

Akin

CryptoLink



November 2024

Share this   

CryptoLink is a compilation of news stories published by outside organizations. Akin aggregates the stories, but the information contained in them does not necessarily represent the beliefs or opinions of the firm. Akin's September CryptoLink update includes developments and events that occurred between October 2024 and November 2024.

The Senate has yet to take action on the 21st Century Act (FIT21) (H.R.4763) which passed the House by a comfortable margin of 279-136 on May 22, 2024. FIT21 is a proposed landmark piece of legislation that would enact a comprehensive regulatory framework for the digital assets industry. Sens. Cynthia Lummis (R-WY) and Kirsten Gillibrand's (D-NY) Lummis-Gillibrand Responsible Financial Innovation Act (S.2281) also awaits consideration in the Senate. Since the election, President-elect Trump has announced key nominations to his cabinet and administration, including Scott Bessent for Secretary of the Treasury, Howard Lutnick for Secretary of Commerce and Paul Atkins, a strong crypto advocate, for SEC Chair. Atkins will replace Gensler, who recently announced his resignation. Atkins is known as a strong backer of cryptocurrencies, and it has been publicly reported that he has expressed reservations about the enforcement actions taken by the Securities and Exchange Commission (SEC) against the domestic crypto industry. 2025 will be a critical year for assessing how new leadership for key U.S. regulators will impact digital asset enforcement actions.

The President-elect has also announced the creation of the Department of Government Efficiency (DOGE) which is to be led by Elon Musk and Vivek Ramaswamy. Both men have expressed support for deregulation of the financial services industry and for cryptocurrencies. Congress is now in the lame-duck session until the end of the year. Members' attention is focused on the National Defense Authorization Act (NDAA), disaster funding following Hurricanes Helene and Milton and a probable continuing resolution (CR). This leaves comprehensive crypto legislation to be handled in the next Congress, when Republicans will control both chambers and the White House. These efforts will be influenced by leadership on the Senate Banking Committee and the House Financial Services Committee. So far, Sen. Tim Scott (R-SC) has been confirmed as the incoming Chair of the Senate Banking Committee, while Democrats Sen. Elizabeth Warren (D-MA) and Rep. Maxine Waters (D-CA) will serve as ranking members on their respective committees. With current Financial Services Chair Patrick McHenry (R-NC) leaving Congress at the end of the year, the gavel for the Committee will likely go to either Rep. French Hill (R-AR) or Rep. Andy Barr (R-KY).

The end of 2024 has shown that regulatory agencies in the United States were focused on digital asset enforcement actions throughout this year. This was made clear by the recently released SEC and Commodity Futures Trading Commission (CFTC) enforcement results for fiscal year 2024, which show the agencies' collective focus over the past year on enforcement actions that involved conduct related to digital assets.

The SEC's 2024 enforcement results show that the majority of the SEC's financial remedies for fiscal year end (FY) 2024 were the product of digital asset-focused cases—in particular, out of the \$8.2 billion in financial remedies the agency obtained, nearly 56% were attributable to a monetary judgment obtained following the SEC's jury trial win against Terraform Labs and Do Kwon. Likewise, the CFTC announced \$17.1 billion in financial remedies this year, which included the CFTC's \$12.7 billion judgment against FTX—the largest recovery for victims and sanctions in CFTC history. Nearly 20% of the CFTC's enforcement actions this year (10 out of 58) involved the digital asset space, ranging from enforcement actions against intermediaries to digital asset exchanges, including Falcon Labs, to actions against digital asset protocols, including Uniswap Labs.

In This Issue

- [Akin Spotlight](#)
- [Key Developments](#)
- [Key Enforcement Actions](#)
- [Akin Thought Leadership](#)
- [Events](#)

Akin Spotlight

Fifth Circuit Holds that OFAC Exceeded IEEPA Authority in Sanctioning Tornado Cash Immutable Smart Contracts

On November 26, 2024, a unanimous three-judge panel of the U.S. Court of Appeals for the Fifth Circuit held in *Van Loon v. U.S. Department of the Treasury* that the decentralized, open-source software project Tornado Cash's immutable smart contracts (i.e., lines of privacy-enabling software code) are not “property” of a foreign national or entity for purposes of sanctions under the International Economic Emergency Powers Act (“IEEPA”). Therefore, the U.S. Department of the Treasury's Office of Foreign Assets Control (“OFAC”) exceeded its statutory authority when it sanctioned these immutable smart contracts in 2022 due to North Korea's use of Tornado Cash to commit cybercrimes such as the laundering of stolen crypto.

