MAYER | BROWN

GLOBAL INVESTIGATIONS & WHITE COLLAR DEFENSE

Our 150-plus Global Investigations & White Collar Defense lawyers across our offices in the Americas, Europe, Asia and the Middle East represent corporations, boards of directors, board committees, public officials and executives in criminal, civil and regulatory enforcement proceedings worldwide.

Mayer Brown's practice includes a diverse team of former federal prosecutors and government enforcement lawyers who know firsthand how government enforcement works and how to respond to the challenges and risks posed by criminal investigations and civil enforcement proceedings. We work closely with clients to ensure compliance with an ever-changing, increasingly global regulatory framework. We respond to investigations by regulators throughout the world and when matters go to trial, we're ready for that, too. We have collectively tried hundreds of federal criminal cases, both as defense counsel and as former prosecutors.

- For ten consecutive years, ***Global Investigations Review*** has named us to the "GIR 30," the publication's list of the "world's top 30 investigations practices."
- ***GIR*** notes that Mayer Brown is a "go-to firm for major corporates under criminal investigation," with our "global network of offices" and "impressive line-up of ex-prosecutors."
- ***Legal 500*** notes that our "extremely knowledgeable and responsive" team provides "an outstanding service at all levels" to corporates and executives engaged in internal investigations, regulatory enforcement actions and litigation.
- ***Chambers & Partners*** notes that Mayer Brown is "active in multiple sectors, with a deep bench of experts on call."
- Sources from ***Legal 500*** say "these are top litigators who can match the very best within the DOJ."
- ***Legal 500 UK*** *notes* that we are "a big player in the commercial fraud market; hugely well-resourced with exceptional lawyers experienced in all kinds of fraud disputes. This is a first rate smart and serious team with a broad range of skills and experience, and with a sound commercial approach."

THE RESOURCES OF A "ONE-FIRM" FIRM

Mayer Brown's one-firm culture—seamless and integrated across all practices and regions—ensures that our clients receive the best of our knowledge and experience.

For example, our Global Investigations & White Collar Defense practice works closely with the firm's world-class appellate practice to develop legal arguments at trial and draft briefs filed in US state and federal appellate courts. Mayer Brown's formidable combined enforcement and litigation experience enables us to defend all aspects of criminal and regulatory actions—from the onset of investigation through the Supreme Court argument, where needed.

Our lawyers also draw on the world-class resources of colleagues in disciplines relevant to our corporate clients, including corporate and securities, finance, banking, derivatives, accounting, tax and environmental—allowing us to quickly grasp the business as well as the legal context of a problem.

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With strong links to the US, the multidisciplinary, cross-border team is well-placed to handle government enforcement matters, criminal investigations and related civil enforcement proceedings.

LEGAL 500

A VIEW FROM THE INSIDE

Our practice includes many former government officials with decades of experience in every facet of regulatory guidance, enforcement and investigation—they bring an insider's view of how the government operates. Our team also includes lawyers who have worked as in-house counsel at multinational companies, amassing practical insight on how to mitigate risk while building business value:

