



8<sup>th</sup> Advanced Forum on

# Economic Sanctions ENFORCEMENT & COMPLIANCE

Ensuring Compliance with Rapidly Changing Restrictions amid Increased Federal and State Enforcement Risks

April 28-29, 2015 • Washington Plaza • Washington, DC

## Hear from Senior Government Officials:

Davin Blackborrow  
Assistant Director for Licensing Office of Foreign Assets Control  
**U.S. Department of the Treasury**

Matthew Borman  
Deputy Assistant Secretary for Export Administration  
Bureau of Industry and Security  
**U.S. Department of Commerce**

Edward Fishman  
Iran and Russia Sanctions Officer  
Office of Economic Sanctions Policy and Implementation  
**U.S. Department of State**

Andrea Gacki  
Associate Director, Compliance & Enforcement  
Office of Foreign Assets Control  
**U.S. Department of the Treasury**

Sean O'Malley  
Vice President and Deputy Chief Investigator, Enforcement Division  
**Federal Reserve Bank of New York**

Polly Greenberg  
Chief, Major Economic Crimes Bureau  
**New York County District Attorney's Office**

Paul Pavwoski  
Office of Sanctions Policy and Implementation  
Bureau of Economic and Business Affairs  
**U.S. Department of State**

Corey Phelps  
Sanctions Compliance Officer  
Office of Foreign Assets Control  
**U.S. Department of the Treasury**

Tracy L. Price  
Assistant Director, FCPA Unit, Enforcement Division  
**U.S. Securities & Exchange Commission**

## What's NEW for 2015?

- ✓ **More Coverage on Russia/Ukraine Sanctions**
  - In-Depth Coverage of Tier 3 Sector Sanctions
  - How to Apply the 50% Ownership Guidelines
- ✓ **New Risks and Opportunities in Light of Easing of Cuba Sanctions**
- ✓ **What the Extension of Iran Sanctions Means for Your Organization**
- ✓ **Best Practices to Integrate Economic Sanctions and AML Compliance**
- ✓ **Compliance 2.0: How to Keep Your Sanctions Program Current amid a Constantly Changing Environment**

Earn CLE/CPE Credits

## Participate in Timely Discussions on Advanced Topics Including:

- Enforcement Trends after BNP Paribas
- How to Coordinate your Financial Crime Intelligence Data Collection
- Weighing the Pros and Cons of Centralized and De-Centralized Compliance Programs
- What is the Current Focus of New York State Sanctions Enforcement
- How Omnibus Rules are Changing Custody Requirements
- Navigating Economic Sanctions Risks when Working with Complex Financial Products

## Share Compliance Best Practices with Senior Executives from:

3M	CIBC	HSBC
AIG	Crédit Suisse	JPMorgan Chase
American Express	GE Capital	Koch Companies Public Sector
BMO Financial Group	General Motors	Morgan Stanley
BNP Paribas	General Reinsurance	

## Increase Your Knowledge by Attending Our Interactive Working Groups – April 27, 2015

- A** Comprehensive Overview of U.S. Economic Sanctions Regulatory Regimes and The Essential Elements of a Robust OFAC Compliance Program
- B** Focus on Russia – Everything You Need to Know about Economic Sanctions Against Russia: A Deep Dive into Key Restrictions and Permitted Activities

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## ECONOMIC SANCTIONS IN THE HEADLINES:

***With Russia on Brink of Recession,  
Putin Faces 'New Reality'***  
– NY Times

***Iran Nuclear Talks Extended for 7 Months***  
– Washington Post

***Obama Moves to Restore Ties to Cuba***  
– WSJ

***US Slaps More Sanctions on  
North Korea after Sony Attack***  
– Reuters

***US to Impose Sanctions on  
Venezuela Officials***  
– Financial Times

ACI's **Advanced Forum on Economic Sanctions Enforcement and Compliance** is widely known as the most comprehensive economic sanctions conference for both networking and content. The 2015 program will feature senior government officials, seasoned in-house representatives and expert private counsel. The program will be current- and will be updated as new sanctions restrictions are added or reduced. Expand your knowledge with the latest guidance on economic sanctions restrictions on Russia/Ukraine, Iran, Canada, Cuba, Myanmar, Venezuela, and North Korea.

