

Digital assets and sanctions compliance: Tornado Cash and beyond

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Davis Polk partners Paul Marquardt and Gabe Rosenberg and counsel Will Schisa authored “Digital assets and sanctions compliance: Tornado Cash and beyond” in *International Financial Law Review*. The article discusses sanctions compliance challenges and best practices in the digital assets space, using the recent Tornado Cash designation as a case study, and addresses the controversy and related legal challenges over whether the U.S. Treasury Department’s Office of Foreign Assets Control action was a lawful and appropriate use of its sanctions authorities.