

**Step toe & Johnson LLP**

China Central Place, 29th Floor,  
Tower 2  
79 Jianguo Road, Chaoyang  
District  
Beijing, 100025  
Tel: +86 10 5834 1000  
Fax: +86 10 5969 6099

Avenue Louise 489  
3rd Floor  
B-1050 Brussels  
Belgium  
Tel: +32 2 626 0500  
Fax: +32 2 626 0510

115 South LaSalle Street  
Suite 3100  
Chicago, IL 60603  
Tel: 312.577.1300  
Fax: 312.577.1370

2121 Avenue of the Stars  
Suite 2800  
Los Angeles, CA 90067  
Tel: 310.734.3200  
Fax: 310.734.3300

633 West Fifth Street  
Suite 700  
Los Angeles, CA 90071  
Tel: 213.439.9400  
Fax: 213.439.9599

1114 Avenue of the Americas  
New York, NY 10036  
Tel: 212.506.3900  
Fax: 212.506.3950

201 E. Washington Street  
Suite 1600  
Phoenix, AZ 85004  
Tel: 602.257.5200  
Fax: 602.257.5299

1330 Connecticut Avenue, NW  
Washington, DC 20036  
Tel: 202.429.3000  
Fax: 202.429.3902

**Step toe & Johnson**

99 Gresham Street  
London, EC2V 7NG  
England  
Tel: +44 20 7367 8000  
Fax: +44 20 7367 8001

## Anti-Money Laundering

Step toe & Johnson LLP provides legal advice on all aspects of anti-money laundering (AML) rules and regulations, both in the compliance counseling and enforcement contexts.

AML requirements, counter-terrorist financing regimes, know-your-customer (KYC) rules, and asset blocking and reporting requirements are increasingly complicated and comprehensive. Our attorneys are well-prepared to confront enforcement problems, to evaluate your company's existing AML policies and procedures, and to assist your company to set up and implement new programs, incorporating best practices that meet with regulatory approval.

The firm's Law Enforcement and Technology group helped draft many provisions of the USA Patriot Act and has an extensive practice advising companies on how to respond to law enforcement requests. The USA Patriot Act includes provisions designed to track down and stop international money-laundering efforts and advance the US government's war on terrorism by expanding its regulatory AML regime and by vigorously pursuing enforcement of AML statutes and regulations.

Section 352 requires each "financial institution"—very broadly defined—to establish AML programs. Financial institutions need to know who their customers are, and more and more about what they are doing, in light of AML and anti-terrorist financing monitoring. KYC regulations currently in place are the first step in an as-yet-to-be-completed regulatory process of extending bank-style AML responsibilities throughout the financial system, and must be monitored closely. Step toe is well-positioned to assist its clients in this area.

### Related Professional Services

Our firm offers a nationally recognized white-collar criminal defense practice should your company become involved in an investigation or enforcement action relating to allegations of money laundering by your clients or customers. We also have an equally skilled financial services team.

*White-collar litigation/criminal defense.* The white-collar litigation team includes Reid Weingarten, widely recognized as one of the nation's top criminal defense lawyers, as well as former federal prosecutors with extensive trial experience and a host of attorneys with substantial experience in other government positions. Our white-collar criminal defense team represents individuals and corporations in some of the most noteworthy cases in the country involving allegations of accounting and securities fraud and corporate misconduct, public corruption, money laundering, price fixing, government contracting fraud, healthcare fraud, and environmental crimes.

## Anti-Money Laundering

Our clients include corporations and senior executives in the telecommunications, pharmaceutical, energy, chemical, electronics, electronic commerce, agricultural, and cruise line industries, as well as financial institutions and foreign governments. When the future of a company hangs in the balance, many of the nation's highest profile senior executives and corporations choose Steptoe to represent them.

*Financial services litigation.* Steptoe litigators represent financial institutions and their officers and directors in white-collar issues such as allegations of money laundering and other alleged violations of law, as well as in lender liability claims and counterclaims involving securities fraud, common-law fraud, and Racketeer Influenced and Corrupt Organizations Act (RICO) claims, and merger and acquisition-related litigation. Our work in these matters has ranged from informal proceedings to cease-and-desist actions and other enforcement matters initiated by federal and state agencies. Steptoe has also defended financial institutions against civil claims predicated on the alleged breach of BSA and AML rules and regulations.

### Representative Matters

#### Case Study—A Prominent National Bank

Steptoe represents one of the nation's most venerable financial institutions in connection with ongoing civil, criminal, and congressional investigations centered on AML/Bank Secrecy Act (BSA) compliance. This representation has embraced both systemic issues of devising and implementing practices and policies to meet with go-forward regulatory approval, and disclosure and enforcement issues in connection with legacy systems and particular historical transactions. In addition, we have assisted in a broad range of internal investigatory work. This ongoing representation has brought Steptoe lawyers in close contact and coordination with the full community of regulatory, congressional, and criminal authorities.

#### Case Study—KYC/Anti-Terrorism Financing Compliance

Steptoe provides advice to financial institutions subject to new USA Patriot Act KYC requirements and long-standing Office of Foreign Assets Control (OFAC) anti-terrorism/asset-blocking regimes. This has involved advising on methods for conducting customer due diligence consistent with the institution's business model; screening customers against various USG lists; resolving false positives; and filing reports with either OFAC, the Financial Crimes Enforcement Network (FinCEN), or both. We have also developed independent audit plans for institutions that are required to test their AML and OFAC compliance systems.

## **Anti-Money Laundering**

### **Case Study—International Compliance**

Step toe represents several major European financial groups—including insurers and intermediaries—that have sought our counsel on how to effectively exploit the single license to write insurance on a cross-border basis in the European Union. Our advice covers the basic regulatory regimes set out in the EU Directives and national implementing provisions, while embracing and addressing European AML and KYC practices and protocols.