



Cari Stinebower

Partner
Chair, International Trade Practice

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Cari practices in the area of economic sanctions, export controls, and anti-money laundering (AML). With more than twenty-five years of government and private sector experience, she counsels clients on how to navigate the complex—and sometimes conflicting—web of government regulations. Cari provides practical guidance designed to allow clients to respond in a complex and changing political and business environment. Together with Winston's other practices, she provides comprehensive and practical solutions for a wide range of clients.

Cari works closely with colleagues in the Global Privacy & Data Security, Financial Services, Corporate, and Complex Commercial Litigation practices.

Cari counsels clients on compliance with U.S. economic sanctions, Bank Secrecy Act and AML laws and regulations, export controls, and anti-corruption/anti-bribery laws and regulations. She works with financial institutions and multinational corporations to develop compliance programs, conduct AML and Office of Foreign Assets Control (OFAC) risk assessments, conduct internal investigations, respond to government investigations, and address potential conflicts of law arising from non-U.S. data privacy and “blocking” laws and regulations. In the last five years,

she also has worked closely with all aspects of the maritime sector to address compliance with U.S. sanctions targeting Iran and, more recently, to address compliance with the Russian Price Cap Coalition.

Cari served as counsel for the U.S. Department of the Treasury's OFAC and as a Programs Officer for OFAC, where she advised on sanctions and anti-terrorism legislation and drafted United Nations Security Council Resolutions and related executive orders. Cari acted as agency counsel in Treasury's defense of a number of challenges to OFAC's authority, whether in litigation related to enforcement actions or in response to congressional investigations. As a result of her work at Treasury, Cari received the Secretary of the Treasury's Certificate for her role in providing guidance in the war against terrorism, establishing a program targeting the Taliban, working with the interagency group to unwind the first sanctions targeting the government of Libya, and drafting the Foreign Narcotics Kingpin Designation Act.

Cari is a frequent writer and speaker on sanctions, AML and anti-corruption/anti-bribery related issues. She has been quoted in publications such as *The Wall Street Journal*, *The New Yorker*, Reuters, Bloomberg and MoneyLaundering.com. Cari also served on Law360's 2022 International Trade Editorial Advisory Board.

Cari has been a guest lecturer at Yale University, Georgetown Law School, and the University of Zurich.

Key Matters

Some of the experience represented below may have been handled at a previous firm.

GOVERNMENT EXPERIENCE

- U.S. Department of the Treasury – Attorney Advisor, Office of the General Counsel, Office of Foreign Assets Control (2001–2005)
- Office of International Programs, Office of Foreign Assets Control (1999–2001)

REPRESENTATIVE EXPERIENCE

- Represents numerous maritime industry participants in establishing state-of-the-art compliance programs designed to nimbly react to the fast-paced designations – both multilateral and unilateral. Engagement includes coordination with federal agencies.
- Worked with a Middle Eastern financial regulator to establish and review anti-money laundering and sanctions compliance requirements for foreign financial institutions operating in that jurisdiction.
- Represented a European financial institution in a multiple-agency investigation into sanctions and money laundering violations relating to avoiding Iran sanctions.
- Worked with a U.S. manufacturer to maintain risk-based sanctions and an export controls compliance program, addressing EU and Canadian blocking statutes.
- Worked with non-U.S. insurers and reinsurers to address rapidly evolving sanctions compliance obligations stemming from the termination of U.S. involvement in the Joint Comprehensive Plan of Action.
- Together with a U.S. heavy equipment manufacturer, addressed evolving sanctions on Venezuela, incorporating anti-money laundering and anti-corruption compliance; applying for license applications from the Office of Foreign Assets Control (OFAC) to wind down obligations in Venezuela.
- Represents multiple clients before OFAC and State in de-listing matters. Representation can and has included litigation before the DC Circuit to challenge sanctions designations.
- Navigated primary and secondary sanctions exposure risk for a non-U.S. client engaged in the acquisition of equipment where Russian banks were involved in financing.

