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*2020 Mid-Year Sanctions and Export  
Controls Update*

October 15, 2020

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## MCLE Certificate Information

- Most participants should anticipate receiving their certificate of attendance via email approximately four weeks following the webcast.
- Virginia Bar Association members should anticipate receiving their certificate of attendance six weeks following the webcast.
- **Please direct all questions regarding MCLE to [CLE@gibsondunn.com](mailto:CLE@gibsondunn.com).**

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# Introduction

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# Major U.S. Sanctions Program Developments

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# Iran Sanctions Program

## Key Developments



*“We call on the international community to join us in crafting a stronger deal that addresses the full range of Iran’s malign behavior.”*

Sec. Mike Pompeo  
(August 20, 2020)

Throughout the past year, the Trump administration has continued to pursue a “**maximum pressure**” campaign against Iran, including:

### Targeting New Iranian Industries:

- In January 2020, President Trump authorized the imposition of sanctions on non-U.S. persons operating in Iran’s **construction, mining, manufacturing, or textiles** sector or **any other sector** determined by the Secretary of the Treasury.
- In July 2020, the United States terminated sanctions waivers that had allowed non-U.S. persons to engage in certain activities involving **Iran’s civil nuclear program**.

### Facilitating Humanitarian Trade:

- The **Swiss Humanitarian Trade Arrangement**—in which OFAC will provide “comfort letters” affirming that sales to Iran of food, agricultural commodities, medicine, and medical devices are not subject to U.S. sanctions—became operational.
- OFAC also issued a general license authorizing certain humanitarian transactions involving the **Central Bank of Iran**.

### Pursuing Re-imposition of UN Sanctions:

- UN embargo on **conventional arms sales** to Iran is set to expire on October 18, 2020.
- After an unsuccessful effort to extend the arms embargo, the United States in August 2020 notified the UN of its intent to trigger the “**snapback**” of UN sanctions on Iran under the Joint Comprehensive Plan of Action (“JCPOA”)—a move significantly complicated by the U.S. withdrawal from the agreement.

# Venezuela Sanctions Program

## *Key Developments*



U.S. sanctions currently target large segments of Venezuela's economy:

- Building on the earlier designations of the state-owned oil company **PdVSA** and the **Central Bank of Venezuela**, the United States in August 2019 sanctioned the entirety of the **Government of Venezuela**.
- U.S. and non-U.S. persons risk being designated for operating in the **gold, oil, financial**, and **defense and security** sectors of Venezuela's economy.



During 2020, the Trump administration has employed sanctions—plus a variety of other legal tools—to increase pressure on the Maduro regime:

- **Indictment of President Nicolás Maduro** and 14 other high-ranking officials, including Venezuela's Defense Minister and Chief Justice.
- Designation of two subsidiaries of the Russian state-run oil giant **Rosneft**.
- Stricter limits on activities of **joint ventures** between multinational energy firms and PdVSA.
- Rapid designations and de-listings of **shipping companies and vessels** involved in the Venezuela oil trade.
- Pressure campaign against maritime industry participants—including **flag registries, ship classification societies, insurers**, and **financial institutions**—that play even an indirect role in exporting Venezuelan oil.

*“The Trump Administration remains committed to targeting those who support the corrupt regime’s exploitation of Venezuela’s oil assets.”*

Sec. Steven Mnuchin  
(March 12, 2020)

# North Korea Sanctions Program

## *Key Developments*



U.S. has continued to mount pressure on the government of North Korea throughout 2020:

### **Issuance of Three Sanctions Advisories:**

- April 15, 2020 advisory on the [North Korean Cyber Threat](#), describing North Korea’s use of cybercrime to generate revenue for the regime and encouraging industries and individuals take protective measures
- May 14, 2020 advisory building upon previously published guidance relating to North Korea, Syria, and Iran’s [illicit shipping practices](#)
- September 1, 2020 advisory on [North Korean Ballistic Missile Procurement](#), identifying key entities involved in and deceptive techniques employed by North Korean ballistics proliferators

### **Amendments to North Korea Sanctions Regulations (“NKS”):**

- April 2020 amendments to existing sanctions made several changes to the NKS, including:
  - implementing secondary sanctions for certain transactions;
  - adding potential sanctions restricting the use of correspondent accounts for non-U.S. financial institutions;
  - prohibiting non-U.S. subsidiaries of U.S. financial institutions from transacting with the government of North Korea or any SDN designated under the NKS;
  - and revising the definitions of “significant transactions” and “luxury goods.”

