Economic Sanctions

Cohen & Gresser represents clients all over the world including corporations, financial institutions, investment funds, executives, and individuals on economic sanctions laws and regulations in key jurisdictions. We help clients identify, assess, and mitigate sanctions-related risks in connection with their operations, transactions, investments, and business relationships.

We advise on sanctions regimes administered by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), the U.S. Department of State, the United Kingdom's Office of Financial Sanctions Implementation (OFSI), and other regulatory authorities. Drawing on experience representing companies, financial institutions, investors, and individuals in complex international matters, we provide practical, business-focused counsel tailored to evolving regulatory requirements and commercial objectives.

Supported by the firm's strengths in regulatory compliance, white collar defense, investigations, corporate transactions, and litigation, we offer comprehensive sanctions advice to clients across multiple practice areas, including:

- Sanctions compliance programs, risk assessments, and internal reviews
- Cross-border transactions, investments, financing, and M&A due diligence
- Customer, vendor, and counterparty screening and due diligence
- Licensing, regulatory guidance, and engagement with government authorities
- Internal investigations, voluntary disclosures, and enforcement matters
- Sanctions issues involving export controls, anti-money laundering, and anti-corruption laws

Sanctions Compliance & Advisory

Representing a multinational company on sanctions and other regulatory compliance obligations in connection with the restructuring of its assets, across multiple jurisdictions in Europe, Eurasia, and North America.

Advised a multinational industrial and technology company on the wind-down of its business operations in Russia, including sanctions compliance, cross-border transactions, and corporate reorganization measures.

Advised a sovereign wealth fund on multiple cross-border M&A transactions involving a co-investor subject to Russia-related sanctions considerations, including related sanctions compliance issues.

Provided U.S. sanctions and OFAC compliance guidance to an international law firm in connection with a prospective representation of a major state-owned energy company in an arbitration matter.

Represented a shareholder and non-executive director of a multinational industrial technology group on U.S. sanctions compliance and sanctions-related regulatory risks arising from international business operations.

Represented a leading educational services company in connection with U.S. economic sanctions compliance matters, including advising on OFAC regulations and obtaining guidance from OFAC regarding sanctions-related issues.

Represented an investor with interests in multinational mining, metals, and industrial businesses on sanctions compliance issues arising under the Russia (Sanctions) (EU Exit) Regulations 2019 in connection with a proposed cross-border share acquisition.

Represented a global advertising technology company on compliance with U.S. economic sanctions and export control regulations, including sanctions and export-control risks associated with its international operations.

Representing a senior investment professional on compliance with the Sanctions and Money Laundering Act 2018, and the Russia (Sanctions) (EU Exit) Regulations 2019 concerning a proposed employment role.

Sanctions Enforcement, Investigations & Delisting

Represented a prominent entrepreneur and founder of international mining, energy, and industrial businesses in connection with proceedings seeking removal from UK sanctions lists.

Represented five executives of a major European financial institution in a U.S. Department of Justice investigation concerning potential violations of U.S. economic sanctions laws arising from cross-border financial transactions.

Representing an individual designated on OFAC's Specially Designated Nationals and Blocked Persons (SDN) List in connection with a federal court challenge seeking a decision on a pending petition for removal from U.S. sanctions lists.

Cross-Border Transactions & Multi-Regime Compliance

Represented a major Asian financial institution in connection with a contemplated cross-border transaction involving complex issues under the U.S. Foreign Corrupt Practices Act, U.S. economic sanctions, export controls, and anti-money laundering laws.