Recent Experience

Arthur J. Gallagher Acquisition of Clements Worldwide

Crowe LLP's Carveout Sale of its Health Care Consulting Business

Culper Capital Partners's Acquisition of Ring Precision Components, New Vision Industries, and Dieco to form The Producto Group

Dominion Financial Services: Mortgage-Backed Notes Series 2021-1

Terold Acquisition of Majority Stake in WX Brands

Hudson Ferry Capital's Sale of ALCOM

Forum Merger II Corp. Business Combination with Ittella International, Inc.

Argand Partners Acquires Cherry

US\$400M GATX Corporation Senior Notes Offering

Recognitions

- *Chambers Global* for International Trade: Export Controls & Economic Sanctions – USA (2019–2025)
 - *Chambers USA* for International Trade: Export Controls & Economic Sanctions (2018–2024)
 - *The Legal 500 US*: “Firm to Watch”, International Trade: Customs, Export Controls and Economic Sanctions (2023–2024)
 - *The Legal 500 US*: “Key Lawyer” for Transport: Aviation and Air Travel – Finance (2021–2023) and Dispute Resolution: Corporate and White-Collar Criminal Defense (2024)
 - *The Legal 500 Latin America* International Firms: for Compliance & Investigations (2024-2025)
 - *Latin Lawyer 250*: Recognized for Arbitration (2024)
 - *Who's Who Legal*: Trade & Customs (2024)
 - *Lawdragon*: “500 Leading Global Litigators” for International Arbitration & Litigation (esp. Global Trade) (2024) and “100 Lawyers You Need to Know in South America” for International Trade, Regulations, and Investigations
 - *Latinvex*: “Top 100 Female Lawyers” for Anti-corruption (2018–2024)
 - *Law360*: “MVP” for International Trade (2020)
 - *The National Law Journal*: “Government Relations Trailblazer” (2019)
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Activities

- American Bar Association (ABA) Section of Administrative Law Member
 - Vice Chair, Section of International Law, International Anti-Money Laundering and Professional Ethics Committee (2008–Present)
 - ABA Gatekeepers Task Force Member
 - Association of Certified Anti-Money Laundering Specialists Enterprise Member
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Credentials

EDUCATION

Cari received a J.D. and an M.A. in U.S. foreign policy from American University in 1996, and received a B.A. from Amherst College in 1993.

ADMISSIONS

- District of Columbia
- Maryland

Related Insights & News

PUBLICATIONS

- “Bankers Worldwide: You May Not Be Interested in Export Controls, But They Are Interested in You,” Banking Law Journal, Co-Author, March 2025
- “[Litigation Versus the Treasury in a Post ‘Chevron Deference’ Doctrine World](#),” Financier Worldwide Magazine, Co-Author, Jan. 22, 2025
- “[Commerce Prepares for an AI Warfare Future with Quarterly Reports of AI Modeling and Computer Cluster Plans](#),” Global Trade & Foreign Policy Insights, Co-Author, Sept. 12, 2024
- “[Revised AML Program Rules Coming Soon: Federal Banking Agencies and FinCEN Propose Rules to Update AML/CFT Program Requirements](#),” Client Alert, Co-Author, Sept. 9, 2024
- “[Treasury Releases Text of Proposed Rule to Regulate Semiconductor Manufacturing, AI, and Quantum Investments in China](#),” Global Trade & Foreign Policy Insights, Co-Author, July 15, 2024
- “[June 2024 Presidential Debate: Key Policy Takeaways](#),” Client Alert, Co-Author, July 10, 2024
- “[China and Hong Kong Expand Protections Over State Secrets](#),” Notes From The China Desk, Co-Author, June 21, 2024
- “[U.S.-China Trade Update: Recent Developments in Export Controls](#),” Global Trade & Foreign Policy Insights, Co-Author, June 20, 2024
- “[China Adds Additional Entities to the Unreliable Entity List](#),” Global Trade & Foreign Policy Insights, Co-Author, June 11, 2024
- “[Do You Know Your Customer? FinCEN & SEC Propose New Investment Adviser KYC Obligations](#),” Client Alert, Co-Author, May 31, 2024

