

Former Commerce Department Assistant Secretary for Export Enforcement, Matthew Axelrod, Joins Gibson Dunn to Co-Chair New Sanctions and Export Enforcement Practice Group

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Gibson Dunn is pleased to announce that Matthew Axelrod, formerly the Assistant Secretary for Export Enforcement at the U.S. Department of Commerce's Bureau of Industry and Security (BIS) and the Principal Associate Deputy Attorney General at the U.S. Department of Justice (DOJ), is joining the firm's D.C. office as a partner in the White Collar Defense and Investigations Practice Group and as Co-Chair of its new Sanctions and Export Enforcement Practice Group. Amid the increased prioritization of sanctions and export enforcement across governmental agencies, particularly DOJ, the U.S. Department of Treasury's Office of Foreign Assets Control (OFAC), and the U.S. Department of Commerce's BIS, Gibson Dunn's new Sanctions and Export Enforcement Practice Group will bolster the firm's existing work in this space and offers clients experienced perspectives from veterans of these three primary enforcement agencies. Partner Adam Smith, who previously served as Senior Advisor to the Director of the U.S. Treasury Department's OFAC and as Director for Multilateral Affairs on the National Security Council, will serve as Co-Chair of the new practice group alongside Matt. Adam also co-chairs the firm's International Trade Advisory and Enforcement Practice Group. Partner David Burns, who served in senior positions in the DOJ's Criminal Division and National Security Division and is Co-Chair of the firm's National Security Practice Group, will also be a member of the new practice group. "Matt is one of the country's foremost leaders in export control enforcement, bringing unique experience from senior-level service at two cabinet agencies, as a white collar defense lawyer in private practice, and as a federal prosecutor, making him a rare talent for launching our Sanctions and Export Enforcement practice," said David. "When it comes to sanctions and export controls, what was once a discrete area of regulatory risk for companies now poses significant enforcement challenges," added Adam. "The firm is launching this practice group to further enhance our existing capabilities to help clients manage and mitigate heightened risks in this complex enforcement landscape." Commenting on Matt's arrival, F. Joseph Warin, Chair of the Litigation Department of Gibson Dunn's Washington, D.C. office and Co-Chair of the firm's global White Collar Defense and Investigations Practice Group, and Stephanie Brooker, Co-Chair of the firm's White Collar Defense and Investigations, Anti-Money Laundering, and Financial Institutions Practice Groups, said: "Matt, who led a robust enforcement regime at the Commerce Department, joins an already world-class enforcement and white-collar practice. We are pleased to have his deep experience to further assist our clients." "I'm thrilled to join forces with Gibson Dunn's collaborative and esteemed white collar, national security, international trade, and export control teams, where my practice will sit at the center of these critical areas," said Matt. "Sanctions and export controls are likely to remain a centerpiece of the enforcement environment for the foreseeable future, bringing increased scrutiny and risk. With the launch of Gibson Dunn's Sanctions and Export Enforcement Practice Group, we are establishing a premier destination practice for clients who need assistance navigating and mitigating their

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potential export controls and sanctions enforcement risks.” Gibson Dunn’s Sanctions and Export Enforcement Practice Group handles all aspects of sanctions and export enforcement matters, including evaluating existing compliance programs, conducting internal investigations, advising on voluntary disclosures, and defending against enforcement actions. **About Matthew Axelrod** Matt is a White Collar Defense and Investigations partner in the Washington, D.C. office of Gibson Dunn and serves as Co-Chair of the firm’s Sanctions and Export Enforcement Practice Group. Matt is a nationally recognized white collar defense lawyer with deep criminal, export control, and national security enforcement experience. Matt’s practice focuses on white collar criminal defense, internal investigations, and compliance counseling for U.S. and foreign institutions and executives. From 2021-2025, Matt served as the Senate-confirmed Assistant Secretary for Export Enforcement at the U.S. Department of Commerce’s Bureau of Industry and Security, where he led a team of over 200 special agents, analysts, and compliance specialists dedicated to enforcing the country’s export control laws. In that capacity, Matt and his team worked to prevent the export of sensitive goods and technologies that could be used by nation-state adversaries to modernize their militaries or commit human rights abuses, worked to ensure that U.S. persons did not participate in unsanctioned foreign boycotts, and brought a record number of criminal and administrative enforcement actions, including the highest standalone administrative penalty in the agency’s history. During his tenure, Matt also co-led the Disruptive Technology Strike Force, an interagency law enforcement initiative that targeted illicit actors, protected supply chains, and prevented critical technology from being acquired by authoritarian regimes and hostile nation-states. Matt also spent over thirteen years at the U.S. Department of Justice (DOJ), including as Principal Associate Deputy Attorney General, where he advised the Deputy Attorney General and Attorney General on DOJ’s most sensitive matters, including its most consequential criminal and national security corporate enforcement matters. As an Assistant United States Attorney in the Southern District of Florida, Matt conducted 19 felony jury trials and handled some of the office’s most high-profile cases, including the convictions of two founders of the Cali Cartel. Matt also previously served as Special Counsel in the White House Counsel’s Office, where he advised on national security and domestic issues. Matt also previously practiced for four years as a partner at another major international law firm, where he represented companies and individuals in internal investigations and government enforcement matters. Matt graduated from Amherst College and Yale Law School, where he served as Notes Editor for *The Yale Law Journal*. Following law school, he clerked for the Honorable Ralph K. Winter, Jr. on the U.S. Court of Appeals for the Second Circuit, and for the Honorable Janet C. Hall on the U.S. District Court for the District of Connecticut.

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