



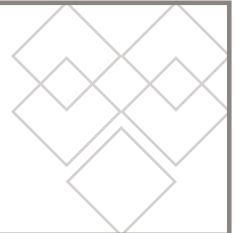
International Trade & Sanctions 2024



PROFILED:

BRITT MOSMAN

Willkie Farr & Gallagher LLP



WILLKIE



International Trade
& Sanctions



BRITT MOSMAN

Partner

Willkie Farr & Gallagher LLP

Washington, DC, US

T: +1 (202) 303 1057

E: bmosman@willkie.com

PERSONAL BIOGRAPHY

Britt Mosman is a partner in and co-chair of Willkie's global trade & investment practice group in Washington, who advises clients on a wide range of international transactional, compliance and enforcement issues. Her experience includes advising global financial institutions and leading multinational companies on economic sanctions, Bank Secrecy Act and anti-money laundering and export controls laws, as well as transaction reviews by the Committee on Foreign Investment in the United States and other national security-related issues. In addition, she routinely advises crypto sector participants on how to comply with BSA/AML and economic sanctions requirements.

WILLKIE

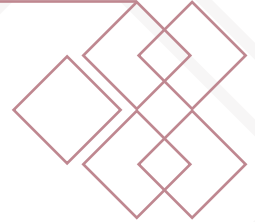
REPRINT

**BRITT MOSMAN**

Willkie Farr & Gallagher LLP



Q&A WITH BRITT MOSMAN

**What qualities and values do you believe are essential for building strong, trusting relationships with clients?**

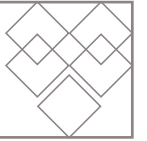
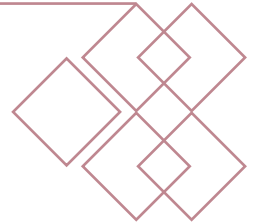
◆ The key to building great and longstanding client relationships starts with producing high-quality work that exceeds expectations. Becoming a trusted adviser also takes time. It is not just telling clients what they want to hear: you must be able to deliver tough news and help clients navigate difficult situations. This is possible only if I have earned their trust in my judgment. Some sanctions lawyers may urge clients to avoid risk altogether, but I try to help my clients evaluate risk in an actionable way. I do the work of understanding my clients' businesses, geopolitical landscape, challenges, and what is important to them, so I can help them successfully balance the legal risks with the commercial realities they face.

What standout moments in your career have significantly shaped your professional journey?

◆ Two standout moments come to mind. The first was working as a legal adviser to the Office of Foreign Assets Control during an exceptionally active and impactful time in sanctions history. I experienced first-hand what many people say about working in government, which is that you can very quickly take on a lot of responsibility if you work hard. Taking on so much responsibility allowed me to develop a deep understanding of how sanctions implementation and enforcement works on the government side, which has been a critical experience that helps me advise clients today. Second, coming to Willkie taught me about leadership, as I have helped more junior lawyers develop their own practices. Without a doubt, investment in the development of associates is great for both clients and the entire team.

**BRITT MOSMAN**

Willkie Farr & Gallagher LLP

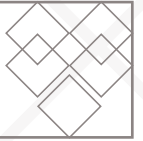
**What are your predictions for the future of your legal specialty? How do you see your vocation evolving over the next few years?**

◆ Sanctions and export controls are constantly evolving to respond to the dynamic geopolitical landscape. I think sanctions will continue to get smarter. In the 2000s, we moved away from broad embargoes and started applying list-based, targeted sanctions against non-state actors. Then we saw the first sectoral sanctions in response to Putin's invasion of Crimea. And now, the Russia sanctions programme has shown the targeted sophistication that is possible with bespoke sanctions to respond to specific national security threats. I think the US government will become increasingly adept at designing sanctions measures that are more complex, flexible and tailored toward achieving the immediate goal. Similarly, we can expect export controls to become a tool of first resort in responding to a variety of global challenges. These developments, combined with the increasingly multilateral nature of sanctions and export controls, means that the bar keeps rising for in-house legal and compliance teams. ■

**“SANCTIONS AND EXPORT CONTROLS ARE CONSTANTLY
EVOLVING TO RESPOND TO THE DYNAMIC GEOPOLITICAL
LANDSCAPE.”**

**BRITT MOSMAN**

Willkie Farr & Gallagher LLP

**REPRESENTATIVE ENGAGEMENTS**

- ◆ Guiding major domestic and foreign companies in preparing voluntary self-disclosures, responding to subpoenas and conducting internal investigations in high-stakes civil and criminal enforcement proceedings by federal and state agencies involving potential violations of sanctions and BSA/AML laws.
- ◆ Counselling clients on the full range of sanctions, BSA/AML and export controls policy and compliance issues.
- ◆ Assisting clients in developing and maintaining sanctions, AML and export controls compliance policies and procedures.
- ◆ Representing lenders, underwriters, borrowers, issuers and companies in international lending, capital markets and M&A transactions regarding sanctions and AML issues.
- ◆ Working with clients in national security reviews at all phases of the transaction life cycle, including conducting CFIUS risk analyses and navigating the CFIUS process through preparation of notices, discussions with CFIUS member agencies, advising on follow-on investigations, and negotiating and implementing mitigation agreements.
- ◆ Advising financial institution and crypto sector clients on BSA/AML-related considerations and suspicious activity reporting requirements.

