Bloomberg Law News 2026-05-20T11:21:52198460789-04:00

Go-To DC Sanctions Attorney Confronts Transactional Trump Era

By Timothy McLaughlin2026-05-20T04:00:11907-04:00

In the spring of 2022, an executive at one of Russia's largest banks learned from a US Department of the Treasury press release that life was about to get exceedingly difficult. In response to Vladimir Putin's invasion of Ukraine, the US government was imposing yet another round of sanctions on Russia, hoping to cripple its economy and starve its war machine of funds. The latest tranche cited the banking executive and dozens of others from the financial industry, in addition to three state-run TV stations and a rifle manufacturer.

Omny Studio: Been Sanctioned by the US Government?...

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The US had already sanctioned the bank itself, but the executive was nevertheless stunned to be on the list. The person wasn't politically connected or particularly wealthy, didn't do work connected to the military and had recently moved to quit. Unsure what to do, the executive (who requested anonymity for fear of repercussions from Russian authorities) asked a colleague for help and got some advice that's been dispensed countless times around the world, to corporate executives and narco-traffickers alike:

Get in touch with Erich Ferrari.

The executive soon sent an email to the offices of Ferrari & Associates, a law firm in Washington, DC, that specializes in helping people and companies get removed from the US sanctions list. From his patch of prime real estate in a repurposed Gilded Age bank building, Ferrari can look across 15th Street at his primary adversary, the Treasury Department. If he peers a bit farther down the road, he can see the Freedman's Bank Building, where Treasury's Office of Foreign Assets Control (OFAC) plans and deploys economic and trade sanctions after they've been established by legislation or an executive order.

He recalls one former employee, who'd crossed over from the other side of 15th Street, saying they imagined while in government that Ferrari was "on yachts with one of these warlords all the time." Ferrari replied, "Dude, I'm a lawyer. What do lawyers do? We sit in front of a computer and write things and do research."

Ferrari's office in Washington.
Photographer: Greg Kahn for Bloomberg Businessweek

He's had plenty to write about since setting up shop in 2009. America's use of sanctions has created a multibillion-dollar industry aimed at either avoiding being hit by them or, if that fails, getting out from under them. Small battalions of compliance officers and in-house lawyers help international companies navigate the web of potential violations. Boutique firms staffed by former Treasury officials offer quiet guidance to sanctioned individuals and companies, while lobbyists touting connections to the Trump administration pitch them on surefire relief. Abroad, due diligence teams scour company records and even family trees looking for possible compliance issues.

