Adam M. Smith

Partner

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Washington, D.C.



Adam M. Smith is a partner in the Washington, D.C. office of Gibson Dunn and serves as co-chair of the firm's International Trade Advisory and Enforcement, as well as the Sanctions and Export Enforcement Practice Groups. He is an experienced international lawyer with a focus on international trade compliance and white collar investigations, including federal and state economic sanctions enforcement, tariffs, CFIUS, embargoes, export and import controls, and anti-bribery/anti-corruption regulations.

Chambers USA and *Chambers Global* consistently rank Adam as a leading attorney in International Trade: Export Controls & Economic Sanctions. In those publications, clients describe Adam as “a terrific resource for clients” and a “reassuring lawyer in a complex area of law.” Most recently, *Legal 500 US* 2025 named Adam a "Leading Lawyer" in International trade: Customs, export controls and economic sanctions. *Global Investigations Review* has named him to its “25 Most Respected Sanctions Lawyers in Washington, D.C.” list, which features individuals who work on the most significant cases. *The Best Lawyers in America*® recognizes him for International Trade and Finance Law. *Who’s Who Legal* regularly recognizes him as a Thought Leader for Trade & Customs, International Sanctions, and in its Global Elite Guide.

Clients benefit from Adam’s experience in the Obama Administration, where he was Senior Advisor to the Director of the U.S. Treasury Department’s Office of Foreign Assets Control (OFAC) and Director for Multilateral Affairs on the National Security Council. At OFAC, he was instrumental in shaping and enforcing sanctions policies, briefing Congressional and private sector leaders, conducting extensive international outreach, and negotiating complex agreements. On the National Security Council, he advised the President on international sanctions, coordinated inter-agency efforts, and developed strategies to counter corruption and promote asset recovery.

Representative Engagements

- Successfully represented a regional financial institution before OFAC and other agencies in responding to a subpoena following revelations of potentially sanctionable conduct.
- Assisted U.S. branch of a foreign financial institution in successfully responding to multi-agency regulatory inquiries and examinations.
- Ongoing sanctions representation for major corporation addressing multi-agency civil and criminal enforcement.
- Advised the board of directors of major financial institution in addressing sanctions governance short-falls and assisted the bank in developing robust policies, procedures, and training protocols.
- Providing ongoing sanctions, anti-corruption, and AML compliance advice to major financial institutions, Fortune 500 manufacturers, and insurers.

Capabilities

International Trade Advisory and Enforcement
Aerospace and Defense
Anti-Corruption & FCPA
Fintech and Digital Assets
Geopolitical Strategy and International Law
National Security
Robotics
Sanctions and Export Enforcement
White Collar Defense and Investigations

Credentials

Education

Harvard University - 2006 Juris Doctor
University of Oxford - 1998 Master of Philosophy
Brown University - 1996 Bachelor of Arts

Admissions

District of Columbia Bar
Maryland Bar

Clerkships

US Court of Appeals, Armed Forces, Hon. James Baker, 2006 - 2007

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- Overhauled sanctions compliance oversight and processes at a major e-payments company.
- Retained by a Fortune 100 manufacturer to conduct an internal FCPA investigation and provided sanctions advice in the context of a proposed deal.
- Worked with a major manufacturer to obtain regulatory approvals for sale of products into high-risk jurisdiction and to manage ongoing licensing and compliance issues.
- Retained by a major cybercurrency enterprise to develop compliance procedures and engage with regulators.

Clients, governments, academia, and other law firms regularly seek Adam's advice. He is a prominent thought leader, and his analysis regularly appears in print and broadcast media, including in *The Economist*, *The Wall Street Journal*, *The New York Times*, *The Washington Post*, and on BBC and NPR. He is the author of three legal texts and dozens of articles and book chapters, has testified before the U.S. Congress and the U.K. Parliament, and is a frequent presenter at industry, governmental, and academic conferences globally.