### **Enforcement Actions:**

- 28 North Korean and 5 Chinese individuals indicted for facilitating over \$2.5 billion in illegal payments to support North Korea’s nuclear program
- OFAC brought an action against [Essentra FZE Limited](#) for violating the NKS by exporting cigarette filters to North Korea and by causing a U.S. bank to engage in transactions involving North Korea

# Syria Sanctions Program

## *Key Developments*



The U.S. continues to maintain pressure on the Assad regime in retaliation for human rights abuses committed against Syria's civilian population.

Previous sanctions focused on designating specific individuals determined to have committed such abuses as well as broad-based sanctions against the Syrian Government, its officials, and related entities. **New Developments include:**

- Implementation of the **Caesar Syria Civilian Protection Act of 2019**, which requires:
  - The President to implement certain secondary sanctions against foreign persons who provide support to the Government of Syria and others
  - The Treasury Secretary to determine whether the Central Bank of Syria is a primary money laundering concern
- **Designation** of individuals and entities under the Caesar Act and EO 13894, including the Syrian first lady and her son
- Promulgation of **new regulations** under EO 13894



*"We anticipate many more sanctions and we will not stop until Assad and his regime stop their needless, brutal war against the Syrian people and the Syrian government agrees to a political solution to the conflict."*

Sec. Mike Pompeo  
(June 17, 2020)

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# New Sanctions Developments

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# Overview of U.S. – China Developments

*A “whole of government” approach in 2020*



## Congressional Action:

**Uyghur Human Rights Policy Act** (Pub. L. 116-145), signed June 17, requires a report within 180 days identifying foreign persons responsible for human rights violations in XUAR.

**Hong Kong Autonomy Act** (Pub. L. 116-149), signed July 14, authorizes sanctions against CCP and Hong Kong leaders in response to the National Security Law.

## U.S. Department of State:

Imposed **visa restrictions** on CCP officials and immediate family members connected to human rights violations in Xinjiang and Hong Kong.

On May 28, 2020, the State Department **revoked its certification** of Hong Kong’s “high degree of autonomy” from China, an action that removes Hong Kong’s special status under the Hong Kong Policy Act of 1992.

State Department announced immediate policy change to end exports of **defense items** to Hong Kong.

On September 30, 2020, the State Department’s Bureau of Democracy, Human Rights, and Labor published its final **Guidance on Implementing the UN Guiding Principles for Transactions Linked to Foreign Government End-Users for Products or Services with Surveillance Capabilities**. The Guidance is designed to assist industry with end-user due diligence where a formal license requirement does not apply.

*Initiatives affecting trade with China are numerous. Below we highlight a few of the key recent developments.*

*Photo credit: Council on Foreign Relations cfr.org*

# Overview of U.S. – China Developments

A “whole of government” approach in 2020



## **Office of Foreign Assets Control:**

On July 1, OFAC, in conjunction with State, Commerce, and DHS, published the **Xinjiang Supply Chain Business Advisory** encouraging U.S. and international businesses to investigate the potential for forced labor in their supply chains with a nexus to XUAR.

Also in July, OFAC designated 4 persons under **Global Magnitsky Act sanctions** for alleged human rights abuses in Xinjiang.

In August, OFAC designated Chief Executive of HKSAR **Carrie Lam**, and 10 additional leaders in Hong Kong and PRC, for actions undermining Hong Kong’s democratic institutions. In September, OFAC published **FAQ 840** warning against direct negotiations with or entering contracts signed by governmental SDNs.

*China imposed unspecified counter-sanctions in response to both actions targeting U.S. congressional and executive branch leaders, the Congressional-Executive Commission on China, and several U.S.-based human rights and pro-democracy NGOs.*

## **U.S. Department of the Interior:**

On September 30, the President declared a national emergency with respect to the United States’ “undue reliance on foreign adversaries,” specifically referencing China, for rare earth elements and other “**critical minerals**.” EO 13953 suggests restrictions on imports, including tariffs and quotas, and directs the Department of Interior to take action to increase domestic supply.