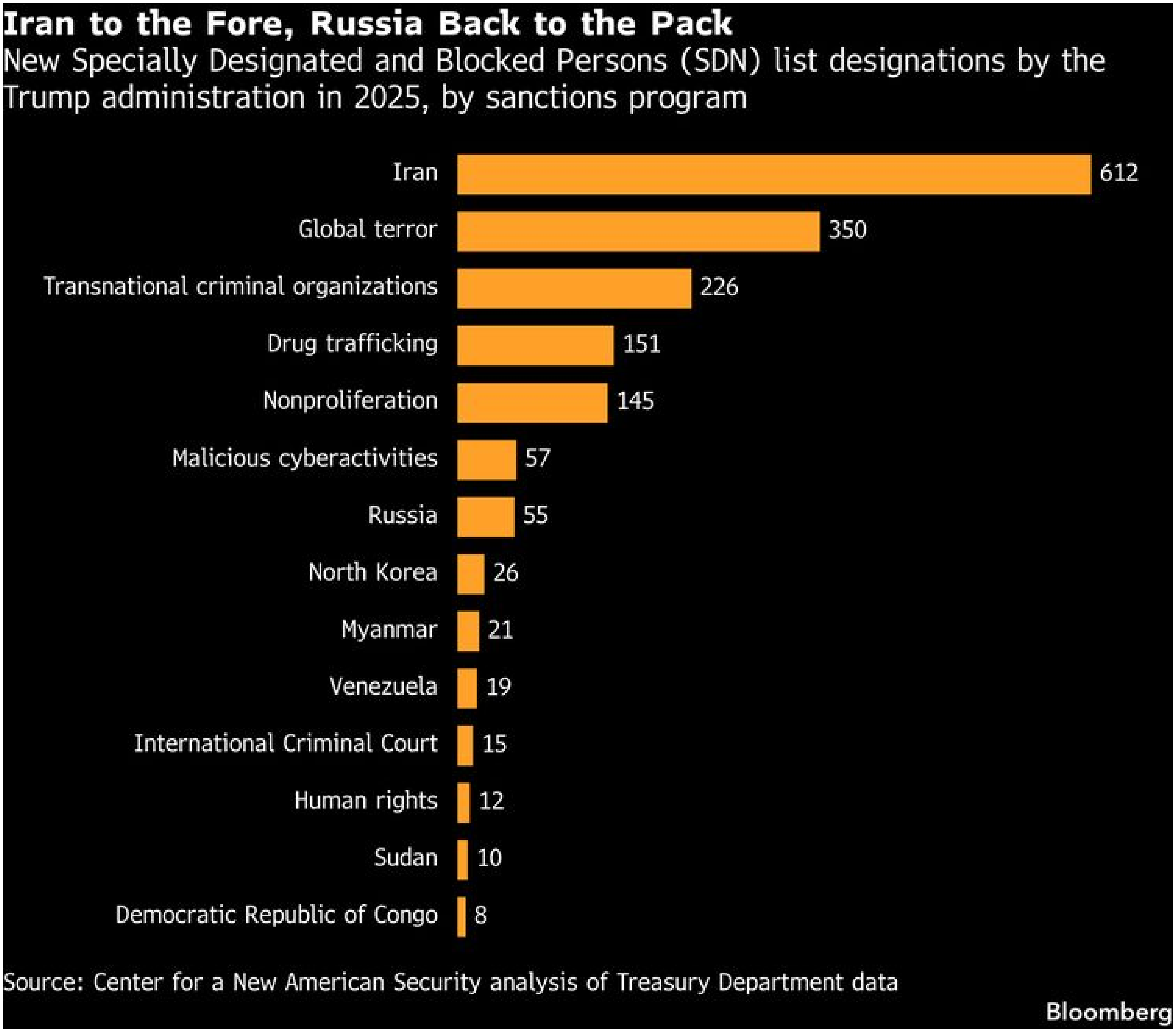
Ferrari arrived early to the field, before it was really much of a field at all, and he's benefited immensely from Washington's bipartisan love of sanctions. Each new round following a global calamity produces a fresh crop of opportunities. Last year the Treasury Department added 1,764 individuals and entities to the Specially Designated Nationals and Blocked Persons (SDN) list, according to the Center for a New American Security. There are now sanctions conferences and sanctions industry professional organizations that dole out annual sanctions awards. Guests on sanctions podcasts riff on policy minutiae. Last year a book detailing the history of sanctions landed on the *New York Times* bestseller list.

By Ferrari's count, his firm has gotten more than 100 individuals and entities delisted. Clients who've been removed from the sanctions roster in recent years include Fadi Serhan, a Lebanese businessman whose Beirut-based electronics store sold equipment to Hezbollah's Al-Manar TV; Ilya Brodskiy and Alexey Panferov, both sanctioned for holding top positions at Russia's Sovcombank; and Angel Rondón Rijo, a dealmaker in the Dominican Republic who was sanctioned during Donald Trump's first term for alleged connections to a corrupt Brazilian construction firm. (The Dominican Republic Supreme Court acquitted Rondón in 2024.)

Some in the sanctions industry keep a low profile to avoid the reputational tarnish that can come with assisting alleged enemies of the state. Not Ferrari. He's a regular on the podcast and panel circuit, delivering his points in a reserved baritone with a technical focus that tends to steer around the more charged aspects of sanctions. His measured cadence belies a legal approach that other attorneys say can at times be aggressive and abrasive. Ferrari has helped to popularize the tactic of suing OFAC. He's taken the office to court more than 50 times, boasting on a recent podcast appearance that he's the most litigious attorney in "the history of US economic sanctions."

His critics charge that he's helping people dodge punishment for actions that have included carrying out or abetting killings, torture and war crimes. Ferrari counters that his work is a necessary check on government power and ensures the proper functioning of sanctions regimes. He also cites his firm belief that even those accused of heinous crimes are entitled to a lawyer. "Someone says I'm taking blood money and I'm facilitating the genocide of an ethnic group," he says. "I guess, if that's your perspective. But at the same time, we do have a legal tradition in this country."

