

Former FinCEN Chief Counsel Joins Crowell & Moring

By **Hannah Sheehan**

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The former top attorney at the U.S. Department of the Treasury's primary anti-money laundering agency has joined Crowell & Moring LLP as the international firm works to further expand its practice in cross-border sanctions, anti-money laundering and export controls.

Washington, D.C.-based Crowell announced the addition of Carlton Greene, the former chief counsel for the Department of Treasury's Financial Crimes Enforcement Network, on Tuesday. Greene joined as a partner and started work in December, serving in the firm's international trade group and on its white collar and regulatory team to advise corporate clients on compliance with economic sanctions, government investigations and anti-money laundering regulations, including the U.S. Bank Secrecy Act.



Carlton Greene

"The practice I'm coming here to do is a sanctions and anti-money laundering practice. It's in some ways a specialized area even though it cuts across so many types of commercial activity. I wanted to be somewhere that would recognize the value of the practice and give it room to grow," Greene told Law360 Thursday, noting Crowell's reputation for collaboration and cross-selling.

Before coming to Crowell, Greene spent over eight years in various roles at the Treasury Department, including nearly five years directing the targeting and investigation of U.S. sanction programs against Iran and North Korea as the assistant director for transnational threats at the Office of Foreign Assets Control. He previously worked as an adviser to the United Nations Security Council on international sanctions against al-Qaida and the Taliban.

Greene was appointed chief counsel at FinCEN in January 2014 after spending several months serving as acting chief counsel. He came to the agency as senior adviser to the director on the Bank Secrecy Act.

"Carlton's substantive experience is virtually unparalleled in the anti-money laundering and sanctions space," Tom Hanusik, chair of Crowell's white collar and regulatory enforcement group, said in a statement.

Greene earned both his law and bachelor's degrees from the College of William and Mary before accepting clerkships in the Sixth Circuit and Virginia federal court. He said his love of practicing law

stems from an interest in finding a way to reconcile complex concepts that seem to be in conflict, which he said he is looking forward to doing at Crowell.

"Industry has to take on a lot of discretion and initiative to apply the rules and so there's a need to really think through carefully how the standards are implemented," Greene said. "The rules give the industry some guidance, but also ... make companies make risk based decisions on how they're going to apply the standard in order to appropriately address the threats of illicit finance that they face."

Crowell & Moring was founded in 1979 and counts more than 500 lawyers among its current staff. The firm has offices in Washington, D.C.; New York; San Francisco; Los Angeles; Orange County, California; Anchorage, Alaska; Cheyenne, Wyo.; London; and Brussels; as well as affiliate offices in Riyadh, Saudi Arabia; and Cairo.

--Editing by Katherine Rautenberg.

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