Cahill Lawyers Author Law.com Article on U.S. Sanctions Risks for Agentic AI Stablecoin Payments

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External Link: So Your AI Agent Sent Stablecoin to an Iranian Wallet: Are You Liable for Violating U.S. Sanctions?

“So Your AI Agent Sent Stablecoin to an Iranian Wallet: Are You Liable for Violating U.S. Sanctions?” (published by *Law.com*) examines sanctions risks arising from agentic AI transactions involving digital assets and offers guidance for market participants seeking to reduce potential exposure.

The article explains that autonomous AI payment agents may present significant compliance challenges under OFAC’s strict-liability sanctions regime, particularly where systems can hold, spend, trade, and transfer stablecoins without human review at the point of transaction. It notes that enforcement authorities are likely to focus on who authorized and controlled the system, who had access to sanctions risk information, who could have prevented the transaction, and who benefited from it.

The article offers practical guidance for market participants seeking to reduce potential exposure as AI-enabled payment systems and digital asset transactions continue to evolve.

The article is authored by Samson Enzer, partner and co-chair of CahillNXT and Kiersten Fletcher, partner and co-chair of White Collar Defense & Investigations, along with counsel Jennifer Potts and Gregory Mortenson and associate Mary Hornak.

Read the Law.com article here:

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