The second Trump administration has pursued a foreign policy agenda that's been described as "transactional," among other, more critical, adjectives. Trump has belittled friends, threatened allies and generally flouted diplomatic conventions in favor of an approach of chummy dealmaking by a few close associates. After going to war in Iran, his administration loosened some sanctions on Russian and Iranian oil exports, only to retighten the latter. Elsewhere, Trump has piled ever more sanctions on Cuba and eased ones on Venezuela and Syria.



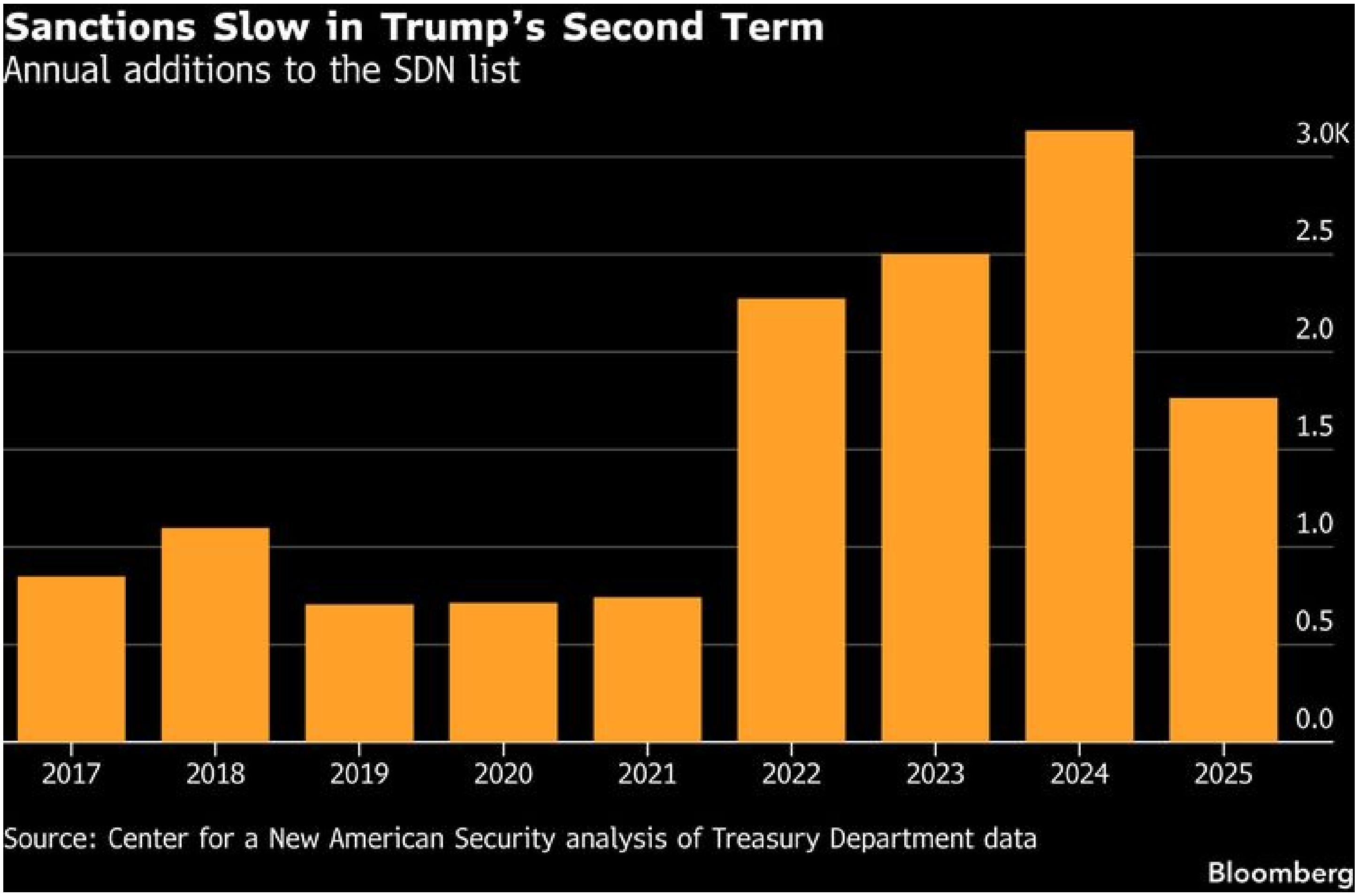
Lobbyists and influence peddlers of all stripes have found lucrative opportunities rafting this unpredictable, monied churn on behalf of sanctioned individuals, but that's not Ferrari. He focuses on the formal delisting process, where opportunities still abound. “It's 100% a growth industry,” he says.

