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# Managing Electronic Data in FCPA Investigations

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# Hypothetical FCPA Scenario

- Thursday afternoon phone call: General counsel wants to discuss an FCPA concern.
- Anonymous email alleges that a sales manager based in Germany was paying bribes to sell the client's products to the Indian government.
- Overnight, the security department mirrored the German sales manager's laptop.
- Sales manager will be in Delhi Monday morning.
- **What do you set in place before boarding the flight to Delhi?**
- **What are the issues for managing electronic data in this FCPA investigation?**

# Overview of the FCPA

- Heightened enforcement activity over the past few years
- Corporate penalties reaching new heights
  - Siemens: \$800 million
  - KBR: \$402 million
- Prosecutions a reality for individuals
  - Prison time: Recent plea agreement for 7-year term
  - From the CEO, to sales managers, to consultants
- Greater cooperation among enforcement authorities

# Overview of the FCPA (cont'd)

- Statute:
  - Anti-bribery provisions
  - Accounting provisions
- Applied to the hypothetical
  - Jurisdiction
  - Elements
    - Foreign official
    - Payment of money to obtain business

# Overview of Investigative Goals

- Ensure that there is no ongoing conduct of concern
- Preserve the evidence and develop the facts
- Provide legal advice and represent client as the circumstances mandate

# Investigative Goals

- Ensure that there is no ongoing conduct of concern
  - If the allegation is true, what needs to be done to stop the conduct?
  - Why is the sales manager in India?
  - Who else does the sales manager work with?
  - What other countries?
  - What other customers?
  - Any prior allegations regarding this person, this division, this country, this company?

## Investigative Goals (cont'd)

- Preserve the evidence and develop the facts
  - Conduct the investigation in a principled, defensible manner
    - Assume that will have to report to the Board, the Audit Committee, auditors, and US enforcement authorities
  - Identify universe of custodians and information
    - Hypothetical: Sales
    - Possible additional functions: Procurement, audit, accounting, controller, operations, HR, legal, compliance, tax, treasury, regulatory, government relations, public affairs/communications, supply chain management
  - Identify applicable jurisdictions
    - Hypo: US, Germany, India, Ukraine

## Investigative Goals (cont'd)

- Provide legal advice and represent client as the circumstances mandate
  - Legal analysis of the facts: Was there an FCPA violation?
    - If yes, what needs to be done by way of remediation, compliance enhancement, disclosure?
  - Protect client's legal privileges
  - Data protection and privacy
  - Local law
  - HR concerns

# Overview of Privacy / Data Protection Issues

- Many foreign countries – and the EU in particular – restrict or prohibit the processing and transfer of personal data
- A systematic assessment is called for:
  - What are the relevant jurisdictions?
  - What are the relevant restrictions on data processing and transfer?
  - What steps can be taken to minimize or eliminate the risk of breaching these restrictions?

# Privacy / Data Protection – Differing Conceptions of Privacy

- Privacy is commonly viewed as a fundamental right overseas
  - Privacy rights extend to an employee’s use of employer email systems
- At the same time, most foreign countries do not permit liberal discovery in the manner that the United States does
- This results in two principal types of regulations:
  - Privacy / Data protection laws – aimed at protecting the privacy rights of foreign citizens
  - “Blocking” statutes – aimed at protecting foreign citizens from invasive U.S.-style discovery

# Privacy / Data Protection – European Union

- European Union 1995 data protection directive:
  - “Member States shall protect the fundamental rights and freedoms of natural persons, and in particular their right to privacy with respect to processing of personal data.”
  - Restricts the “**processing**” and transfer of “**personal data**” – these terms are broadly defined
  - Implemented differently in each EU member state

## Privacy / Data Protection – Assessing Relevant Jurisdictions

- First step: Determine the relevant jurisdictions. Some possible factors:
  - Where are the relevant employees based?
  - What are the nationalities of the relevant employees?
  - What categories of data will aid the investigation?
  - Where is this data created? Stored? Accessed?
- **In this case:** *At least* Germany and India are relevant jurisdictions.

