Samantha Sewall

Of Counsel

ssewall@gibsondunn.com
T: +1 202.887.3509
Washington, D.C.



Samantha Sewall is of counsel in the Washington, D.C. office of Gibson Dunn and a member of the firm's International Trade Advisory and Enforcement Practice Group.

She advises clients on compliance with U.S. legal obligations at the intersection of global trade, foreign policy, and national security, focusing her practice on compliance with U.S. economic sanctions, export controls, anti-boycott laws, customs, and national security reviews of foreign direct investment (CFIUS). Samantha has experience advising companies across a wide range of sectors including aerospace, banking and financial institutions, defense, energy, medical devices and pharmaceuticals, shipping, retail, telecommunications, and travel. She regularly assists clients to assess risk, advocate before regulators, enhance compliance measures, and navigate the shifting international trade legal landscape.

Representative economic sanctions engagements include:

- Obtaining a specific license from the Office of Foreign Assets Control ("OFAC") to provide healthcare-related services to persons resident in comprehensively sanctioned countries for a global provider of business process and digital services.
- Advising a non-U.S. manufacturer in negotiations with OFAC and the U.S. Department of Justice in connection with a sanctions enforcement action and settlement.
- Responding to an OFAC subpoena related to screening gaps for a U.S.-based financial institution.
- Providing a sanctions risk assessment to a digital payments platform provider covering sales in higher risk jurisdictions.
- Drafting and revising sanctions compliance policies and procedures for clients across industry sectors.
- Advising on the design of sanctions compliance programs.
- Providing sanctions-related due diligence for M&A transactions.

Representative export control and antiboycott engagements include:

- Conducting an internal investigation and submitting a voluntary self-disclosure of export control compliance exceptions for a global oil & gas industry company and obtaining a resolution without penalty.
- Assessing export control classification and licensing compliance policies and procedures.
- Providing advice regarding compliance with U.S. antiboycott laws, including reporting requirements and compliance policy development.

Capabilities

International Trade Advisory and Enforcement
Financial Institutions
Fintech and Digital Assets
National Security
Sanctions and Export Enforcement
White Collar Defense and Investigations

Credentials

Education

Georgetown University - 2012 Juris Doctor
Patrick Henry College - 2008 Bachelor of Arts

Admissions

District of Columbia Bar
Virginia Bar

2026 Gibson, Dunn & Crutcher LLP. All rights reserved.
For other information, please visit us at **www.gibsondunn.com**

GIBSON DUNN

Representative CFIUS engagements include:

- Obtaining CFIUS clearance for the acquisition of an aerospace and defense tooling manufacturer by a U.K.- and Cyprus-owned private fund.
- Providing CFIUS analysis for private equity transactions, including assessment of target companies' critical technologies.

In-house counsel experiences include:

- Eight-month secondment to the in-house global trade legal team of a global e-commerce and technology company.
- Six-month secondment as the in-house global trade counsel to a top-10 global manufacturer of medical devices.*

On a *pro bono* basis, Samantha has assisted clients with understanding U.S. trade controls and immigration issues, and she has worked with an international rule of law NGO to support law enforcement training efforts to combat transnational human trafficking and forced labor.

Prior to joining Gibson Dunn, she served as a Political-Economic Program Assistant supporting the U.S. Embassy in Côte d'Ivoire. Samantha was previously an associate with a large international law firm where she was a member of the international trade and investment practice group.

Samantha graduated *magna cum laude* from Georgetown University Law Center in 2012, where she was elected to the Order of the Coif and was a member of the Georgetown Law Journal. She is admitted to practice in the Commonwealth of Virginia, the District of Columbia, and the U.S. Court of International Trade.

**Representation occurred prior to Samantha's association with Gibson Dunn.*

Speaking Engagements and Publications

- Co-author, "USA - Sanctions Laws and Regulations 2027," *ICLG*, September 17, 2026
- Panelist, Georgetown Law Institute of International Economic Law, Global Trade Academy, "Economic Sanctions and Export Controls in an Age of Geopolitical Rivalries," November 6, 2025
- Moderator, "Legal Developments in Russia-Related Sanctions," The George Washington University Law School, Business and Finance Law Review Symposium, April 13, 2024
- Lecturer, Foreign Service Institute, "Everything You Ever Wanted to Know about U.S. Sanctions…But Were Afraid to Ask," March 27, 2023
- Moderator, ABA International Law Section, "Fireside Chat on Export Control Enforcement with Assistant Secretary Matthew S. Axelrod," December 15, 2022
- Panelist, Gibson Dunn webcast, "CFIUS Enforcement Guidelines: First-Ever Guidance on Enforcement and Penalties in U.S. National Security Reviews of FDI," December 13, 2022
- Speaker, Gibson Dunn webcast, "2020 Sanctions and Export Controls Update," October 15, 2020
- Featured Speaker, The Knowledge Group "OFAC's Heightened Enforcement Trends: Practical Compliance Tips and Strategies," June 30, 2020

Samantha Sewall
Of Counsel

ssewall@gibsondunn.com
T: +1 202.887.3509
Washington, D.C.

2026 Gibson, Dunn & Crutcher LLP. All rights reserved.
For other information, please visit us at **www.gibsondunn.com**

GIBSON DUNN