Adam is a 2006 *magna cum laude* graduate of Harvard Law School where he was a Chayes Fellow, the recipient of the Laylin Prize for the best work in international law, and the Senior Editor of the *Harvard International Law Journal*. He graduated *magna cum laude* from Brown University in 1996 with a Bachelor of Arts degree in Political Science and Economics, and an MPhil in Politics from Oxford University in 1998 where he was the Seaton Scholar in Politics at St. Hugh's College. Following law school, Adam served as a law clerk for the Honorable James Baker on the U.S. Court of Appeals for the Armed Forces. Adam subsequently practiced for more than three years at a major international law firm in Washington, D.C., where he advised clients on trade policy, national security, regulatory reform and risk, FCPA, and international investment. He has also held postings with the United Nations in New York, the World Bank / IFC in Washington, D.C. and abroad, and the OECD in France.

Select Recent Publications

Since 2006, Adam has been a frequent presenter to industry and academic audiences on international economic and national security matters, and is the author of numerous articles, book chapters, and three books.

- "Post 9/11 US Sanctions and Their Limitations," in *The Strategy of Sanctions* (S. Paine and A. Toprani eds), U. of Michigan Press, 2026
- "Tariffs and sanctions: an uneasy balancing act at the Supreme Court," *Financier Worldwide*, January 2026
- Contributing Editor, Sanctions 2026, International Comparative Legal Guide.
- "What to Expect on Tariffs and Related Risks," *Financier Worldwide*, May, 2025, pg. 115-118
- "Keeping Sanctions 'Smart': Calibrating U.S. Sanctions Policy to Overcome Overcompliance," North Carolina Journal of International Law, Vol. 48(3), Summer, 2023
- "United States Expands Sanctions Authorization of Internet-Based Activities in Wake of Protests in Iran," NYU Program on Corporate Compliance and Enforcement, October 17, 2022
- "The View from the United States," *Navigating the Global Sanctions Landscape in 2022*, Control Risks
- *SWIFT and Certain Punishment for Russia? There Are Better Ways to Deter Moscow than Threatening its Banking Access*, Foreign Affairs, January 4, 2022

Select Recent Speaking Engagements

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- Panelist, The IEEPA Tariff Ruling and its Aftermath, Tax Analysts Tax Trends Summit, Nov. 10, 2026, Washington, DC
- Panelist, The GIR Insight Sanctions Roundtable, Washington, DC, November 4, 2026
- Panelist, “Tactics to Counter a New Era of Sanctions Evasion and Sham Transactions,” AML & Fraud Conference, American Bankers Association, Washington, DC, October 14, 2026
- Panelist, “The Calculus of Self-Disclosure for Sanctions and Export Controls,” Ethicsverse, October 22, 2026
- Moderator, “Future of Sanctions Compliance: Revisiting the Impact of Divergence, Global Fragmentation and Geopolitical Unpredictability on New Sanctions, Designations and More,” ACI Flagship Conference on Economic Sanctions, Washington, DC, April 29, 2026
- Speaker, “International Trade in the Second Trump Administration: Sanctions, Export Controls, Tariffs from Washington to Brussels and Beyond,” Seminar at Yulchon LLC, Seoul, South Korea, April 24, 2026
- Panelist, Navigating Cross-Border Regulatory Change, Riyadh International Disputes Week, Riyadh, Saudi Arabia, February 1, 2026
- Panelist, Complying with New OFAC Recordkeeping and Retention Requirements, 15th Annual New York Forum on Economic Sanctions, December 4, 2025
- Speaker, U.S. Sanctions – A Policy and Legal Overview, National University of Singapore, Faculty of Law, November 25, 2025
- Speaker, Countering Illicit Maritime Trade: Sanctions Risks, Red Flags, and Resilience, Jakarta, Indonesia, November 20, 2025
- Speaker, A New Comprehensive Framework for Sanctions-Lifting, Geneva Graduate Institute, Geneva, Switzerland, November 18, 2025
- Speaker, ACAMS Sanctions Watch, October 9, 2025
- Panelist, “Trump Administration Policy Implications on Sanctions,” Society for International Affairs conference on Trade Implications During Times of Increased Geopolitical Tension, Washington, D.C., May 21, 2025
- Speaker, World50, CEO Kitchen Cabinet – Early Trump Administration Policies and Priorities, May 21, 2025
- Speaker, National Association of Corporate Directors, The First 100 Days & Beyond: What Board Members Need to Know, Houston, Texas, May 14, 2025
- Speaker, A View from the Private Sector, Workshop on Sanctions-Lifting Conditions for Conflict Resolution and Sustainable Peace, Geneva Graduate Institute, Geneva, Switzerland, May 5-6, 2025
- Presenter, “Audit and Sanctions Evasion: Looking Through a Risk-Based Lens,” ACAMS Assembly, Hollywood, Florida, April 29, 2025
- Speaker, PE 141: Terrorism Finance and Economic Sanctions, Sanctions Primer, Foreign Service Institute of the United States, Washington, D.C., April 14, 2025
- Lecture, “International Trade in the Second Trump Administration: Sanctions, Tariffs, and More, Oh My,” University of Pennsylvania School of Law, Philadelphia, PA, April 10, 2025
- Speaker, “Pathways for Sanctions Relief, Reconstruction and Governance in Syria,” Clingendael Institute, The Hague, Netherlands, March 17, 2025
- Speaker, “International Trade in the Second Trump Administration: Expectations, Possibilities and Opportunities,” Abu Dhabi/Dubai, UAE, February 26-27, 2025
- Panelist, “International Trade and Anti-Corruption—The Evolving Landscape of Extraterritorial Regulation,” Saudi International Disputes Week, Riyadh, Saudi