The district court had held that Tornado Cash's underlying smart contracts were “property,” and Tornado Cash was an entity capable of being designated under IEEPA. Reaching only the first issue, the Fifth Circuit reversed and remanded the case to the lower court, concluding that the plain meaning of the term “property” requires something “capable of being owned,” but the immutable smart contracts at issue are “just software code” deployed by individuals without contractual counterparties (despite the fact that the term uses the word

“contracts”). In addition, the immutable smart contracts are not “contracts” or “services” under OFAC regulations. Therefore, the immutable smart contracts are beyond the scope of OFAC’s blocking power.

Notably, the court explained that “IEEPA grants the President broad powers to regulate a variety of economic transactions, but its language is not limitless.” As a result, the court noted that if “certain uncontrollable technology” current falls outside of OFAC’s sanctions authority, then Congress would need to amend IEEPA (originally passed in 1977) or otherwise pass new legislation if it so wishes.

In finding that the district court erred in giving “heightened deference” to OFAC’s definition of “property,” the court cites *Loper Bright v. Raimondo*, the recent U.S. Supreme Court case which overruled the *Chevron* deference doctrine with respect to agency interpretations of statutes. Given that this decision is one of the first cases to address OFAC’s regulatory authority post-*Loper Bright*, it remains to be seen whether other OFAC interpretations of IEEPA will be easier to challenge in the coming months, despite the typical deference given to OFAC in light of the agency’s national-security-focused mandate.

The government has until late January to decide whether it wishes to appeal this decision to an *en banc* Fifth Circuit panel or the U.S. Supreme Court. If it does not appeal, then the district court will need to issue a mandate instructing OFAC how to proceed, which will then inform how OFAC may adjust the current Tornado Cash-related SDN designations (which are broader than just the immutable smart contracts), as well as [related FAQ guidance](#). The U.S. Court of Appeals for the Eleventh Circuit is also currently considering a similar Tornado Cash-related challenge to OFAC’s authority in *Coin Center et al. v. Yellin et al.*

The Fifth Circuit’s decision can be found [here](#).

Key Developments

Pennsylvania Passes Bitcoin Rights Bill

On October 23, 2024, the Pennsylvania House of Representatives passed House Bill 2481 (the Digital Assets Authorization Act, which has been dubbed the “Bitcoin Rights Bill”), which broadly enables self-custody of digital assets, legalizes Bitcoin as a payment method and introduces taxation rules for Bitcoin transactions, marking a significant advancement in U.S. crypto regulation. The bill passed with overwhelming bipartisan support in a 176-26 vote.

The text of the bill can be found [here](#).

UK Releases Draft Regulations on Reporting and Due Diligence Requirements for Crypto Assets Service Providers

On October 30, 2024, the United Kingdom released draft regulations titled “The Cryptoasset Service Providers (Due Diligence and Reporting Requirements) Regulations 2025” (the Regulations) and launched a consultation seeking views on the implementation of the new rules and certain other proposals, closing by January 10, 2025. The Regulations set out further details of reporting and due diligence requirements for reportable crypto asset service providers (RCASPs) to comply with the Regulations, penalties for failing to comply and appeals processes, the requirement for crypto-asset users to provide a valid self-certification and associated penalties for failure to provide a valid self-certification. According to the consultation announcement, the draft regulations will be of interest to

RCASPs, which facilitate the provision of crypto assets and transactions with crypto assets, organizations and bodies that represent RCASPs or their advisors and crypto asset users.

The text of the draft regulations can be found [here](#) and further information can be found [here](#).

Blockchain Association Reports \$429 Million Expenditure in Defensive Litigation Against the SEC

On November 1, 2024, the Blockchain Association, a cryptocurrency lobby, updated its “Regulation by Enforcement” webpage to state that Blockchain Association member companies had spent \$429 million in defensive litigation against the SEC, reporting 104 enforcement actions brought by the SEC against the digital asset industry under Chair Gensler through 2023. On October 30, 2024, the Blockchain Association, in partnership with HarrisX, released a report on public perception polling on the SEC’s “regulation by enforcement” approach to the U.S. digital asset industry under Chair Gary Gensler’s leadership and, according to polling, voters preferred “clear rules and regulation over enforcement by a factor of two-to-one” and “voters believe that the U.S. has taken the wrong approach toward crypto and that the SEC has been too heavy handed.”

