



## Dainia Jabaji

Of Counsel

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Dainia focuses her practice on white collar, financial regulatory, and international trade investigations, enforcement, compliance, and defense. Drawing on her prior experience leading regulatory investigations at a global financial institution, Dainia helps clients navigate important complex regulations in a changing world. Dainia brings over a decade's-worth of experience in financial regulatory/national security matters, including those related to Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT), the Bank Secrecy Act (BSA), and Office of Foreign Assets Control (OFAC).

Since the beginning of her career, Dainia has worked with financial industry clients in navigating complex and changing regulations. Having previously led cross-border sanctions investigations at one of the world's largest financial institutions, Dainia provides practical and valuable assistance to clients in identifying, understanding, and investigating regulatory concerns. Dainia has particularly notable experience in AML/CFT/BSA and OFAC sanctions regulations and is often invited to speak on such topics.

Dainia regularly works with financial institutions and other clients in conducting internal investigations and represents them in front of government regulators and agencies, including OFAC and the U.S. Department of the

Treasury's Financial Crimes Enforcement Network (FinCEN). She also assists with disclosures, petitions, license applications, and enforcement action defense. Dainia has represented clients in front of the U.S. Department of Justice and other law enforcement agencies in significant federal investigations. She has also worked on matters involving the Consumer Financial Protection Bureau (CFPB), the Office of The Comptroller of The Currency (OCC), and the Federal Reserve Board (FRB). Additionally, she has defended clients in class actions related to these regulations, and in civil litigation matters related to various torts such as defamation and discrimination.

Dainia has a strong interest in pro bono representation and has assisted clients in a variety of matters relating to international humanitarian relief efforts, police brutality and rights violations, and asylum.

## Recent Experience

Secured Settlement for Fox on Brink of Trial in High-Profile Defamation Litigation Brought by US Dominion Voting Systems

TradeStation Announces Business Combination with Quantum FinTech

TradeZero Announces Business Combination with Dune Acquisition Corp.

The Jordan Company, LP's Acquisition of the Spartech Group

R1's Acquisition of VisitPay

Netfin Acquisition Corp.'s Business Combination with Triterras Fintech Pte Ltd.

Frontenac Co.'s Acquisition of Newterra Group Ltd.

## Activities

- National Association of Women Lawyers' (NAWL), Selected for 2024 Leadership Program
- American Bar Association
- New York State Bar Association
- Washington DC Bar Association
- Palestinian American Bar Association
- Los Angeles Association of Business Trial Lawyers
- Association of Certified Anti-Money Laundering Specialists (ACAMS), Enterprise Member
- ACI Women in Sanctions Network, Member
- Alliance for Inclusion and Justice, Board Member
- Porta Strategies LLC, Advisory Board Member

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## Credentials

### EDUCATION

Dainia received her J.D. from State University of New York at Buffalo School of Law in 2013, and her B.S. from The College at Brockport, State University of New York in 2010.

