

2026

Holland & Knight
Anti-Money Laundering Practice



Our Profile

Holland & Knight is a global law firm with approximately 2,200 lawyers and other professionals in 35 offices worldwide. Our clients span the U.S. and international financial marketplace. Whether businesses seeking financing or financial institutions needing experienced counsel, we help them navigate changes and financial regulations.

Financial Services

Holland & Knight represents a wide range of domestic and international companies, including financial institutions, in business transactions that involve financing. We help clients navigate through new and emerging marketplace trends and regulations, and manage operational changes.

Our Financial Services Team is comprised of innovative strategists, experienced litigators and transactional attorneys with long-term dealings in the banking arena and knowledge of rapidly changing market standards for various types of transactions. Accordingly, our team is particularly well-suited to advise and assist clients in the following:



Services for Businesses Seeking Financing

- aviation finance
- commercial lending
- equipment financing and leasing
- infrastructure finance
- maritime transactions, bankruptcies and workouts
- mergers and acquisitions
- public finance, including swaps and derivatives
- public-private partnerships
- real estate finance
- securitization
- structured finance
- tax credit transactions
- warehousing
- workouts, restructurings and insolvency



Services for Financial Institutions

- anti-money laundering
- art loans
- bank regulations
- bank failures
- creditors' rights
- cyber liability insurance
- data privacy and security
- de novo banks
- Foreign Corrupt Practices Act
- financial investigations
- international financial regulations
- investment management
- foreign banks expanding into the U.S.
- sanctions compliance
- specialty finance
- trust fund management

Financial Services Regulations

Holland & Knight's Financial Services Regulatory Team provides compliance and regulatory advice regarding state and federal financial services issues to banks, international agencies and branches of foreign banks, broker-dealers, registered investment advisors, mortgage banks, loan servicers, investment banks, debt collectors, retailers, auto finance companies, credit card issuers, FinTech industry members and money transmitters. We are distinguished by the scope of services that we provide as well as our geographic reach. Our team includes lawyers throughout the country, including Florida, California, Colorado, Illinois, the Mid-Atlantic states, Massachusetts, New York, Texas and Washington, D.C.

Financial services increasingly stretch across state lines and national boundaries. We have guided clients through the regulatory regimes of more than 100 jurisdictions worldwide, including nearly every nation in Latin America and the European Union. Our Cuba Action Team closely monitors developments in that nation and is poised to guide clients in offering financial services in that market when those opportunities become available.

Naturally, we advise regulated financial institutions on federal and state regulatory issues involving prudential safety and soundness concerns, including strategic transactions, capital maintenance, affiliate transactions, permissible activities and related governance matters.

Anti-Money Laundering

Holland & Knight's Anti-Money Laundering Team regularly assists clients in achieving and maintaining compliance with anti-money laundering laws. Our priority is to ensure that each AML program complies with the regulations administered by the U.S. Department of the Treasury's Office of Foreign Assets Control. We advise clients on the application of the criminal money laundering statutes to specific transactions, including the interaction between money laundering and corruption (a predicate offense of money laundering). In addition, our team counsels companies on the appropriate due diligence necessary to ensure compliance. We work closely with the firm's White Collar Defense and Compliance Services teams to defend companies in litigation matters involving money laundering issues. Examples of matters handled by our AML Team include:

- legal opinions on the application of the anti-money laundering statutes to specific transactions
- preparation of customer/investor profile forms
- establishment of numerous AML compliance programs
- advice on offshore AML requirements
- counsel and assistance in conducting AML due diligence

Banking Law: BSA/AML/OFAC

The financial services industry continues to rapidly evolve. Compliance requirements are growing in significant ways as regulatory changes and risk management issues become more complex and require greater resources and management attention. The CFPB, AML, BSA and OFAC are now as much a part of the financial services lexicon as notions of lending, product development and liability management. The Bank Secrecy Act / Anti-Money Laundering / Office of Foreign Asset Control Practice Team is a multidisciplinary group composed of attorneys experienced in the laws and regulations affecting BSA/AML/OFAC compliance. Because of the depth of experience in these critical areas, we are well-suited to provide representation in matters relating to today's challenging compliance environment, from federal and state anti-money laundering and know-your-customer statutes and regulations to the development and implementation of effective anti-money laundering programs.