Ferrari.
Photographer: Greg Kahn for Bloomberg Businessweek

Although the US has deployed economic sanctions for decades, the years following the Sept. 11 attacks heralded their arrival as a "tool of first resort." Treasury was pushed to the forefront of America's war on terrorism, with officials in Washington manning the unseen front lines, parsing bank ledgers and Swift messages. Juan Zarate, a high-ranking official responsible for investigating terrorist financing and financial crimes under George W. Bush, called these new foot soldiers "bureaucratic insurgents — guerrillas in gray suits."

People hit by sanctions aren't generally sympathetic to the general public. Many remain outwardly defiant, downplaying the difficulties of being penalized. Beyond the stigma, the practical consequences of being forced out of much of the world's banking infrastructure are severe. After Carrie Lam, the former chief executive of Hong Kong, was sanctioned in 2020 over the territory's crackdown on civil liberties, she said she'd had to keep piles of cash at home because no bank would take her money. The former Russian bank executive says being sanctioned felt like being "erased" from the financial system. The sanctions cut off access to the person's non-Russian bank account, among other consequences. "My money was toxic," the executive says. "And my career was of course totally ruined, because I would never be able to work at a financial institution outside of Russia."

The stated goal of US sanctions is not to punish, but rather to bring about "positive change in behavior," according to OFAC. The office, which didn't respond to requests for comment for this article, states on its website that it draws its "power and integrity" from both its ability to apply sanctions and its "willingness to remove persons from such lists consistent with the law." To be removed, a sanctioned individual submits a petition laying out why they should be delisted. Success can result from changes in behavior, proof of mistaken identity and death. But even the last of these is no guarantee. In one notable case, Amado Padron, a former Cuban military official, remained sanctioned until 2015 despite having been executed by a firing squad in 1989 for his role in a drug smuggling ring. (His removal was part of a larger cleanup of longstanding Cuba sanctions.)



Critics complain that the delisting process is onerous, opaque and slow. The former Russian banker managed to get off after just over a year. The determination from OFAC came after the person had left the sanctioned bank and moved out of Russia. While that was relatively quick, it was still long enough that the executive contemplated suing as a way to expedite the process.

There's also often little fanfare when sanctions are dropped, making it hard for someone to reform their reputation. The former Russian banker worried about potentially remaining in compliance databases for as long as a decade. It's been, the executive says, the life of a "refugee" — feeling unwanted in Russia and unwelcome elsewhere. Still, the banker didn't blame Washington for what happened: "This was the fault of the Russian government."

Ferrari at his office.
Photographer: Greg Kahn for Bloomberg Businessweek

Ferrari grew up in Pittsburgh, in a half-Iranian household. He says his career choices were limited from the start: doctor, engineer or lawyer. He settled for the last, landing at St. Mary's University School of Law in San Antonio, an institution that's both geographically and reputationally distant from the Ivy League schools that feed top law firms and government ranks in Washington.

At St. Mary's, Ferrari linked up with Jeffrey Addicott, an Army veteran and professor who was running the Center for Terrorism Law. Addicott didn't worry too much about academic accolades when choosing his assistants. He was looking, he remembers, for people who could "'lean forward in the saddle,' as we say here in Texas." Ferrari's hustle impressed him.

Back then, Ferrari recalled on a 2023 podcast appearance, an interest in national security law meant you were going to "defend detainees in Guantánamo Bay or you go to the JAG Corps and prosecute detainees in Guantánamo Bay." Neither option interested him. He first encountered OFAC while reading about a case against the Holy Land Foundation for Relief and Development, a Texas-based charity accused of funneling funds to Hamas, and was intrigued.

