

Europe-Caucasus-Asia

For decades, Miller & Chevalier has assisted clients with their toughest challenges in the Europe-Caucasus-Asia (ECA) region, which includes Armenia, Azerbaijan, Belarus, Estonia, Georgia, Kazakhstan, Kyrgyzstan, Latvia, Lithuania, Moldova, Russia, Tajikistan, Turkmenistan, Ukraine, and Uzbekistan. We regularly handle significant matters for international and ECA-based clients operating in the region, who benefit from our lawyers' cultural and language fluency, significant on-the-ground knowledge, and relationships with local counsel. Our highly skilled practitioners include 17 attorneys with deep experience in the region, two of whom speak Russian. Our team includes individuals who have worked in relevant U.S. government agencies, including the U.S. Securities and Exchange Commission (SEC) lawyer, the Fraud Section of the Criminal Division at the U.S. Department of Justice (DOJ), and the U.S. Department of Commerce. This government experience is complemented by our in-house expertise – many of our attorneys have spent time detailed to companies with operations in the ECA region.

Clients around the world currently face a tapestry of sanctions regimes, export control regulations, and other relevant laws that are difficult to navigate for most. Our [Economic Sanctions and Export Controls](#) experts routinely advise and represent clients before the Department of Treasury's Office of Foreign Asset Control (OFAC) in delisting and licensing applications under the various sanctions programs, conduct due diligence on assets in the ECA region, counsel on export control issues, interact with banking institutions to resolve blocking of funds, and represent in court forfeiture proceedings. Our team regularly conducts risk assessments and audits and advises on commodity jurisdiction determinations and classification rulings, including for foreign investment in the United States/Committee on Foreign Investment in the United States (CFIUS) review.

In addition, we have profound experience assisting clients, including companies and boards of directors, in a variety of matters, including:

- Conducting [internal investigations](#) on various subject matters, such as potential fraud, embezzlement, corruption, and [workplace misconduct](#)
- Advising clients on anti-corruption compliance in the region, including as related to the [U.S. Foreign Corrupt Practices Act](#) (FCPA)
- Developing, managing, and testing anti-corruption compliance programs, providing issue-specific advice and opinion letters
- Advising on transaction structuring and due diligence
- Representing our clients before U.S. enforcement agencies, including the DOJ, the Department of Commerce, Department of Treasury, Department of State, and the SEC

In 2018, Miller & Chevalier led the inaugural [Europe-Caucasus-Asia Corruption Survey](#), in which we partnered with 10 law firms in the ECA region to survey business executives, in-house legal and compliance personnel, and other professionals working in a broad cross-section of industries regarding corruption in the region.

Our Senior Counsel [Homer E. Moyer, Jr.](#), is the founder and Chairman emeritus of the Board of the CEELI Institute, an independent, non-profit organization dedicated to the development and training of an international network of legal and judicial professionals committed to advancing the rule of law, with a focus on Central and Eastern Europe. Practice Lead [Ann Sultan](#) currently serves as president of the Board of Friends of the CEELI Institute and firm Chair [Kathryn Cameron Atkinson](#) serves on the Institute's International Advisory Board.

Representative Engagements

- Investigated and advised on potential U.S. sanctions issues arising from a major airline company's attempt to purchase aircraft

engines from a Russian entity.