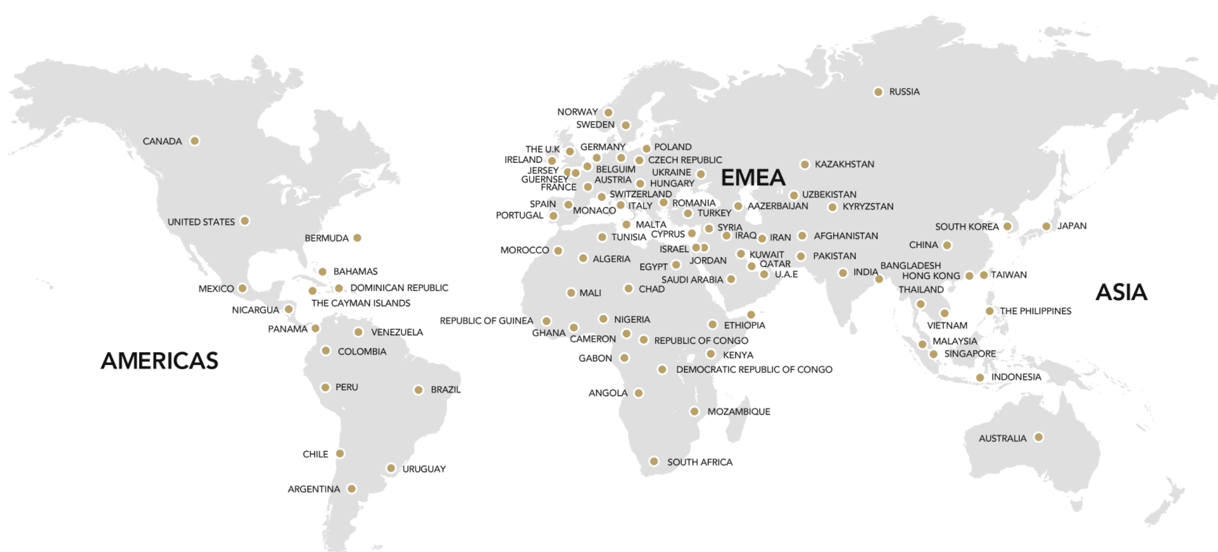
- Assistant attorney general for DOJ's National Security Division, United States Attorney from Washington DC, and Homeland Security Advisor to the President
- Chief of the International Narcotics and Money Laundering Section for the US Attorney's Office for the Eastern District of New York (EDNY)
- Chief of the Business & Securities Fraud Section for the US Attorney's Office for the Eastern District of New York (EDNY)
- Head of enforcement at the US Office of Foreign Assets Control (OFAC)
- Deputy enforcement director at the US Consumer Financial Protection Bureau (CFPB)
- Deputy assistant general of DOJ's Consumer Protection Branch
- Senior official from the New York Department of Financial Services (NYDFS)
- Senior US Securities and Exchange Commission (SEC) officials
- Assistant US attorneys and DOJ prosecutors from around the country, along with a former Federal Bureau of Investigation (FBI) agent assigned to the FBI's International Corruption Unit
- General counsel at the US National Security Agency
- Deputy assistant general of DOJ's National Security Division
- Attorney general of Brazil
- Enforcement counsel to the UK Financial Services Authority (FSA)
- Former general counsel of Fiat/Chrysler
- Vice president and associate general counsel, BMO Financial Group
- Special senior counsel in the New York Stock Exchange's Paris office
- Board member that developed the International Standards Institute standard for anticorruption management programs

COMPREHENSIVE COUNSEL

INVESTIGATIONS

We conduct investigations to position the client to understand and navigate regulatory and compliance risks and potential collateral consequences that could flow from any substantiated misconduct, involving corruption, fraud of any kind, antitrust/competition, money-laundering, privacy, cybersecurity and data privacy, environmental, sanctions and export controls and a variety of other regulatory and enforcement risk areas. Our team also conducts independent internal investigations on behalf of corporate management, boards of directors and audit or special litigation committees. We staff these matters with a diverse team of seasoned criminal defense and compliance lawyers whose prior government, investigative and in-house experience make them the optimal choice to navigate a company's most perilous issues and crises.

