



## Dainia Jabaji

Of Counsel

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**Dainia Jabaji focuses her practice on white collar, government enforcement, internal investigations, grand jury investigations, and financial crimes compliance. Dainia previously worked for one of the world’s largest financial institutions, where she specialized in Bank Secrecy Act (BSA), anti-money laundering (AML), and Office of Foreign Assets Control (OFAC) sanctions matters.**

For the past decade, Dainia has worked with some of the world’s largest financial institutions and international companies on bank regulatory and financial crimes compliance matters. Dainia provides a gamut of services to her clients—from proactive counseling regarding policies and procedures, to conducting internal investigations, drafting disclosures, responding to subpoenas, and representing clients in front of government regulators and supervisory bodies.

Prior to joining Winston, Dainia led multi-jurisdictional OFAC sanctions investigations and conducted BSA/AML risk assessments for a global financial institution. Drawing on her wealth of experience, Dainia brings an in-depth understanding of the complexity of financial institutions and their internal structures, international payment processing, and complex government regulations.

Dainia also frequently assists non-financial institution clients with respect to OFAC/AML matters, and in conducting internal investigations and providing regulatory defense services.

## 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.

R1's Acquisition of VisitPay

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

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

Frontenac Co.'s Acquisition of Newterra Group Ltd.

## Activities

- American Bar Association
- New York State Bar Association
- Washington DC 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

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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

- ["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
- ["S. Walks Back Sanctions Against Turkish Government,"](#) Winston & Strawn Briefing, Co-author, Oct. 24, 2019
- ["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
- ["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**

- "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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### **CLIENT ALERT**

Be Advised: Investment Advisers Face Renewed Prospect of AML/CFT Compliance Obligations

MARCH 4, 2024

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### **CLIENT ALERT**

FinCEN House Rules: Proposed AML Rules to Combat Money Laundering in Residential Real Estate

FEBRUARY 20, 2024

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**WEBINAR**

The Corporate Transparency Act's Beneficial Ownership Information Reporting Rule and What You Need to Know  
FEBRUARY 8, 2024

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**BLOG**

The U.S. Corporate Transparency Act – Is Your Business Organization Ready to Comply?  
FEBRUARY 7, 2024

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**CLIENT ALERT**

New York Governor Signs Amended Version of the LLC Transparency Act into Law  
JANUARY 17, 2024

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FinCEN Launches Beneficial Ownership Information Registry  
JANUARY 4, 2024

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**BLOG**

FinCEN and BIS Expand SAR Guidance for Export Control Evasion, as General Prohibition Ten Looms Large  
NOVEMBER 8, 2023

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**SPEAKING ENGAGEMENT**

Dainia Jabaji Speaks on ACSS New York Chapter Webinar: "A Needle in a Paystack: Best Practices in Identifying Sanctioned Securities"  
JULY 20, 2023

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**NEWS**

2022 Pro Bono Impact Report  
MAY 1, 2023

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**CLIENT SUCCESS**

Winston Acts as Lead Trial Counsel for Fox News and Fox Corp. in US Dominion Voting Systems Defamation Cases, Settling Matter on Brink of Trial  
APRIL 18, 2023

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**BLOG**

FinCEN Finalizes Rule Implementing Beneficial Ownership Reporting Requirements  
OCTOBER 31, 2022

# Capabilities

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