



## Michael O'Leary

Of Counsel

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**Mike O'Leary represents companies and individuals in connection with investigations and enforcement actions by domestic and foreign regulatory and criminal authorities.**

### PRACTICES

Advertising, Marketing, and Sponsorships  
 Government Investigations and White Collar Defense  
 Foreign Corrupt Practices Act and Anti-Corruption  
 Export Controls (ITAR/EAR) and Trade Sanctions (OFAC)  
 Commercial Litigation  
 Class Actions  
 Advertising, Labeling, and Consumer Class Actions  
 Compliance Systems, Audits, and Disclosures  
 International Trade and Compliance Committee on Foreign Investment in the United States (CFIUS)

### EDUCATION

Columbia Law School, J.D., 2003  
 Harlan Fiske Stone Scholar  
 Vassar College, B.A., 2000  
 History

### BAR ADMISSIONS

District of Columbia  
 New York

### COURT ADMISSIONS

U.S. Supreme Court  
 U.S. Court of Appeals for the District of Columbia Circuit  
 U.S. District Court for the District of Columbia  
 U.S. District Court for the Southern District of New York  
 U.S. District Court for the Eastern District of New York  
 U.S. District Court for the District of

Mike regularly counsels businesses facing compliance and regulatory issues relating to foreign bribery, money laundering, the Arms Export Control Act (AECA), the International Traffic in Arms Regulations (ITAR), the Foreign Agents Registration Act, and U.S. economic sanctions programs administered by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC).

Mike previously served as an Assistant United States Attorney in the U.S. Attorney's Office for the Southern District of Florida in Miami, where he investigated and prosecuted a wide variety of federal offenses, including bank and wire fraud, identity theft, violent crimes, Medicare fraud, money laundering, currency-related offenses, and international narcotics trafficking. During his time as a federal prosecutor, Mike tried sixteen jury trials and argued two cases before the Eleventh Circuit Court of Appeals. Mike also previously served as a law clerk to the Honorable Cecilia M. Altonaga, United States District Judge for the Southern District of Florida.

### CLIENT RESULTS

#### Representative Matters

Represented a major defense contractor in connection with an internal investigation relating to alleged ITAR violations, a large audit of its export compliance protocols, and voluntary disclosures to the U.S. Government.

Counsels a Fortune 100 heavy equipment manufacturer on US. export controls and economic sanctions compliance matters.

Obtained final judgment on behalf of a group of U.S. service members and their families against Iran after a bench trial in federal court.

Represents U.S. Government employees killed and injured in August 1998 bombings of the U.S. Embassies in Nairobi, Kenya and Dar es Salaam, Tanzania in a number of civil actions against entities and governments who supported the attacks.

Represented an individual in connection with criminal federal bribery charges.

Counsels multiple entities and individuals regarding registration obligations

Maryland

under the FARA.

Advises a number of companies on anti-money laundering and anti-corruption compliances issues.

Represents an entity in connection with federal litigation arising from relief fund awards under the federal CARES Act.

Represented a major financial institution in connection with a wide variety of domestic and foreign inquiries into alleged manipulation of benchmark interest and exchange rates.

Represented a number of Swiss financial institutions and a Swiss professional services firm in connection with investigations related to the DOJ's Offshore Tax Compliance Initiative.

Represented a foreign bank in an internal investigation into possible violations of OFAC sanctions.

Represented a foreign executive in connection with an investigation into alleged economic espionage.

Represented a large international electronics company in a multimillion-dollar civil fraud case.

## **PUBLICATIONS**

"OFAC: Sanctions Compliance Provisions in Lease Agreements Alone May Be Insufficient," *International Compliance Blog*, Co-Author, 11/27/19

"OFAC Sanctions "Sudanese Oligarch" for Fraud and Corrupt Dealings in South Sudan," *International Compliance Blog*, Co-Author, 10/18/2019

"Criminal and Civil Enforcement of Environmental Laws," *Environmental Regulation of the Mining Industry, excerpted from the Second Edition of the American Law of Mining, Chapter 165*, Co-Author, 2018

"SEC Domestic Anti-Bribery Action – No Flyovers for Violations of Internal Policies," *Holland & Hart News Update*, Co-Author, 12/09/2016

## **SPEAKING ENGAGEMENTS**

"Cryptocurrency Anti-Money Laundering: Regulatory Trends and Risk Issues Explored," *The Knowledge Group Webinar, Faculty*, March 2019