- “The U.S. Corporate Transparency Act – Is Your Business Organization Ready to Comply?” Global Trade & Foreign Policy Insights, Co-Author, Feb. 7, 2024
- “New York Governor Signs Amended Version of the LLC Transparency Act into Law,” Client Alert, Co-Author, Jan. 17, 2024
- “FinCEN Launches Beneficial Ownership Information Registry,” Client Alert, Co-author, Jan. 4, 2024
- “FinCEN and BIS Expand SAR Guidance for Export Control Evasion, as General Prohibition Ten Looms Large,” Global Trade & Foreign Policy Insights, Co-author, Nov. 8, 2023
- “United States Eases Select Sanctions on Venezuela’s Oil Sector,” Global Trade & Foreign Policy Insights, Co-author, Oct. 20, 2023
- “China Places Export Controls on Raw Materials Used in Semiconductor Manufacturing,” Global Trade & Foreign Policy Insights, Co-author, July 9, 2023
- “The EU Issues an Eleventh Package of Sanctions Against Russia,” Global Trade & Foreign Policy Insights, Co-author, June 26, 2023
- “U.S. Sanctions and Export Controls Against Russia and FinCEN Alert,” Global Trade & Foreign Policy Insights, Co-author, May 25, 2023
- “The EU Issues a Tenth Package of Sanctions Against Russia,” Global Trade & Foreign Policy Insights, Co-author, March 2, 2023
- “The United States and the United Kingdom Announce New Wave of Sanctions Against Russia,” Global Trade & Foreign Policy Insights, Co-author, March 2, 2023
- “Winston & Strawn’s International Trade Overview of U.S., EU, and Japanese Sanctions: One Year After Russia’s Invasion of Ukraine,” Global Trade & Foreign Policy Insights, Co-author, Feb. 23, 2023
- “China Adds Lockheed Martin and Raytheon Missiles & Defense to the Unreliable Entity List,” Global Trade & Foreign Policy Insights, Co-author, Feb. 17, 2023
- “U.S. arrests Bitzlato cofounder, alleges \$700 mln of illicit funds processed,” *Reuters*, Media Mention, Jan. 18, 2023
- “Venezuelan oil exports flow using false documents, ships linked to Iran,” *Reuters*, Media Mention, Nov. 30, 2022
- “Removing Sanctions on Crypto Mixer Tornado Cash Won’t Be Easy,” *The Wall Street Journal – Risk & Compliance Journal*, Media Mention, Oct. 27, 2022
- “Top 12 Importing Do’s and Don’ts,” *Inbound Logistics*, Media Mention, Oct. 18, 2022
- “Unpacking OFAC’s New Russian Accounting Services Ban,” *Law360*, Co-author, May 16, 2022
- “How Multinationals Can Withstand US-China Trade Conflicts,” *Law360*, Co-author, March 16, 2022
- “Gazprombank: The Big Russian Lender That Dodged Western Sanctions,” *The Wall Street Journal*, Media Mention, March 11, 2022
- “Biden aims to hit wealthy Russians where it hurts to stop war against Ukraine,” *Washington Examiner*, Media Mention, March 3, 2022
- “Worst-Ever Russia Sanctions Set To Become A Business, Market Nightmare,” *Today UK News* and *UK Time News*, Media Mention, March 1, 2022
- “Higher prices, more risk: How Russia’s war on Ukraine is likely to affect the global economy,” NPR’s Marketplace Podcast, Media Mention, Feb. 24, 2022
- “Law firms gear up as U.S., Europe impose new sanctions on Russia,” *Reuters*, Media Mention, Feb. 23, 2022
- “Balance of Power: Preparing for Sanctions,” Bloomberg Balance of Power Podcast, Media Mention, Feb. 18, 2022