*Photo credit: Council on Foreign Relations cfr.org*

# SDN List: Chinese Entities

## *Select Designations*



- **Shanghai Saint Logistics Limited (SSLL) (May 19, 2020):** Designated for allegedly acting as a general sales agent (GSA) for Iranian commercial airline Mahan Air, an entity sanctioned by OFAC and the State Department for transporting terrorists and lethal cargo throughout the Middle East in support of Iran’s IRGC and the Assad regime in Syria.
  - Since Treasury Secretary Mnuchin warned the aviation industry back in 2019 to “sever all ties and distance themselves immediately” from Mahan Air, OFAC has designated seven GSAs—including SSLL—for ties to the airline.
- **Xinjiang Public Security Bureau, Four Communist Party Officials (July 9, 2020):** Designated under Global Magnitsky sanctions for allegedly violating the human rights of an ethnic minority population, the Uyghurs, through mass arbitrary detention and physical abuse.
  - In response, China announced sanctions against U.S. entities and officials, including the U.S. Congressional-Executive Commission on China, U.S. Ambassador at Large for International Religious Freedom Sam Brownback, and Senator Marco Rubio (R-FL).
- **Xinjiang Production and Construction Corps, Two Communist Party Officials (July 31, 2020):** Also designated under Global Magnitsky sanctions for alleged human rights violations in Xinjiang.
  - Concurrent with this action, OFAC issued General License No. 2. to authorize certain wind down and divestment transactions until September 30 (later extended to November 30).

# Cuba Restricted List: FINCIMEX, Travel Companies

## *Select Designations*



- **June 12, 2020 Additions:** The following seven Cuban military-owned sub-entities—most operating in Cuba’s tourism industry—were added: (1) a financial services company (FINCIMEX); (2) three hotels (Hotel Marqués de Cardenas de Montehermoso, Hotel Regis, Playa Paraíso Hotel); (3) two diving centers (Varadero, Gaviota Las Molas); and (4) a marine park for tourists (Cayo Naranjo Dolphinarium).
  - FINCIMEX handles remittances to Cuba and processes foreign-issued credit cards, and is the exclusive Cuban representative of Western Union—the vendor of choice for thousands of Americans who send money to their Cuban relatives.
  - Secretary of State Pompeo alleged that the profits generated by these seven entities were being used to oppress the Cuban people and fund interference in Venezuela.
- **September 28, 2020 Addition:** American International Services (AIS), a subsidiary of FINCIMEX, was added. AIS processes remittances to Cuba, and is the provider of a popular debit card used by Cuban citizens that can be funded online by U.S. family members. The State Department urged those seeking to remit funds to Cuba to utilize mechanisms not controlled by the Cuban government.

# Section 7031(c): Corrupt Actors, Human Rights Violators

## *Select Designations*



- So far, in 2020, the State Department has designated **over 60 individuals** pursuant to Section 7031(c) of the Further Consolidated Appropriations Act of 2020. For example:
  - **IRGC Commander Hassan Shahvapour (Jan. 18, 2020)**: Designated for allegedly commanding military units that killed as many as 148 Iranian protestors in November 2019.
  - **Thirteen Former Salvadoran Military Officials (Jan. 29, 2020)**: Designated for alleged involvement in the killing of six Jesuit priests and two others on November 16, 1989 on the campus of Central American University.
  - **Roberto Sandoval Castañeda, Former Governor of a Mexican State (Feb. 28, 2020)**: Designated for allegedly misappropriating state assets and receiving bribes from narcotics trafficking organizations.
  - **Two Former Venezuelan Government Officials (July 28, 2020)**: Designated for accepting bribes and kickbacks, in exchange for awarding lucrative supply contracts for a state-owned electricity company.
  - **Former Libyan Foreign Ministry Official Andrew Wonplo (Sept. 10, 2020)**: Designated for alleged involvement in passport fraud scheme.

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# Other Sanctions Developments

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# Sanctions on the International Criminal Court



- In June, the President signed Executive Order 13928 authorizing sanctions against the **International Criminal Court (“ICC”)**, a treaty-based international legal institution located in the Hague. The ICC was formed by the Rome Statute, signed in 1998.
- The EO followed the decision of the ICC Court of Appeals in March 2020 to authorize the ICC’s Office of the Prosecutor to open an **investigation into alleged war crimes** committed by the Taliban, the Afghan security forces, and by U.S. government personnel in Afghanistan since 2003.
- In September, the Treasury Department announced the designation of two individuals, **Fatou Bensouda**, the Chief Prosecutor of the ICC, and **Phakiso Mochochoko**, head of the ICC’s Jurisdiction, Complementarity, and Cooperation Division.
- On October 1, OFAC published implementing regulations in new **Part 520** to 31 C.F.R. Chapter 5.
- Also on October 1, the Open Society Justice Initiative and four law professors filed a lawsuit in the S.D.N.Y. to enjoin the President and OFAC from enforcing the EO on the grounds that it **violates constitutional protections** for free speech and exceeds the President’s powers under IEEPA.