Our clients cover virtually all areas of the financial services landscape. This includes state-chartered banks, national banks, domestic and foreign bank holding companies, Edge Act corporations, de novo banks, international bank agencies, branches, representative offices of foreign banks in the U.S., broker / dealers, money service businesses, foreign banking institutions with no presence in the U.S., offshore banks and trust companies. Typical engagements include:

- general consultation / advice on BSA/AML/OFAC laws and regulations
- development of BSA/AML/OFAC Compliance Programs, policies, procedures and systems
- assistance with BSA/AML/OFAC examinations and responses to regulators
- representation before various regulatory agencies, OFAC and/or Financial Crimes Enforcement Network (FinCEN)
- supervising / coordinating internal due diligence, including look-back and forensic reviews
- informal / formal regulatory enforcement actions, i.e., memorandums of understanding (MOU) and cease and desist orders
- negotiating, drafting and preparing anti-money laundering, anti-corruption and OFAC-related representations, warranties and covenants in loan documentation (including loan syndication documentation)
- supervising / coordinating third-party service providers and outside consultants to complete BSA/AML risk assessments and audits
- general, functional and targeted training to financial institution employees, compliance staff, management and directors
- advice / counsel to directors and officers regarding their responsibility and liability in BSA/AML/OFAC matters
- advice / counsel regarding potential civil money penalties, fines and forfeitures
- defense of civil and criminal forfeiture actions and money laundering criminal prosecutions before administrative or judicial bodies
- advice / counsel regarding virtual currencies and related licenses and compliance issues

Latin America Capabilities

The Latin America Practice at Holland & Knight includes more than 200 multicultural and multilingual attorneys offering a multitude of services to assist clients to successfully do business in Latin America. The firm has a strong commitment and connection to Latin America, representing clients with interests in the region for more than 40 years. We have built an extensive support network across the region, including the firm's offices in Bogotá, Mexico City and Monterrey as well as long-standing relationships with nearly all of the principal law firms throughout Central and South America as well as the Caribbean.

Our lawyers provide counsel on the full range of corporate and finance transactions, including in the areas of equity and debt capital markets, structured finance and securitizations, project finance and project bonds, bank lending, and mergers and acquisitions. Our Latin America Practice advises clients on private equity investments, international taxation matters, regulatory issues, the Foreign Corrupt Practices Act (FCPA), FIBRAs, government matters, and international arbitration and dispute resolution.

Members of our team have been selected for inclusion in leading industry publications based on their work in the region. A number of our attorneys are consistently ranked by *Chambers Latin America*, *Legal 500 Latin America*, *Latin Lawyer 250*, *Chambers Global* and *IFLR1000*.



Mexico City and Monterrey Offices

Holland & Knight is one of the few U.S.-based firms with a full-service office in Mexico. Our teams in Mexico City and Monterrey, an integral part of our Latin America Practice, has substantial experience across all Mexican business sectors and is enhanced by our established working relationships with leaders in the country's business and government sectors. Our attorneys have robust experience representing international and domestic clients across all industries in local and cross-border transactions. In addition, our Mexico offices has assisted the Mexican government in the analysis, design and drafting of key current legislation and regulation, as well as in the implementation of several infrastructure projects. Our team has been a leading participant in the formation of the Mexican securitization industry. We have provided representation in several first-ever transactions, and the structures we designed for several large-scale deals are now considered to be the standard in the financial markets.



Bogotá Office

We significantly expanded the breadth of our Latin America Practice capabilities with the opening of our Bogotá office in 2012. Holland & Knight is one of the few U.S.-based law firms with an office in Colombia that offers the full range of legal services. Our Colombia Practice offers solutions to domestic companies with local and international legal needs, as well as international companies that wish to enter the Colombian market. Members of our team assist clients in all aspects of their business operations, with an emphasis on transactional and finance matters, as well as international disputes. We regularly counsel clients in capital markets, cross-border transactions, international trade, mergers and acquisitions, joint ventures, venture capital and private equity investments, international licensing and franchising, and international litigation and arbitration. In addition, we provide regulatory advice to foreign companies doing business in Colombia, as well as Colombian companies doing business abroad.



Cuba Strategic Advisory Team

Navigating Cuba related matters requires more than technical legal knowledge – it demands an informed, strategic approach grounded in regulatory fluency, political awareness and practical experience. Holland & Knight's Cuba Strategic Advisory Team works collaboratively with clients to manage risk, identify opportunity and move forward with confidence in one of the most complex and sensitive regulatory environments affecting international business today. Our lawyers advise U.S. and international clients on inbound and outbound matters involving Cuba, with a focus on delivering clear, actionable guidance tailored to your commercial objectives and risk tolerance.



Venezuela Strategic Advisory Team

Holland & Knight's Venezuela Strategic Advisory Team helps clients navigate Venezuela's rapidly shifting policy, sanctions and regulatory landscape by assessing exposure, supporting strategic government engagement and advising on operational and investment decisions during the country's transition. We help clients pursue cross-border opportunities in Venezuela and the region with coordinated U.S. and on-the-ground support, advising on market entry and reentry, transactions and structuring, energy and infrastructure matters, and dispute resolution.