In 2005, Ferrari published a paper in the St. Mary's law review on the topic of charities supplying aid to Muslims in the Middle East and Central Asia. He warned that overreach by the government to pursue these organizations could mean "civil liberties are unnecessarily abused and the freedoms for which we fight become meaningless phantoms." (He included an eclectic set of acknowledgments with the paper, thanking his parents, the students at the University of Tehran and members of the Wu-Tang Clan.)

After graduating in 2006, Ferrari decamped to Washington. For a while, he slogged through freelance work reviewing law documents. One day, while he was at a sandwich shop, he ran into Douglas McNabb, a federal criminal defense lawyer he'd previously seen speak on a panel in Texas. Ferrari inquired about a job; McNabb, as it happened, had just picked up two sanctioned Mexican lawyers as clients. He asked Ferrari to do some part-time work on the case.

Ferrari struck out on his own a few years later, in 2009. To advertise his services, he started a blog, writing a stream of posts on OFAC listings and occasionally musing on politics. His operation was bare-bones, run out of an apartment whose rent he paid in part with proceeds from an e-book he'd written titled *Iranian Transactions Regulations Practice Guide*.

Much of what kept him busy was Iran-focused compliance work — tasks such as helping people access bequests. He was also a regular at events focused on the unintended impact of sanctions on ordinary Iranian citizens. His suits back then billowed more, and his message was more social-justice oriented. "Sanctions target states, they target individuals, they target entities, but they are enforced against people," he said at an event in 2013. "People feel the repercussions of the sanctions as much as any corporation or bank does."

Around this time, Richard Nephew was serving as the principal deputy coordinator for sanctions policy at the Department of State. The department works in conjunction with Treasury, helping to gather information on possible targets and assess how sanctions might further US foreign policy goals. Nephew, whose background was in nuclear arms, was surprised to learn that State officials took meetings with representatives of sanctioned people — who, at the time, tended to be hardened terrorists with no chance of being removed. "Bin Laden ain't petitioning the government to get off the sanctions list," Nephew says. Ferrari was the first person he met doing this type of work. (Later, the two debated sanctions policy at Columbia University, where Ferrari told the gathered students that sanctions weren't the unparalleled policy tool they were often touted to be, citing Public Enemy's Chuck D: "Don't believe the hype.")

The expansion of sanctions to corporate executives and other actors created a pool of potential clients who were generally extremely wealthy. They were willing to shell out to seek delisting even if the process was lengthy and success far from guaranteed. "From the very beginning," says Margaret Ververis, an early hire who worked with Ferrari for more than seven years, "it definitely felt like there was a lot of opportunity, because there really wasn't another firm that was in this niche."

Some of Ferrari's first delisting clients were under sanction for alleged roles in the narcotics trade. A few of the people he dealt with had eccentric personalities. "Some of them, OK, some of them are a little bit flamboyant," he says. While pitching a potential client in Africa, Ferrari was directed to step into a cage containing a big cat. He did — and still didn't get the job.

As the business expanded, it reflected geopolitical turns. Myanmar, run by a military dictatorship that had been piled with sanctions because of its violent repression of democratic opposition, was by 2014 in the midst of reforms that raised the possibility of sanctions easing. Steven Law, the son of a notorious drug kingpin, contacted Ferrari about being removed; he'd been listed in 2010 over business dealings that included building ports and highways. Ferrari arrived in Yangon expecting to meet a flashy businessman surrounded by a security detail. Instead he found the diminutive Law sitting alone in a hotel lobby, wearing a Members Only jacket. Law and his company were both delisted in 2016 when Barack Obama lifted sanctions on Myanmar, citing democratic advances such as the prior year's elections.

A chart OFAC compiled of Law's business network hangs in a conference room in Ferrari's office, part of a trophy wall that appears to troll Treasury through interior design. One photograph shows the mustachioed Mohamed Bachir Suleman, an alleged drug trafficker in Mozambique, sitting with his arms outstretched. Another shows a smiling Oleg Deripaska, a Russian oligarch and Ferrari client who sued OFAC in 2019 to be removed from the sanctions list. Shortly after, Ben Sasse, then a Republican senator from Nebraska, described Deripaska in a hearing as a "bottom-feeding scum sucker."