## ADMISSIONS

- District of Columbia
- California
- New York

## 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
- “[New York Governor Signs Amended Version of the LLC Transparency Act into Law](#),” *Winston & Strawn Briefing*, Co-author, Jan. 17, 2024
- “[FinCEN Launches Beneficial Ownership Information Registry](#),” *Winston & Strawn Briefing*, Co-author, Jan. 4, 2024
- “[The U.S. Corporate Transparency Act – Is Your Business Organization Ready to Comply?](#)” *Winston & Strawn Briefing*, Co-author, Nov. 15, 2023
- “[FinCEN and BIS Expand SAR Guidance for Export Control Evasion, as General Prohibition Ten Looms Large](#),” *Winston & Strawn Briefing*, Co-author, Nov. 8, 2023
- “[FinCEN Finalizes Rule Implementing Beneficial Ownership Reporting Requirements](#),” *Winston & Strawn Briefing*, Co-author, Oct. 31, 2022
- “[OFAC Sanctions a Second Virtual-Currency Mixer](#),” *Winston & Strawn Briefing*, Co-author, Aug. 15, 2022
- “[Russia–Ukraine Conflict Increases Regulatory Risks for Sanctions Evasion Through Crypto-Based Transactions](#),” *Winston & Strawn Briefing*, Co-author, July 27, 2022
- “[Russian Economic Sanctions May Heighten the Risks for Evasion Through Cryptocurrencies](#),” *Winston & Strawn Briefing*, Co-author, July 26, 2022
- “[Unpacking OFAC’s New Russian Accounting Services Ban](#),” *Law360*, Co-author, May 16, 2022
- “[Sanctions Summary – Russia Invasion of Ukraine](#),” *Winston & Strawn Briefing*, Co-author, Feb.–Mar. 2022
- “[Another Crack in the Protective Shell of Shell Companies](#),” *Winston & Strawn Briefing*, Co-author, Dec. 17, 2021
- “[OFAC’s Eye on Virtual Currencies – Cryptocurrency Regulation and Enforcement Updates](#),” *Winston & Strawn Briefing*, Co-author, Nov. 4, 2021
- “[Russia Sanctions and Considerations in Building a Sanctions Compliance Programme](#),” *Journal of Financial Compliance, Volume 4, Number 4*, Co-author, Summer 2021
- “[Biden Amends EO 13959, Removes Several Previously Designated Chinese Military Companies, and Designates 59 Chinese Companies as Chinese Military-Industrial Complex Companies](#),” *Winston & Strawn Briefing*, Co-author, June 4, 2021
- “[AML Risk Alert for Broker-Dealers](#),” *Winston & Strawn Briefing*, Co-author, April 12, 2021
- “[Congress Passes Corporate Transparency Act Requiring Small Businesses to Report Beneficial Ownership Information](#),” *Winston & Strawn Briefing*, Co-author, Dec. 21, 2020

- “Tensions Expected to Grow Between Washington and Beijing,” Winston & Strawn Briefing, Co-author, Dec. 2, 2020
- “FinCEN Issues First-of-its-kind \$60 Million Penalty Against Operator of Bitcoin ‘Mixers,’” Winston & Strawn Briefing, Co-author, Oct. 29, 2020
- “FFIEC Updates BSA/AML Examination Manual,” Winston & Strawn Briefing, Co-author, April 30, 2020
- “Financial Institutions – Regulatory Response and Considerations Related to the COVID-19 Pandemic,” Winston & Strawn Briefing, Co-author, April 7, 2020
- “Bank of England Publishes Discussion Paper: Central Bank Digital Currency,” Winston & Strawn Briefing, Co-author, April 3, 2020
- “Treasury Department Releases 2020 National Strategy for Key Updates to AML/CFT Regime,” Winston & Strawn Briefing, Co-author, Feb. 25, 2020
- “House Passes Beneficial Ownership Disclosure Legislation Aimed at Increasing Transparency of Small Businesses in the U.S.,” Winston & Strawn Briefing, Co-author, April 30, 2020
- “U.S. Walks Back Sanctions Against Turkish Government,” Winston & Strawn Briefing, Co-author, Oct. 24, 2019
- “U.S. Imposes Sanctions on Portions of the Turkish Government,” Winston & Strawn Briefing, Co-author, Oct. 15, 2019
- “OFAC Places Caps on Remittances to Cuba and Removes Authorization for ‘U-Turn’ Transactions,” Winston & Strawn Briefing, Co-author, Sept. 11, 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