The Blockchain Association’s webpage can be found [here](#), and the report can be found [here](#).

UK FCA Welcomes Project Guardian’s First Industry Report on Tokenization

On November 4, 2024, the U.K. Financial Conduct Authority (FCA) announced Project Guardian’s first industry report on tokenization. Project Guardian is an international collaboration of industry and regulators, led by the Monetary Authority of Singapore, that explores the use of fund and asset tokenization. In the report, firms set out an ambitious, phased vision for the use of distributed ledger technology in asset management. The report further discusses potential industry and regulatory standards needed to scale tokenization use-cases and enable firms and investors to benefit from the technology. The FCA noted that in 2025 it planned to collaborate with the Monetary Authority Singapore to explore the regulatory considerations for tokenization within the asset and wealth management sector.

The full text of the report can be found [here](#) and the FCA’s press release can be found [here](#).

Members of Congress Publish Letter to US Treasury on Effects of Crypto Mixer Sanctions

On November 14, 2024, seven members of Congress (Sean Casten, Stephen F. Lynch, Bill Foster, Brad Sherman, David Scott, Emanuel Cleaver II and Joyce Beatty) sent a letter to the U.S. Department of the Treasury requesting information about the ongoing use of the cryptocurrency mixing service Tornado Cash after sanctions were imposed in 2022. The letter noted that, despite sanctions, Tornado Cash has remained online and continues to function as a decentralized smart contract. In the letter, questions were put to the U.S. Treasury, including requesting an estimate of the amount of activity, illicit and legitimate, that has passed through Tornado Cash since August 8, 2022, and the amount of illicit activity that has passed through cryptocurrency mixers year-over-year.

A copy of the letter can be found [here](#).

SEC Chair Gensler to Depart Agency on January 20, 2025

On November 21, 2024, the SEC announced that Chair Gary Gensler will step down effective at 12:00 p.m. on January 20, 2025. Chair Gensler began his tenure on April 17, 2021, in the immediate aftermath of the GameStop market events. According to the announcement, he

led the agency through a robust rulemaking agenda to enhance efficiency, resiliency and integrity in U.S. capital markets and oversaw high-impact enforcement cases to hold wrongdoers accountable and return billions to harmed investors. The announcement further noted that under Chair Gensler, the SEC brought actions against crypto intermediaries for fraud, wash trading, registration violations and other misconduct, and in the last full fiscal year, according to the SEC's Office of the Inspector General, 18% of the SEC's tips, complaints and referrals were crypto-related, despite the crypto markets comprising less than 1% of the U.S. capital markets.

The SEC's press release can be found [here](#).

CFTC's Global Markets Advisory Committee Advances Recommendation on Tokenized Non-Cash Collateral

On November 21, 2024, the CFTC Global Markets Advisory Committee, sponsored by Commissioner Caroline D. Pham, advanced a recommendation to expand the use of non-cash collateral through the use of distributed ledger technology. The recommendation provides a legal and regulatory framework for how market participants can apply their existing policies, procedures, practices and processes to support use of distributed ledger technology for non-cash collateral in a manner consistent with margin requirements.

The CFTC's press release can be found [here](#).

SEC Announces Enforcement Results for Fiscal Year 2024

On November 22, 2024, the SEC announced that it had filed 583 total enforcement actions in fiscal year 2024 while obtaining orders for \$8.2 billion in financial remedies, the highest amount in SEC history. The \$8.2 billion in financial remedies consisted of \$6.1 billion in disgorgement and prejudgment interest, also the highest amount on record, and \$2.1 billion in civil penalties, the second-highest amount on record. Approximately 56% of the \$8.2 billion financial remedies ordered are attributable to a monetary judgment obtained following the SEC's jury trial win against Terraform Labs and Do Kwon, who were charged with one of the largest securities frauds in U.S. history. In its announcement, the SEC flagged a number of key crypto-related enforcement actions, including: the SEC charging Xue Lee and Brenda Chunga for their involvement in an allegedly fraudulent crypto-asset pyramid scheme known as HyperFund that raised more than \$1.7 billion from investors worldwide; the SEC settling charges against Silvergate Capital for false and misleading disclosures to investors about the strength of their compliance program and the monitoring of crypto customers, including FTX, by its wholly owned subsidiary, Silvergate Bank and settling charges against Barnbridge DAO for failing to register its offer and sale of structured crypto assets offered and sold as securities.

The SEC's enforcement results can be found [here](#).

