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Hannah M. Thibideau Special Counsel

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Concentrates in regulatory enforcement, anti-money laundering and sanctions compliance, and white collar criminal defense.

Hannah represents entities and individuals in matters before the SEC, DOJ, FINRA, and prosecutors' offices. She advises banks, broker-dealers, investment advisers, private funds, and insurance companies on antimoney laundering and sanctions regulations and related issues governing their investment and business activities.

She also advises on all aspects of federal and state civil litigation.

Practices

LITIGATION

SEC ENFORCEMENT AND WHITE COLLAR DEFENSE

Bar Admissions

New York

Education

University of Virginia School of Law, J.D.

• Editorial Board, Virginia Sports and Entertainment Law Journal

Macaulay Honors College at Hunter College, B.A.

Phi Beta Kappa

Publications

- "Sanctions Update: OFAC Encourages Voluntary Self-Disclosure for Sanctions Violations," Schulte Alert, Aug. 2, 2023
- "FinCEN Issues Proposed Access Rule and Proposed Forms to Further Implement the CTA," Schulte Alert, Feb. 7, 2023
- "AML Recent Developments: What Practitioners Need to Know," The Review of Securities & Commodities Regulation, Nov. 9, 2022
- Securities Enforcement Quarterly, Schulte Publication, November 2022
- "FinCEN Issues Final Rule Requiring Reporting of Beneficial Ownership Information," Schulte Alert, Oct. 20, 2022
- "Russian Sanctions Update: OFAC Issues Broad Restrictions on 'New Investment' in Russia," Schulte Alert, June 10, 2022
- "Russian Sanctions Update: FinCEN and NYDFS Issue Guidance,"
 Schulte Alert, April 25, 2022
- "Sanctions Update: US Imposes Sweeping Sanctions Against Russia and Belarus," Schulte Alert, Feb. 28, 2022
- "Sanctions Update: US Begins to Roll Out Sanctions Against Russia," Schulte Alert, Feb. 23, 2022
- "US Expands Sanctions Against Belarus, Barring New Sovereign Debt Transactions," Schulte Alert, Dec. 10, 2021
- Securities Enforcement Quarterly, Schulte Publication, October 2021; republished in the Harvard Law School Forum on Corporate Governance, November 2021
- "SPAC Litigation Alert: CEO of Acquisition Target Charged in First Criminal Indictment Connected to a De-SPAC Transaction," Schulte Alert, Aug. 9, 2021
- "SPAC Litigation Alert: SPAC Sponsor and CEO Agree to Pay Civil Penalties and Forfeit Sponsor Shares Following SEC's Charge of

- "White House Revamps Chinese Securities Trading Ban," Schulte Alert, June 8, 2021
- "SPAC Litigation Alert: Kwame Amo v. MultiPlan," Schulte Alert, March 29, 2021
- "US Sanctions on Chinese Company Securities: Further Developments," Schulte Alert, Jan. 19, 2021
- "OFAC Provides Guidance on Trading Ban in Chinese Companies," Schulte Alert, Dec. 31, 2020
- "White House Bans Trading in 31 Chinese Companies," Schulte Alert, Nov. 13, 2020
- "FinCEN and Banking Agencies Provide Clarification on PEP Screening Best Practices," Schulte Alert, Oct. 5, 2020
- "AML Update: FinCEN Issues First-Ever Enforcement Guidelines and Federal Banking Agencies Update Enforcement Guidance," Schulte Alert, September 2, 2020; republished in The Banking Law Journal, February 2021
- "Sanctions Update: OFAC Regulations, Advisories and Enforcement Actions: November 2019 through July 2020," Schulte Alert, August 7, 2020; republished in The Hedge Fund Journal, September 2020
- "Sanctions Update: US Sanctions Compliance During COVID-19," Schulte Alert, April 24, 2020
- "Economic Sanctions," Successful Partnering Between Inside and Outside Counsel, April 2020
- "Mitigating OFAC Risks in Mergers and Acquisitions," Schulte Alert,
 Feb. 3, 2020; republished in Thomson Reuters Westlaw Journal
 Bankruptcy, March 24, 2020
- "Sanctions Update: DOJ Revises Voluntary Self-Disclosure Policy for Export Control and Sanctions Violations," Schulte Alert, Jan. 2, 2020

- "OFAC Expands Reporting Obligations and Highlights Importance of Cooperation," Schulte Alert, Nov. 21, 2019; republished in The Hedge Fund Journal, February 2020
- "Sanctions Update: Iran, Venezuela, Ukraine, Nicaragua and Cuba," Schulte Alert, Oct. 11, 2019, co-author
- "OFAC Update: A Framework for Compliance and Recent Settlements," Schulte Alert, July 12, 2019, co-author; republished in The Hedge Fund Journal, August 2019
- "Discovery Trends in Litigation Finance Arrangements," Bloomberg Law, April 2018, co-author; republished in Harvard Law School Forum on Corporate Governance and Financial Regulation, May 15, 2018
- "Federal Appeals Court Rules CFPB Structure Unconstitutional,"
 Schulte Client Alert, Oct. 12, 2016, co-author

Speaking Engagements

- "Enforcement and Examinations," 33rd Annual Schulte Private Capital Forum, January 2024
- "Sanctions," Schulte Private Capital Conversations, July 2023
- "SEC Focus on Off-Channel Communications: Latest Update for Private Fund Managers," Schulte Webinar, April 2023
- "Regulatory Compliance and Enforcement," Schulte 32nd Annual Private Investment Funds Seminar, January 2023