

Partner Rachel Alpert Quoted in *GIR* on Waiver Authority in New Russia Sanctions Bill

Publications

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Partner Rachel Alpert was quoted in a *Global Investigations Review (GIR)* article examining the Lindsey O. Graham Sanctioning Russia and Iran Act of 2026 and the broad waiver power it grants the president over the new sanctions authorities.

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Rachel explained that the legislation's practical impact will hinge on interpretation and enforcement, noting that the executive branch's discretion to use, or decline to use, the new authorities make the ultimate effect of the law uncertain. She addressed the tension in giving the executive flexibility to adapt sanctions to shifting foreign policy goals against the risk that a waiver provision this broad could undercut the law's aim of sustaining long-term pressure on Russia.

As Co-Chair of the firm's National Security and Crisis Practice and Human Rights and Global Strategy Practice, Rachel guides multinational companies and institutions through US sanctions, export controls, and national security regulations. Drawing on her experience as Chief Counsel at the US Treasury Department's Office of Foreign Assets Control (OFAC), Rachel helps clients understand not only what the law requires, but how policy is shaped and implemented across government.

Related Lawyers



Rachel K. Alpert

Partner

ralpert@jenner.com

+1 202 639 3871

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