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## Jeremy Paner Authors Article in Law360 on Sanction Risks Stemming from Mexican Port

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**Aug. 12, 2025** – Jeremy Paner authored an article in [Law360](#) on the sanctions risks for corporations doing business in Mexico following a June 18 assertion by the Office of Foreign Assets Control (OFAC) that the Cártel de Jalisco Nueva Generación (CJNG) “controls the deep-water port of Manzanillo.”

In the article, Paner explains the port of Manzanillo is the largest port in Mexico, and that its location on the Pacific coast means it serves as a focal point for commercial trade with Asia, making it a vital link in lawful global supply chains.

“OFAC’s unequivocal statement and apparent finding that the port is controlled by CJNG means that as a matter of law certain entities associated with the port qualify as agents of the cartel, pursuant to OFAC regulations,” Paner said. “Companies operating in or trading with Mexico should therefore carefully consider how to mitigate the risk arising from their dealings involving the port.”

In the article, Paner breaks down the key stakeholders in the port, including its current Chinese ownership – which the White House has publicly decried – as well as the Mexican Navy, which is currently managing a multibillion-dollar expansion of the port.

The article concludes with Paner discussing how companies doing business in Mexico and through the port can mitigate sanction risks.

“Mitigating the sanctions compliance risk from payments involving either the key stakeholders or routine port operations requires enhanced internal controls and an understanding of company-specific historical risk indicators,” Paner wrote. “In sum, screening against the SDN List is not sufficient following OFAC’s June declaration that CJNG controls the port.”

[Read the article.](#)

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