### Benchmark your compliance program during candid discussions on:

- Factors to centralize or decentralize your program
- How much due diligence is enough
- How to protect your organization from potential liability
- Pros and cons of internal investigations and voluntary disclosures
- Responding to the increased coordination among government agencies
- Dangers of boilerplate language in M&A contracts
- Best practices for managing compliance during a period of transition

### More Time to Network with Your Peers

- Dedicated Tracks – Customize your program
- More Government Speakers from Treasury, State, Commerce, DOJ, Federal Reserve and New York State
- New International Speakers from Russia, Canada, England and Italy.
- Champagne Roundtables to Discuss Topics That Matter to You
- Interactive Audience Polling

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Select panel sessions will incorporate anonymous polling to collect audience feedback and identify compliance best practices. Polling is designed to give audience members a unique look into how industry is dealing with challenges related to Russia Sanctions, Doing Business in Cuba, Facilitation Payments and Compliance Programs.

With individual keypads, the audience will be able to respond to panel questions candidly, enabling you to get honest feedback about compliance and the formulation of corporate economic sanctions strategy.

## WHO ATTENDS THIS EXCLUSIVE CONFERENCE

### Vice Presidents, Directors and Managers of

- OFAC Compliance
- Global Sanctions
- AML
- Financial Crime
- Regulatory Compliance
- Export Controls
- International Trade Compliance

### - Government Relations

- Internal Controls

### Corporate Counsel

- Sanctions Counsel
- International Trade Counsel
- Trade and Regulatory Counsel
- Export Compliance Counsel

### Outside Counsel Specializing in

- Economic Sanctions
- OFAC
- International Trade Law
- Export Controls
- Regulatory Compliance
- Banking/Insurance
- AML, Fraud

## Pre-Conference Workshops | Monday, April 27, 2015

9:00 am to 12:30 pm – Registration Begins at 8:30 am

### **A** Comprehensive Overview of U.S. Economic Sanctions Regulatory Regimes and the Essential Elements of an Effective Compliance Program

*Michael Zyrnick*

Head of Global Sanctions Investigations and Analytics  
HSBC North American Holdings (Washington, DC)

*David Stephens*

Vice President, Global Sanctions  
American Express (New York, NY)

Get updated on the latest U.S. economic sanctions restrictions in effect today. Participants of this interactive and practical workshop will receive an overview of the sanctions in each of the principal targeted countries with a recent focus on recent developments. Topics covered will include:

- Learn the nuts and bolts of OFAC comprehensive and limited sanctions on Burma, Cuba, Iran, North Korea, Russia Syria, and Sudan operate
- Understand how OFAC's list-based programs include a range of subtle nuances that can expose U.S. persons to civil and criminal liability
- Discover how statutory exemptions, general licenses, and specific licenses allow for the processing of otherwise prohibited activity
- Review OFAC required reporting requirements and the Economic Sanctions Enforcement Guidelines
- Learn how best practices in the development of a global sanctions compliance program can protect you against enforcement actions
- Participate in numerous case studies applying U.S. sanctions to real-life situations
- Learn how to test your program for accuracy
- 10 critical elements that should be in every global sanctions compliance program

1:30 pm to 5:00 pm – Registration Begins at 1:00 pm

### **B** Focus on Russia – Everything You Need to Know about Economic Sanctions Against Russia/Ukraine: A Deep Dive into Key Restrictions and Permitted Activities

*Elizabeth Davy*

Partner  
Sullivan & Cromwell (Washington, DC)

*Alexander Bychkov*

Partner  
Baker and McKenzie – CIS, Ltd (Moscow, Russia)

The economic sanctions against Russia/Ukraine present a new type of restrictions. More than just country imposed sanctions, there are sector and ownership restrictions too. This primer will review the new restrictions in great detail. This session will be small and interactive so you can bring your questions and leave with answers that are important for your company or clients. Topics covered will include:

- Overview of U.S. Executive Orders 13660, 13661, and 13662 and EU restrictive measures concerning Ukraine
- Regulatory implications for categories of persons subject to sanctions by U.S. authorities
- How to screen effectively for 50% or more ownership
- Managing OFAC's guidance on persons whose property is blocked
- Comprehensive review of OFAC and EU Ukraine sectorial prohibitions
- Managing OFAC's guidance on persons whose property and interests in property are blocked
- Insights into threats and calls for counter sanctions in Russia
- How to revise your sanctions policies, procedures and protocols to reduce risk

### Continuing Legal Education Credits



Accreditation will be sought in those jurisdictions requested by the registrants which have continuing education requirements. This course is identified as nontransitional for the purposes of CLE accreditation.

