Asia-based e-commerce platform** to evaluate and address sanctions risks related to a joint venture.

An **East Asian industrial group** with investments and business activities in higher-risk industries and jurisdictions.

An **E.U.-based software company** to investigate potential violations of U.S. export controls.

**Several Indian energy companies** with historical and ongoing business dealings with counterparties targeted by U.S., E.U., and UK sanctions, including assisting with license applications to relevant authorities.

Several leading **insurers and reinsurers** to conduct due diligence on higher-risk customers, claims, and acquisitions.

Several large **private equity groups** to conduct due diligence on acquisitions and assist portfolio companies with adopting appropriate risk-based compliance programs.

Numerous **financial institutions**, including banks, securities broker-dealers, and investment advisers, with issues identified in the course of routine screening and reporting procedures.

A **U.S. headquartered international media company** in relation to disclosure, resolution and remediation of E.U. and UK sanctions breaches relating to multiple sanctions regimes.

White Collar Crime/Enforcement/  
Investigations Firm of the Year  
*Benchmark Litigation U.S. Awards, 2018, 2019,  
2020 and 2022*

White Collar Practice Group of the Year  
*Law360, 2021*



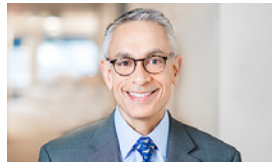


## Our Team



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Ranked as a leading firm in the U.S. for  
International Trade: Export Controls &  
Economic Sanctions.

*Chambers USA, 2023*

Recognized as a leading practice in  
the "Sanctions Law Firm of the Year,  
Europe" category.

*WorldECR Awards, 2017, 2018 and 2021*