Ferrari's office.
Photographer: Greg Kahn for Bloomberg Businessweek

Ferrari's legal challenge was unsuccessful, but Deripaska had been the rare Russian to even try taking the sanctions on during a period of intense distrust toward Moscow. A few years later, Russia's invasion of Ukraine doubled Ferrari's business practically overnight. Other firms kept a distance at first, but the influx of money eventually outweighed some of their concerns. "I'm like, 'Wait a second. All you guys who used to say, "We don't do that sort of thing," you guys are all now doing that sort of thing,'" Ferrari says. His own firm has managed to get at least a half-dozen clients removed from the Russian sanctions list since the war began.

Ferrari advises clients that OFAC has broad discretion and that much of the material used as evidence to sanction someone is classified. Thus, he says, the aim is usually to identify and address its concerns rather than try to disprove its allegations. "It doesn't matter if you did it or not," he'll often say.

He's devised a rough formula for predicting whether a client will get delisted. It rests on the three "D"s. The first is divestment, from the activity that landed the person or company on the list. The second is distance, from when the sanctioning took place — the longer it's been, the better, generally speaking. The third is denunciation, of the offending practice. Ferrari says the last one is a welcome sweetener but not strictly necessary — and he notes that it can be profoundly unwise for clients who still live in "jurisdictions with open windows" (that is, where state critics have died under suspicious circumstances). Ferrari says it isn't uncommon for him to tell a potential client they have a 0 to 5% chance of being delisted. Rarely does his estimate rise above 50%.

Ferrari has a reputation for taking on cases others avoid. Another sanctions-focused attorney working in Washington, Robert Clifton Burns, wrote an article mocking Ferrari's unsuccessful case on behalf of Peruvian drug trafficker Fernando Zevallos Gonzales, who'd used an airline he owned to shuttle tons of cocaine around the world. Burns titled the article "Worst. Case. Ever. Seriously," writing, "If you are trying to convince OFAC that you are no longer a narcotics kingpin, it's best to make the argument while not sitting in a jail cell in Peru serving a twenty-five year sentence for narcotics trafficking and money laundering."

One lawsuit Ferrari brought was on behalf of Alain Goetz, a Belgian national accused of smuggling hundreds of millions of dollars' worth of gold that brought in revenue for armed groups across Africa. (Goetz denies the allegations and has said the transparency of his business made him a target for journalists and nongovernmental organizations.) Ferrari sued OFAC on Goetz's behalf after two rejected attempts at delisting. In a decision handed down last year, Chief US District Judge James Boasberg dismissed one of Ferrari's arguments as "all gums." Another, he said, "sits on a faulty premise and topples accordingly."

A former senior OFAC official, who asked not to be named discussing internal processes, describes being of two minds about Ferrari's lawsuits. On one hand, the official says, it's important for OFAC to be held to account and for sanctions to be defensible in court. On the other, it has limited resources to address delistings. It isn't fair that lawsuits have become a way to force the office to prioritize a client. "People basically get to jump the line because maybe they have access to Erich Ferrari, and therefore there's a lawsuit," the official says.

The general public's critiques are sometimes even harsher. In a LinkedIn post last year, Ferrari touted the delisting of three clients from Myanmar. "Never had a triple removal action … until today," he wrote. Derisive comments soon piled up below the post, and it began rippling through pro-democracy circles elsewhere. One woman left a review of Ferrari & Associates on Google, writing, "Every dollar this firm earns from this client is stained with the blood of the people of Myanmar."

Ferrari says he read every comment and feels “like s---” about it. He was bothered enough to go back and calculate how much the Myanmar cases brought in: It was about 0.2% of revenue during the period they were active. They weren’t “moneymakers” for the firm, Ferrari says; they were routine, and not the windfall that activists claimed.

He suggests that people think of his work as a valuable administrative service, elaborating the point with an analogy that might not convince many human-rights organizations. “The police have put them on the list,” he says of his clients. “I’m going to the police and explaining why their conduct has been changed so that the police should not be worried about them anymore.”