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ACI certifies that this activity has been approved for CLE credit by the State Bar of California.

You are required to bring your state bar number to complete the appropriate state forms during the conference. CLE credits are processed in 4-8 weeks after a conference is held.

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### Continuing Professional Education Credits



American Conference Institute (ACI) will apply for Continuing Professional Education credits for all conference attendees who request credit. There are no pre-requisites and advance preparation is not required to attend this conference.

Course objective: Update on the latest economic sanctions restrictions and procedures to prevent inappropriate payments. Recommended CPE Credit: 15.5 hours. An additional 4.0 credit hours will apply to each workshop.

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To request credit, please check the appropriate box on the Registration form.

# Main Conference Day 1 Tuesday, April 28, 2015

7:30 Registration Begins and Continental Breakfast

8:30 **Opening Remarks from Conference Co-Chairs**

*Brandon Reddington*  
Global Sanctions Officer  
Credit Suisse (Washington, DC)  
Former Senior Sanctions Advisor – Securities, OFAC

*David Stephens*  
Vice President, Global Sanctions  
American Express (New York, NY)

8:45 **The Cost of Non-Compliance Gets Larger and Larger: What We Can Learn From the Huge Settlements of the Past Few Months**

*Andrea Gacki*  
Associate Director, Compliance & Enforcement  
Office of Foreign Assets Control  
U.S. Department of the Treasury (Washington, DC)

*Tracy L. Price*  
Assistant Director, FCPA Unit, Enforcement Division  
U.S. Securities & Exchange Commission (Washington, DC)

*William M. McGlone*  
Partner  
Latham & Watkins LLP (Washington, DC)

- Take-aways from the big settlements – BNP Paribas, Fokker Services, and other recent cases: common features and elements
- Increased coordination across government agencies, including expanding role of Departments of Justice and State as well as federal authorities
- Emerging theories of criminal liability, including “causing” violations by non-U.S. entities
- How does the government assess and take into account “cooperation” for settlement purposes?
- The pros and cons of internal investigations and voluntary disclosures
- Penalty and prosecution risks for employees and officers of corporate enforcement targets
- Enhancements to internal compliance programs in response to settlements

9:45 **Focus on Russia: Interactive Panel on 50% Rule Scenarios to Avoid a Violation of the Ownership Rule**

*Edward Fishman*  
Iran and Russia Sanctions Officer  
Office of Economic Sanctions Policy and Implementation  
U.S. Department of State (Washington, DC)

*Chad Thompson*  
Attorney, Global Ethics & Compliance Center  
General Motors Company (Detroit, MI)

*Katherine Haennicke*  
Senior Counsel and Vice President – Legal, Corporate & Compliance Group  
BMO Financial Group (Chicago, IL)

*Cari N. Stinebower*  
Partner  
Crowell & Moring LLP (Washington, DC)

This new format will allow the audience to participate in scenarios that involve complex screening decisions. Applying the Russia/Ukraine 50% ownership rules poses unique challenges as it is necessary to aggregate the ownership interest of the SDNs. This practical panel will present 3 separate fact patterns based on real case studies we will discuss the steps to consider in this process. This session will review:

- How to figure out 50% ownership with multiple minority partners
- How to resolve US origin goods being exported from EU to Russia (Oil and Gas)
- M & A: Existing loan being sold to US partner where there are sectorial sanctions on the borrower

10:45 Networking Break

11:00 **Focus on Russia: Dissecting the Complexities of the New Tier Three Sectorial Sanctions on Capital Markets, Energy, and Defense Industries**

*Andy Gelinas*  
Sanctions Counsel  
Morgan Stanley (New York, NY)

*Nadia Leonova*  
Director  
Deloitte Financial Advisory Services (Moscow, Russia)

*John B. Reynolds III*  
Partner  
Davis Polk & Wardwell LLP (Washington, DC)