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Arabia, February 24, 2025

- Speaker, “Masterclass: Predictions for the Global Sanctions Landscape in 2025,” ACAMS Webinar, February 20, 2025
- Speaker, “Russia Sanctions: US and non-US Perspectives,” at the Coping with U.S. Export Controls and Sanctions 2024 Conference, Washington, DC, December 9, 2024
- Speaker, “Global Magnitsky, Targeted Sanctions and UFLPA: Lessons Learned,” at the 14th Annual New York Forum on Economic Sanctions, New York, NY, December 5, 2024
- Presenter, “International Trade Issues in the Second Trump Administration,” G100 Chief Executive Summit, New York, NY November 17, 2024
- Invited Speaker, “Protecting the Maritime Industry from DPRK Illicit Activities – Understanding Sanctions,” Presentation to Taiwanese Industry, Kaohsiung, Taiwan, November 4, 2024
- Invited Speaker, “NGL Skill Series – International Trade Issues Corporate Leaders Need to Know,” World 50 Organization, October 30, 2024
- Lead Speaker, “Sanctions and Export Controls: Key Regulatory and Enforcement Trends,” Gibson Dunn Webcast, October 17, 2024
- Speaker / Moderator, “Navigating Global Sanctions and AML Risk,” Association of Corporate Counsel Annual Meeting, Nashville, TN, October 7, 2024
- Moderator, “Introduction to US Sanctions,” Association of Corporate Counsel, September 5, 2024
- Taskforce Member, “RUSI UK Sanctions Taskforce Meeting,” London, UK, June 25, 2024
- Speaker, Sanctions and Reinsurance Industry, Singapore Association of Reinsurers, Singapore, June 4, 2024
- Invited Presenter, ACAMS Sanctions May 2024 Monthly Update, May 31, 2024
- Invited Lecturer, “Sanctions 101 and Sanctions Compliance,” U.S. State Department – Foreign Service Institute, Washington, D.C., April 29, 2024
- Speaker, “A View from a Sanctions Lawyer,” Maritime Sanctions Roundtable, Middlebury Institute of International Studies, Limassol, Cyprus, March 27, 2024
- Lecturer, “Sanctions and Export Controls 101,” University of Pennsylvania Law School, Philadelphia, PA, March 21, 2024
- Panelist, PLI: Coping with U.S. Export Controls and Sanctions, “Russia Sanctions: U.S. and non-U.S. Perspectives,” Washington, D.C., December 14, 2023
- Witness, United States House of Representatives Committee on Financial Services – Sub-Committee on National Security, Illicit Finance, and International Financial Institutions, “Restricting Rogue-State Revenue: Strengthening Energy Sanctions on Russia, Iran, and Venezuela,” December 12, 2023
- Invited Lecturer, National Security Law, “Sanctions – Where Have We Been and Where Are We Going?” New York University School of Law, New York, NY, November 28, 2023
- Panelist, “Reverse CFIUS” – The Emerging Restrictions on U.S. Outbound Investments, Harvard Law School Association, Washington, D.C., November 2, 2023
- Co-Moderator, “National Security, Sanctions and Export Controls Conference,” New York, NY, October 11, 2023
- “Economic Sanctions and National Security,” Harvard Law School, Cambridge, MA, October 6, 2023
- Speaker, ACAMS Monthly Sanctions Update – “Reverse” CFIUS, Inbound Real

