



## Steven Grimes

Partner

Chicago

+1 312-558-8317

Steve brings a unique set of global experiences to his clients, having honed his investigation skills as a federal prosecutor, demonstrated his courtroom expertise leading or co-leading twelve trials, and having developed a pragmatic approach to client-service while in-house as a chief compliance officer and litigator at a multinational Fortune 500 company.

Steve is a former U.S. federal prosecutor, an experienced trial lawyer, and a former chief compliance officer and senior litigation counsel for a global publicly-traded Fortune 500 company. Steve's practice encompasses serving as lead trial counsel on complex business disputes, providing compliance counseling, and leading sensitive internal investigations and government interactions. Steve's in-house experiences greatly aid his ability to provide pragmatic service to his clients. Steve also spent over two years leading Winston's Asia Litigation practice and heading Winston's former Hong Kong office.

Steve is a true trial lawyer, having taken 12 cases to trial as lead or co-lead counsel (having yet to lose at trial). As a trial lawyer, his litigation practice covers many substantive areas, including complex commercial disputes, *qui tam* defense, product liability, mass torts/product liability, civil RICO, distributor/supply disputes, shareholder disputes, white collar criminal defense, antitrust/competition, financial/audit claims, technology and trade secret litigation, health care fraud, bribery, auction and sports memorabilia fraud, environmental claims, and consumer class actions.

Steve's experience is in both federal and state courts in the U.S., as well as various courts and forums around the world.

In addition to trial work, Steve focuses a portion of his practice conducting internal investigations, often across borders, and interfacing with regulators on behalf of his clients. He works with companies and individuals across financial services, health care/life sciences, insurance, technology, manufacturing, energy/utilities, and other industries to investigate allegations related to: trade secret theft; insider trading/securities fraud; sports memorabilia and auction fraud (Steve is one of the few attorneys in the country with significant experience in this area); accounting, banking, and insurance fraud; PPP loan fraud; tax fraud; health care fraud; technology and data security breaches; anti-money laundering; conflicts of interest; trade sanctions; financial disclosures; campaign finance; and anti-bribery and corruption laws. In one highly publicized matter, Steve assisted a financial firm with the investigation and ultimate federal prosecution and conviction for theft of trade secrets and obstruction of justice by two of the firm's employees. Steve is currently representing an individual charged with "the largest bribery scheme in Ohio history."

On the consulting side of his practice, Steve provides advice to companies and boards seeking to build, improve, and defend compliance programs. Having worked with dozens of companies, both private and public, and having built a compliance program from the ground up while in-house, Steve is able to identify and help clients work through common roadblocks.

Steve previously served as an assistant United States attorney for the U.S. Department of Justice, assigned to the Public Corruption Section in Chicago. As a federal prosecutor, the jury sided with Steve in each case that he tried. He prosecuted corporate executives, public officials, and law enforcement officers for: fraud, bribery, extortion, and perjury, including the prosecutions of a member of Chicago Mayor Richard Daley's cabinet; a county commissioner; a former Chicago alderman; the president of a large pharmaceutical company; the CEO, president, and vice president of a large privately held sports memorabilia auction house; and several Chicago building inspectors.

As a prosecutor, working hand-in-hand with law enforcement, Steve also investigated and prosecuted a wide range of criminal cases involving corporate fraud, cybercrime, theft of trade secrets, tax fraud, health care fraud, racketeering, terrorism, sex trafficking, drug and gun trafficking, murder, and gang violence. Steve's work often garnered local and national headlines, and he has been featured in various media forums, including a featured role on CNBC's "American Greed."

## Key Matters

- Defending a series of product liability cases brought against a manufacturer of infant formula. Steve was part of the trial team that recently secured a complete defense verdict against claims seeking over US\$5B in damages.
- Defending an individual in criminal and civil proceedings related to alleged bribery.
- Defending a client in numerous lawsuits related to alleged environmental contamination and product liability claims.
- Defending individuals in connection with a DOJ investigation into alleged FDA violations.
- Defending a client in various supplier disputes.
- Defending a client in a dispute over alleged breaches of a settlement agreement.
- Defending several food manufacturers in class action claims related to food ingredients and labelling.
- Defending a bet-the-company cross-border trade secret litigation for an international manufacturing company.
- Defending McDonald's Corporation in class action cases brought by consumers about McDonald's food, including the infamous "obesity case." Steve also represented McDonald's in a series of class action cases about the trans fatty acid (TFA) levels in McDonald's french fries.

- Member of the team that successfully brought Lanham Act claims against a trade organization for disparaging makers of high fructose corn syrup.
- Key member of the team that defended Microsoft in a high-stakes trade secret lawsuit alleging theft of volume management software.
- Led the prosecution team that brought highly publicized fraud charges against William Mastro, an influential sports memorabilia figure, in connection with Mr. Mastro's efforts to rig online auctions and his alteration of the "most expensive baseball card in the world."
- Member of the team that prosecuted a man for cyberstalking an ESPN sportscaster.
- Led the prosecution team that won the first-ever life sentence for a Chicago-area sex trafficker for enslaving a number of young women.
- Instrumental in bringing a RICO case against a Chicago-area gang, the Hobos, who were found guilty of committing nine murders.

