

Webcast: 2025 Sanctions and Export Enforcement Trends

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The U.S. enforcement environment governing international trade has intensified significantly in 2025. Since the start of the Trump Administration's second term, U.S. trade policy has seen a sharp resurgence in unilateral tariffs accompanied by the risk of False Claims Act scrutiny, alongside an emphasis on increased sanctions and export enforcement under the administration's America First Trade Policy. Enforcement activity continues to target specific countries and sectors, with sustained attention on sanctions, export controls, tariffs, and antiboycott regulations. From escalating tariff measures to multi-agency regulatory actions, understanding the evolving compliance expectations is more critical than ever. In this webinar, we examine the key enforcement trends, policy shifts, and practical compliance strategies shaping today's global trade landscape.

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PANELISTS: **F. Joseph Warin** is Co-Chair of Gibson Dunn's global White Collar Defense and Investigations Practice Group, and he is chair of the Washington, D.C. office's 200-person Litigation Department. Mr. Warin is ranked annually in the top-tier by Chambers USA, Chambers Global, and Chambers Latin America for his FCPA, fraud and corporate investigations experience. Mr. Warin has handled cases and investigations in more than 40 states and dozens of countries involving federal regulatory inquiries, criminal investigations and cross-border inquiries by international enforcers, including UK's SFO and FCA, and government regulators in Germany, Switzerland, Hong Kong, and the Middle East. He has served as a compliance monitor or counsel to the compliance monitor in three separate FCPA monitorships, pursuant to settlements with the SEC and DOJ.

Matt Axelrod is a nationally recognized white collar defense lawyer with deep criminal, national security, and export enforcement experience. Matt's practice focuses on internal investigations, crisis management, and white collar criminal defense for U.S. and multinational companies. Matt is the only person to have served as both the Assistant Secretary for Export Enforcement at the U.S. Department of Commerce's Bureau of Industry and Security (BIS) and Principal Associate Deputy Attorney General at the U.S. Department of Justice (DOJ) — a role described in the New York Times as "the most demanding job in all of DOJ." His over 25 years of combined government enforcement and white-collar defense experience are why clients consistently rely on Matt to help them navigate their most sensitive and complex matters. Matt co-chairs the firm's Sanctions and Export Enforcement practice, where he works closely with clients to conduct internal investigations, evaluate compliance programs, advise on voluntary self-disclosures, and defend against government-facing investigations. **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 and Sanctions and Export Enforcement Practice Groups.

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He is an experienced international lawyer with a focus on international trade compliance and white collar investigations, including federal and state economic sanctions enforcement, CFIUS, the Foreign Corrupt Practices Act, embargoes, and export and import controls. 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.

Christopher T. Timura is a partner in the Washington, D.C. office of Gibson Dunn and a member of the firm's International Trade Advisory and Enforcement, Sanctions and Export Enforcement, and White Collar Defense and Investigations Practice Groups. Christopher helps clients solve regulatory, legal and political problems that arise at the intersection of national security, trade, and foreign policy, and to develop corporate social responsibility (CSR) and environmental, social, and governance (ESG) strategies, policies, and procedures. His clients span sectors and range from start-ups to Global 500 companies. In 2022, Christopher was appointed to the Department of Commerce Bureau of Industry and Security Regulations and Procedures Technical Advisory Committee, where he chairs its export control enforcement working group. Most recently, Christopher was ranked in the Chambers Global 2024 guide for USA International Trade: Export Controls & Economic Sanctions. **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 and Sanctions and Export Enforcement Practice Groups. 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, national security reviews of foreign direct investment (CFIUS), customs, and anti-boycott laws. 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. © 2025 Gibson, Dunn & Crutcher LLP. All rights reserved. For contact and other information, please visit us at www.gibsondunn.com. Attorney Advertising: These materials were prepared for general informational purposes only based on information available at the time of publication and are not intended as, do not constitute, and should not be relied upon as, legal advice or a legal opinion on any specific facts or circumstances. Gibson Dunn (and its affiliates, attorneys, and employees) shall not have any liability in connection with any use of these materials. The sharing of these materials does not establish an attorney-client relationship with the recipient and should not be relied upon as an alternative for advice from qualified counsel. Please note that facts and circumstances may vary, and prior results do not guarantee a similar outcome.

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