We have conducted investigations in over 85 countries around the globe, including Afghanistan, Algeria, Angola, Argentina, Australia, Austria, Azerbaijan, Bahamas, Bangladesh, Belgium, Bermuda, Brazil, Cameroon, Canada, Chad, Chile, the Cayman Islands, China, Colombia, Cyprus, Czech Republic, Democratic Republic of Congo, Dominican Republic, Egypt, Ethiopia, France, Gabon, Germany, Ghana, Guernsey, Hungary, Hong Kong, India, Indonesia, Iran, Iraq, Israel, Ireland, Italy, Japan, Jersey, Jordan, Kazakhstan, Kenya, Kyrgyzstan, Kuwait, Mali, Malta, Malaysia, Mexico, Monaco, Morocco, Mozambique, the Netherlands, Nigeria, Nicaragua, Norway, Pakistan, Panama, Peru, Poland, the Philippines, Portugal, Qatar, Republic of Congo, Republic of Guinea, Romania, Russia, Saudi Arabia, Singapore, South Africa, South Korea, Spain, Sweden, Switzerland, Syria, Taiwan, Thailand, Tunisia, Turkey, the UK, Ukraine, United Arab Emirates (UAE), Uruguay, United States, Uzbekistan, Venezuela and Vietnam.



Government Investigations. We routinely defend companies under investigation by the DOJ, SEC, CFTC and other federal agencies, as well as various state attorneys general and foreign authorities, including the UK Serious Fraud Office, France's Agence Française Anticorruption, the Hong Kong Monetary Authority, Hong Kong Securities and Futures Commission, Monetary Authority of Singapore and dozens more worldwide. We navigate companies through these investigations, and quarterback crisis management of any collateral public relations, civil or regulatory issues. We interview witnesses and partner with forensic accountants and analysts and ensure proper document preservation, collection, review and production. We help clients fulfill fiduciary obligations, address board and shareholder concerns, develop and execute remediation plans and address the many other aspects of representation during a government investigation.

Cross-Border Investigations. Working seamlessly with our partners around the world, we advise on the potential global ramifications of cross-border investigations in areas such as data privacy, state secrets, attorney-client privilege, employment and the interplay of foreign and domestic laws.

LITIGATION

We have collectively tried hundreds of criminal cases both as prosecutors and defense lawyers, with an outstanding record of success in state and federal courts and jurisdictions around the world. In addition, we represent clients in complex civil litigation arising under federal and state securities laws spawned by, and related to, criminal investigations. Frequently, we are retained near the culmination of an investigation to assess litigation risks and develop pre-emptive strategies, to defend against enforcement proceedings or to negotiate favorable settlements.

We have negotiated with and litigated extensively—and successfully—against the government. We are skilled negotiators familiar with the issues that drive government investigations and the factors that influence prosecutorial decision-making, using our substantial trial and investigative experience, which provides real value in negotiations. We have convinced many prosecutors that criminal charges should not be brought or negotiated outcomes more favorable than those originally proposed by the government.

COMPLIANCE

We have deep experience advising publicly-listed and privately held companies on the design, implementation, and testing of end-to-end compliance programs across multiple jurisdictions, in every industry and at all stages of maturity. We identify the opportunities to improve in clients' compliance programs and business activities to mitigate risk and to meet the current regulatory landscape and increasingly aggressive enforcement efforts of prosecutors and regulators.

Using our insider knowledge about how prosecutors apply criminal law to alleged business crimes, we work with clients to build out new programs from scratch and undertake tailored internal compliance reviews that identify control gaps and opportunities to improve clients' existing programs and business activities to mitigate risk effectively. Our work in proactively reviewing and improving compliance programs is a key facet of our defense of companies under investigation for corruption related matters by DOJ, the SEC, and other authorities globally, as the quality of a company's compliance program and the robustness of its efforts to remediate gaps are key factors when authorities consider what type of resolution, if any, may be warranted.

A WIDE RANGE OF MATTERS

White collar defense matters encompass a wide range of regulatory and statutory requirements, each with its own unique enforcement aspects.