CFTC Announces Enforcement Results for Fiscal Year 2024

On December 4, 2024, the CFTC announced that it had filed 58 enforcement actions and obtained over \$17.1 billion in monetary relief in FY 2024. The \$17.1 billion in financial remedies consisted of \$2.6 billion in civil monetary penalties and \$14.5 billion in disgorgement and restitution. The CFTC brought 10 enforcement actions during FY 2024 that involved conduct related to digital assets. In particular, the CFTC obtained record-breaking monetary sanctions in various types of digital asset cases, including in actions against FTX and Binance, charging Voyager's former CEO with commodity pool fraud, filing multiple actions involving decentralized finance and filing and settling charges with companies acting as intermediaries to digital asset exchanges. The \$12.7 billion FTX judgment is the largest recovery for victims and sanctions in CFTC history.

The CFTC's enforcement results can be found [here](#).

Trump Picks Paul Atkins as New SEC Chair

On December 4, 2024, it was announced that President-elect Donald Trump picked Paul Atkins to serve as the newly appointed chair of the SEC. Trump made the announcement in a post on his Truth Social platform. Atkins was previously an SEC commissioner under President George W. Bush. Media reports suggest that Atkins will be a strong advocate for looser regulation of crypto assets. In his post, President-elect Donald Trump stated that “Paul is a proven leader for common sense regulations ... [and] recognizes that digital assets & other innovations are crucial to Making America Greater than Ever Before.”

Further information can be found [here](#) and [here](#).

Key Enforcement Actions

Bitcoin Fog Operator Sentenced for Money Laundering Conspiracy

On November 8, 2024, the U.S. Department of Justice (DOJ) announced that Roman Sterlingov was sentenced to 12 years and six months in prison for his operation of the longest-running bitcoin money laundering service on the darknet. According to court documents and evidence presented at trial, from 2011 through 2021, Sterlingov was involved in operating Bitcoin Fog, the darknet's longest-running cryptocurrency “mixer” which enabled criminals to hide their illicit proceeds from law enforcement and processed transactions involving over 1.2 million bitcoin, valued at approximately \$400 million at the time the transactions occurred. The bulk of this cryptocurrency came from darknet marketplaces and was tied to various illicit activities, such as illegal narcotics and identity theft. In addition to his term of imprisonment, Sterlingov was sentenced to pay a forfeiture money judgment in the amount of \$395,563,025.39, and forfeiture of seized cryptocurrencies and monetary assets valued at approximately \$1.76 million. In addition, Sterlingov was ordered to forfeit his interest in the Bitcoin Fog wallet, totaling approximately 1,345 bitcoin and currently valued at more than \$103 million. Deputy Attorney General Lisa Monaco noted that the “sentence reflects the Department’s determination to dismantle the criminal networks that enable criminal actors to flourish and ensure consequences for the criminals operating them.”

The SEC's press release can be found [here](#).

FTX Files \$1.8 Billion Lawsuit Against Binance and Former CEO

On November 10, 2024, in the ongoing Chapter 11 proceedings, FTX filed a complaint in the U.S. Bankruptcy Court for the District of Delaware against Binance Holdings Limited, Changpeng Zhao and certain other Binance entities, seeking to recover, for the benefit of FTX's creditors, at least \$1.76 billion that was fraudulently transferred to Binance and its executives at the FTX creditors' expense, as well as compensatory and punitive damages to be determined at trial.

The complaint can be found [here](#).

Foreign National Pleads Guilty to Laundering Millions in Proceeds from Cryptocurrency Investment Scams

On November 12, 2024, the DOJ announced that Daren Li (a dual citizen of China and St. Kitts and Nevis, and a resident of China, Cambodia and the United Arab Emirates (UAE)), pleaded guilty to one count of conspiracy to commit money laundering for his role in a scheme to launder millions of dollars in proceeds of cryptocurrency investment scams. According to court documents, Li admitted that he conspired with others to launder funds obtained from victims through cryptocurrency scams and related fraud. Li admitted that at least \$73.6 million in victim funds were directly deposited into bank accounts associated with him and his co-conspirators, including at least \$59.8 million deposited from U.S. shell companies that laundered victim proceeds. Li is scheduled to be sentenced on March 3, 2025 and faces a maximum penalty of 20 years in prison.

The DOJ's press release can be found [here](#).

