

International Trade & Investments

Cahill serves as a trusted advisor to its clients on complex and always-evolving international trade compliance issues, including economic trade sanctions, export controls, anti-money laundering (AML) laws, and supply chain compliance. Cahill's practice in these areas has focused on identifying risks as part of pre-acquisition due diligence for both buyers and lenders, advising companies on regulatory changes, developing and enhancing corporate compliance programs, conducting bespoke risk assessments and trainings for clients, and counseling clients through investigations and regulatory disclosures.

Trade Sanctions

The sanctions landscape is always shifting in scope, scale and complexity in response to new geopolitical turbulence. Because of the immediacy of their implementation, changes in sanctions administered by the Office of Foreign Assets Control (OFAC) and other agencies can have an abrupt impact on our clients' businesses and investments. Cahill lawyers take a proactive approach to monitoring these changes and provide our clients with practical solutions to ensure compliance. The Cahill team also assists clients in seeking guidance, obtaining specific licenses and making voluntary self-disclosures to OFAC, when appropriate.

Export Controls

As with sanctions, numerous recent and continuing changes to U.S. export controls have wide-ranging implications for companies and their business operations. Cahill's team helps companies understand and be prepared to address these risks, particularly in the investment and due diligence context.

AML

Cahill advises financial institutions and other clients on understanding and complying with their obligations under the Bank Secrecy Act and other laws and regulations issued by the Financial Crimes Enforcement Network (FinCEN), as well as state and federal banking and securities supervisors. For companies seeking to divest assets, Cahill has developed a highly effective investigative and screening process focused principally on risks associated with AML regulations, particularly in high-risk jurisdictions.


Supply Chain Compliance

Companies with multinational operations or complex supply chains face increasing regulatory and public scrutiny concerning the social and environmental impacts of their business. Cahill advises such companies and their boards and committees in navigating legal and reputational risks that relate to supply chain compliance, including environmental impact and labor practices.

The regulatory and reputational scrutiny faced by companies relating to their inventory sourcing comes on a number of fronts. We have experience helping companies exercise appropriate oversight of various levels of their supply chains, including the development of standards for suppliers and providing strategies for monitoring suppliers' compliance with company policies and increasing regulatory requirements. We also have experience conducting sourcing-related risk assessments and advising clients on their compliance with the requirements of the Uyghur Forced Labor Prevention Act, the California Transparency in Supply Chains Act, and the U.K. Modern Slavery Act, among other laws.

Our recent experience includes:

- Advising a re-insurance company on the OFAC license application process in connection with a multi-million dollar claim by a sanctioned entity involving an insured vessel.
- Advising the operations of a Latin American agribusiness company in detecting entities in its supply chain that may be sanctioned by the U.S. government for connections to narcotics trafficking.
- Advising clients operating in the cryptocurrency and DeFi sectors on developing and implementing sanctions compliance programs.

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- Developing and implementing global AML pre-acquisition due diligence procedures to apply across all potential acquisitions of a global asset manager.
 - Conducting an investigation on behalf of a global retailer into sourcing relationships in Southeast Asia, which were the subject of international media attention and regulatory scrutiny. Cahill also assisted the retailer in redesigning and implementing its global responsible sourcing compliance program to ensure increased visibility into suppliers throughout its supply chain.
 - Representing a group of U.S. apparel retailers in an investigation by an activist NGO into potential violations of foreign labor and environmental regulations in the retailers' indirect supply chain.