

Charlie Steele

Year of Call: 1984
Direct Access: No

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Charles (Charlie) Steele is a Professional Associate in the **Business Crime, Regulatory and Sanctions** team, based in Washington DC.

Charlie is a former senior US Treasury Department, Department of Justice, and FBI official with more than 35 years of government and private-sector experience in regulatory and criminal compliance, investigations, enforcement, and litigation matters, in a variety of industries and sectors. He has worked primarily on US economic sanctions and anti-money laundering matters since 2009; before that, he worked on a broad range of complex white-collar and national security investigations, prosecutions, and other matters.

In addition to his role as a Professional Associate, Charlie has a solo law practice, the Law Office of Charles Steele. He advises and represents clients primarily on US economic sanctions matters, including counselling, compliance advice, delisting petitions, license applications, enforcement actions, and training. He also helps clients with anti-money laundering enforcement matters. He is available to serve in mitigation roles in foreign direct investment matters before the US Government's Committee on Foreign Investment in the United States ("CFIUS").

Charlie also works with Forensic Risk Alliance, a UK- and US-based global market leader in forensic consulting.

Charlie's most recent government service was as Chief Counsel for the Office of Foreign Assets Control (OFAC), where he led the team of lawyers providing legal advice and support to OFAC in the administration and enforcement of US economic sanctions. He previously held the positions of Associate OFAC Director in charge of Enforcement, Deputy Director of FinCEN (the US anti-money laundering agency), FBI Deputy General Counsel, Chief of Staff to the FBI Director, and Chief of Staff of the Justice Department's National Security Division. He began his legal career serving as an Assistant US Attorney (federal prosecutor) for 12 years, conducting dozens of grand jury investigations, 27 jury trials, and several appeals in US Courts of Appeal.

Charlie works closely with his colleagues in the Business Crime, Regulatory and Sanctions team at Outer Temple Chambers on matters with a US element which may require his expertise and knowledge of the relevant laws.

London (Main Office)

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Areas of Expertise

Sanctions

Charlie is a former Chief Counsel for the Office of Foreign Assets Control (OFAC), where he led the team of lawyers providing legal advice and support to OFAC in the administration and enforcement of US economic sanctions, in furtherance of US national security and foreign policy goals.

He also has many years' experience in the private sector at international law firms and a global consulting firm, advising on economic sanctions and other matters.

Notable Sanctions cases

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- Providing legal opinions on the meaning, scope, and applicability of US sanctions in particular situations, for several US and non-US businesses in a variety of industries and sectors.
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- Serving as an expert witness on US sanctions issues in two international arbitrations.
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- Providing legal advice to law firms and lawyers as to their own potential exposure to sanctions issues, and their own sanctions compliance efforts, arising in the course of their representations of their clients.
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- Representing individuals who are witnesses in US Department of Justice criminal grand jury investigations.
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- Filed requests for licenses from OFAC to unfreeze funds, and to authorize transactions otherwise prohibited under sanctions rules.
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- Filed petitions with OFAC for removal of individual and corporate clients from the Specially Designated Nationals and Blocked Persons List (the "SDN List").
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Business Crime

Charlie has worked in both the government and private sector. As a federal prosecutor, Charlie conducted 27 jury trials, dozens of grand jury investigations, and several appeals in the US Courts of Appeals for the Ninth and District of Columbia Circuits. He has also worked in the private sector at international law firms and a global consulting firm specialising in economic sanctions, anti-money laundering, financial crimes, and anti-bribery and corruption.

Notable Business Crime cases

- Participation as a defence attorney in several large internal corporate investigations in anti-bribery, sanctions and anti-money laundering matters.
 - As a federal prosecutor, successfully prosecuted the highest-ranking official of the US Small Business Administration in Arizona on bribery and corruption charges. Tried the case to guilty verdict on all counts, then successfully argued the case on appeal.
 - Successfully prosecuted a currency structuring case against an Arizona real estate developer. The case was unusual in that although there were suspicions of money laundering, the government could not prove that the money came from illegal sources, so only currency structuring was charged (there were no money laundering charges, nor charges as to illegality of underlying economic activity). Successfully tried the case to a jury, with convictions on all counts; the convictions were then affirmed by the Court of Appeals.
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Publications

- Sanctions Screening: Challenges and Control Considerations, in The Guide to Sanctions – Fourth Edition
- Practical Solutions in Cross-border Investigations, in The Asia-Pacific Investigations Review 2024
- Navigating and Preventing Cross-border Investigations, in The Asia-Pacific Investigations Review 2023
- Sanctions Screening: Challenges and Control Considerations, in The Guide to Sanctions – Third Edition
- Anti-Money Laundering Trends and Challenges, in Europe, Middle East and Africa Investigations Review 2022
- Strengthening Supply Chains amid Growing Trade Restrictions, in Asia-Pacific Investigations Review 2022
- Sanctions Screening: Challenges and Control Considerations, in The Guide to Sanctions – Second Edition
- Anti-Money Laundering Trends and Challenges, in Europe, Middle East and Africa Investigations Review 2021

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Experience

Previous positions held include:

- Office of Foreign Assets Control (OFAC) Chief Counsel
- OFAC Associate Director for Enforcement
- Financial Crimes Enforcement Network (FinCEN) Deputy Director
- Office of the Comptroller of the Currency Deputy Chief Counsel
- US Department of Justice (DOJ) National Security Division Chief of Staff
- Deputy Director, Guantanamo Review Task Force
- Chief of Staff to the FBI Director
- FBI Deputy General Counsel
- Assistant U.S. Attorney

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