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U.S. Cross-Border Enforcement in Latin America Raises Stakes for At-Risk Individuals

U.S. authorities are intensifying cross-border enforcement efforts tied to suspected corruption, cartel-linked activity, and suspicious financial activity in Latin America, increasing risks for politically exposed persons, business leaders, and state-linked individuals. As investigations become increasingly coordinated across borders, individuals with exposure should proactively assess potential legal, financial, and reputational risks.

U.S. enforcement authorities are intensifying their focus on suspected corruption, cartel-linked activity, and suspicious financial activity tied to Latin America, signaling a more assertive and outward-facing approach to cross-border investigations. Recent developments in Mexico—including the indictment of a sitting governor, increased visa revocations, and heightened scrutiny of financial institutions—underscore a willingness to pursue not only senior public officials, but also the business networks and individuals operating around them.

This broader enforcement has already taken hold in Brazil, where U.S. authorities have coordinated with local investigations to pursue large-scale corruption and financial misconduct tied to the U.S. financial system. At the same time, U.S. indictments of senior figures such as Venezuela's Nicolás Maduro and Cuba's Raúl Castro further illustrate a readiness to bring criminal charges against high-level actors in the region as part of a broader enforcement strategy.

Together, these developments point to a more expansive and coordinated risk environment. At-risk individuals, including politically exposed persons, business leaders, and those operating in proximity to state-linked or high-risk sectors, may face scrutiny.

Against this backdrop, individuals with exposure to the region should take a proactive approach to assessing and managing cross-border risk, particularly as enforcement priorities and political dynamics continue to evolve.

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- **Map U.S. jurisdictional exposure in light of evolving U.S.–LatAm dynamics**. Assess connections to the U.S. financial system—including dollar transactions, correspondent banking, and U.S.-linked entities—while monitoring how the U.S. government's posture toward specific countries may shape enforcement priorities. Shifts in bilateral relationships, potential designations, or broader policy changes can materially influence both the likelihood and nature of scrutiny.
- **Reassess political and state-linked relationships**. Examine interactions with public officials, politically exposed persons, and state-affiliated or regulated sectors, particularly where such relationships may be scrutinized under expanding enforcement theories.
- **Evaluate exposure through financial institutions and broader networks**. Consider risks arising from relationships with regional financial institutions, intermediaries, and business partners, especially where those entities may be subject to investigation, sanctions risk, or other regulatory pressure.
- **Identify early indicators of scrutiny and prepare for cross-border action**. Monitor signals such as visa restrictions, account limitations, or informal inquiries, and anticipate coordinated investigations across jurisdictions, including offshore financial centers. Early assessment of asset structures and reputational exposure can be critical before scrutiny becomes a formal investigation.

As U.S. authorities expand the scope and tools of cross-border enforcement in Latin America, risk is becoming more network-driven, jurisdictionally fluid, and shaped in part by evolving U.S. political priorities in the region. At-risk individuals in Mexico, Brazil, Venezuela, Colombia, and across Latin America should proactively assess their exposure and positioning, recognizing that early, informed action may be critical to mitigating legal, financial, and reputational consequences.

About Kobre & Kim

Kobre & Kim is a global law firm that focuses on cross-border disputes and investigations, often involving fraud and misconduct.

Our team:

- Is positioned to help clients in Latin America through our U.S.-qualified disputes teams in São Paulo and Miami that routinely act in cross-border government investigations involving Latin American and foreign authorities.
- Wields deep government investigations experience with former U.S. prosecutors based in Miami, Washington, New York, Wilmington, Seoul and London.
- Deploys onshore and offshore lawyers – including an integrated group of U.S. litigators and offshore lawyers qualified in key jurisdictions, such as BVI, the Cayman Islands, Dubai and Hong Kong – helping clients identify vulnerable assets and mitigate reputational harm caused by investigations.

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