- "The Week in GRC: US and European Activist Investors Eye UK Companies and Kohl's Adopts Poison Pill," *Corporate Secretary*, Media Mention, Feb. 4, 2022
- "Threat of Hard-Hitting Russia Sanctions Leaves U.S. Companies Planning for All Scenarios," *The Wall Street Journal – Risk & Compliance Journal*, Media Mention, Jan. 31, 2022
- "The Morning Risk Report: Afghanistan Sanctions Could Be Imposed but Carry Risks, Observers Say," *The Wall Street Journal – Risk & Compliance Journal*, Media Mention, Aug. 17, 2021
- "Trump Order Clarifies Chinese Company Ban, but Questions Linger," *The Wall Street Journal – Risk & Compliance Journal*, Media Mention, Jan. 14, 2021
- "Deutsche's Compliance Procedures Limit Damage of Sanctions Settlement," *The Wall Street Journal – Risk & Compliance Journal*, Media Mention, Sept. 10, 2020
- "Commerce Move Affects Exports To Chinese Nuclear Co.," *Law360*, Co-author, Sept. 17, 2019
- "OFAC Places Caps on Remittances to Cuba and Removes Authorization for 'U-Turn' Transactions," Winston & Strawn Briefing, Co-author, Sept. 11, 2019
- "Helms-Burton litigation adds a wrinkle to business ventures in Cuba," *WorldECR* Special Report: US Sanctions and Enforcement, Issue 81, Co-author, July/Aug. 2019
- "Banks Beware: A Second Round of Significant Extraterritorial Sanctions Looms," Winston & Strawn Briefing, Co-author, July 12, 2019
- "In Two Announcements, OFAC Amends Three General Licenses Relating to Venezuelan and Ukrainian Transactions and Makes Minor Amendments to the North Korean Sanctions Regulations," Winston & Strawn Briefing, Co-author, July 1, 2019
- "U.S. Government Pressures Iran's Leadership with Additional Sanctions," Winston & Strawn Briefing, Co-author, June 26, 2019
- "Five Chinese Entities Involved with Supercomputers Placed on Entity List," Winston & Strawn Briefing, Co-author, June 26, 2019
- "Regulatory Amendments to 31 C.F.R. Part 501: Reporting, Procedures, and Penalties Regulations," Winston & Strawn Briefing, Co-author, June 21, 2019
- "Commerce and Treasury Narrow Travel General Licenses to Cuba," Winston & Strawn Briefing, Co-author, June 5, 2019
- "BIS Issues 90-DAY Temporary General License Authorizing Certain Exports to Huawei," Winston & Strawn Briefing, Co-author, May 23, 2019
- "Developments in Telecom Supply Chain Security Controls," Winston & Strawn Briefing, Co-author, May 17, 2019
- "DOJ Issues Updated Guidance on the 'Evaluation of Corporate Compliance Programs,'" Winston & Strawn Briefing, Co-author, May 13, 2019
- "Developments in U.S. Policy Toward Iran: New Executive Order Targets the Iron, Steel, Aluminum, and Copper Sectors of Iran," Winston & Strawn Briefing, Co-author, May 10, 2019
- "Lifting of Helms-Burton Title III Waiver and Sanctions on Cuba, Venezuela, Iran, and Nicaragua," Winston & Strawn Briefing, Co-author, April 24, 2019
- "All or Nothing? OFAC Adds PDVSA to the SDN List," *International Trade Bulletin*, Co-author, Jan. 30, 2019
- "The Month in International Trade – December 2018," *International Trade Bulletin*, Co-author, Jan. 10, 2019
- "Iran: Sanctions Issues Facing The International Shipping and Insurance Industries," *World ECR A World of Change*, Co-author, Nov. 2018
- "Financial Regulators Have Gotten the Memo – The Brand 'Memo'," *SA Financial Regulation Journal*, Co-author, Sept. 21, 2018