Bitfinex Hacker Sentenced in Money Laundering Conspiracy

On November 14, 2024, the DOJ announced that Ilya Lichtenstein was sentenced to five years in prison for his role in a money laundering scheme linked to the theft of 120,000 bitcoins from global cryptocurrency exchange Bitfinex. According to court documents, Lichtenstein hacked into Bitfinex's network in 2016, fraudulently authorizing over 2,000 transactions, transferring 119,754 bitcoins to his personal wallet. Lichtenstein's wife, Heather Morgan, employed various sophisticated methods to launder the stolen funds, including using fictitious identities, automated transactions and cryptocurrency mixing services. On August 3, 2023, Lichtenstein and Morgan both pleaded guilty to one count of conspiracy to commit money laundering. In addition to his term of imprisonment, Lichtenstein was ordered to serve three years of supervised release.

The DOJ's press release can be found [here](#).

Operator of Helix Darknet Cryptocurrency "Mixer" Sentenced in Money Laundering Conspiracy and Ordered to Forfeit Over \$400 Million in Assets

On November 15, 2024, the DOJ announced that Larry Dean Harmon was sentenced to three years in prison for his operation of the darknet cryptocurrency "mixer" Helix, which processed transactions involving over \$300 million worth of cryptocurrency from 2014 to 2017. According to court documents, Harmon ran Helix, a darknet mixer that laundered customers' bitcoin and that processed at least approximately 354,468 bitcoins on behalf of its customers. The DOJ's press release noted that much of those funds were coming from or going to darknet drug markets, and Harmon retained a percentage of these transactions as his commissions and fees for operating Helix. On August 18, 2021, Harmon pleaded guilty to conspiracy to commit money laundering. In addition to his term in prison, Harmon was sentenced to three years of supervised release; a forfeiture money judgment in the amount of \$311,145,854 and forfeiture of seized cryptocurrencies, real estate and monetary assets valued at over \$400 million.

The DOJ's press release can be found [here](#).

Judge Rejects Kraken's Motion for Interlocutory Appeal in SEC Case

On November 18, 2024, U.S. District Judge William H. Orrick denied Kraken's motion to certify an order for interlocutory appeal in the SEC's litigation against Payward Inc., et al. (doing business as Kraken). In the order, Judge Orrick noted that he did not believe certification would materially advance the ultimate termination of the litigation and that while the SEC had "plausibly alleged its theory of securities violations against Kraken, only discovery will establish whether the sales, trades, and exchanges on Kraken truly met all the Howey elements."

The order can be found [here](#).

SEC Charges BIT Mining with FCPA Violations

On November 18, 2024, the SEC announced that BIT Mining Ltd. (formerly known as 500.com Limited) agreed to pay a \$4 million civil penalty to resolve charges that it violated the Foreign Corrupt Practices Act (FCPA) from 2017 to 2019 by engaging in a widespread bribery scheme to influence numerous foreign officials, including members of Japan's parliament, in efforts to establish an integrated resort casino in Japan. The SEC's order found that the bribery scheme involved illicit payments of approximately \$2.5 million in the form of cash bribes, entertainment and extravagant trips. BIT Mining consented to the SEC's order finding that it violated the anti-bribery, recordkeeping and internal accounting controls provisions of the FCPA. BIT Mining further agreed to cease and desist from committing or causing any violations and any future violations of the aforementioned provisions and to pay the civil penalty.

In a parallel action, the DOJ announced that an indictment was unsealed on November 18, 2024 charging the former CEO of BIT Mining Ltd., Zhengming Pan, with violations of the FCPA. BIT Mining entered into a three-year deferred prosecution agreement (DPA) in connection with criminal information filed in the District of New Jersey charging BIT Mining with one count of conspiracy to violate the anti-bribery and books and records provisions of the FCPA and one count of violating the books and records provisions of the FCPA. Pursuant to the DPA, BIT Mining agreed that the appropriate criminal penalty was \$54 million. However, due to BIT Mining's financial condition and demonstrated inability to pay the penalty, BIT Mining and the DOJ agreed that BIT Mining would pay a total criminal penalty of \$10 million, and the DOJ agreed to credit up to \$4 million against the civil penalty BIT Mining agreed to pay to the SEC to resolve a parallel investigation.

The SEC's press release can be found [here](#) and the DOJ's press release can be found [here](#).