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Estate Restrictions, Voluntary Self-Disclosure Considerations, September 13, 2023

- Keynote Speaker, Countering a Taiwan Crisis with Economics, United States Studies Center, University of Sydney, Sydney, Australia, August 17, 2023
- Invited Speaker, U.S. Sanctions and Export Controls: From Russia to China and Beyond, American-Australian Chamber of Commerce, Melbourne, Australia, August 16, 2023
- Invited Speaker, “An Introduction to Sanctions – From Russia to China and Beyond,” Osgood Center at the Elliot School, American University, Washington, D.C., August 4, 2023
- Speaker, “A View from the Private Sector,” Sanctions Roundtable for Greek Shipping, U.S. State Department / Middlebury Institute of International Studies / North Standard P&I Club, Athens, Greece, May 23, 2023
- Speaker, “Sanctions and Export Controls for the Shipping Sector,” Presentations to Ship Owners, Piraeus, Greece, May 24, 2023
- Panelist, “Implications of Sanctions Against Russia,” European Central Bank / Harvard Law School Symposium on Building the Financial System of the 21st Century, European Central Bank, Frankfurt, Germany, May 11, 2023
- Invited Speaker, “America at a Crossroads: Sanctions, Boycotts, and Economic Warfare – Do They Work?” JUDJ / Community Advocates, Los Angeles, CA, May 3, 2023
- Presenter, Association of Corporate Counsel – Hong Kong, “Russian Sanctions Update for Multinational Corporations – The Russian Oil Price Cap,” Hong Kong SAR, April 26, 2023
- Lecturer, “Sanctions 101: Where Have We Been and Where Are We Going?,” University of Pennsylvania Law School, Philadelphia, PA, April 20, 2023
- Panelist, “Sanctions and Export Controls: Regulatory Defense Considerations,” Georgetown Law Center, Washington, D.C., April 18, 2023
- Invited Speaker, “Understanding Sanctions and Export Controls on China,” Bank of America Emerging Markets Symposium – World Bank / IMF Spring Meetings 2023, Washington, D.C., April 13, 2023
- Invited Speaker, “Sanctions Overcompliance – The Private Sector’s Rationales for, and the Consequences of, Overcompliance,” North Carolina Journal of International Law 2023 Symposium: Sanctions After the Invasion of Ukraine, Chapel Hill, NC, March 24, 2023
- Panelist, ACAMS Sanctions Masterclass: Jurisdiction and Sanctions Regimes, February 28, 2023
- Panelist, Gibson Dunn webcast, “Bank Secrecy Act/Anti-Money Laundering and Sanctions Enforcement and Compliance Update,” February 28, 2023
- Panelist, AML and OFAC / Sanctions Enforcement Update, Tax Enforcement Without Borders, Bahamas Financial Services Board, Industry Development Series Seminar, Nassau, Bahamas, February 16, 2023
- Keynote Speaker, Economic Sanctions and Trade Controls in 2023, Gibson Dunn Presentation to French Industry, Paris, France, January 30, 2023
- Invited Speaker, Wirtschaftsbeirat Bayern Startseite (Bavarian Economic Advisory Board), Sanctions and Export Controls: Dealing with the Tsunami to Come, Munich, Germany, January 27, 2023

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