Latin America Practice Strengths



Equity and Debt Capital Markets

Members of Holland & Knight's Latin America Practice have extensive experience representing both issuers and underwriters in cross-border offerings of debt and equity securities, including the following transactions:

- Holland & Knight advised **Fibra UNO** in its international offering of \$1 billion in senior notes. The offering was divided into two tranches, \$400 million at a rate of 4.869 percent maturing in 2030 and \$600 million at a rate of 6.39 percent maturing in 2050. Both were issued in accordance with Rule 144A and Regulation S under the U.S. Securities Act of 1933. The successful offering was oversubscribed 4.5 times, exceeding the initial target amount of \$800 million. This transaction was awarded Financing Innovation of the Year 2019 by Latin Finance.
- Representing the sponsor in connection with the project financing of a liquefied natural gas (LNG) to power a project in Panama. The project will entail the construction, installation, operation and marketing of a 420 megawatt (MW) power generating plant using natural gas as a fuel source. The project will have an LNG import terminal with sufficient capacity for the reception and storage of the fuel and corresponding regasification components. Also, the LNG terminal will have the capacity to offer services of storage, regasification, use of the dock, among others, to the various participants of the Panamanian power market. The approximately US\$1 billion project cost / approximately US\$500 million financing is intended to be raised through a Rule 144A/Regulation S project bond offering.
- Representing the borrower in 1) a US\$225 million, nonrecourse loan financing to be provided by MUFG Bank Ltd., and Canadian Imperial Bank of Commerce for the project awarded to ATN3 S.A. for the construction and operation of the 220 Kv Machupicchu–Quencoro–Onocora–Tintaya transmission line and associated substations in the Republic of Peru and 2) the project bond private placement for the subsequent refinancing.
- Representing the national geothermal energy company of El Salvador on its inaugural Rule 144A/Regulation S international bond offering expected to be in the approximate principal amount of \$500 million.



Structured Finance and Securitization

Drawing from decades of technical know-how and industry experience, we advise on a range of debt, equity and hybrid financing techniques. We represent banks, financiers, lessors, lessees, manufacturers, borrowers, airlines, maritime operations, government organizations and some of the largest Latin American airlines. Examples of our recent structured finance and securitization experience include the following:

- Advised **Financiera de Desarrollo Nacional (FDN)**, Colombia's infrastructure development bank, **Sumitomo Mitsui Banking Corp.** and the **China Development Bank** as lead arrangers of the \$650 million financing of the Mar 2 project, which is part of Colombia's fourth generation (4G) road infrastructure plan. The Mar 2 project is a 254 km toll road in Antioquia, Colombia, that includes the construction of 11 tunnels and 59 bridges. It is the 17th project to receive funding within the 4G program. Holland & Knight has represented FDN in seven of these projects.
- Represented **BBAM US LP** and **BBAM Aviation Services** as servicers in connection with the "Horizon II" asset-backed securitization (ABS) transaction, involving an ABS structured in three tranches of notes: \$375 million in A notes, \$69 million in B notes and \$41 million in C notes. The proceeds of such financing have been used to acquire an initial portfolio of 20 narrow-body aircraft on lease to 16 airlines in 13 countries, including Chile.
- Represented **SMBC Aviation Capital** on the sale and leaseback financing of numerous new aircraft with a variety of international carriers in Mexico, El Salvador and Colombia.



Mergers and Acquisitions

We regularly advise Latin American clients, as well as U.S.- and European-based companies doing business in the region, on cross-border mergers, acquisitions, joint ventures and other business combinations and expansions. Through our Mexico City, Monterrey and Bogotá offices, we also advise on similar transactions governed by Mexican and Colombian law, respectively. Examples of our lawyers' corporate and M&A transactions include the following:

- Advised Spanish telecommunications company **Telefónica Group** in the multijurisdiction transaction sale of its data center in Mexico to Asterion Industrial Partners, a Pan-European infrastructure fund manager. The global transaction, includes 11 data centers for 550 million euros with the installed service capacity of 29 megawatt (MW) located in seven countries: Chile, Argentina, Brazil, Spain, Mexico, Peru and the U.S.
- Represented **AccorHotels** in connection with its acquisition of Chile's Atton Hoteles. Holland & Knight served as U.S. and Colombian counsel in the deal. AccorHotels agreed to buy the management company behind Chile's Atton Hoteles for approximately \$105 million. AccorHotels will acquire 100 percent of the management company that operates 11 Atton hotels across Chile, Peru, Colombia and Florida in the United States.
- Represented Chilean importer and distributor of automobiles in acquisition of 70 percent interest in a Brazilian company in the business of assembly and production of automotive vehicles and parts.