## Recent Experience

EQT Private Equity Acquisition of Chr. Hansen's Natural Colors Division

## Recognitions

Steve was recognized in the 2024 and 2025 editions of *The Best Lawyers in America*® for White-Collar Criminal Defense and the 2024 edition of *Chambers USA* in the area of Litigation: White-Collar Crime & Government Investigations. He was recognized by *Legal 500 US* from 2018–2023 for Dispute Resolution: Corporate Investigations & White Collar Criminal Defense and listed as a "Key Lawyer" for Intellectual Property: Trade Secrets in 2024. He was recognized in the 2024 and 2025 editions of *Lawdragon's* "Leading Global Cyber Lawyers" guide, as well as *Lawdragon's* "500 Leading Global Litigators" 2023 and 2024 guides.

Steve was named a "Dispute Resolution Star" in Competition/Antitrust, Commercial and Transactions, and White-Collar Crime by *Benchmark Litigation Asia-Pacific* 2019–2020. He has also been named to *China Business Law Journal's* (CBLJ) 2020 "A-List of China's Top 100 Lawyers" (foreign firms). In 2018, he was named to *Chicago Daily Law Bulletin's* "Forty Under 40" list. Steve was recognized as a 2019 "Emerging Lawyer" by *Leading Lawyers* which identifies the top 2% of lawyers who are under 40 years old.

Steve was awarded the "Mitch Mars Prosecutorial Award" by the Chicago Crime Commission in 2014. He was the recipient of the "Homeland Security Director's Award" in 2012, which is a national award given for superior investigative performance. Steve also received the "Chicago Crime Commissions Star of Distinction Award" in 2011.

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## Activities

Steve co-taught "Computer Crime and the Legal System," focusing on the legal issues surrounding cyber, technology, data security, and trade secret law, at the University of Illinois Law School (with David Glockner); and he has served as an adjunct professor of law at Loyola University Chicago Law School. Steve regularly publishes articles and speaks to lawyers and corporations about trial strategy, compliance, investigations, and trade secret matters.

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Steve received a J.D., *magna cum laude*, from Cornell Law School in 2005, where he was elected to Order of the Coif. He received a B.S. in organizational development and human resources management, *magna cum laude*, from Miami University in 2001.

### ADMISSIONS

- Illinois

### CLERKSHIPS

- USDC - Northern District of IL for the Honorable Amy J. St. Eve
- USDC - Northern District of IL for the Honorable Amy J. St. Eve

## Related Insights & News

### SPEECHES

- “How to Handle Whistleblower Complaints Against Executive Management,” Kroll and Duff & Phelps CLE Presentation, Co-presenter, Nov. 12, 2020
- “How to handle the most rigorous investigation in China?” International Anti-Commercial Bribery and Compliance Conference, Shanghai, Moderator, Dec. 12, 2019
- “It’s Raining Regulation – Handling Uncertainty Both Internally and Externally,” Lexology Live: Shanghai, Moderator, Dec. 3, 2019
- “Trade Secrets: Are you Prepared for Data Theft?” C-Integrity Symposium 2019, Hong Kong, Speaker, May 8, 2019
- “The Role, Purpose and Perspective: White Collar Defense From the Perspective of an In-House Counsel, the Role We Play as a Defense Lawyer and the Purpose of the Prosecutor,” C-Integrity Symposium 2019, Hong Kong, Keynote Speaker, May 8, 2019
- “Trade Secrets: Global Laws, Risks, and Trends,” 46th Global Legal ConfEx & Law Tech Exhibition, Singapore, Speaker, Feb. 21, 2019
- “Trade Secrets Theft: Legal Teams Weigh In on Prevention & Investigation,” Winston & Strawn and FTI Consulting Webinar, Co-presenter, Jan. 24, 2019
- “China-US Trade and Cross-Border Investment,” hosted with the Hong Kong Electronic Industries Association, the Toys Manufacturers’ Association, the Toy Manufacturers Association, the Hong Kong Young Industrialists Council, and Monte Jade Science and Technology Association, Hong Kong, Speaker, Nov. 15, 2018
- “Minimizing Risk from Distributors, Vendors, Brokers, and Intermediaries,” the 12th Annual China Anti-Corruption Compliance Summit, Shanghai, Speaker, Oct. 2018
- “Trade Secrets Protection and Enforcement,” Sandpiper Partners’ 2nd Annual Trade Secrets Protection, Enforcement, and Litigation Conference, Chicago, Speaker, Jun. 21, 2018
- “Trade Secret Protection – Practical Advice on Protecting and Defending Your Organization’s Trade Secrets,” Winston & Strawn eLunch, Speaker, Jun. 12, 2018
- “Hardening Defenses: Knowing What You Must Defend, When and How to Defend It,” Law Firm and General Counsel Cyber Security Summit, Chicago, Speaker, Jun. 7, 2018
- “Trade Secrets Theft and Protection,” CRBEN Quarterly Meeting, Speaker and Host, Jan. 2018