*“The United States is not a party to the ICC, and we will take all necessary measures to protect our citizens from this renegade, so-called court.”*

*- U.S. Sec’y of State Michael Pompeo*

*“The sanctions announced by the United States administration on 2 September against two Court staff members, including its Prosecutor, are unacceptable and unprecedented measures that attempt to obstruct the Court’s investigations and judicial proceedings.”*

*- Josep Borrell, High Representative of the EU for Foreign Affairs*

*Photo credit: United Nations un.org*

# Other Developments

## New York & Delaware



Department of  
Financial Services

New York State's **Department of Financial Services ("DFS")** regularly brings enforcement actions against banks for sanctions, money laundering, and related violations.

DFS brought several significant actions in 2020:

- \$35 million settlement with **Industrial Bank of Korea** for its failure to maintain adequate Bank Secrecy Act and anti-money laundering ("AML") compliance programs
- \$220 million settlement with **Bank HaPoalim** for knowingly facilitating clients' tax evasion
- \$150 million action against **Deutsche Bank** for its failure to flag suspicious activities involving Jeffrey Epstein's accounts as well as its failure to adequately monitor the activities of its clients Danske Estonia and FBME Bank, despite known risks associated with both banks

**OFAC and Delaware's Department of Justice** entered into a partnership agreement to facilitate information sharing between the agencies and coordination of investigations.



*New DFS General Counsel, Richard Weber, has significant background in sanctions and AML compliance*

PARTNERSHIP AGREEMENT

BETWEEN

THE OFFICE OF FOREIGN ASSETS CONTROL  
OF THE U.S. DEPARTMENT OF THE TREASURY

AND

DELAWARE DEPARTMENT OF JUSTICE

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# Export Controls

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# Export Controls

## *Emerging & Foundational Technologies and New Controls*



### **“Emerging” Technology – Awaiting New Controls**

- The Export Controls Reform Act of 2018 (“**ECRA**”) required BIS to identify and impose new export controls on technologies that are essential to U.S. national security but are not currently subject to restrictive controls.
- After a two-year interagency process and approval by the relevant multilateral bodies, BIS has begun identifying and imposing export controls on new categories of emerging technologies, including most recently:
  - i. hybrid additive manufacturing / computer numerically controlled tools;**
  - ii. computational lithography software designed for the fabrication of extreme ultraviolet masks;**
  - iii. technology for finishing wafers for 5nm production,**
  - iv. forensics tools that circumvent authentication or authorization controls on a computer and extract raw data;**
  - v. software for “monitoring and analysis of communications and metadata acquired from a telecommunications service provider via a handover interface”; and**
  - vi. sub-orbital aircraft.**
- We expect BIS to continue identifying and controlling new categories of emerging technologies.

# Export Controls

## *Emerging & Foundational Technologies and New Controls*



### **“Foundational” Technology – Initiating Interagency Process**

- BIS released an Advanced Notice of Proposed Rulemaking (“**ANPRM**”) on August 26 to solicit the public comments on the type of technologies that should be subject to ECRA-required controls on “foundational” technologies.
- The ANPRM explicitly notes that **countries subject to U.S. arms embargoes**, a list which includes **China**, are likely to require export licensing going forward for any foundational technologies.
- The ANPRM also suggests that we should at least expect expanded controls on **semiconductor manufacturing equipment** and associated software tools, lasers, sensors, and underwater systems.

### **0Y521 Series Classification for Geospatial Imagery Software**

- In addition to its efforts to identify and classify “emerging and foundational technologies,” BIS started the new year by deploying a rarely-used tool to respond to emergent national security concerns regarding the export of certain AI software designed to automatically identify selected items from geospatial images.
- The **0Y521 series** of Export Control Classification Numbers (“ECCNs”) allows BIS to quickly impose temporary export restrictions on uncontrolled items that present a military or intelligence advantage.
- The controls on covered geospatial imagery software will last at least until January 2021, and the United States will work with its allies over the course of 2020 to impose permanent, multilateral controls on this software.

