



OFAC experience. Industry expertise.  
Sanctions clarity.

New York, NY

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Clarity Compliance Consulting is a boutique sanctions advisory firm that pairs industry expertise with deep Office of Foreign Assets Control (OFAC) experience. Founded by the former head of OFAC's Compliance Division and the agency's lead expert on shipping, energy, and insurance, Clarity helps companies resolve their most urgent and sensitive sanctions issues and plan for what's next.

With Clarity, clients work directly with the people who wrote today's sanctions rules. We understand what OFAC is really looking for in targeting and civil enforcement investigations, and we give our clients practical, tailored compliance advice that reflects how the agency actually works.

## WHAT KEEPS OUR CLIENTS UP AT NIGHT

### **Geopolitical shifts and sanctions divergence**

Companies that once thought of themselves as "low sanctions risk" can quickly find themselves in trouble due to shifting policy winds, and sanctions regimes that seemed intractable (Syria, Venezuela, Iran, Russia) may be waived or revoked due to geopolitical changes. Some sanctions regimes have diverged among jurisdictions, creating compliance friction and conflicts of law.

### **OFAC enforcement focus on new industries and ten-year statute of limitations**

OFAC has now imposed penalties on private equity, broker dealers, venture capital, international freight forwarders, crypto, and real estate companies. OFAC has ten years to conduct civil enforcement investigations, heightening the risks for companies that uncover apparent violations.

### **Drug cartels now classified as terrorists**

Companies with operations or supply chains in Latin America are now exposed to additional civil and criminal risk and must make challenging decisions regarding local subsidiaries, counterparties, suppliers, and ports.

### **Intense pressure on shipping and energy, even as sanctions shift**

OFAC blocked nearly 500 vessels in 2025. OFAC has granted temporary relief to the shadow fleet via GLs 134 and U, but maritime shipping companies, commodities traders, and insurers/reinsurers will be exposed to complex and changing sanctions risks in 2026.



## HOW CLARITY CAN HELP

### **OFAC Stress Tests and Risk Assessments**

Clarity offers two tiers of assessment. Our OFAC Stress Test is a focused, rapid evaluation of your most critical exposures and your readiness to respond if OFAC came knocking today. For companies that want a more comprehensive view, our full Risk Assessment evaluates sanctions risks across business lines, jurisdictions, transactions, supply chains, and counterparties.

### **Investigations and Remediation**

When an investigation is triggered by an internal finding, negative media, or a regulator's request, you want people who know OFAC's enforcement process on your side. Clarity knows how OFAC values apparent violations and what remediation it expects to see. We have led large-scale remediation efforts at international financial institutions. We can partner with your sanctions counsel on privileged matters and work easily alongside law firms, other consultants, and your in-house compliance team.

### **Gap Assessments and Control Enhancements**

Sanctions regulations change faster than most compliance programs can keep up with. Clarity identifies the gaps between where your program is and where OFAC expects it to be, based on direct experience with what OFAC actually scrutinizes. We help clients close those gaps in a way that is practical for their business, not just defensible to regulators.

### **AI and Compliance Tool Proof of Concepts, Build Outs, and Evaluation**

Clarity works with compliance and engineering teams and technology companies to build, stress-test, and evaluate AI-powered compliance tools. Whether you're developing a new product for the sanctions compliance market or evaluating tools you already use, we bring the subject matter expertise needed for tools that holds up in real-world scenarios. We stress-test tools against edge cases drawn from our experience at OFAC, help design workflows that augment human judgment rather than replace it, and advise on how to make AI-driven outputs accurate, defensible, and regulator-ready.

### **Due Diligence**

Clarity reviews acquisitions and investments for sanctions exposure, drawing on firsthand knowledge of the evasion typologies, ownership structures, and jurisdictions that OFAC targets.

### **Customized Training**

Clarity designs and delivers training built around your industry and risks, informed by the same expertise that produced OFAC's guidance for the maritime, insurance, energy, and banking sectors.

### **Sanctions Horizon Advisory**

Clarity can help you war-game new sanctions regimes, stress-test portfolios and positions against scenarios, and provide ongoing horizon scanning so clients aren't caught flat-footed when policy moves. Other advisory firms can tell you what might happen in geopolitics. Clarity tells you what OFAC will do about it.



## Claire O'Neill McCleskey

### CO-FOUNDER

Former head of OFAC's Compliance Division and a leading expert on sanctions and financial crimes, Claire brings deep experience providing practical guidance on the most sensitive and complex sanctions issues to the insurance and reinsurance, manufacturing, shipping, energy and commodities, banking, investment management, and securities industries.

