

Insights



Beau Barnes Discusses Potential OFAC Enforcement Strategy Shift from Companies to Executives

May 13, 2019

Publication: **Law 360**

Kobre & Kim's Beau Barnes brings his economic sanctions and regulatory background to evaluate recent developments in enforcement actions from the U.S. Treasury's Office of Foreign Assets Control (OFAC) and their implications for U.S. companies in *Law 360*. After years of targeting sanction-violating companies, recent guidance documents and enforcement actions from OFAC have hinted at a strategic shift to fining executives and officials.

OFAC's transitioning to specific individuals would be a new, pressure-based strategy that could have lasting implications for companies and the officials within them. "OFAC doesn't just make statements like this by accident," Barnes said. "It's a subtle signal that they are going to take individual personal liability seriously."

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