SEC Charges Touzi Capital, LLC and Its Managing Member for Misleading Investors and Misusing Investor Funds

On November 29, 2024, the SEC filed a civil injunctive action against Touzi Capital, LLC and Eng Taing, its managing member, for allegedly defrauding more than a thousand investors in unregistered securities offerings that raised more than \$100 million. According to the SEC's complaint (filed in the U.S. District Court for the Southern District of California), between 2021 and early 2023, Taing and Touzi Capital conducted unregistered offerings of securities of its crypto asset mining funds, raising almost \$95 million from more than 1,200 investors nationwide. However, the SEC's complaint alleged that the defendants misled investors about the use of investor proceeds by commingling and misappropriating investor funds and raised capital through false and misleading statements about the liquidity of their investments and other factors material to the investment's profitability. For example, Touzi allegedly raised almost \$23 million for its debt rehabilitation business but commingled some of those funds with those of its crypto asset mining businesses and other unrelated Touzi businesses. The SEC seeks permanent injunctions, disgorgement with prejudgment interest, and civil penalties against each of the defendants, as well as an officer and director bar against Taing.

The SEC's press release can be found [here](#).



[Akin Win for Celsius Litigation Administrator, NY Bankruptcy Court Allows Legal Notices Sent via NFTs \(October 30, 2024\)](#)

[Akin Launches AI Law & Regulation Tracker \(August 1, 2024\)](#)

[U.S. Supreme Court to Clarify Securities Fraud Pleading Requirements for Falsity and Scienter During 2024-2025 Term \(June 28, 2024\)](#)

[Bipartisan Legislation Introduced in the Senate to Establish a Regulatory Framework for Stablecoins \(April 22, 2024\)](#)

[Coinbase Court Embraces ‘Ecosystem’ Approach to Identifying Crypto-Asset Securities \(April 3, 2024\)](#)

[Are Crypto Tokens Securities? Terraform Court Says ‘Yes’ in Extensive Decision \(January 12, 2024\)](#)

Events

[Consensus Hong Kong](#)

February 18-25, 2025

Hong Kong

Consensus Hong Kong convenes global leaders in tech and finance to debate pressing issues, announce key developments and deals, and share their visions for the future. Consensus is produced by the award-winning media outlet CoinDesk and is guided by its commitment to independent, unbiased journalism.

[Consensus Toronto](#)

May 14-16, 2025

Toronto

The Consensus flagship event now heads to Toronto setting the stage for the most important conversation in crypto and Web3. Consensus has been the world’s largest, most diverse gathering of the cryptocurrency, blockchain and Web3 communities produced by award-winning crypto media outlet CoinDesk.



Learn more about our Digital Assets,
Cryptocurrency and Blockchain practice.

[Learn More >](#)

Questions?

If you have any questions, please contact your regular Akin lawyer or advisor or:



Peter I. Altman
[Email](#)
Los Angeles
+1 310.728.3085



Ryan P. Fayhee
[Email](#)
Washington, D.C.
+1 202.887.4009



Adam Hilkemann
[Email](#)
Dallas
+1 214.969.2867



Mitchell P. Hurley
[Email](#)
New York
+1 212.872.1011



Wael Jabsheh
[Email](#)
Abu Dhabi
+971 2.406.8525



M. Lance Jasper
[Email](#)
Los Angeles
+1 310.552.6442



Brad M. Kahn
[Email](#)
New York
+1 212.872.8121



Jacqueline Yecies
[Email](#)
New York
212.872.7479



Nicholas R. Lombardi
[Email](#)
Dallas
214.969.2723



Kate L. Powers
[Email](#)
New York
+1 212.872.8070



Andrew R. Schlossberg
[Email](#)
Washington, D.C.
+1 202.887.4314



Kaitlyn A. Tongalson
[Email](#)
New York
+1 212.872.8106



Samuel J. Olswanger
[Email](#)
Washington, D.C.
+1 202.416.5142



Sahar Abas
[Email](#)
Dubai
+971 4.317.3052



Patrick Gaul
[Email](#)
Washington, D.C.
+1 202.416.5247

Solicitors Regulation Authority under number 267321. A list of the partners is available for inspection at Eighth Floor, Ten Bishops Square, London E1 6EG. For more information about Akin Gump LLP, Akin Gump Strauss Hauer & Feld LLP and other associated entities under which the Akin network operates worldwide, please see our [Legal Notices](#) page.

[Update Your Preferences](#) | [Subscribe](#) | [Unsubscribe](#) | [Forward to a Friend](#) | [Legal Notices](#) | [Privacy Policy](#)

This email was sent by: 2001 K Street, N.W., Washington, DC 20006-1037