

EREN

Economic Sanctions and Anti-Money Laundering Practice

Serving, inter alia, the World's Banks and Financial Services Companies

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The Eren Law Firm

The Eren Law Firm is a responsive and results-oriented, boutique law firm that advises and represents banks, financial services companies, corporations, governments, individuals, and other clients on a variety of issues and matters.

Our core areas of expertise and concentration are:

- Financial, investment, and trade regulation
- Corporate transactions
- International litigation/arbitration
- International law

In the area of financial and trade regulation, the combined quality and years of experience of our lawyers, both within and outside of the US government, makes us one of the world's leading firms in the areas of economic sanctions and anti-money laundering.

The kind, blend, and strength of our expertise and capabilities ensure that our clients receive advice, representation, and insight that protect and advance their interests.

Our Economic Sanctions Practice

The Eren Law Firm is a leading economic sanctions and anti-money laundering boutique law firm based in Washington, DC comprised of lawyers who have served at the U.S. Treasury Department's Office of Foreign Assets Control (OFAC), the U.S. State Department, and the U.S. Justice Department.

Mr. Eren and Mr. Pinter of the firm served in senior positions at OFAC, the agency that administers U.S. economic sanctions, for a combined 25 years. Mr. Eren and Mr. Pinter entered private law practice respectively, in 2000 and 2004. Mr. Eren and Mr. Pinter advise and represent financial institutions, financial services companies, and other clients with respect to all aspects of OFAC-administered sanctions and U.S. anti-money laundering (AML) laws and regulations. They also design OFAC and AML compliance programs and conduct risk assessments for clients, and represent clients in, among other matters, applications for OFAC licenses (such as for the unblocking of funds and accounts, and authorization for prohibited transactions), SDN list removal petitions, other sanctions relief; in sanctions, and anti-money laundering enforcement proceedings, and in sanctions litigation.

Complemented by Mr. Comras, Mr. Eren and Mr. Pinter also provide clients with a unique insight and perspective on the policies underlying sanctions, and help clients to see big-picture sanctions issues. Mr. Ristau and Mr. Eren together handle litigation matters involving sanctions and anti-money laundering laws and regulations.

Learn More and Benefit from Our Experience, Insights and Capabilities

For further information about The Eren Law Firm and to learn how the Firm can be of assistance and benefit to you or your company, please visit: www.erenlaw.com or contact Hal Eren at tel. + 1 202 429 9883 (direct), or via email at hal.eren@erenlaw.com.

Our Lawyers

Mr. Eren

Between 1992 and 2000, Mr. Eren served at OFAC, where, among other things, he participated in the formulation of OFAC-administered laws and regulations, including the Iranian Transactions Regulations, and dealt with OFAC adjudications and decisions involving the application of sanctions laws and regulations to complex and sensitive trade and financial transactions/matters. Mr. Eren's last position at OFAC was as Senior Sanctions Advisor. After Treasury, Mr. Eren joined the Washington DC office of Clifford Chance, where he advised clients and the firm itself on U.S. economic sanctions and anti-money laundering matters. In 2002, he established The Eren Law Firm.

Mr. Pinter

During his 17-year tenure at OFAC prior to joining the Firm in 2004, Mr. Pinter participated in the shaping of economic sanctions programs administered by OFAC, and in the formulation, implementation, modification and termination of sanctions. Mr. Pinter was a prime arbiter of all major OFAC decisions. Mr. Pinter served as OFAC's Chief of Licensing between 1987 and 2002, and he later also oversaw OFAC's Civil Penalties program. Mr. Pinter periodically also served as Acting Director of OFAC.

Mr. Comras

Prior to joining the Firm in 2004 as special counsel, Mr. Comras, a retired career diplomat of the United States, served in several senior positions at the U.S. Department of State involving the imposition and administration of economic sanctions. From 1992 to 1994, Mr. Comras was the chief U.S. architect of the international economic sanctions against Yugoslavia and directed U.S. efforts to ensure the effective international implementation and enforcement of these sanctions. After the State Department, Mr. Comras served at the UN, under appointment by Secretary General Kofi Annan, as one of five international monitors to oversee the implementation of Security Council measures against terrorism (al-Qaeda) and terrorism financing. Mr. Comras is the Firm's lead counsel in dealings with the U.S. Department of State.

Mr. Ristau

Prior to entering private law practice, Mr. Ristau served at the U.S. Justice Department, where during 1963-1981, he was the Director of the Office of Foreign Litigation. In this position Mr. Ristau supervised all suits by or against the United States in foreign courts, and was instrumental in the establishment of the Iran-US Claims Tribunal at the Hague. Mr. Ristau is a co-author of the U.S. Foreign Sovereign Immunities Act of 1976 and testified before Congress in support of the Act. Since leaving Justice and joining the firm in 2004, Mr. Ristau's practice consisted of transnational litigation and international commercial arbitration, representing foreign governments and international companies. Mr. Ristau is an internationally-recognized expert on international judicial assistance and is the author of a two-volume treatise entitled *International Judicial Assistance, Civil and Commercial*. Mr. Ristau leads the Firm's international litigation and arbitration practice, which includes litigation arising from U.S. economic sanctions.



Elements of Our Economic Sanctions Practice

US Treasury OFAC-administered sanctions (executive orders, statutes, regulations)

Advice, Opinions, Interpretations, Guidance, Representation, Advocacy

- Prohibitions and Requirements
- Exemptions, Licenses and Exceptions
- Questions of Jurisdiction
- Compliance Policies and Programs, Compliance Training
- Due Diligence
- Status of Blocked Property (assets and liabilities)
- Conflicts of Sanctions Laws (international)
- Reporting
- Advice on Complex Issues Facing Banks and Financial Services Companies
 - U.S. banks, U.S. Branches of Foreign Banks, Foreign banks, Broker-Dealers, Investment Banks, Insurance Companies, Commodities Traders
 - Intersection/Interplay of Sanctions and Anti-Money Laundering Laws
- License Applications and Other Sanctions Relief -- trade and financial transactions/activities, e.g., blocked funds and contracts, agricultural and medical exports, travel-related transactions
- Requests for Interpretive Guidance
- Internal Investigations/Look-Backs
- Compliance Audits & Testing
- Enforcement and Penalty Defense (civil and criminal) -- Administrative Proceedings, Negotiations/ Informal Settlements, Litigation
- Voluntary Disclosures
- Blacklist (SDN or OFAC List) Removal Petitions
- Protection of Assets and Preparation for Post-Sanctions Situations
- Claims, Claims Settlement, Expropriation Issues, Satisfaction of Judgments

Advice, Opinions, Guidance, Representation/Advice on Conflicts of Laws

- US Helms-Burton Sanctions (Cuba), US Iran Sanctions Act Sanctions
- UK, EU, Canadian and Other Countermeasures to US Sanctions

In addition to its practice in the area of areas of economic sanctions, anti-money laundering, bank regulation and supervision, and related enforcement defense, The Eren Law Firm advises and represents clients in connection with, among other matters, corporate transactions, and disputes involving banking, finance, and investments. The Firm's select and diverse group of clients includes U.S. and non-U.S. financial institutions and financial services companies, other U.S. and non-U.S. companies, individuals, and sovereign governments.

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