We represent clients across the most highly regulated industries—such as **health care, defense, automotive, gaming, energy, technology and the global financial services sector**—on the full range of matters for which companies and executives can be held accountable. These include:

- **Anti-Money Laundering (AML).** AML issues present compliance challenges for even the most sophisticated financial institutions. When it comes to these areas of the law, "getting it wrong" can result in long-standing reputational damage and substantial cost in terms of both financial penalties and added compliance burdens. We first seek to avoid unwanted outcomes by counseling clients on day-to-day compliance and the complexities of areas of applicable law in the United States, the United Kingdom, Europe, the Middle East and Asia. If problems arise, we help clients determine the scope of the problems, investigate their root causes, assess potential liabilities, fashion remedial responses and determine whether self-disclosure to regulatory authorities is warranted. If regulators decide to take enforcement actions or to investigate, we defend clients and, if necessary, assist with the successful management of the conditions imposed under governmental settlement agreements.
- **Accounting Fraud.** The officers and directors of public companies, as well as domestic and international accounting firms, turn to Mayer Brown when facing high-profile allegations of financial fraud involving accounting and auditing irregularities.
- **Antitrust.** We defend companies and their executives in both criminal antitrust investigations and in matters before antitrust regulators in the United States, the European Union and non-EU European countries, including on cross-border parallel proceedings.
- **Environmental.** We defend companies and individuals against allegations of environmental crimes and have been involved in some of the most far-reaching prosecutions and compliance claims brought by the US Environmental Protection Agency and state environmental agencies.
- **Export/Import Violations.** Our sanctions and export controls team has extensive experience helping clients navigate the complexities of often overlapping UK, EU and US sanctions and export controls. We advise financial institutions and regulated entities on a broad range of matters involving regulatory engagement such as the preparation of voluntary disclosures and licence applications in connection with sanctions, proceeds of crime and export control matters. We also advise clients on the conduct of investigations and evaluate and remediate compliance programs so that they will stand up to regulatory scrutiny. And we defend clients in criminal investigations predicated on alleged violations of the sanctions laws.
- **US Foreign Corrupt Practices Act (FCPA) and UK Bribery Act.** We represent companies,

boards, executives and other individuals on matters involving the FCPA, including internal investigations into alleged FCPA violations, DOJ/SEC or foreign investigations and enforcement proceedings, compliance reviews and transactional due diligence. Our capabilities in this area are strengthened by our global presence, along with our experience in related areas, including export control, sanctions and embargo laws. Our regional offices and partners in the Americas, Asia, Europe and the Middle East are well-versed in the complex issues relating to the FCPA and cross-border investigations.

- **Multilateral Development Banks (MDB).** Our lawyers have represented some of the world's most sophisticated infrastructure firms in a number of MDB integrity office investigations. We are well placed to assist on all aspects of MDB integrity compliance and enforcement including conducting integrity risk assessments, internal investigations, responding to audit requests and MDB investigations into alleged misconduct, negotiating resolutions, defending sanctions proceedings and advising on the development and implementation of ICPs and supporting applications for release from debarment or other sanctions.
- **US False Claims Act (FCA)/Qui Tam.** The FCA is recognized as a primary fraud enforcement tool for the DOJ. We represent clients in industries targeted by the FCA, including government contracts, health care, financial services, energy, and global trade. We have successfully resolved FCA and qui tam matters at all phases of the process, from investigation through trial.
- **Government Contracts.** Companies with government contracts depend on Mayer Brown when they face federal investigations alleging procurement fraud, regulatory investigations and FCA qui tam cases.
- **Health Care Fraud.** We regularly conduct internal investigations and defend health care companies facing FCA/qui tam matters and cross-border issues, including issues arising under the FCPA. Additionally, we have within our practice a former DOJ health care fraud coordinator, who brings significant experience in the defense of providers facing civil, criminal or parallel investigations into such matters as Anti-Kickback, Stark, cost reports, billing for services not rendered, up-coding, bundling and the myriad of other challenges facing health care providers related to reimbursement.
- **Intellectual Property Crimes.** Our team of former prosecutors has experience handling some of the most significant trade secret/IP theft cases, from both the defense and prosecution roles. We represent clients in government investigations and criminal litigation. We also conduct internal investigations, perform due diligence and provide compliance advice to reduce the risk of trade secret theft.
- **Securities Enforcement.** We represent corporate and individual clients in civil and criminal securities-related matters before the complete array of securities regulators, governmental bodies, exchanges and self-regulatory organizations worldwide.
- **Tax Evasion and Fraud.** We represent domestic and non-U.S. financial institutions in IRS audits and regulatory and criminal enforcement proceedings involving allegations of tax-related misconduct, including aiding and abetting tax evasion by U.S. taxpayers, violations of Qualified Intermediary regulations and FATCA non-compliance issues.