## Privacy / Data Protection – Identifying Applicable Restrictions

- Second step: Identify applicable restrictions
  - Regional, national, local restrictions
    - Need to consult with local counsel
  - Consider nature of the data itself:
    - Personal data? Sensitive personal data? Third party/customer data? Industry-specific sensitivities?
- **In this case:** German statute implementing EU directive will apply. Local German law also may apply.

# Privacy / Data Protection – Exceptions

- Third step: Develop a plan to fall within exceptions to the restrictions and/or minimize the risk of violation
  - Potential exceptions:
    - Consent? Necessity? Defense of legal claim?
    - Consider consultation with data protection officers for informal advice or formal consent
  - Strategies to limit exposure
    - Early, narrow filtering of data in country (or onsite)
    - In-country processing and review
    - Redaction of identifying information to permit transfer
    - Contractual provisions/safe harbor to allow eventual transfer

# Privacy / Data Protection – Action Items

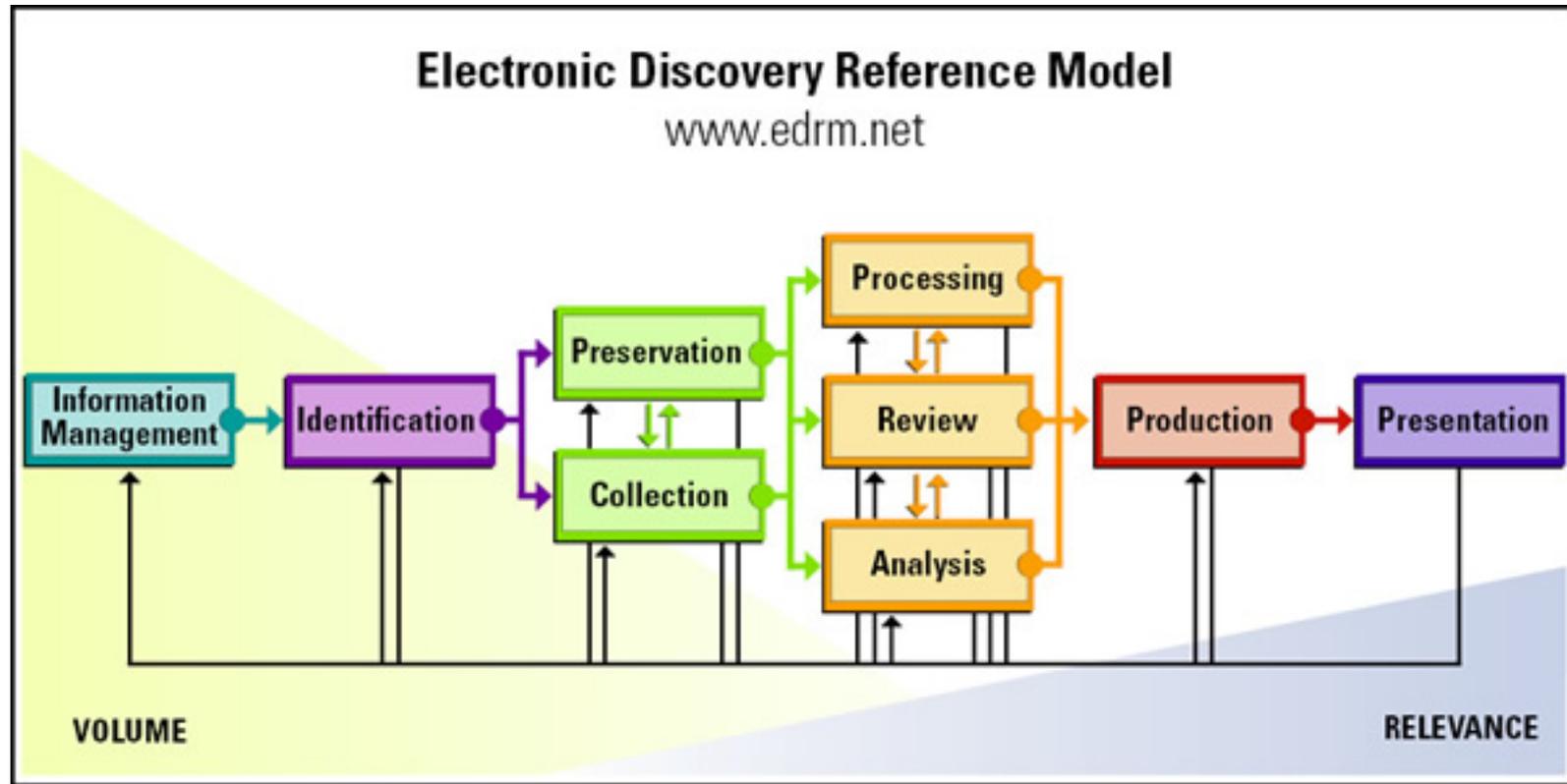
- Before You Board The Plane:
  - Instruct the security department not to transport the hard drive image or take any further steps to process or transfer data
  - Reach out to counsel regarding German and Indian data protection frameworks, and other potentially relevant jurisdictions
  - Consider options for in-country and “safe harbor” data processing and review support