Delistings sometimes become fodder for partisan attacks, which can make the process more difficult. In 2021, for example, Republican lawmakers and conservative think tanks seized on the delisting of Mammut Industrial Group, an Iranian conglomerate and Ferrari client that had been sanctioned by Trump, calling it a sign of Joe Biden’s weakness. The company didn’t respond to requests for comment.

One title Ferrari soundly rejects, as he makes clear in almost every media appearance, is that of lobbyist. He’s suspicious of those who pitch sanctioned actors on quick relief based on personal connections to the Trump administration. Others are too. Nephew, who served as global anticorruption coordinator in the State Department under Biden, says Trump’s foreign policy has been unlike any in memory. “When people normally talk about transactionalism and foreign policy, what they’re actually talking about is nonprincipled foreign policy,” he says. Trump’s approach is “almost effectively, you scratch my back, I’ll scratch yours.”

One recent example of a more transactional approach saw Milorad Dodik, who’d recently been president of Bosnia and Herzegovina’s autonomous Serb Republic, mount an expansive effort to get relief. He’d been sanctioned late in Obama’s final term, for obstructing the Dayton Accords, the US-brokered peace agreement signed in 1995 to end the Bosnian War, then he and his family were targeted again for sanctions in 2022 and 2023. Last August tensions crested again when Bosnia’s election commission stripped Dodik of his title and he refused to step down.

Dodik meets with Putin in Sochi in October 2025.
Photographer: Mikhail Metzel/Pool/AFP/Getty Images

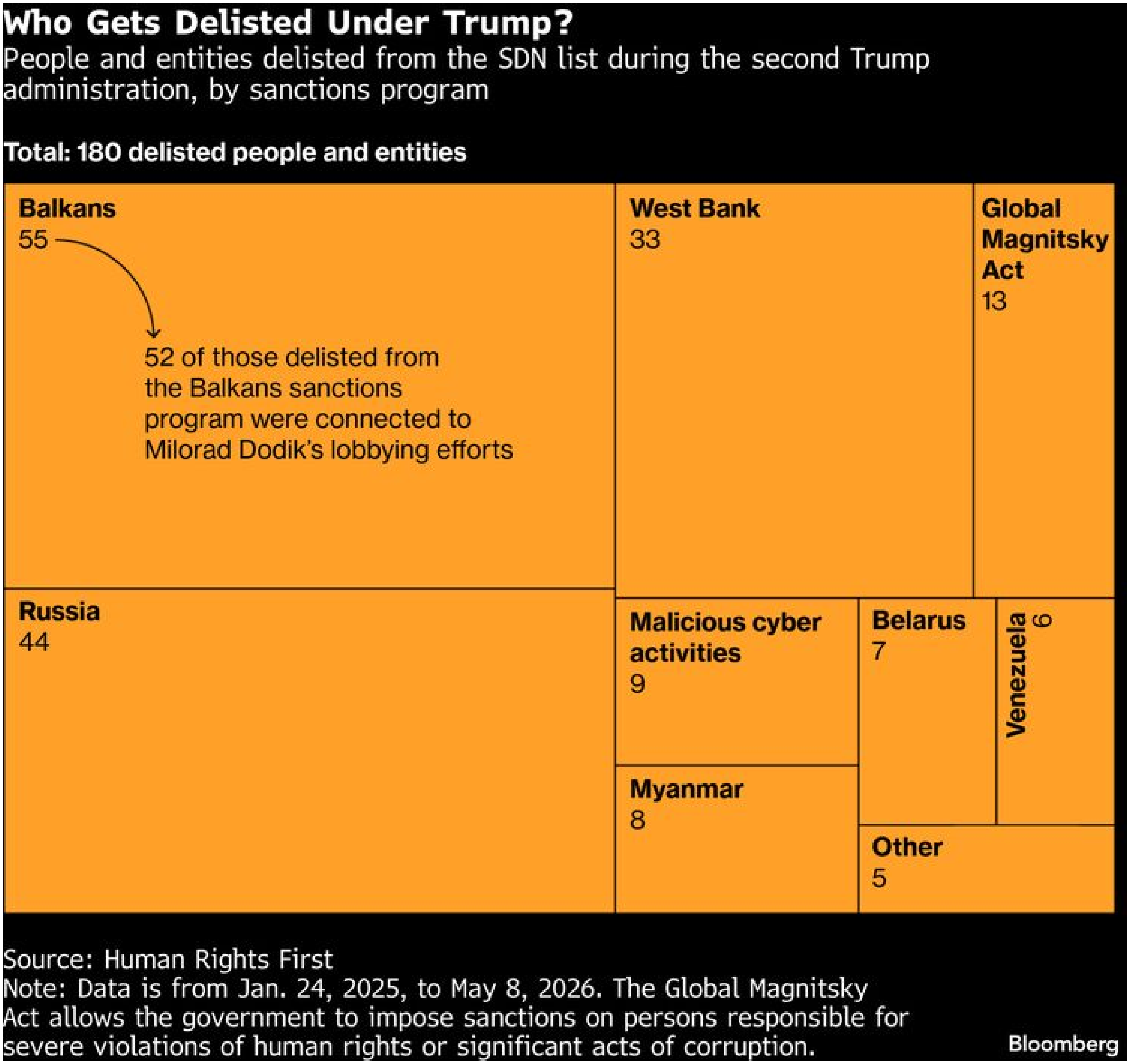
The relief campaign, formally conducted on behalf of the Serb Republic and encompassing others in addition to Dodik, involved numerous individuals in Trump's orbit and cost hundreds of thousands of dollars, according to lobbying records. Registered lobbyists included former Illinois Governor Rod Blagojevich, whom Trump pardoned early in his second term, and Christopher Harvin, a former Trump campaign adviser. (Blagojevich initially agreed to an interview with *Bloomberg Businessweek*, then stopped responding to messages. Harvin says he wasn't involved in lobbying over the sanctions but rather held meetings with US officials to explain the broader investment opportunities the region presented.)