REPRESENTATIVE EXPERIENCE

INVESTIGATIONS & LITIGATION

- Represented a **global manufacturing company** in its recently resolved DOJ and SEC investigation into potential FCPA violations in Asia. The investigation involved over 45 lawyers and professionals from Mayer Brown's Los Angeles, New York, Chicago, Washington DC, Hong Kong, Beijing and Shanghai offices.
- Representing **two of the senior FTX executives**, Ryan Salame (CEO, FTX Digital Markets) and Sam Trabucco (co-CEO, Alameda Research) in ongoing DOJ, SEC, CFTC, and other investigations, regulatory inquiries, bankruptcy and liquidation proceedings, and litigation surrounding the collapse of FTX, the cryptocurrency exchange. This matter has been covered extensively by numerous media outlets including the *New York Times,* the *Wall Street Journal, CNN, CNBC* and *Fox Business,* among others. As has been widely reported, the investigation and prosecution includes FCPA charges involving alleged corrupt conduct in China.
- Secured a victory for **Island Industries** when a federal jury in Los Angeles returned a unanimous $8 million verdict (which was then trebled) and a $2.7 million fee award in favor of our client, following a three-day False Claims Act trial against defendant Sigma Corporation. The trial concerned Sigma's knowing false statements leading to the evasion of antidumping duties that the Commerce Department imposes on imports of Chinese steel pipe fittings. On appeal, Sigma raised a host of arguments, claiming that the district court lacked jurisdiction to hear the case, that Commerce's regulatory scheme precluded FCA liability, and that the underlying regulatory scheme was too ambiguous to support liability. The Ninth Circuit rejected each of these arguments while instead adopting Mayer Brown's reasoning. The Ninth Circuit's ruling is the first ever by an appellate court affirming an FCA verdict in a case predicated on Customs violations.
- Represented **Société Générale** (SG) (with co-counsel) in investigations by US and French authorities that arose from allegations concerning manipulation of the London Interbank Offered Rate (LIBOR) and activity in Libya. The investigations posed not only the prospect of enormous fines and related sanctions but also the likelihood of separate resolution announcements with attendant reputational consequences. With the assistance of Mayer Brown and our co-counsel, SG was able to negotiate simultaneous resolutions and contain the financial and public relations fallout.
- Acting for a **fund manager** licensed by the Securities and Futures Commission (SFC) in an internal investigation and related investigations by the Insurance Authority (IA) and the SFC into suspicious investment transactions between an authorized insurance company in Hong Kong and our client involving US$50 million of assets.
- Representing one of the **world's largest consulting companies** in connection with an ongoing government investigation into various allegations of embezzlement, fraud and corruption relating to its business in Tanzania.