- Provided advice and counsel to a large multinational energy company regarding potential issues under the U.S. sectoral sanctions against Russia related to the payment of debts owed by companies on OFAC's Sectoral Sanctions Identification (SSI) list. After investigation of the facts, the firm interacted with the company's bank and with U.S. regulators on complex issues about whether U.S. sanctions permit payment after the normal "debt" deadline for SSI's where delays in payment occur as a result of attempts to resolve good faith disputes about the proper amount of an invoice for goods and services. Ultimately obtained a license from U.S. regulators so that company could accept late payment of the receivable.
- Advised a Fortune Global company and its senior executive management team on rapidly changing economic sanctions developments concerning Countering America's Adversaries Through Sanctions Act (CAATSA) and regulatory changes by OFAC.
- Advised companies and individuals on ITAR and export control defenses to alleged violations, including related administrative, constitutional, and criminal legal defenses.
- Successfully pursued OFAC license to secure funds from an SSI in compliance with U.S. sanctions against Russia.
- Represented individuals in petitions to delist property (aircraft, vessels, etc.) from OFAC's Specially Designated Nationals (SDN) List.
- Conducted a challenging investigation on behalf of VEON (formerly VimpelCom), a major European telecommunications company, into activities in the ECA region, with the investigation including Uzbekistan, Kazakhstan, Tajikistan, Georgia, Armenia, Russia, and other countries, as well as investigations by the U.S., Sweden, France, the Netherlands, and Switzerland. In addition to conducting the investigation, our team was lead counsel in negotiating one of the most significant resolutions since the passage of the FCPA and assisted the company throughout its three-year monitorship, which was successfully completed in 2020.
- Conducted an investigation of a global agricultural company's operations in the Ukraine in response to anonymous allegations of corruption submitted to our client, which copied the DOJ. After our presentation on the findings, the DOJ closed its investigation with no action taken.
- Served as U.S. counsel to a Canadian company with a U.S. issuer parent. Our team assisted Canadian counsel respond to a whistleblower report of corruption in connection with a project in Kazakhstan. The whistleblower reported the allegations to the Royal Canadian Mounted Police and our team assisted the company in disclosing the allegations to the DOJ and SEC.
- Represented a software company in addressing allegations of improper payments to a Russian official in connection with obtaining contracts and related business. The investigation involved the collection of relevant data across several sites, and document review and interviews in Russian and English. Our team helped the client revise its compliance program to better address Russia-related risks and has advised the client as to specific compliance issues.
- Represented an energy company in an FCPA investigation conducted by the SEC and DOJ, with an ancillary investigation by the U.K. Serious Fraud Office (SFO). The matter, which concerned operations in Russia and several other countries, involved government interviews of company personnel, including very senior management. Ultimately, the DOJ and SEC issued declination letters.
- Conducted an investigation of whether an employee of an oil and gas services company was colluding with an agent to bribe government customers. Our team oversaw the review of electronic data (primarily in Russian), conducted interviews of employees and the third party, and recommended remediation.
- Engaged by a multinational corporation in the oil and gas industry to conduct an investigation of its Italian subsidiary's use of representatives to sell to customers in Russia. The investigation included interviews in Italy and Switzerland, discussions with representatives of third parties, and document review (in English and Italian) to assess potential violations of the FCPA and U.S.

export controls. Our team assisted the company in remediating the issues, including termination of third parties and employees.

- Investigated the circumstances of a prevailing bid on a tender submission to a national oil company in Ukraine, and related compliance issues. Our team engaged directly with the Audit Committee Chair of the national oil company, as well as its Internal Audit lead.

Government Experience

- Director, Office of International Affairs, U.S. Securities and Exchange Commission
- Senior Adviser for International Issues to U.S. Securities and Exchange Commission Chairman Arthur Levitt
- Deputy Director, Office of International Affairs, U.S. Securities and Exchange Commission
- Assistant Director, Office of International Affairs, U.S. Securities and Exchange Commission
- Assistant Chief Litigation Counsel, Division of Enforcement, U.S. Securities and Exchange Commission
- General Counsel, U.S. Department of Commerce
- Counselor to the Secretary, U.S. Department of Commerce
- Deputy General Counsel, U.S. Department of Commerce
- Attorney-Advisor, U.S. Customs and Border Protection, Office of International Trade - Regulations & Rulings

Rankings and Recognition

Chambers USA

- Corporate Crime & Investigations: The Elite (Nationwide), 2021 - 2025
- Corporate Crime & Investigations (Nationwide), 2015 - 2020
- FCPA (Nationwide), 2014 - 2025
- International Trade: Customs (Nationwide), 2024 - 2025
- International Trade: Export Controls & Economic Sanctions (Nationwide), 2022 - 2025
- International Trade (Nationwide), 2005 - 2015

Chambers Global

- Corporate Crime & Investigations (USA), 2016 - 2024
- Corporate Investigations/Anti-Corruption (Global: Multi-Jurisdictional), 2017 - 2024
- FCPA (USA), 2015 - 2024
- Investigations & Enforcement (International & Cross-Border) (USA), 2020 - 2024

Global Investigations Review

- GIR 30 Top Global Investigations Practice, 2015 - 2024
- Boutique or Regional Practice of the Year, 2016
- "Elite" in Washington, DC's FCPA Bar, 2016

Legal 500

- Dispute Resolution: International Trade (U.S.), 2011, 2013 - 2022

Best Lawyers® "Best Law Firms"

- International Trade and Finance Law (District of Columbia), 2011 - 2025
- International Trade and Finance Law (National), 2011 - 2025

Ann Sultan

PRACTICE LEAD

RELATED PEOPLE

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