- “Practical Advice from a Former Chief Compliance Officer: How to Build, Grow, and Measure a Corporate Compliance Program,” The Real Deal Webinar, Speaker, Nov. 2017
- “Cybersecurity and Data Breach Responses for Financial Institutions: Recent Developments and Best Practices,” CBA Financial Institutions Committee, Speaker, Nov. 2014
- “Keynote: Turning Lemons into Lemonade: How the FBI Can Be Your Best Ally,” at the SC Congress Chicago 2014, Speaker, Nov. 2014

## PUBLICATIONS

- “The Anticorruption Manual: A Guide for State Prosecutors,” Chapter author for NAAG’s, June 2021
- “Corporate Compliance Strategies To Protect Data,” *CISO Mag Magazine*, Co-author, Nov. 2020
- “Assessing Extraterritorial Reach of DTSA After III Decision,” *Law360*, Co-author, April 28, 2020
- “Trade Secrets in Review,” *Intellectual Property & Technology Law Journal*, Co-author, March 1, 2020
- “Reasonable Measures’ For Protecting Trade Secrets: A Primer,” *Law360*, Co-author, Feb. 27, 2019
- “When To Call The Feds For Trade Secret Theft Investigations,” *Law360*, Co-author, Feb. 5, 2019
- “Trade Secrets, Cross-Border Disputes, and the ITC,” *Hong Kong Lawyer*, Co-author, Nov. 2018
- “Trade Secrets—A Holistic Approach,” *Bloomberg Law*, Co-author, July 2018
- “The Path to Restitution After Lagos,” *Law360*, Co-author, July 2018
- “Moving Your Compliance Program to the Next Level,” *Thomson Reuters Forum Magazine*, Interviewee, Spring 2018
- “Plaintiffs Increasingly Pursuing Class Action Securities Fraud Claims Following Data Breaches,” *Winston & Strawn Briefing*, Co-author, Jan. 30, 2018
- “Biometric Privacy Litigation: The Next Class Action Battleground,” *Bloomberg BNA’s Class Action Litigation Report*, Co-author, Jan. 2018
- “Q&A With Steven Grimes and Robb Adkins of Winston & Strawn LLP,” *Corporate Compliance Insights*, Interviewee, Dec. 2017
- “Medical Directors At Risk Under Anti-Kickback Statute,” *Law360*, Aug. 2014
- “Health Care ‘Kickbacks’ Cover More Than You Might Think,” *Law360*, Co-author, Aug. 2014
- “SEC Is Focusing On Cybersecurity—And So Should You,” *Law360*, Co-author, March 2014
- “High Court May Tighten Reins On Data Breach Class Actions,” *Law360*, Feb. 2014

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## PRO BONO IN ACTION

Winston Secures Dismissal of Charges for Young Black Man Wrongly Accused of a Crime  
JANUARY 28, 2025

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## RECOGNITIONS

Winston Attorneys Recognized in *The Best Lawyers in America*® 2025  
AUGUST 15, 2024

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## RECOGNITIONS

Winston Lawyers Featured on the 2024 *Lawdragon* 500 Leading Global Litigators List

JULY 25, 2024

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## RECOGNITIONS

Winston & Strawn Recognized in *The Legal 500 U.S.* 2024

JUNE 12, 2024

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## RECOGNITIONS

Winston & Strawn Recognized in *Chambers USA* 2024

JUNE 6, 2024

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## RECOGNITIONS

Winston Attorneys Recognized in the Inaugural Edition of the *Lawdragon* 500 Leading Global Cyber Lawyers

APRIL 29, 2024

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## RECOGNITIONS

Winston Attorneys Recognized in *The Best Lawyers in America*® 2024

AUGUST 17, 2023

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## RECOGNITIONS

Winston Attorneys Featured on *Lawdragon's* 500 Leading Global Litigators List 2023

JULY 21, 2023

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## RECOGNITIONS

Winston & Strawn Recognized in *The Legal 500 U.S.* 2023

JUNE 7, 2023

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## RECOGNITIONS

Winston & Strawn Recognized in *The Legal 500 U.S.* 2022

JUNE 8, 2022

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## BLOG

Taiwan's MOJ Raids 10 Chinese Tech Companies for Local Talent Poaching Immediately After Taiwan's Legislature Amends Its Anti-Espionage Law To Include Stiff Penalties

JUNE 2, 2022

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## RECOGNITIONS

Winston & Strawn Recognized in *The Legal 500 U.S.* 2021

JUNE 10, 2021

# Capabilities

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