# Export Controls

## *Military End Use(r) Rule*



- The **Military End Use / User Rule** previously required a license for the export of “**covered items**” if the exporter knew or had reason to know that the items were intended either for a “**military end user**” in Russia or Venezuela or for a “**military end use**” in China, Russia, or Venezuela.
- This rule was expanded on **June 29** in four important respects to cover new items, end uses and end users:
  - 1. Expanded list of covered items**
    - The new list of covered items includes certain technology and software relating to materials processing, electronics, telecoms, information security, sensors and lasers, and propulsion.
  - 2. Expanded military end uses subject to control**
    - While the prior formulation of the rule captured items exported to “produce,” “develop,” or “use” military items, the new rule also includes items that “support or contribute to” those functions.
    - The list of functions considered “military end uses” is also broadened to include the operation, installation, maintenance, repair, overhaul, or refurbishing of military items.
  - 3. Restricted exports to Chinese military end users**
    - The prior version of the rule only covered exports to military end users in Russia and Venezuela. The new rule also requires licenses for exports of covered items to Chinese military end users.
  - 4. Broadened reporting requirement for exports to China**
    - Electronic Export Information (“EEI”) is required for exports of items described on the Commerce Control List (“CCL”) to China, Russia, and Venezuela regardless of their value, end use, end user, or whether a license is required for their export.

# Export Controls

## *Narrowed License Exceptions*



- The same concerns regarding military-civil fusion that motivated the expansion of the Military End Use / User Rule also prompted BIS to remove and consider amending two important export license exceptions.

### **License Exception Civilian End Users (“CIV”)**

- On June 29, along with the expansion of the Military End Use / User Rule, BIS removed License Exception CIV, which previously allowed certain items controlled only for national security reasons to be exported to countries presenting national security concerns, if those items were intended only for civil end users and civil end uses.
- National security concerns controls for a large category of items to a large group of countries—meaning License Exception CIV previously had relatively broad applicability.
- By removing License Exception CIV, the Commerce Department now requires a license for the export of items subject to the EAR and controlled for NS reasons to D:1 countries.

### **License Exception Additional Permissive Reexports (“APR”)**

- License Exception APR allows unlicensed reexports of certain items from a trusted ally with a similar export controls regime to countries that only present national security concerns (as opposed to nuclear or chemical weapons proliferation).
- BIS sought public comments on proposed changes to the exception because of concerns about variations in how the U.S. and its international partners perceive the threat caused by the policy of military-civil fusion pursued in certain countries.

# Export Controls

## *Targeting Huawei*



- The **Direct Product Rule** makes certain foreign-made items subject to U.S. export controls if they are made from certain types of U.S.-origin software or technology.
- On May 15, 2020, BIS announced a new **Huawei-specific Direct Product Rule**, designed to increase the range of items subject to U.S. restrictions on trade with Huawei.
- That rule was amended on August 17 to further restrict the category of items that are subject to the broad prohibitions targeting Huawei.
- The new rule makes certain foreign-made items subject to U.S. export controls targeting Huawei if the item is provided with knowledge that
  - i. The item will be incorporated into or used to produce or develop an item made, bought, or ordered by Huawei or its Entity List designated affiliates; or
  - ii. Huawei or any of its designated affiliates will participate in a transaction involving the item.
- Items that meet either of these two criteria are not only subject to U.S. export controls, but because of Huawei's designation to the Entity List, are also effectively prohibited from being provided to Huawei.
- Together with Huawei's Entity List designation, this new rule will significantly restrict Huawei's ability to receive critical components and technology from U.S. and non-U.S. suppliers.

# Export Controls

## *Tightening Controls on Hong Kong*



- In response to China’s Hong Kong National Security Law, President Trump announced on May 29 that the U.S. would reevaluate its export controls imposed on Hong Kong to revoke any preferential treatment given to the territory over mainland China.
- On July 30, BIS announced that it would be **suspending license exceptions** that treated Hong Kong differently than mainland China.
- As a result of the suspension, license exceptions that previously permitted unlicensed exports, reexports, or transfers to or within Hong Kong, but not to mainland China, no longer authorizes exports to Hong Kong. Such exports will now require specific authorization from BIS.
- License exceptions affected (but not necessarily unavailable) may include those pertaining to certain types of technology and software (“**TSR**”), replacement of parts and equipment (“**RPL**”), aircraft, vessels, and spacecraft (“**AVS**”), gifts (“**GFT**”), and baggage (“**BAG**”).
- An **Executive Order** announced on July 14 will likely require further leveling of treatment for exports to Hong Kong and mainland China.