# Practical Application of the EDRM in the Global Arena



# Framework for Success





# Forensic Collections

- Where is the collection going to take place?
  - Educate the forensic specialist on specific legal issues
  - Determine if forensic specialist has regional experience
  - Review laws to determine if data must stay in-country
  - Analyze laptop to determine other collection points
- Is the mirrored copy an exact forensic image/duplicate of the original?
  - Date Modifications
  - Chain-of-custody



# Forensic Collections

- Is the technology language universal enough?
  - Most technical specialists can speak to each other in different countries because the technical language was developed only in the last fifty years
- Do you need a native language project manager?
  - Provides translation of business needs versus litigation needs
  - Assists forensic specialist in managing client expectations



# Safe Harbor and Privacy Laws

- What is consider personal or private?
  - Is an individual the custodian of a laptop or is the company the custodian?
  - Do the local laws carry over when a laptop is imaged in a different country than its origin?
- Different cultures, different meanings
  - United States – U.S. Chamber of Commerce
  - Europe – European Union
  - Asia – Specific Governments
  - South America – Specific Governments



# Early Case Assessment

- Do you need to do early case assessment software?
  - Does the technology selected support non-English language?
  - If so, what components (*e.g.*, search, translate) are supported? If not, what are your alternatives?
- What other technologies need to be evaluated in light of the global implications?



# Non-English OCR

- Foreign language OCR
  - Not all OCR engines are created equal
  - Most OCR engines that handle foreign language can do one language extremely well
  - Challenge occurs when your dataset contains multiple languages
  - Additional challenge when a single document is multi-lingual
  - Understand what languages you might need to address
- Use human translators to ensure quality



# Document Production

- Is your language glossary discoverable?
- Do you need to produce both originals and translations?
- Will you endorse the translations differently than the originals?



# Best Practices

- Plan as much in advance as possible
- Halt forensic collection until local privacy laws are confirmed
- Select tools on both functionality and language capability
- Talk to providers directly to manage non-English language discovery
- Plan for production requirements early in the case



