



## Sanctions Enforcement Actions Update

as of August 1, 2025

Country	Quick Facts	Key Compliance Lessons
<b>Interactive Brokers LLC</b> <a href="#">Blog</a> <a href="#">Enforcement Release</a>	<b>\$11,832,136 settlement</b> (\$5,234,583,687 potential liability) 12,376 violations of: Iranian Transactions and Sanctions Regulations Syrian Sanctions Regulations Ukraine-/Russia-Related Sanctions Regulations Cuban Assets Control Regulations Russian Harmful Foreign Activities Sanctions Regulations Chinese Military Industrial Complex Sanctions Regulations Global Magnitsky Sanctions Regulations	<ol style="list-style-type: none"><li>1. IP geo-blocking is a critical control.</li><li>2. Periodically test, audit, and calibrate existing controls.</li><li>3. Maintain strong transaction monitoring tools.</li><li>4. Obtain proper legal guidance from a sanctions expert.</li><li>5. Compliance controls must evolve with sanctions regulations.</li></ol>
<b>Harman International Industries, Inc.</b> <a href="#">Blog</a> <a href="#">Enforcement Release</a>	<b>\$1,454,145 settlement</b> (\$4,154,700 potential liability) 11 violations of: Iranian Transactions and Sanctions Regulations	<ol style="list-style-type: none"><li>1. U.S. sanctions apply to foreign subsidiaries of U.S. companies.</li><li>2. Beware of business units “self-policing.”</li><li>3. Apply heightened sanctions risk to known transshipment hubs.</li><li>4. Proper recordkeeping is critical.</li><li>5. Remediation and self-disclosure help mitigate penalties.</li></ol>
<b>Key Holding, LLC</b> <a href="#">Blog</a> <a href="#">Enforcement Release</a>	<b>\$608,825 settlement</b> (\$4,007,088 potential liability) 36 violations of: Cuban Assets Control Regulations	<ol style="list-style-type: none"><li>1. U.S. sanctions apply to foreign subsidiaries of U.S. companies.</li><li>2. Prioritize post-acquisition compliance integration.</li><li>3. Foster awareness of sanctions laws, not necessarily mastery.</li><li>4. Remediation and self-disclosure help mitigate penalties.</li><li>5. Implement robust screening and monitoring.</li></ol>
<b>Unicat Catalyst Technologies, LLC</b> <a href="#">Blog</a> <a href="#">Enforcement Release</a>	<b>\$3,882,797 settlement</b> (\$8,035,626 potential liability) 14 violations of: Iranian Transactions and Sanctions Regulations Venezuela Sanctions Regulations	<ol style="list-style-type: none"><li>1. Conduct thorough pre- and post-acquisition due diligence.</li><li>2. U.S. sanctions apply to foreign subsidiaries of U.S. companies.</li><li>3. Foster a culture of compliance throughout the organization, especially tone at the top.</li><li>4. Remediation and self-disclosure help mitigate penalties.</li><li>5. Implement robust screening and monitoring.</li></ol>
<b>GVA Capital Ltd.</b> <a href="#">Enforcement Release</a>	<b>\$215,988,868 settlement (maximum)</b> 4 violations of: Ukraine-/Russia-Related Sanctions Regulations 28 violations of: Reporting, Procedures and Penalties Regulations	<ol style="list-style-type: none"><li>1. Robust due diligence on beneficial ownership is critical.</li><li>2. Ignore legal advice at your own peril.</li><li>3. Timely and complete subpoena responses are non-negotiable.</li><li>4. “Gatekeepers” face heightened sanctions scrutiny.</li><li>5. Voluntary self-disclosures can mitigate severe penalties.</li></ol>

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