- AML Chapter, Handbook of Export Controls and Economic Sanctions, Author, 2013
- American Bar Association, International Legal Developments Year in Review: 2009. Chapter 2: Export Controls and Economic Sanctions, Co-author, Spring 2010

SPEAKING ENGAGEMENTS

- “Economic Sanctions Compliance and Enforcement: View from the Private Sector,” American P&I Club and Winston & Strawn Economic Sanctions Seminar, Co-panelist, May 29, 2024
- “Leading is Risky Business,” Caribbean Regional Compliance Association (CRCA) Conference 2023, Co-panelist, Oct. 13, 2023
- “Roundtable Discussion: Cuba Opportunities,” Winston & Strawn “Cuba 2023 – Navigating Opportunities in the Current Business and Regulatory Environment” Program, Moderator, May 5, 2023
- “How to Get Your Legal Transactions Approved with the EU Member States,” American Conference Institute U.S. Economic Sanctions Enforcement and Compliance Conference, Co-panelist, April 26, 2023
- “Future Waves: What Are the Trends in the Trust, Banking, Corporate Services and Insurance Sectors?” CRCA Conference, Co-panelist, Nov. 3, 2022
- “Risk & Compliance: Navigating Shipping through Volatile Geopolitics,” Lloyd’s List Webinar, Co-panelist, May 26, 2022
- “International Trade: 2021 Year End Review and Predictions for 2022,” Winston & Strawn Webinar, Co-panelist, Jan. 20, 2022
- “Iran: What to Expect from Current Iran Negotiations and Will Opportunities Open in 2022?” American Conference Institute U.S. Economic Sanctions Enforcement and Compliance Conference, Co-panelist, Dec. 7, 2021
- “China Landscape: Staying Compliant with Rapidly Changing Export Controls and Sanctions Regulations,” American Conference Institute, Co-panelist, April 27, 2021
- “Trade, National Security and the Future of US-China Economic Relations,” NFTC’s 2021 Virtual Conference and Awards Ceremony, Co-panelist, Jan. 12, 2021
- “Changing Hands: International Trade Under a New Administration,” Winston & Strawn Webinar, Co-panelist, Dec. 17, 2020
- “Economic Sanctions 2021: What to Expect from the New Administration,” ACAMS U.S. Capital Chapter Panel, Co-panelist, Nov. 13, 2020
- “The Moving Target of Sanctions Compliance,” First Risk and Compliance Forum, Presenter, Oct. 8, 2020
- “International Supply Chain and the U.S. Government Focus on China,” Winston & Strawn’s Disruptive Technologies Legal Summit, Co-moderator, Sept. 30, 2020
- “Third Party Management: Everyone Talks about Due Diligence, But How Do We Operationalize It?” Consero, Co-presenter, Sept. 2020
- “Russia Deep Dive: Staying Compliant with Primary and Secondary Sanctions Restrictions,” American Conference Institute, Co-panelist, July 28, 2020
- “Next Generation Screening: Pairing Artificial intelligence with Risk Intelligence,” Kharon & Accuity, Co-panelist, Aug. 20, 2020
- “Implications for the Danish Maritime Community of Recent U.S. Government Sanctions Guidance,” Winston & Strawn Webinar, Co-panelist, June 2, 2020
- “Sanctions and the Shipping Sector,” Center for a New American Security, Co-panelist, May 27, 2020
- “Recent Trends in Sanctions,” Winston & Strawn Webinar, Co-panelist, April 29, 2020

