

# Samantha Sewall

## Of Counsel

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Washington, D.C.

Samantha Sewall is of counsel in the Washington, D.C. office of Gibson, Dunn & Crutcher and a member of the firm's International Trade Practice Group.

She advises clients on compliance with U.S. legal obligations at the intersection of global trade, foreign policy, and national security, focusing her practice on compliance with U.S. economic sanctions, export controls, national security reviews of foreign direct investment (CFIUS), and anti-boycott laws. Samantha has experience advising companies across a wide range of sectors including aerospace, banking and financial institutions, defense, energy, medical devices and pharmaceuticals, shipping, retail, telecommunications, and travel.

### Representative economic sanctions engagements include:

- Obtaining a specific license from the Office of Foreign Assets Control ("OFAC") to provide healthcare-related services to persons resident in comprehensively sanctioned countries for a global provider of business process and digital services.
- Advising a non-U.S. manufacturer in negotiations with OFAC and the U.S. Department of Justice in connection with a sanctions enforcement action and settlement.
- Responding to an OFAC subpoena related to screening gaps for a U.S.-based financial institution.
- Providing a sanctions risk assessment to a digital payments platform provider covering sales in higher risk jurisdictions.
- Drafting and revising sanctions compliance policies and procedures for clients across industry sectors.
- Advising on the design of sanctions compliance programs.
- Providing sanctions-related due diligence for M&A transactions.

### Representative export control and antiboycott engagements include:

- Conducting an internal investigation and submitting a voluntary self-disclosure of export control compliance exceptions for a global oil & gas industry company and obtaining a resolution without penalty.
- Assessing export control classification and licensing compliance policies and procedures.
- Providing advice regarding compliance with U.S. antiboycott laws, including reporting requirements and compliance policy development.

### Representative CFIUS engagements include:



### Capabilities

International Trade  
Financial Institutions  
Fintech and Digital Assets  
National Security  
White Collar Defense and Investigations

### Credentials

#### Education

Georgetown University - 2012 Juris Doctor  
Patrick Henry College - 2008 Bachelor of Arts

#### Admissions

District of Columbia Bar

- Obtaining CFIUS clearance for the acquisition of an aerospace and defense tooling manufacturer by a U.K.- and Cyprus-owned private fund.
- Providing CFIUS analysis for private equity transactions, including assessment of target companies' critical technologies.

**In-house counsel experiences include:**

- Eight-month secondment to the in-house global trade legal team of a global Seattle-based e-commerce and technology company.
- Six-month secondment as the in-house global trade counsel to a top-10 global manufacturer of medical devices.\*

On a *pro bono* basis, Samantha has assisted clients with understanding U.S. trade controls and immigration issues, and she has worked with an international rule of law NGO to support law enforcement training efforts to combat transnational human trafficking and forced labor.

Prior to joining Gibson Dunn, she served as a Political-Economic Program Assistant supporting the U.S. Embassy in Côte d'Ivoire. During her time there she was responsible for programs and research related to private sector engagement and bilateral political and economic issues. Samantha was previously an associate with a large international law firm where she was a member of the international trade and investment practice group.

Samantha graduated *magna cum laude* from Georgetown University Law Center in 2012, where she was elected to the Order of the Coif and was a member of the Georgetown Law Journal. She is admitted to practice in the Commonwealth of Virginia, the District of Columbia, and the U.S. Court of International Trade.

\*Representation occurred prior to Samantha's association with Gibson Dunn.

**Speaking Engagements**

- Moderator, "Legal Developments in Russia-Related Sanctions," The George Washington University Law School, Business and Finance Law Review Symposium, April 13, 2024
- Lecturer, Foreign Service Institute, "Everything You Ever Wanted to Know about U.S. Sanctions...But Were Afraid to Ask," March 27, 2023
- Moderator, ABA International Law Section, "Fireside Chat on Export Control Enforcement with Assistant Secretary Matthew S. Axelrod," December 15, 2022
- Panelist, Gibson Dunn webcast, "CFIUS Enforcement Guidelines: First-Ever Guidance on Enforcement and Penalties in U.S. National Security Reviews of FDI," December 13, 2022
- Speaker, Gibson Dunn webcast, "2020 Sanctions and Export Controls Update," October 15, 2020
- Featured Speaker, The Knowledge Group "OFAC's Heightened Enforcement Trends: Practical Compliance Tips and Strategies," June 30, 2020

**Publications**

- *Short-Term Sanctions – The New Normal?*, *Financier Worldwide* (January 2020)
- *Sanctions Enforcement Trends In the Era of COVID-19*, *The Review of Securities & Commodities Regulation*

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