- “Calibrated” sanctions and shifting U.S. foreign policy
- SDNs, SSILs, comprehensive territorial sanctions and unrecognized annexations
- Debt, equity, financing and extensions of credit: 90-days, 30-days, or never?
- Modifying loan terms: waivers, amendments, rating changes, payment acceleration, syndicated loans
- Intricacies and evolution of OFAC’s “50% rule”
- Energy projects in the real world of falling oil prices: “Arctic,” “offshore,” “deepwater,” “shale” and oil v. gas projects
- Interpreting FAQs
- Compliance responses and reputational risks on (at least) three continents

12:00 **The New Cuba Business Landscape from a Sanctions Perspective – How Initiatives to Restore Diplomatic Relations with Cuba will Affect your Business**

*Matthew Borman*  
Deputy Assistant Secretary for Export Administration  
Bureau of Industry and Security  
U.S. Department of Commerce (Washington, DC)

*Corey Phelps*  
Sanctions Compliance Officer  
Office of Foreign Assets Control  
U.S. Department of the Treasury (Washington, DC)

*Greta Lichtenbaum*  
Partner  
O’Melveny & Myers LLP (Washington, DC)

*Maura Rezendes*  
Senior Counsel  
Allen & Overy LLP (Washington, DC)  
Former Chief, Office of Enforcement, OFAC

- Changes to OFAC’s Cuba Assets Control Regulations and the Export Administration Regulations
- Identifying what is not permitted, and the substantial prohibitions that remain
- Opportunities and continued restrictions for key U.S. business sectors, including hospitality/tourism, agriculture, energy, telecommunications, financial services, and insurance
- Compliance challenges that accompany a partial lifting of sanctions
- What further changes would require congressional action
- What lies ahead – predictions for the future

12:45 Networking Luncheon for Attendees and Speakers

RUSSIA

CUBA



RUSSIA

2:00–2:45

**Track A**

**Compliance 2.0: Developing Your Game Plan to Keep Your Sanctions Program Current and Ensure that Your Company is Prepared for Future Restrictions**

*Wes Edwards*  
Deputy General Counsel – Investigations  
Koch Companies Public Sector, LLC  
(Wichita, KS)

*Ronald Meltzer*  
Partner  
Wilmer Cutler Pickering Hale and Dorr LLP  
(Washington, DC)



- OFAC precedents and likely trends for changing the scope of existing sanctions
- Key compliance issues and risks during a period of transition/change
- Best practices in managing compliance during a period of transition/change
- Compliance case studies on Libya, Myanmar, Russia and Cuba
- Future developments and how to prepare for them

**Track B**

**Navigating Risks with Complex Financial Products including Derivatives and Letters of Credit**

*Brandon Reddington*  
Global Sanctions Officer  
Credit Suisse (Washington, DC)  
*Former Senior Sanctions Advisor – Securities, OFAC*

*Eric Kadel Jr.*  
Partner  
Sullivan & Cromwell LLP  
(Washington, DC)

- Due diligence on counterparties and the transaction to identify sanctions risks
- Review of OFAC guidance to the securities industry
- Best practices in identifying and addressing compliance risks in complex products
- Methods to support due diligence and address risks through contractual terms
- Specific applications in the context of Ukraine-related sectoral sanctions, including review of OFAC FAQ guidance

2:45–3:30

**Track A**

**How to Minimize Facilitation Risks When Dealing with a New or Established Client**

*Kerri-Ann Bent*  
Vice President,  
Financial Crime Sanctions Advisory  
Barclays Corporate and Investment Bank  
(New York, NY)

*Alba J. Rovira-Paoli*  
Managing Director and Head of Alerts –  
Global Sanctions Compliance  
BNP Paribas (New York, NY)



*Kathleen C. Little*  
Partner  
Vinson & Elkins LLP (Washington, DC)

- Methods to attempt to resolve conflicting data discovered during due diligence
- How do you determine whether a client is “controlled” by a designated entity and when does it matter
- What do you do when banks repeatedly reject transactions despite the fact that you find no evidence to indicate that the client is subject to sanctions
- How to handle the lack of reliable publicly available information when dealing with state affiliated clients

**Track B**

**Focus on Securities Industry Risks and Changing Custody Requirements**

*Stephanie Rice*  
Vice President Global Sanctions Compliance  
JPMorgan Chase (New York, NY)

*Paul Marquardt*  
Partner  
Cleary Gottlieb Steen & Hamilton LLP (Washington, DC)

- Impact of Clearstream investigation on the securities industry
- Best practices for conducting due diligence on your clients
- Interplay with AML diligence
- Implications beyond securities custody