- Representing an **oil and gas company** in a cross-border DOJ public integrity investigation into potential domestic corruption, foreign corruption and violations of the Foreign Agent Registration Act.
- Representing a **Norwegian shipping company,** a subsidiary in a leading global energy infrastructure group, in relation to claims made by a Brazilian company in the offshore Oil and Gas industry. The claims relate to contractual payments that were suspended by our client pending the outcome of due diligence into allegations made in Brazilian press reports and in Brazilian court records implicating the Claimant in a high-profile bribery and corruption investigation known as "Operation Car Wash."
- Representing a recently retired **Chief Executive Officer at a publicly traded mining exploration and production company** in connection with a joint DOJ and SEC investigation following the Company's public disclosure of a potential reduction to its resource and reserve estimation regarding its primary asset.
- Representing a **multinational engineering firm** in a World Bank investigation involving a significant project in India.
- Conducting an internal investigation in Saudi Arabia related to alleged corruption, conflict of interest and other misconduct for one of the **world's largest engineering companies**, an issuer on the New York Stock Exchange.
- Conducted multiple internal investigations for a **Brazilian multinational petrochemical company** with direct report to the Ethics Committee to address allegations regarding the alleged violation of internal compliance polices, conflict of interest in the execution of contracts with suppliers and moral harassment, potentially committed by members of the company's top management.
- Conducted an internal investigation for a **leading offshore drilling company** on allegations of an employee's self-embezzlement and kickbacks from third-party vendors to secure certain agreements with a client's subsidiary in Brazil. The investigation included the review of tens of thousands of electronic documents and interviews.
- Represented a **UK-based oil and gas exploration company** that was defrauded by individuals claiming to be foreign officials in connection with the acquisition of oilfield assets in Africa. We worked with US authorities to help the company successfully recover the lost funds from US bank accounts. The US-based member of the conspiracy was successfully prosecuted for the fraud.
- Represented **an international investment bank's staff** in an investigation by the ICAC concerning the bank's hiring program in connection with a separate US FCPA probe. Advising **financial institutions** and other stakeholders in high profile money laundering matters, including advising on making suspicious transaction reports and related civil litigation work such as applications for urgent injunction, Norwich Pharmacal applications and handling criminal investigations by the Police.
- Representing a **US-based real estate investment fund** in connection with a money laundering investigation being conducted by the US Attorney's Office for the SDNY. The government is investigating claims that some of the client's investors used alternative payment mechanisms to

fund their investments, which resulted in the receipt of illicit proceeds for investment purposes.

- Conducted an internal anticorruption investigation for a **clean energy corporation** in relation to its subsidiary's operations and dealings with third-party contractors in China, as reported by a whistle-blower.
- Advising an **aviation company** facing criminal charges by the US Department of Justice.
- Advised a **Hong Kong listed Chinese company** in investigations initiated by the Public Security Bureau and other law enforcement authorities in China through the Hong Kong police in relation to fraud, corruption and other commercial crimes.
- Acted for a well-known **global beauty products company** in an extensive FCPA internal investigation in China.
- Represented a major **fintech company** in a grand jury investigation by the US Attorney's Office for the EDNY of alleged anti-money laundering and Bank Secrecy Act offenses. The investigation involved allegations of aiding and abetting identity theft and misappropriation of government funds. We believe, at this point, that we have persuaded the US Attorney's Office not to bring any charges against our client.
- Acting as lead counsel to a **French multinational company** in the defense of bribery charges in a European affiliate. To date, we have successfully managed to convince the DOJ not to bring any charges.
- Counsel to the **world's leading developer and operator of integrated resorts**, in connection with an FCPA investigation involving allegations from a former company executive of misconduct in the Chinese administrative region of Macau.
- Counsel to a **global construction management firm** in a joint investigation by the DOJ and UK Serious Fraud Office (SFO) into alleged corrupt payments in the United Arab Emirates and elsewhere.
- Counsel to a **European bank** in an investigation by the DOJ and Commodity Futures Trading Commission (CFTC) involving the LIBOR rate.
- Counsel to **several foreign banks and individual taxpayers** in the DOJ/IRS investigation of alleged improperly tax sheltered accounts held by US taxpayers in Europe.
- Counsel to a **private military company** in a DOJ investigation of alleged violations of the FCPA and export control laws.
- Counsel to a **medical device manufacturer** in the investigation and settlement with DOJ and 39 State Attorney Generals of a civil false claims act matter involving the reimbursement of durable medical equipment beyond the products "reasonable useful life" and allegations of violations of the Medicare Anti-solicitation statute.
- Counsel to a **medical supplies company** in parallel criminal and civil DOJ investigations in-volving allegations of fraudulent health care billing practices with potential False Claims Act damages.
- Counsel to an **international chemicals firm** in an SEC investigation of possible FCPA violations in Argentina, resulting in a decision by the SEC not to pursue the matter.
- Counsel to a **US oil and gas corporation** in a joint DOJ/SEC investigation into potential money laundering and securities violations.