### BACKGROUND

As Head of OFAC's Compliance Division, Claire led the agency's guidance on sanctions compliance and implementation, administration of blocked assets, and advisory to OFAC targeting teams. Claire provided guidance to industry and foreign governments on the most urgent and complex sanctions problems, including maritime casualties, proposed or ongoing M&A, divestment, and energy asset transactions, authorized activities under OFAC licenses, interpretation of OFAC regulations, and design of sanctions compliance programs. Claire led the drafting and publication of over twenty public guidance documents on complex sanctions topics for the maritime and shipping, energy, banking, legal, and other industries, in addition to multi-stage project to revise over a hundred baseline Frequently Asked Questions (FAQs) for the public. Claire also oversaw multiple complex OFAC remediation efforts by private companies. While leading Compliance, Claire created OFAC's first private sector engagement team, which delivered 300 industry engagements in first fiscal year and enhanced OFAC's public-private partnership across a broad range of industries. Claire also oversaw Compliance's implementation of NPSM-2, including publishing critical guidance on Iranian sanctions evasion.

As Senior OFAC Policy Advisor, Claire was a key architect of the Russian oil price cap policy and worked closely with the governments of the European Union, United Kingdom, and other international partners. For her work on the Russia sanctions, Claire was awarded the U.S. Treasury's Salmon P. Chase Award for exceptional service in a time of crisis and the Distinguished Employee of the Year Award.

Prior to joining OFAC, Claire advised global banks and crypto companies on anti-money laundering and sanctions risks and remediation at Promontory Financial Group. She also led complex global money laundering investigations at HSBC in London. Claire also led Section 311 investigations at the Financial Crimes Enforcement Network (FinCEN), where she specialized in Mexican drug cartels. She also served as FinCEN's Attache to Mexico in Mexico City. She began her career working in investigative journalism at InSight Crime. She holds a bachelor's and a master's degree in security studies from Georgetown University and speaks fluent Spanish and intermediate Portuguese.



## Claire Grunewald

### CO-FOUNDER

Trusted sanctions compliance adviser to the insurance, reinsurance, and maritime shipping industries. Named the 19th most influential person in shipping in 2024 by Lloyd's List Intelligence, Claire spearheaded OFAC's guidance for the insurance and shipping industries and led the agency's implementation of the Russian Oil Price Cap and NPSM-2.

### BACKGROUND

Claire served as OFAC's lead expert on the insurance, reinsurance, maritime, shipping, cargo, aviation, and energy sectors. She drafted the agency's first scenario-based guidance for the maritime insurance and shipping sectors, providing industry with a practical framework for designing compliance programs, risk assessments, training, and commercial contractual clauses. She drafted OFAC's guidance for the insurance industry on subrogation rights, exclusion clauses, and other key sanctions compliance topics. She led implementation of NPSM-2, publishing guidance on Iranian sanctions evasion and leading outreach to the private sector on countering Iran.

In her role at OFAC, Claire worked closely with Lloyd's of London and the Lloyd's Market Association, leading insurers and reinsurers in the United States, Europe, and the UK, and key maritime sector stakeholders around the world, expanding OFAC's private sector engagements through various international meetings, workshops, and presentations. She was named the 19th most influential person in shipping by Lloyd's List for this work. She advised private sector stakeholders on complex sanctions inquiries and regulatory changes, and frequently briefed OFAC and Treasury leadership on energy and insurance market dynamics to inform key policy decisions. She also has experience with blocked asset management and OFAC reporting requirements.

Prior to joining OFAC, Claire co-founded a blockchain philanthropy startup and was awarded a U.S. Department of Defense Boren Scholarship in Chile. She speaks fluent Spanish.



## Naomi Maxwell

### CHIEF OF STAFF/CONSULTANT

Experienced legislative affairs expert and advisor to OFAC leadership. Trusted executive briefer and advisor on stakeholder management. Expert project manager.

### BACKGROUND

Naomi brings expertise in U.S. sanctions law developed through her tenure in OFAC's front office working on legislative affairs strategy. She has led some of OFAC's most high-profile and complex legislative initiatives across multiple sanctions programs, including Iran, Russia and Venezuela. She was a key advisor to OFAC leadership providing strategic direction and support and handled various inquiries, including over 100 Congressional briefings. In recognition of her contributions to the Treasury Department as a committed trusted advisor, Naomi was awarded the Meritorious Service Award.

In addition to time at Treasury, Naomi has also served the Department of State in legislative affairs where she negotiated legislative language spanning a broad range of international portfolios to advance U.S. foreign policy objectives. She also worked as a regulatory animal welfare advocate with the Humane World Action Fund.

Naomi holds a Juris Doctor from Arizona State University's Sandra Day O'Connor College of Law and is an active member of the District of Columbia bar. Naomi lives in Washington D.C.