

→ Sanctions and Anti-Money Laundering

Economic sanctions and embargoes are constantly evolving in response to the changing geopolitical, foreign policy, and national security landscape. Anti-money laundering (AML) laws obligate companies to prevent activity that facilitates financial criminal activity, including knowing their customers through KYC protocols. Sheppard Mullin's Sanctions & AML team supports clients to comprehend and navigate the complex obligations under U.S., European Union (EU), and United Kingdom (UK) sanctions, anti-money laundering, and combatting-financing-of-terrorism laws and regulations. Our attorneys draw on decades of experience to provide smart and practical advice on international sanctions and AML laws, develop effective compliance strategies, and represent companies in government and internal investigations.

Capabilities

Our Sanctions & AML team regularly:

- Advises companies on sanctions implications in project planning and market entry;
- Responds to OFAC subpoenas and DOJ investigations;
- Builds OFAC compliance programs, including policies, procedures and training;
- Conducts due diligence in cross-border transactions;
- Helps clients obtain licenses from OFAC and other governmental bodies and submit advisory opinions;
- Leads audits and internal investigations of potential violations;
- Represents clients in developing voluntary self-disclosures and interfaces with agencies,
- Defends clients during enforcement actions; and
- Pursues de-listing applications as needed.

Global Reach

Our team helps clients conduct their global business from our offices in Washington, D.C., New York, California, Brussels, and London. We maintain a strong Washington, D.C. presence as we routinely liaise with regulators at government agencies in Washington, D.C. and beyond including:

- U.S. Department of Justice (DOJ)
- Office of Foreign Assets Control (OFAC), U.S. Department of the Treasury
- Financial Crimes Enforcement Network (FinCEN), U.S. Department of the Treasury
- European Commission and the European External Action Service
- Office of Financial Sanctions Implementation (OFSI), HM Treasury of the United Kingdom

Counseling & Compliance

We support our global clients in their day-to-day business with practical and strategic solutions to comply with the complex comprehensive and targeted economic sanctions programs. We regularly design compliance policies and procedures tailored to our clients' operations and risk profile. We also help companies monitor, update and enhance existing procedures and offer dynamic training for all levels of the company. We are readily available for the urgent compliance questions that companies face each day and for longer term projects.

Investigations & Enforcement

We conduct internal investigations of potential violations and walk our clients through the voluntary self-disclosure process as needed. We support clients in responding to government inquiries, representing them in government investigations, and when necessary, we negotiate pre-penalty actions and settlements.

Cross-Border Transactions and Due Diligence

We advise on cross-border mergers and acquisitions, both in the due diligence phase, in filings to the Committee on Foreign Investment in the United States (CFIUS), and post-acquisition integration. We build our due diligence team from a diverse group of professionals to help clients manage risk pre- and post-acquisition or merger.

Industry Expertise

Our Sanctions & AML attorneys advise clients in the following industries among others:

- Transportation
- Telecom
- Space and Satellite
- Technology and Technology Transactions
- Private Equity
- Crypto, Blockchain & Fintech
- Privacy and Cybersecurity
- Retail
- Life Sciences
- Aerospace and Defense
- Financial Services
- Emerging Company & Venture Capital
- Food & Beverage
- Energy