## **SPEAKING ENGAGEMENTS**

- “Sanctions 101: Sanctions Impacting Palestine and Related Compliance Considerations,” Palestinian American Bar Association Webinar, Co-presenter, Nov. 25, 2024
- “International Trade 2023 Year In Review and Predictions for 2024,” Winston & Strawn Webinar, Speaker, Jan. 4, 2024
- “Newly Emerging High-Risk Jurisdictions: Best Practices to Identify & Mitigate Risk in China, Latin America, UAE, Oman, Turkey, and the Former Soviet Union,” ACI Women in Sanctions Network Webinar, Co-presenter, Oct. 25, 2023
- “A Needle in a Paystack: Best Practices in Identifying Sanctioned Countries,” Association of Certified Sanctions Specialists (ACSS) Webinar, Panelist, July 20, 2023
- “Cryptocurrency or Kryptonite? How Companies Can Protect Against Criminal and Regulatory Enforcement,” Around the Block(chain) with Winston CLE Series, Panelist, April 13, 2022
- “International Trade: 2021 Year End Review and Predictions for 2022,” Winston & Strawn Webinar, Panelist, Jan. 20, 2022
- “Current Events and Hot Topics in Sanctions,” ACAMS New York Chapter Webinar, Panelist, Nov. 9, 2021
- Texas Blockchain Summit, Attendee Interviewer, Oct. 8, 2021
- “Ransomware and Its Impact on Financial Crime,” ACAMS New York Chapter Webinar, Panelist, June 29, 2021

- “Blockchain and Crypto: Regulations and Compliance Nuances, and Managing Risk,” The Platinum Network’s Regliance 2021 Conference, Panelist, June 10, 2021
  - “Changing Hands: International Trade Under a New Administration,” Winston & Strawn Webinar, Moderator, Dec. 17, 2020
  - “International Payments - Sanctions and AML Compliance in the Fintech Era,” Winston & Strawn’s Disruptive Technologies Legal Summit, Moderator, Sept. 30, 2020
  - “A Primer on Anti-Money Laundering and Counter Terrorism,” American Bar Association, 10th Annual National Institute for Consumer Financial Services, Nashville, TN, Presenter, Oct. 4, 2019
  - “Secrets to Managing an ICO 2.0,” StartEngine ICO 2.0 Summit, Santa Monica, CA, Panelist, April 20, 2018
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## **BLOG**

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

APRIL 9, 2025

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## **CLIENT ALERT**

FinCEN Issues Interim Final Rule, Bringing an End to the Corporate Transparency Act as We Know It

MARCH 25, 2025

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## **BLOG**

President Trump’s Iran-Related Memo and Key Takeaways

MARCH 18, 2025

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## **CLIENT ALERT**

Corporate Transparency Act: Treasury Department Halts All Enforcement of Its CTA Rules and Announces that Future CTA Rules Won’t Apply to Domestic Reporting Companies

MARCH 3, 2025

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## **BLOG**

Executive Order 14148: Impact on Sanctions and Trade

MARCH 3, 2025

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## **CLIENT ALERT**

Corporate Transparency Act: FinCEN Announces It Will Not Issue Fines or Penalties for Failure to File or Update BOI by March 21, 2025

FEBRUARY 28, 2025

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## **CLIENT ALERT**

Corporate Transparency Act: Latest Court Order Puts the BOI Reporting Rule Back in Effect, But FinCEN Extends the Compliance Deadline

FEBRUARY 19, 2025

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## **SEMINAR/CLE**

Winston Hosts 2025 Financial Services Symposium in Charlotte

JANUARY 30, 2025

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**BLOG**

With the End of Chevron Deference, Doors Open for Financial Institutions to Challenge Treasury

JANUARY 27, 2025

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**CLIENT ALERT**

Corporate Transparency Act Updates: SCOTUS Pauses One Preliminary Injunction and FinCEN Confirms BOI Reporting Is On Hold (For Now)

JANUARY 24, 2025

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**PRO BONO IN ACTION**

Winston Facilitates Medical Evacuation of a Critically Wounded Girl

DECEMBER 18, 2024

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**CLIENT ALERT**

Federal Judge in Texas Blocks Enforcement of the Corporate Transparency Act Nationwide and FinCEN States That It Will Not Require Compliance with the CTA – For Now

DECEMBER 8, 2024

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## Capabilities

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International Trade

Government Investigations, Enforcement & Compliance

Financial Services Transactions & Regulatory

Public Companies

Financial Services

Insurance

Cryptocurrencies, Digital Assets & Blockchain Technology

Financial Crimes Compliance