# Export Controls

## *Human Rights-Based Entity List Designations*

- BIS is authorized to **designate to the Entity List** companies and other organizations for acting counter to U.S. national security and foreign policy interests, and has historically have been focused on regional stability, counterproliferation, anti-terrorism concerns, and violators of U.S. sanctions and export controls.
- Beginning in October of last year, however, BIS added **human rights** to this list of concerns, particularly as they relate to the Chinese government's actions in the XUAR and other regions of China directed at Uyghurs, Kazakhs, and other members of Muslim minority groups in China.
- On **October 9, 2019**, the ERC placed the XUAR People's Government Public Security Bureau, eighteen of its subordinates, and an additional eight businesses on its Entity List, thereby restricting their access to American exports.
- On **June 5, 2020**, BIS placed eight additional businesses and one governmental institute on the Entity List on the explicit basis of their human rights violations. Those added to the Entity List are largely surveillance or security companies, including certain artificial intelligence start-ups.
- Most recently, on **July 22**, BIS designated eleven additional entities. Nine appear to be in the apparel, accessories, and manufacturing sectors and were designated due to the ERC's finding that they were using forced labor. Two other entities were added for their involvement in conducting genetic analyses used to further the repression of Muslim minority groups in the XUAR.

# Export Controls

## *TikTok and WeChat – Targeting Chinese Mobile Apps*



- In November 2019, the Committee on Foreign Investment in the U.S. (“**CFIUS**”) began reviewing the acquisition by ByteDance, TikTok’s Chinese parent company, of Music.ly, TikTok’s predecessor, to determine whether that transaction presented national security concerns.
- Before the CFIUS case concluded, President Trump intervened in early August, announcing in two executive orders that the Commerce Department would impose restrictions not only on **TikTok**-related transactions but also on transactions involving **WeChat**—another Chinese-owned mobile app.
- The announcement, which relied on a national emergency declared in 2019 regarding the information and communication technology and services supply chain, represented an unprecedented use of the President’s authority under the International Emergency Economic Powers Act (“**IEEPA**”).
- The President also announced that, at CFIUS’s recommendation, he would **require ByteDance to sell** TikTok, sparking a public bidding war for the app that Oracle and Wal Mart appear to have ultimately won.
- In early September, the Commerce Department announced that it would be prohibiting U.S. person involvement in a list of transactions relating to the distribution or support of the TikTok and WeChat mobile apps.
- Before the restrictions could come into effect, federal judges in two cases blocked their implementation on the grounds that the President may have overstepped his IEEPA authorities and violated users’ first amendment rights.

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# Upcoming Webcasts & Today's Panelists

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# Upcoming Gibson Dunn Webcasts

- **October 16 | Trends in Government Investigations into Foreign Influence in the Private Sector: A discussion of FARA and related provisions** | 12:00 – 1:00 pm EDT  
If you are interested in attending, please [click here](#).
- **October 22 | False Claims Act Updates for Drug and Device Manufacturers** | 12:00 – 1:30 pm EDT  
If you are interested in attending, please [click here](#).
- **October 27 | In-house Guidance for Managing Non-U.S. Antitrust Investigations** | 12:00 – 1:30 pm EDT  
If you are interested in attending, please [click here](#).
- **November 4 | False Claims Act Updates for Health Care Providers** | 12:00 – 1:30 pm EST  
If you are interested in attending, please [click here](#).
- **November 9 | Spoofing: What it is, where it's going** | 12:00 – 1:00 pm EST  
If you are interested in attending, please [click here](#).
- **November 12 | Managing Internal Audit and Investigations** | 11:30 – 12:30 pm EST  
If you are interested in attending, please [click here](#).
- **November 16 | Corporate Compliance and Sentencing Guidelines** | 12:00 – 2:00 pm EST  
If you are interested in attending, please [click here](#).

\* Continued on next page

- **November 18 | SEC Enforcement Focus on COVID-19 Issues and Recent Accounting Cases** | 12:00 – 1:15 pm EST

If you are interested in attending, please [click here](#).

- **December 2 | What's next? The Legislative and Policy Landscape After the 2020 Election** | 12:00 – 1:00 pm EST

If you are interested in attending, please [click here](#).

- **December 3 | FCPA 2020 Case Round-Up** | 12:00 – 1:30 pm EST

If you are interested in attending, please [click here](#).

- **December 8 | Congressional Investigations and Oversight Post-Election** | 12:00 – 1:00 pm EST

If you are interested in attending, please [click here](#).

- **December 10 | International Anti-Money Laundering and Sanctions Enforcement** | 12:00 – 1:30 pm EST

If you are interested in attending, please [click here](#).

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