3:30 Networking Break

3:45–4:30

**Track A**

**Focus on Canada: Deciphering the Interaction of Canadian Sanctions with US and EU Sanctions Regimes**

*Milos Barutciski*  
Partner, Co-Head of International Trade  
Bennett Jones LLP (Toronto, ON)

*John Boscariol*  
Partner  
McCarthy Tetrault LLP (Toronto, ON)

- Update on latest Canadian sanctions
- Understanding the exceptions for Canadian sanctions rules
- Managing inconsistencies with US and EU sanctions
- Exemption permits and navigating the administrative process
- Cuba, the US embargo and the Canadian extraterritorial measures claw-back – life after the thaw

**Track B**

**The Sanctions Exclusionary Clause as a Tool for OFAC Compliance for Insurers and Reinsurers**

*Andrew R. Gifford*  
Senior Vice President and  
Assistant General Counsel  
General Reinsurance Corporation  
(Stamford, CT)

*David J. Brummond*  
Of Counsel  
DLA Piper LLP (Washington, DC)  
*Former Senior Sanctions Advisor – Insurance for OFAC*

- Conceptual and legal basis for exclusionary clause
- Model exclusionary clauses
- Problems in practical application
- Due diligence beyond the use of exclusionary clauses

4:30–5:15

**Track A**

**Ten Critical Elements That Should Be Part of Every Global Sanctions Compliance Program**

*Sahand Boorboor*  
Compliance Director, Advise & Consult  
Global Sanctions Compliance  
JPMorgan Chase & Co. (New York, NY)

*Mel Schwechter*  
Partner  
Baker Hostetler LLP  
(Washington, DC)



- Senior management involvement and policy statements
- Appointment of responsible compliance official
- “Risk-based” compliance program
- Integration of the compliance function throughout the company
- Timing and delivery of training
- Key elements of effective internal self-assessments. Who should conduct?
- Strategies to keep your program updated

**Track B**

**Focus and Priorities of Non-OFAC Enforcement**

*Sean O'Malley*  
Vice President and Deputy Chief Investigator, Enforcement Division  
Federal Reserve Bank of New York (New York, NY)

- Financial institutions are facing increasing scrutiny from other regulatory bodies
- Hear about how regulators are working together on investigations
- Find out what the Federal Reserve is looking for during bank examinations

5:15 **Champagne Roundtables**

End the day informally as you network and share views with your peers on best practices and current issues impacting the industry.

- Iran
- Russia/Ukraine
- EU
- Cuba
- Myanmar/Burma

6:15 End of Day One

# Main Conference Day 2 Wednesday, April 29, 2015

## 8:45 **Opening Remarks from Conference Co-Chairs**

*Brandon Reddington*  
Global Sanctions Officer  
Credit Suisse (Washington, DC)  
Former Senior Sanctions Advisor – Securities, OFAC

*David Stephens*  
Vice President, Global Sanctions  
American Express (New York, NY)

## 9:00 **Focus on Iran from Both the US and EU Perspectives: What is the Impact of the Extension of the Iran Sanctions Restrictions**

IRAN

*Paul Pawowski*  
Office of Sanctions Policy and Implementation  
Bureau of Economic and Business Affairs  
U.S. Department of State (Washington, DC)

*David Lorello*  
Partner  
Covington & Burling LLP (London, UK)

*Marco Padovan*  
Founder  
Studio Legale Padovan (Milan, Italy)

*Jamie Boucher*  
Partner  
Skadden, Arps, Slate, Meagher & Flom LLP (Washington, DC)

- Frequently asked questions relating to the extension of temporary sanctions relief through June 30, 2015
- Impact of P5+1 sanctions on non-US companies
- Differences between US and EU sanctions with Iran
- What types of business activity is most likely to involve potential transactions with Iran
- New opportunities for non-US companies to do business in Iran

## 10:00 **Achieving Enterprise-Wide Compliance Risk Management: How to Integrate Economic Sanctions and AML Compliance Controls**

*Ann Broeker*  
Compliance Leader – Economic Sanctions and International Trade Controls  
GE Capital (Chicago, IL)

*G. Stephen Alsace*  
Senior Director, Sanctions  
CIBC AML Group (Toronto, ON)

*Rachel Sloan – Panel Moderator*  
Principal  
Deloitte Financial Advisory Services (New York, NY)

