



Michael O'Leary

Of Counsel

505 9th St. NW, Suite 700, Washington, DC 20004

P 202.654.6922

mjoleary@hollandhart.com

Mike delivers strategic legal counsel to help clients navigate regulatory compliance, government investigations, enforcement defense, and disputes in state and federal court.

PRACTICES

Export Controls, Economic Sanctions, and Customs
Government Investigations and White Collar Defense
FCPA and Anti-Corruption
International Services
Cross-Border Transactions
Business Litigation

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 Maryland

Drawing on his experience as a former federal prosecutor, Mike guides companies and individuals through complex legal challenges where business operations meet government oversight. A core aspect of Mike's practice is advising companies on international trade compliance, particularly U.S. economic sanctions, export controls, foreign investment reviews, and customs matters.

Mike partners with clients to develop practical risk management strategies and compliant policies. He counsels clients on issues relating to money laundering laws, the Bank Secrecy Act, state and federal money transmission laws, anti-corruption laws, the federal False Claims Act, and regulatory obligations under the Lobbying Disclosure Act and Foreign Agents Registration Act.

When allegations of misconduct arise, he represents companies and individuals in high-stakes government investigations and criminal and civil enforcement actions, leveraging his prosecutorial background to develop effective defense strategies. Mike also represents clients in range of complex civil litigation and administrative proceedings.

As an Assistant United States Attorney for the Southern District of Florida in Miami, Mike 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. He handled sixteen jury trials and argued two cases before the Eleventh Circuit Court of Appeals.

Before joining the U.S. Attorney's office, Mike served as a judicial law clerk to Judge Cecilia M. Altonaga of the United States District for the Southern District of Florida.

EXPERIENCE

International Trade

- U.S. economic sanctions programs administered by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC).
- The Arms Export Control Act (AECA) and the International Traffic in

Arms Regulations (ITAR).

- Export Administration Regulations (EAR)
- Foreign direct investment controls and the Committee on Foreign Investment in the United States (CFIUS) review process
- U.S. anti-boycott laws
- Advising on U.S. customs and tariff compliance issues.

Anti-Money Laundering Laws

- Criminal and civil anti-money laundering prohibitions
- The Bank Secrecy Act and its implementing regulations administered by the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN)
- State and federal money transmission laws and licensing obligations

Other Criminal and Civil Experience

- Procurement Fraud, Federal Programs Fraud, and the False Claims Act (FCA)
- Anti-corruption laws including the Foreign Corrupt Practices Act (FCPA)
- Mail and Wire Fraud
- Report of Foreign Bank and Financial Accounts (FBAR) Compliance
- Trade secret disputes including actions under the Defend Trade Secrets Act
- Civil and criminal asset forfeiture laws and judgment enforcement proceedings

CLIENT RESULTS

Compliance Counseling

Counseled a major equipment manufacturer on U.S. export controls and economic sanctions compliance matters.

Developed compliance policies and advised multiple companies on anti-money laundering and anti-corruption compliances issues

Counsels multiple entities and individuals regarding registration obligations under the LDA and FARA.

Advised multiple companies with respect to federal and state money transmitting licensing issues.

Counseled cryptocurrency company with respect to anti-money laundering and sanctions compliance.

Counseled non-profit entities with respect to compliance with anti-

corruption and sanctions laws.

Investigations

Represented major defense contractor in connection with internal investigations of alleged ITAR violations, audits of its export compliance protocols, and voluntary disclosures to the U.S. Government.

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.

Litigation

Represented group of corporate entities and individuals in connection with successful petition for removal from the OFAC SDN list.

Obtained dismissal of civil complaint against federal defense contractor for breach of contract, fraud, and restraint of trade claims.

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.

Represented 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 and related judgment enforcement proceedings.

Represented an individual in connection with criminal federal program fraud charges.

Represented Alaska Native Corporation (ANC) in connection with successful challenge to whether ANCs were eligible to receive CARES Act funds.

Represented entity in obtaining a temporary restraining order in trade secrets dispute arising under the Defend Trade Secrets Act.

Successfully represented entity at trial arising from whistleblower complaint filed by terminated employee.

PUBLICATIONS

"FinCEN EXEMPTS U.S. Companies and U.S. Persons from CTA

Reporting Requirements," *CTA Legal Update*, March 26, 2025

"The CTA Is Back (Sort Of)—What Reporting Companies Need to Know," *CTA Legal Update*, March 11, 2025

"CTA Whiplash: Fifth Circuit Reinstates Nationwide CTA Injunction ," *CTA Legal Update*, December 30, 2024

"What the Last-Minute Reinstatement of the Corporate Transparency Act Means for Businesses," *CTA Legal Update*, December 26, 2024

"What Does the Nationwide Preliminary Injunction of the Corporate Transparency Act Mean for Businesses? ," *CTA Legal Update*, December 5, 2024

"Key Compliance Takeaways for Companies from the DOJ's New Corporate Whistleblower Program," *Department of Justice Update*, August 20, 2024