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Jeremy Paner Quoted by Financial Times and Bloomberg on Trump's Brazil Sanctions

Articles & Press

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Sept. 4, 2025 – Jeremy Paner was quoted by the [Financial Times](#) and [Bloomberg](#) on sanctions that President Trump has imposed against Minister of the Supreme Federal Court of Brazil Alexandre de Moraes, part of a trade offensive by the Trump administration against Brazil.

Moraes was targeted under the Global Magnitsky Act, originally intended for perpetrators of grave human rights abuses or corruption, after being accused by the administration of curbing freedom of expression and conducting politicized prosecutions.

While the measures freeze any U.S. assets Moraes may own, and bar U.S. persons from doing business with him, the exact overseas implications are debated. The key question is how broad an interpretation will be adopted by the U.S. Treasury's Office of Foreign Assets Control (OFAC).

Punishment for violation of Magnitsky sanctions can include fines and secondary sanctions. The standard test is whether a line can be drawn from the U.S. providing a benefit to the sanctioned individual, Jeremy Paner told [Financial Times](#).

The publication went on to say that the politicized nature of the Trump administration's grievances against leftwing-ruled Brazil leave many doubts. "In a normal case, OFAC would be unlikely to take an aggressive enforcement posture, but in this one you can't take the politics out," Paner added. Jeremy further explained that Moraes will likely end up "debanked" because U.S. financial institutions will avoid banks that serve sanctioned customers.

The Bloomberg article described how the threat of U.S. sanctions has impacted Banco do Brasil, where Moraes has an account. According to the article, the bank is considering contingency plans if OFAC levies additional financial sanctions on its clients, or on the bank itself.

"For sanctions violations, you get big numbers real quick," Paner explained. "Banks outside of the United States in countries that prohibit recognizing US sanctions have nonetheless paid billions of dollars in fines to OFAC."

Transactions in U.S. dollars involve the U.S. financial system, since they're cleared and settled through New York, or using accounts funded in New York, which leaves them under OFAC jurisdiction no matter where they originate or end, Paner said.

OFAC has sanctioned judges accused of corruption by human rights groups, but those actions involved settled cases, Paner told Bloomberg. "It has never sanctioned a judge for a pending, ongoing proceeding."

Read [the Financial Times article](#) and [the Bloomberg article](#).

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Jeremy P. Paner

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