

Anti-Money Laundering and Economic Sanctions

Skadden represents a wide variety of U.S. and international clients in regulatory, civil and criminal matters involving U.S. and European anti-money laundering (AML) and economic sanctions laws, including those administered by the U.S. Office of Foreign Assets Control (OFAC), the U.S. Financial Crimes Enforcement Network (FinCEN) and other U.S. federal and state regulators; the European Union; Her Majesty's Treasury; the U.K. Office of Financial Sanctions Implementation; the French Ministry of Finance; and the French General Directorate of the Treasury, among others.

Skadden advises global financial institutions, payment services providers, digital asset service providers and other multinational companies from all industries, their boards and senior officers, and individuals in all aspects of global economic sanctions and anti-money laundering compliance.

We have substantial experience helping our clients prepare for and respond to regulatory examinations, assessing the need for and drafting voluntary disclosures, and conducting internal investigations and transactional due diligence. We also defend our clients in enforcement proceedings before all major federal and state regulatory agencies, including OFAC, FinCEN, the Federal Reserve board, the U.S. Office of the Comptroller of the Currency and the New York State Department of Financial Services, as well as federal and local prosecutors, and have successfully resolved a number of multi-agency civil and criminal settlements. Additionally, we assist with various disclosure requirements for European investigative agencies, including the U.K. Office of Financial Sanctions Implementation, the U.K. Serious Fraud Office, the U.K. Financial Conduct Authority, the U.K. Prudential Regulatory Authority, the German Federal Financial Supervisory Authority and public prosecutors, the French National Financial Prosecutor's Office (Parquet National Financier), the French Anti-Corruption Agency, the French Prudential and Resolution Control Authority, the French AMF and investigating magistrates.

We also offer substantial experience with post-enforcement remediation matters. Our attorneys frequently assist clients in developing and implementing internal compliance programs and advise on the

design of remedial measures (including in-house training programs). We advise our clients in executing AML and OFAC lookbacks mandated by regulators. Additionally, our team provides legal and strategic advice to clients who engage monitors and independent consultants regarding the conduct of such reviews and in responding to findings and recommendations.

Before any such needs arise, we engage at the ground level to prevent and detect potential violations of law with our day-to-day compliance counseling. Our team has assisted hundreds of clients, including scores of the world's largest banks, in reviewing, developing and implementing worldwide sanctions and AML compliance programs to identify and avert potential legal breaches. We design and tailor compliance programs to meet each client's business requirements, taking into account the existing organizational and management structures, culture and global needs, as well as the expectations of regulators.

Our sanctions and AML transactional review and support services are an extension of our position as a leader in global M&A. The combination of our compliance counseling experience and our global deal platform positions us to easily draw on the necessary resources to work with clients to identify and manage "deal-stopping" issues at an early stage (or before entering into a transaction) and to monitor these matters through the life of a transaction. Conducting proper transaction reviews, including advising on the risks associated with complex transactions, completing in-depth pre- and post-transaction due diligence, and drafting and negotiating contractual terms are key tools to ensure compliance with sanctions and AML practices and mitigate the risk of enforcement actions or reputational damage.

Government Enforcement and White Collar Crime

Continued

Many of our attorneys have government experience directly related to economic, financial and international trade sanctions, including in OFAC, the U.S. Department of the Treasury's Office of Terrorist Financing and Financial Crimes, the Federal Reserve System, the U.S. Department of Commerce and the U.S. Department of State, as well as serving as a legislative adviser for international trade and foreign policy in the U.S. Senate. Our attorneys also have served on the U.S. Attorney General's Economic Crimes Council and the U.S. Department of Defense's Defense Policy Advisory Committee on Trade.

We are experienced in a wide variety of matters involving banking secrecy and data protection compliance matters as well as local blocking statutes such as the French Blocking Statute.

In 2020, *Legal 500 UK* ranked Skadden Tier 1 for Regulatory Investigations and Corporate Crime. The firm received the 2019 top ranking in International and Internal Investigations from *Decideurs Compliance Guide* and was rated "Excellent" in the Compliance Programs category for the second year in a row.

Skadden was named *Law360's* Practice Group of the Year 2019: White Collar, the 2019 Transatlantic Investigations Team of the Year by the Transatlantic Legal Awards and *The American Lawyer's* 2018 White Collar/Regulatory Litigation Department of the Year. *Global Investigations Review* awarded Skadden with the Most Important Development in Investigations for 2018, and we received a 2017 *Chambers USA* Award for Excellence for having the nation's top Securities and Financial Services Regulation practice. Skadden was one of only five firms recognized in the Sanctions Law Firm of the Year — USA category at the *WorldECR* 2017 awards. The practice and its attorneys also have been recognized by *Chambers and Partners*, *US News — Best Lawyers Best Law Firms*, *Who's Who Legal*, *IFLR1000* and the Women in Business Law European Awards.