Project Finance/Bonds and Infrastructure

Holland & Knight represents the interests of majority and minority finance partners and sponsors, including commercial lenders, export credit agencies, multilateral development banks, developers, suppliers and contractors. We have experience in risk identification and allocation aspects of numerous types of projects, as well as practical knowledge of financing methods and ensuing complications involving publicly funded undertakings as privatization project structures. Examples of our projects, infrastructure and energy lawyers' experience include the following:

- Advised **MUFG Union Bank** and **TMF Group**, the offshore collateral agent, the offshore account bank and the onshore collateral agent, in a complex secured dual tranche project acquisition financing (R\$14 billion senior debentures and US\$2.45 billion senior loans) by Engie Brasil in order to affect Engie's acquisition of Trans Austria Gas (TAG) pipeline's 4,505 km natural gas pipeline in Brazil. The transaction was complicated by the bidding procedures required by the Brazilian government to approve the privatization of a state-owned entities' asset and the retention of a 10 percent interest by the selling entity.
- Advised **Financiera de Desarrollo Nacional (FDN)**, Colombia's infrastructure development bank, as credit enhancement provider in connection with the \$547 million Ruta del Cacao project financing, which is part of Colombia's fourth generation (4G) road infrastructure plan. The final structure included at least four tranches of secured debt, including COP, UVR and USD.
- Representing the borrower and sponsor in connection with the US\$197 million project financing for a 100 megawatt (MW) renewable wind project in Argentina under the new RenovAr program. The park will be located in the province of La Rioja, which has aggressive renewable energy targets. The financing will be provided by the Inter-American Investment Corp. and BNP Paribas and benefit from a CESCE issued insurance program.
- Represented **Santander Bank** as value-added tax (VAT) lender in connection with financing of the VAT receivables related to the construction of five geographically diversified diesel power plants in Chile, with expected total project budget of approximately US\$250 million, including engineering, procurement and construction (EPC)-related costs of approximately US\$210 million.
- Representing the borrower in a \$130 million syndicated credit facility for the refinancing of existing indebtedness related to certain hydroelectric power generating projects in Peru. Sumitomo Mitsui Banking Corp. is acting as lender, sole bookrunner, structuring bank and administrative agent in the transaction.



Bank Lending

Holland & Knight regularly represents banks, multilateral financial institutions and borrowers in connection with the negotiation and documentation of complex commercial lending transactions, including transactions involving investment funds of various types.

We have handled a broad range of financial transactions secured by a variety of collateral, including financial assets, inventory and equipment, accounts receivable and loan portfolios. Examples of our lawyers' lending transactions include the following:

- Represented **MUFG Bank** as lead arranger and bookrunner on a \$221 million credit facility to Banco Latinoamericano de Comercio Exterior S.A. (Bladex).
- Represented **CrediQ** on a \$142.5 million, nine-year, secured credit facility provided by the Overseas Private Investment Corporation (OPIC) and a \$11.8 million three-year secured facility provided by Citibank N.A. Based in El Salvador, CrediQ offers vehicle financing services to customers. The OPIC and Citi term facilities will support the expansion of CrediQ's vehicle finance and lending programs for small and medium enterprises in Central America, helping them address the challenges faced when accessing financing in the region.
- Represented **Banco Latinoamericano de Comercio Exterior S.A. (Bladex)** as administrative agent and Bladex, Banco General and Grupo Promerica as joint lead arrangers and bookrunners on a one-year, \$131.5 million senior secured club loan and letter of credit facility for Corporación Favorita C.A.
- Represented **Wells Fargo Bank N.A.**, as sole lead arranger, bookrunner and administrative agent on a \$100 million, three-year, senior unsecured syndicated loan for BBVA Peru, one of the leading banks in Peru.

Connect with Our Team



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Committed to Our Clients

Our mission is simple: we are dedicated to advancing your interests – no matter how complex – by providing cutting-edge solutions to your matters in an efficient and timely manner. Our team is comprised of innovative strategists, experienced litigators and transactional attorneys with long-term dealings in the industry and knowledge of rapidly changing market standards.

Holland & Knight Practice Overview

Anti-Money Laundering

Banking Law

Corporate Transactions, Finance and International Tax

Consumer Protection Defense and Compliance

Cuba Strategic Advisory Team

Global Compliance and Investigations

Latin America

Litigation and Dispute Resolution

Mergers and Acquisitions

Private Wealth Services

Real Estate and Capital Markets

Regulatory and Government Affairs

Venezuela Strategic Advisory Team

Industry Sectors

Energy & Natural Resources

Finance & Financial Services

Healthcare & Life Sciences

National Security & Defense

Real Estate & Hospitality

Technology & Telecommunications

Transportation & Infrastructure