

Practice Update

Navigating Venezuela's Re-Entry Into Global Energy and Financial Markets

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Recent actions by the U.S. government signal a meaningful shift in how Venezuelan energy assets may re-enter global markets — and how companies with exposure to the region should be thinking about risk, opportunity, and timing.

Under a new policy framework, the United States has begun facilitating the marketing and sale of Venezuelan crude oil through authorized channels, with proceeds held in U.S.-controlled accounts and disbursed under U.S. government oversight. While narrow in scope and highly structured, these measures represent the most significant change in Venezuela-related energy and sanctions policy in years.

For companies that have long viewed Venezuela as legally or commercially inaccessible, this moment warrants close attention.

What Has Changed — and Why It Matters

The policy reflects several core developments:

- Venezuelan crude and refined products will be marketed internationally through approved commodity traders and financial institutions.
- Sale proceeds will initially be held in U.S.-controlled accounts to ensure transparency, compliance, and lawful distribution.

Related People

Pedro A. Freyre
Scott D. Marrs
LaKeisha C. Marsh
Felicia Leborgne Nowels
Luis A. Perez
Eric D. Rapkin

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- Sanctions are being selectively eased to permit authorized transportation and sale activity, while maintaining strict controls over who may participate and how.
- The program is expected to begin with tens of millions of barrels and continue on an open-ended basis, subject to U.S. policy direction.

Taken together, these steps do not signal a wholesale normalization of Venezuela-related commerce. Instead, they establish a **highly regulated, compliance-driven framework** through which limited activity may proceed — creating both opportunity and legal complexity.

Who Should Be Paying Attention

These developments are particularly relevant for:

- **Energy companies and traders** assessing lawful participation in crude and refined product transactions.
- **Financial institutions and commodity financiers** involved in trade finance, payment processing, or structured transactions tied to energy flows.
- **Infrastructure, shipping, and logistics companies** supporting authorized transport and export activity.
- **Investors and distressed-asset funds** evaluating legacy exposure, re-entry strategies, or enforcement and recovery options.
- **Multinational companies with historical Venezuela exposure** reassessing sanctions risk, compliance posture, and contingent liabilities.

For each of these stakeholders, the opportunity is not simply access — it is **lawful access**, structured to withstand sanctions scrutiny, political risk, and future policy shifts.

Strategic Considerations for Companies

Organizations evaluating next steps should be asking:

- Does this framework create a viable path for participation — or does it increase compliance exposure?
- How should existing contracts, licenses, or dormant assets be reassessed in light of selective sanctions relief?
- What governance, controls, and documentation will regulators expect as activity resumes under U.S. oversight?
- How durable is the current policy environment, and how should risk be allocated contractually?

Answering these questions requires more than transactional execution; it requires integrated legal, regulatory, and geopolitical judgment.

How Akerman Supports Clients in This Moment

Akerman advises clients navigating Venezuela-related developments at the intersection of sanctions, energy, finance, and cross-border risk. Our team brings deep experience across Latin America, including lawyers who are licensed in and have worked in Venezuela, enabling coordinated guidance across jurisdictions.

We work with clients on:

- Sanctions and export-control compliance
- Energy and commodities transactions
- Cross-border structuring and risk allocation
- Asset recovery, disputes, and enforcement
- Policy analysis, restructuring, and contingency planning

Below are links to key Akerman practices and resources that may be helpful as the situation

unfolds. Our lawyers are available to discuss specific questions and to help clients assess next steps with clarity and confidence.

- International Litigation and Arbitration
- Economic Sanctions and Export Controls
- International Trade and Customs
- White Collar Crime and Government Investigations
- Energy and Infrastructure
- Corporate
- Litigation

Companies with Venezuelan interests should focus not simply on what is permitted today, but on making informed decisions that remain resilient as conditions evolve. As Venezuela's legal and commercial landscape shifts — incrementally and unevenly — companies that move deliberately, with clarity around risk and opportunity, will be best positioned to respond.

For tailored advice, please contact:

- Corporate: Pedro A. Freyre, Chair, International Practice
- Litigation: Luis A. Perez, Chair, Latin America & the Caribbean Practice
- Sanctions: Felicia Leborgne Nowels
- Government: LaKeisha C. Marsh, Chair, Government Strategies Practice
- Real Estate: Eric D. Rapkin, Chair, Real Estate Practice Group
- Energy: Scott D. Marrs, Office Managing Partner, Houston

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