- Counsel to a **medical device company** in a DOJ civil and criminal investigation into alleged off-label promotion of a medical device.
- Representing a **former senior employee of a diversified natural resources company** in an SFO criminal investigation into allegations of bribery and corruption relating to the company's oil activities in Africa. Our client is an individual allegedly implicated in the SFO's case against the company, which led to the company being convicted for bribery the first corporate conviction of this kind in the UK.
- Counsel to an **oil and gas corporation** in a DOJ/SEC joint investigation surrounding multimillion dollar stock and land deals, involving alleged securities fraud and money laundering.
- Counsel to an **audit committee of a US semiconductor company** in an SEC investigation involving allegations that committee improperly failed to take litigation reserves.
- Advising on the UK aspects of a highly sensitive US/UK investigation in the **aviation sector.**
- Advising a **global telecoms company** in relation to worldwide bribery investigations.
- Advising a **global construction company** in relation to Bribery and Bid Rigging investigations.
- Advising a **major oil company** in relation to Bribery issues in various emerging markets.
- Representing a **major pharmaceutical company** in coordinated US and Mexican litigation against a Mexican government agency which has filed suit based on the corrupt conduct to which the pharmaceutical company admitted engaging in Mexico in its 2016 FCPA resolution with the DOJ and the SEC.
- Representing an **oil and gas pipeline company** in connection with a DOJ investigation following the DOJ's public raid on a sitting Congressperson's home and targets information related to the Congressperson and operations in Mexico.
- Representing a **Japanese chemical company** and its US affiliate in an ongoing US Customs and DOJ investigation considering the company's use of the GSP duty elimination program.
- Representing a **foreign automobile manufacturer** in a cross-border DOJ investigation involving the potential evasion of emissions requirements through the use of "defeat devices" or other improper actions.
- Representing a **bank** in a DOJ investigation and parallel federal court litigation arising out of a $60 million credit facility secured through fraud by a purported private equity fund. Another bank was also a victim in connection with a $100 million loan. We successfully petitioned the court to impose a receivership over the private equity fund and its principal. The team also secured a consent judgment against the fund's principal (admitting fraud) and a default judgment against the fund itself. The DOJ's investigation and civil litigation are ongoing.
- Lead trial counsel for a **former US Congressman** in a federal criminal trial in the District of Arizona involving charges of public corruption, fraud and money laundering, which raised substantial legal issues involving the operation of the Speech or Debate Clause.

- Lead trial counsel for the **former president of one the largest labor unions in the country** in federal criminal trial in the Central District of California involving charges of embezzling union funds, mail fraud, bank fraud and filing false tax returns.
- Counsel to a **public health product company** indicted for violating the Arab boycott statute (prohibiting US companies from refusing to supply their product or services to Israel based on the request of an Arab country).
- Representing a **European financial institution** in an investigation and licensing proceedings with OFAC and a Swiss prosecutor relating to funds frozen subject to a corruption-related investigation.
- Acting for **eOne**, a multinational entertainment company, in its High Court battle with Monex Europe Limited, a Foreign Exchange trading company, and Prince Marwaha, eOne's former treasurer, relating to a currency trading fraud with alleged losses in excess of £18 million. This representation involved extensive asset tracing and injunction applications.

