

Ex-OFAC Counsel, Sanctions Pro Joins Morrison & Foerster

By **Al Barbarino**

Law360 (February 10, 2021, 6:49 PM EST) -- Andrea Delisi, a former lead attorney in the U.S. Treasury Department's Office of Foreign Assets Control, has joined Morrison & Foerster LLP's national security and global risk groups, she confirmed in an interview with Law360 on Wednesday.

Delisi, an ex-OFAC assistant chief counsel, started work at the firm Monday as of counsel and is based in Washington, D.C.

During her nearly eight years at OFAC, Delisi advised on economic sanctions programs involving human rights, corruption and terrorism tied to countries including Iran, Syria and Venezuela.

"Initially I will be sticking to what I know best, and that's sanctions work," Delisi said of her new role.

"I'll be dealing with the same legal framework, but viewing the questions from a different angle," she said, noting that she anticipates working with a host of global financial institutions to ensure compliance with OFAC sanctions.

The task is particularly crucial amid an administration change, which can result in fairly quick changes in sanctions policy, Delisi said.

A prime example came Wednesday, when President Joe Biden announced the U.S. will sanction Myanmar's military leaders after a coup that overturned the country's democratic election, she noted.

"Sanctions are pretty nimble. They can be stood up and taken down in some circumstances, and they can be adapted to meet the foreign policy goals of new administrations," Delisi said.

The new role sees Delisi teaming up once again with John Smith, co-head of the firm's national security practice and a former OFAC director who left the agency in May 2018.

"When I heard John was looking to expand his team, I couldn't pass up the opportunity," Delisi said.

Smith told Law360 that Delisi brings a "vast wheelhouse" of knowledge across industries to help clients understand OFAC's expectations and guidance, adding that she is "coming in at a key time, as the world



Andrea Delisi

of sanctions work" shifts along with the new administration.

"Global clients want to know what to expect and what the rules are in this brave new world," Smith said, noting that he anticipates a renewed focus on countries like China, Russia, Venezuela and Iran.

Delisi's work at OFAC also included drafting presidential executive orders, the publication of regulations and regulatory guidance, and the interpretation of statutes, legislative proposals and judicial decisions, the firm said in a statement Wednesday.

She also advised OFAC regarding enforcement and civil penalty actions; regulatory, licensing and compliance matters; and sanctions listing and delisting actions, the firm said.

Before joining OFAC in 2013, Delisi spent more than seven years as an associate with Hogan Lovells.

--Editing by Bruce Goldman.