- Overlap of sanctions and AML compliance programs – sharing of staff and resources
- How to coordinate your financial crime intelligence data collection
- What are the expectations of the regulators to have cross- controls to mitigate enterprise risk?
- Weighing the pros and cons of centralized vs. decentralized compliance programs: How to decide which is best for your organization

## 11:00 Coffee Break

## 11:15 **The Top 5 Economic Sanctions Pitfalls to Avoid During Mergers & Acquisitions**

*Judith Lee*  
Partner  
Gibson, Dunn & Crutcher LLP (Washington, DC)

*Amy Worlton*  
Partner  
Wiley Rein LLP (Washington, DC)

- Assessing red flags in the due diligence process—where should you be looking?
- Resolving ownership and control issues – how to scope the full panoply of foreign and U.S. persons involved
- Over- and under-inclusive representations and warranties
- Evolving sanctions and the dangers of boilerplate language in merger agreements
- Spotting linkages to related compliance issues such as FCPA, BSA/AML, Export Controls, or CFIUS

## 12:15 Luncheon for Attendees and Speakers

## 1:30 **Focus on New York State Enforcement: How to Stay Clear of the Widening Reach of New York State Actions against Global Organizations**

*Polly Greenberg*  
Chief, Major Economic Crimes Bureau  
New York County District Attorney's Office  
(New York, NY)

- What are the investigative priorities in NY?
- What should you do when you get a subpoena?
- How to cooperate with the authorities during an investigation

## 2:15 **Designing a Risk-Based Action Plan for the First Two Weeks after a Sanctions Violation is Discovered**

*Scott Horton*  
Associate General Counsel  
AIG (New York, NY)

*Michael O'Kane*  
Partner  
Peters & Peters (London, UK)

*Kay Georgi*  
Partner  
Arent Fox LLP (Washington, DC)

*Valentin Povarchuk*  
Trade Compliance Counsel  
3M (Saint Paul, MN)

- Who should conduct the investigation?
- Identifying the ideal point person to manage the process
- How to utilize technology to gather data
- What should you do about foreign affiliates?
- Dealing with foreign privacy laws
- When to call OFAC
- Protecting attorney/client privilege

## 3:15 Networking Break

3:30 **How Best to Converse with the U.S. Government when Confronted by a Sanctions Violation**

*Doug Hassebrock\**  
Director of Office of Export Enforcement  
Department of Commerce/Bureau of Industry and Security  
(Washington, DC)

*Steven W. Pelak*  
Partner  
Holland & Hart LLP (Washington, DC)

- In 2015 and beyond, which sanctions violations are most likely to initiate or prompt U.S. Government Enforcement Action?
- Why do some sanctions violations result in civil enforcement actions and others result in criminal enforcement actions?
- Should a company ever resolve a sanctions violation without speaking to more than one administrative enforcement agency?

\* Invited at time of print. Please check the website for program updates.

4:15 **Working Closer with OFAC to Obtain Necessary Licenses or Advisory Opinions in a Timely Manner**

*Davin Blackborrow*  
Assistant Director for Licensing  
Office of Foreign Assets Control  
U.S. Department of the Treasury (Washington, DC)

*Erich Ferrari*  
Partner  
Ferrari & Associates, P.C. (Washington, DC)

- Types of transactions OFAC will license
- Interacting with OFAC to facilitating an authorization
- Do's and don'ts when applying for licenses: What to include in your application to expedite the process
- The anticipated timeframe for OFAC responses, and how to obtain a status update regarding your application
- How OFAC and the State Department interact on licensing matters and the potential impact on your license

5:00 **Conference Ends**

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### CONFERENCE

Date: April 28-29, 2015

Time: 9:00 – 18:15

VENUE: Washington Plaza Hotel

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8<sup>th</sup> Advanced Forum on

# Economic Sanctions ENFORCEMENT & COMPLIANCE

Ensuring Compliance with Rapidly Changing Restrictions amid Increased  
Federal and State Enforcement Risks

**April 28-29, 2015 • Washington Plaza • Washington, DC**



**Hear from Senior Government Officials:**

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- Edward Fishman  
Iran and Russia Sanctions Officer  
Office of Economic Sanctions Policy and  
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- Andrea Gacki  
Associate Director, Compliance & Enforcement  
Office of Foreign Assets Control  
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