COMPLIANCE

- Advising a **global consumer goods technology company** in a variety of anti-corruption compliance, government contracting, and third-party risk mitigation matters in Israel, West Africa, South East Asia, and the Middle East.
- Counsel to a **US issuer and leading global industrial company**, on an enterprise wide review of its compliance program, including improvement opportunities and updates to its overarching structure and resourcing decisions, alongside specific advice on updates to anticorruption, trade sanctions, competition, and data privacy related policies, controls, and monitoring activities. We are currently also assisting the company to conduct global anticorruption/FCPA and trade sanctions/export controls risk assessments.
- Advising a **major energy company** in a variety of compliance and investigations matters in West Africa, South America, the Middle East and elsewhere.
- Advising a **French manufacturing company** on the design and implementation of a global risk and compliance program including as to an internal structure covering priority areas within its new Code of Conduct: Anti-corruption, Anti-trust, Data Privacy, Ethics & Business Conduct and Enterprise Risks including SOX/financial controls and fraud. This also includes advice on implementing controls under French anticorruption laws, including as to anti-corruption (Sapin II) and the Duty of Care law.
- Conducted a non-confidential review of **Ecopetrol's** Global Compliance Program, in accordance with the requirements of the Brazilian Clean Company Act, Decree 8,420/2015 and the regulations of the CGU. The work included the analysis of risks associated with the Program and its effects on the identified risks, review of company policies and standards and the review of the company's anticorruption provisions.
- Provided anticorruption and compliance advice to a **major international oil and gas service company** in connection with the $500 million dollar acquisition of a leading manufacturer of oil and gas drilling and production equipment with agents and operations in Brazil, Angola and Vietnam.

- Advised a **multinational financial services company** in connection with the compliance remediation program the bank was required to implement as a condition of its DPA with the DOJ. Among other things, that work included advising the Bank in connection with its efforts to detect and deter fraud and market manipulation on a worldwide basis.
- Designing, leading and implementing a procurement and compliance review for a **major public institution**, with former executives subject to previous enforcement actions related to procurement fraud, including process and transactional testing, and best practice recommendations.
- Leading multisubject matter (including anti-corruption, workplace conduct, trade, data privacy, governance and competition) compliance program design and implementation project with Audit Committee reporting, for a **global publicly traded information security company** with customers across markets including financial services, energy, healthcare and government.
- Leading on multipractice, multijurisdiction legal and regulatory risk assessment and integration project for an innovative technology new market entry by a **global US issuer**; including assessing, mitigating and creating an integration roadmap for a new business model via a global, holistic and integrated approach. Topics covered include financial regulations, tax, regulatory and IT transactions, cyber security/data privacy, intellectual property, trade/export, products liability, global mobility and supply chain/ESG risks.
- Leading multipractice, multijurisdiction risk assessment and integration project for **global issuer** in technology sector focusing on anticorruption, trade, data privacy, as well as cross-border commercial and labor risks.
- Advising an **international professional services firm** on issues of privilege and state immunity, both in the UK and the US.
- Acted as an independent compliance consultant to review the implementation and effectiveness of the compliance program of a **Chinese construction and infrastructure company** in relation to its debarment by the African Development Bank.
- Advised a **leading global manufacturer of food packaging materials and food contact** equipment on specific product regulatory issues in China and the handling of urgent food safety cases in China such as food recall.
- Advised an **electricity network owner** on establishing a competition law compliance program and dawn raids defense system.
- Advised **multinational corporations** on various antibribery and corruption-related risks and issues in conducting business in China, including rebate and kickbacks, donation and sponsorships, gifts and entertainment.
- Designed and conducted anticorruption due diligence reviews for M&A transactions in China on behalf of various **multinational corporations** involving the business of healthcare and medical, engineering, oil and gas, construction and infrastructure, heavy machinery, consumer goods, shipping, manufacturing, real estate and PE industries.

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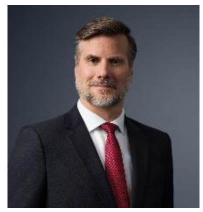

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