

## Enforcement Insights

### Complex and Dynamic Sanctions Enforcement

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2025 was a notable year for U.S. sanctions policy and enforcement, marked by both major policy shifts and active regulatory oversight. In addition to applying sanctions as a standard foreign-policy tool, the administration utilized sanctions to address national security concerns stemming from TCOs and cartels and to address trade concerns through the imposition of tariffs. OFAC maintained a steady pace of enforcement, underscoring the importance of robust compliance programs and careful monitoring of business counterparties and transactions.

Several key policy developments shaped the sanctions landscape in 2025. [Executive Order 14157](#) authorized the designation of certain cartels as Foreign Terrorist Organizations, reflecting an increased focus on disrupting fentanyl trafficking networks. In a significant shift, sanctions targeting Syria were largely rolled back through OFAC [General License 25](#), issued in May, authorizing nearly all transactions previously prohibited under the Syria Sanctions Regulations, and a June [executive order](#) lifting the Syrian national emergency, formally terminating OFAC's Syria sanctions program.

Sanctions also were prominently used this year in response to trade concerns. After declaring national emergencies related to trade deficits and fentanyl trafficking, the administration utilized the International Emergency Economic Powers Act (IEEPA) to impose tariffs on imports from dozens of countries, including Canada, China, and Mexico. In November, the Supreme Court heard arguments on the executive authority to impose tariffs through IEEPA; to date no ruling has been issued.

OFAC announced 14 civil penalties in 2025, across multiple sectors and covering a variety of fact patterns. We summarize four notable actions below:

**Family International Realty:** In January, Family International Realty, a Miami-based real estate brokerage, and its owner, Roman Sinyavsky, [settled](#) allegations that they facilitated the transfer of ownership of two luxury condominiums in Miami on behalf of two individuals targeted under OFAC's Ukraine/Russia sanctions. Family International Realty and several law firms allegedly participated in transferring the real estate interests of the sanctioned individuals to non-sanctioned family members, and companies owned by those family members. Family International Realty and Sinyavsky agreed to pay OFAC a settlement amount of \$1,076,923. In parallel civil and criminal proceedings, the two condominiums were ordered forfeited, and Sinyavsky pleaded guilty to IEEPA violations and money laundering and was sentenced to a year and a day in prison. These enforcement actions demonstrate OFAC's and the DOJ's continued focus on "gatekeepers" such as realtors, investment advisors, and attorneys, and the risks that dealing with blocked property pose to the various parties to, and service providers involved in, a transaction.

**Unicat Catalyst Technologies:** In June, Unicat Catalyst Technologies agreed to pay \$3.9 million to [settle](#) alleged violations of OFAC's Iran and Venezuela sanctions programs. Through third parties and its subsidiaries outside of the U.S., Unicat supplied industrial catalyst products valued at \$2.6 million to sanctioned end-users in Iran and Venezuela. In a parallel criminal action, a private equity firm that acquired Unicat discovered the sales to Iran and Venezuela, promptly disclosed the conduct, and cooperated fully with the DOJ, receiving the first-ever declination against an acquirer under the DOJ's NSD M&A Safe Harbor Policy, which we [previously discussed](#) in our second quarter update. The case underscores the importance of supply-chain compliance processes, and the DOJ's willingness to decline prosecutions against acquiring companies that self-report misconduct and cooperate.

**GVA Capital:** Also in June, OFAC imposed a \$216 million civil [penalty](#)—the statutory maximum—on GVA Capital, a San Francisco-based venture capital firm, after OFAC found that the firm had knowingly managed an investment for a sanctioned Russian national. OFAC found that GVA's senior management dealt with an individual they knew was a sanctioned Russian individual's proxy, thereby indirectly dealing with, and acting for, the sanctioned Russian individual. GVA also obtained a legal opinion that incorrectly determined that it was not dealing in blocked property. OFAC found that GVA's violations were not self-disclosed and were egregious. In addition, GVA failed to respond fully to an OFAC subpoena for more than two years, resulting in 28 violations of OFAC's Reporting, Procedures, and Penalties Regulations. This rare, non-settled public enforcement action highlights OFAC's willingness to take enforcement action against persons who deal with proxies for sanctioned persons and expectation of fulsome compliance with its investigations.

**Interactive Brokers:** In July, Interactive Brokers agreed to pay OFAC \$12 million to [settle](#) allegations that over several years, the brokerage processed thousands of transactions involving sanctioned countries, including China, Cuba, Iran, Russia, Syria, and Venezuela. Although Interactive Brokers blocked access from IP addresses linked with sanctioned countries, a bug in the company's IT systems allowed customers located in Iran, Cuba, and Syria to access the brokerage's services. In addition, the brokerage failed to include Crimea, a sanctioned territory, in its IP address blocking list, leading to additional apparent violations. Notably, the brokerage also processed transactions with blocked Russian banks believing, incorrectly, that a wind-down license authorized the transactions. This enforcement action highlights the complexity and dynamic nature of U.S. sanctions and the challenges associated with maintaining up-to-date knowledge of changing law, and appropriately tuned IT compliance systems.

This year's policy changes and enforcement actions reinforce the complex and dynamic state of U.S. sanctions. While the scope of prohibitions involving the principal parties to a transaction are generally well established, the enforcement actions described above demonstrate OFAC's sharper focus on the facilitators of dealings between principal parties involving blocked property: proxies and gatekeepers such as real estate brokers, attorneys, and investment managers. Several of this year's enforcement actions were notable because they involve companies that took steps to comply with sanctions, but reached incorrect legal conclusions, resulting in violations. Throughout 2025, OFAC and the DOJ continued to incentivize self-disclosure, cooperation, and remediation. As we move into 2026, we can expect to see increased enforcement and similar trends.