- ["How to Deter Russian Aggression in an Election Year: Legislative Options,"](#) Atlantic Council, Co-presenter, March 16, 2020
- "Sanctions: What are They Good For?" American Israeli Political Action Committee (AIPAC), Co-presenter, March 1, 2020
- "Gas Beyond an Energy Source – An Enabler of Trade and Industrialization in Latin America," Powering Africa Summit / Latin America Energy Forum, Moderator, Feb. 24, 2020
- "Helms Burton Act Roundtable," American Society of International Law, Miami, Co-panelist, Feb. 14, 2020
- "A 20/20 View on 2020's Legislative and Regulatory Outlook," ACAMS Annual Anti-Financial Crime and Public Policy Conference, Washington, D.C., Co-presenter, Feb. 6, 2020
- ["Economic Sanctions Developments and Disruptions for the Aviation Finance Sector,"](#) Airline Economics Growth Frontiers, Dublin, Ireland, Jan. 20, 2020
- "Surviving the Tsunami of Global Regulations," Caribbean Regional Compliance Association Conference, St. Lucia, Co-presenter, Nov. 8, 2019
- "Disruptive Worldwide Landscape," Silicon Valley Disruptive Technologies Summit, Santa Clara, California, Speaker, Sept. 11, 2019
- "U.S. Sanctions and Export Control – Are you up to Speed and Prepared?" Hong Kong General Chamber of Commerce, Co-presenter, Aug. 1, 2019
- "U.S. Sanctions and Export Control – Are you up to Speed and Prepared?" American Chamber of Commerce in Shanghai, China, Co-presenter, July 30, 2019
- "U.S. Sanctions and Export Control – Are you up to Speed and Prepared?" Beijing, China, Co-presenter, July 25, 2019
- "International Update: Sanctions, Export Controls, and Immunity," Legal Issues in Museum Administration, Washington, D.C., Co-presenter, March 21, 2019
- "Global Standards, Best Practices and Key Challenges for International Financial Institutions in Managing Sanctions Related Risks," Kharon Global Sanctions Summit, New York, Moderator, April 8, 2019
- "International Sanctions: Status Quo?" 5th Meeting on Financial Services Compliance, EIZ, Europa Institute at University of Zurich, Zurich, Switzerland, Co-presenter, Nov. 13, 2018
- "Bribery and Corruption, Money Laundering, and Sanctions: Understanding Financial Crime Risks and Their Impact on Shipping," 2018 MLA AGM, Franschhoek, South Africa, Co-presenter, Sept. 1, 2018

RECOGNITIONS

Winston & Strawn Noted by *Latin Lawyer* as One of the Most Popular International Law Firms in 2024 in Latin America

APRIL 10, 2025

BLOG

Executive Order 14203 "Imposing Sanctions on the International Criminal Court" and Key Takeaways

APRIL 9, 2025

BLOG

April 2 Tariffs and Implications for Importers and Investors

APRIL 3, 2025

SPONSORSHIP

Winston & Strawn Sponsors, Attorneys Speak at FIBA AML Conference 2025

MARCH 24, 2025

RECOGNITIONS

Winston Attorneys Featured on the 2025 *Lawdragon* 100 Lawyers You Need to Know in South America List

MARCH 21, 2025

BLOG

President Trump's Iran-Related Memo and Key Takeaways

MARCH 18, 2025

BLOG

Executive Order Directs Investigation to Consider a Global Copper-Import Tariff

MARCH 7, 2025

BLOG

Trump Hosts Modi to Discuss Trade Arrangements

MARCH 6, 2025

BLOG

Executive Order 14148: Impact on Sanctions and Trade

MARCH 3, 2025

RECOGNITIONS

Winston Recognized in *Chambers Global* 2025

FEBRUARY 25, 2025

BLOG

U.S. Government Proposes Trade Sanctions Against Chinese-Built or -Operated Vessels

FEBRUARY 24, 2025

BLOG

President Trump's Proclamation on Aluminum Tariffs

FEBRUARY 20, 2025

Capabilities

Government Investigations, Enforcement & Compliance

Compliance Programs

International Trade

Corporate Governance

Crisis Management

Financial Services Transactions & Regulatory

Financial Services Litigation

Maritime & Admiralty

Financial Services

Cryptocurrencies, Digital Assets & Blockchain Technology

Automotive & Mobility

Oil & Gas

Energy

Technology, Media & Telecommunications

Insurance

Financial Crimes Compliance