Another person involved in the lobbying effort, who asked not to be identified so they could discuss sensitive details of the process, says OFAC was largely an afterthought. "The delisting process is very cumbersome, very formalized and usually a dead end," the person says. "The best approach, in my view, is to address the political actors."

Lobbyists met with officials in various departments and argued that the High Representative for

Bosnia and Herzegovina at the time, Christian Schmidt, who was responsible for overseeing the Dayton Accords, had unfairly targeted Dodik. The lobbyist says they cast Schmidt's efforts as "lawfare on steroids" to US officials. He likens Dodik's treatment to the various prosecutions and investigations of Trump. "Whatever they did to Donald Trump," the person says, "paled in comparison with what they were doing to Dodik." (The High Representative's office said in an email that the investigations into Dodik were conducted by independent judicial authorities, and that "Lobbyists represent the interests of their clients, and their statements should be understood in that context." Schmidt unexpectedly stepped down from his role in mid-May, calling it a "personal decision.")

The sides eventually agreed that the State Department would recommend the lifting of sanctions in exchange for Dodik stepping aside. Dodik appointed a longtime adviser as acting president on Oct. 18, and 11 days later, OFAC delisted him and dozens of his allies and family members. "It was very neat, very elegant and very effective," the lobbyist says. On X, Dodik thanked Trump and "his associates" for correcting "an injustice perpetrated by the Obama and Biden administrations." (The State Department said in an email that the administration had worked with partners in Bosnia and Herzegovina to bring greater stability to the country, and that "U.S. leadership and diplomacy successfully ended this crisis.")



This new approach to removing sanctions is precisely the sort of politics-first approach Ferrari prefers to avoid. “I just want to be the technical guy,” he says, “writing letters and coming up with remediation measures.” But even that’s not always straightforward. Ferrari says that, since Trump’s first term, the government has been asking more of sanctioned individuals. Rather than just changing their behavior, he says, they’re being asked to show they’re “taking proactive steps in furtherance of US policy.” With Venezuela, for example, activities like speaking out against the government of Nicolás Maduro are encouraged.

For the former banker, some normalcy has returned since being delisted. Getting health insurance again became possible, at least. Still, there are challenges, especially accepting that a career built over decades is now finished. There's also the realization that staying in Russia, where the bite of sanctions wouldn't have been felt, would have been easier. Sanctions only work, the ex-banker says, in places that are "easy to reach."

The banker contends that, however understandable Treasury's measures were, there should be a distinction between someone like them and the military-supporting "vampires" who were also on the blacklist. Of course, Ferrari might point out that vampires need lawyers too.

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