

Economic Sanctions

Multi-disciplinary advice for financial institutions and corporations on regulatory compliance, internal investigations, and enforcement actions

The extensive new international sanctions against Russia in response to the situation in Ukraine are a reminder that sanctions compliance is a critical issue for financial and non-financial companies around the world. The risks of noncompliance are complex and rapidly evolving: new sanctions are issued frequently, and usually with no advance notice; sanctions authorities often take divergent approaches to implementation; and enforcement actions are on the rise.

How We Can Help

FRA's highly skilled team includes experts with broad and deep sanctions experience, including a former OFAC Chief Counsel, and a former OFAC Associate Director for Enforcement. We have expertise across compliance risk management, investigations, enforcement, monitorships, and data analytics, and offer our clients a holistic response to sanctions risk management.

HOLISTIC RISK ASSESSMENT AND COMPLIANCE PROGRAM REVIEWS

Sanctions compliance risk assessments and reviews are a critical tool in identifying and helping to mitigate sanctions compliance risks. We work with our clients to review their sanctions governance, risk assessments, internal controls, assurance, and staff training. We perform look-back reviews to identify any historic issues.

RESPONSES TO REGULATORY OR ENFORCEMENT ACTIONS

From assistance with responding to inquiries and requests from regulators, to assessment of financial gain in connection with settlements, we have decades of specialised experience helping clients navigate regulatory investigations and enforcement.

INDEPENDENT INVESTIGATION SUPPORT

We perform, and support law firms in, independent investigations into potential sanctions breaches and remediation of any issues identified.

SANCTIONS RISK ANALYTICS

FRA's sanctions analytics tools combine our investigations experience with our understanding of sanctions lists and banking and corporate operations. These tools enable "speed to light" in identifying third-party interactions and transactions/payments constituting potential violations.

EVALUATION AND TESTING OF AUTOMATED SANCTIONS SCREENING SOLUTIONS

We can evaluate sanctions screening arrangements, both at the outset of a business relationship and on an on-going basis. We map the process, assess data completeness and stress-test output in a test environment. We also advise on optimization techniques to reduce generation of false alerts.

MARKET-LEADING COMPLIANCE MONITORSHIP SUPPORT

FRA's extensive experience enables us to support either the monitor or the company undergoing monitorship with the variety of forensic accounting skills and compliance expertise needed to achieve and demonstrate regulatory compliance.

THEME-BASED SANCTIONS RISK IDENTIFICATION

We have deep experience as to schemes employed to evade sanctions detection; our experts can assist in identifying sanctions circumvention techniques.

LITIGATION AND ARBITRATION SUPPORT

Our seasoned experts have extensive and specialised experience with respect to litigation and arbitration. With our multi-disciplinary approach, we can analyse complex funds flows, review correspondence and accounting records, and quantify losses.

75+

COUNTRIES WHERE WE HAVE WORKED

160+

SPECIALISTS

35+

LANGUAGES SPOKEN IN-HOUSE



Why FRA

A TEAM OF EXPERTS TAILORED TO YOUR UNIQUE NEEDS

We bring together the best team suited to each client and engagement, combining the expertise and skillsets of accountants, lawyers, former bankers and regulators, traders, audit and compliance professionals, financial analysts, and data analytics experts as required.

AN AGILE APPROACH

Our approach to staffing is nimble and responsive. As we do not provide audit services, we are generally free of conflicts in this regard.

ONE GLOBAL FIRM

Our 10 global offices operate as one firm with seamless integration of our forensic accounting, data governance and data analytics teams to ensure a consolidated and efficient approach to solving clients' problems.

Our Track Record

BANK LEUMI

Review of OFAC, AML and FATCA compliance and corporate governance as consultant to the New York Department of Financial Services-appointed monitor.

LUOKUNG TECHNOLOGY CORP

Engaged by counsel to provide expert witness services in a lawsuit by the company challenging its designation under the Trump Administration's "Chinese Communist Military Company" economic sanctions (since replaced by the Biden Administration's "Chinese Military Company" sanctions). The client won a rare injunction from the court prohibiting the government from maintaining the action.

CONSUMER GOODS RETAILER

Retained by a global consumer goods retailer with operations in locations presenting high sanctions risk, to review sanctions policies and procedures, compare alignment of policies to operations, and identify and review third parties (suppliers, consumers, distributors) presenting potential sanctions risk.

A US DEFENSE CONTRACTOR

FRA performed an affordability analysis (balance sheet, cash flow and P&L analysis) for counsel to a U.S.-based defense company for use in negotiations with OFAC relating to penalties for supplying goods to designated entities and individuals

EXPERIENCE WITH REGULATORS

- US Treasury, Office of Foreign Assets Control (OFAC)
- US Department of Justice (DOJ)
- US Securities and Exchange Commission (SEC)
- UK Financial Conduct Authority (FCA)
- UK Serious Fraud Office (SFO)
- UK Office of Financial Sanctions Implementation (OFSI)

CASE STUDY

Sanctions Investigation: Financial Institution

FRA conducted an investigation on behalf of a financial institution and their legal counsel relating to potential breaches of OFAC sanctions. The analysis interrogated SWIFT message data to identify links between disconnected transactions involving sanctioned parties and the actual movement of associated funds via US financial institutions. The identified transactions were provided to regulators and formed an integral part of the settlement agreement between OFAC and our client.

CONTACT US

Charlie Steele Partner, Washington DC
+1 (202) 355 1258
csteele@forensicrisk.com

Simon Taylor Partner, London
+44 (0)20 7269 5843
staylor@forensicrisk.com

Weng Yee Ng Partner, London
+44 20 7269 7833
wng@forensicrisk.com

Derek Patterson Principal, London
+44 (0)20 7269 7836
dpatterson@forensicrisk.com

Sarah Wrigley Director, London
+44 (0)20 7269 7827
swrigley@forensicrisk.com