



Michael O'Leary

Of Counsel

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

P 202.654.6922

mjoleary@hollandhart.com

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

PRACTICES

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

INDUSTRIES

Mining

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

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

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

"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