

# Ex-US sanctions official: Biden to mirror Trump's approach minus the "flourishes"

Michael Griffiths

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A former senior US Treasury Department lawyer expects the incoming president to enthusiastically use sanctions as a tool of foreign policy but will probably avoid some of the more controversial measures seen in the Trump era.

Charlie Steele, who was chief counsel at the Office of Foreign Assets Control (OFAC) from January 2019 to March 2020, said that the Biden-led government will likely be as “energetic and aggressive” in handing down new designations as the previous two administrations.

However, he said that the new president will most probably shy away from targeting a geopolitical ally, such as Turkey, which has seen several government officials and ministries sanctioned by the US over the past three years.

The new administration will also most likely not replicate controversial actions such as the decision in September 2019 to [sanction members of the International Criminal Court](#) for investigating US soldiers over conduct in Afghanistan, according to Steele.

The ex-OFAC lawyer spoke to GIR after joining Forensic Risk Alliance's (FRA) Washington, DC office in December. It is his third move back to private practice from the US government, previously doing stints at Davis Polk & Wardwell, KPMG and Cadwaladar Wickersham & Taft amongst a near-30 year career in law enforcement.

In addition to his role as chief counsel at OFAC, Steele has also been the associate director of enforcement at the agency, as well as chief of staff of the Justice Department's national security division, the deputy director of the US Treasury's Financial Crimes Enforcement Network and the FBI deputy general counsel.

Steele said that he preferred joining a consultancy over returning to a law firm because of the differences in the scope of the job. "The work is a bit broader in a sense than you can get into assessing and offering assistance across clients' entire business operations, rather than being largely limited to providing legal advice as to the scope and applicability of laws and regulations," he said.

A significant factor in his decision to move to FRA was how its focus matches his expertise. "They don't do the auditing or the tax consulting, so the work is entirely forensic, which matches my experience and skill set. And, the fact that they're so focused on investigations, and data issues is appealing to me," Steele added.

"The size is also interesting, they're big enough to do complex sophisticated work across borders and small enough to be nimble and flexible compared to large consultancies or law firms," he said.

Steele says he will primarily handle sanctions matters and anti-money laundering cases. He also has experience across a vast array of white-collar areas, including prosecutions under the Foreign Corrupt Practices Act.

Frances McLeod, a co-founding partner at FRA, [said in a statement](#): "We are delighted to welcome Charlie to FRA. His extensive leadership experience and specialized knowledge from having served in the US Treasury and Justice Departments will give our clients valuable strategic insight when navigating sanctions proceedings and other white collar enforcement matters."

FRA has acted on several high-profile recent cases that have reached the public eye, including the internal investigation into [suspected money laundering and sanctions violations](#) at Swedish lender Swedbank and the Airbus bribery case, which ended with a [\\$4 billion settlement with French, UK and US settlement in January 2020](#).

The firm won the [Investigations Consultancy of the Year Award](#) at the 2020 GIR Awards.

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