# Where Can We Help You?

Todd M. Haley  
Vice President, E-Discovery  
ePIC

<http://www.epiclds.com>

202.349.0177

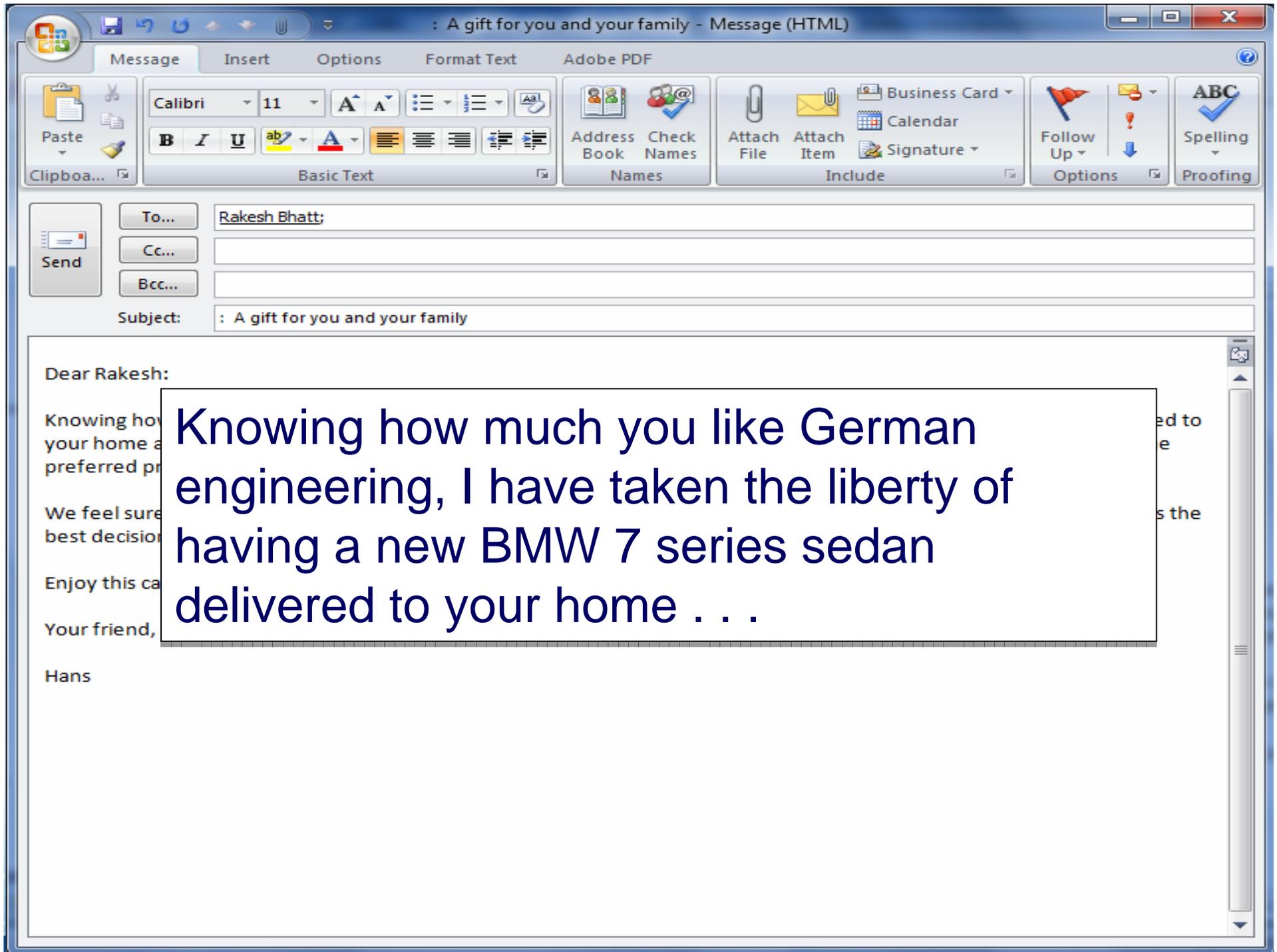
Search | Analyze | Review



## Managing Electronic Data in an FCPA Investigation

Strategies for Searching and Reviewing  
Foreign-Language Documents

John Tredennick  
Catalyst Repository Systems



Knowing how much you like German engineering, I have taken the liberty of having a new BMW 7 series sedan delivered to your home . . .

आप और आपके परिवार के लिए एक उपहार - Message (HTML)

Message Adobe PDF

Reply Reply to All Forward to All Respond

Delete Move to Folder Create Rule Other Actions

Block Sender Not Junk Junk E-mail

Safe Lists

Categorize Follow Up Mark as Unread Options

Find Related Select Find

From: Hans Freidiger Sent: Mon 6/1/2009 10:55 PM  
To: Rakesh Bhatt  
Cc:  
Subject: आप और आपके परिवार के लिए एक उपहार

भेजा: शुक्रवार 3/4/2009 10:01

प्रिय राकेश,

आपको यह बताते हुए बहुत गर्व महसूस हो रहा है की हमारे द्वारा निर्माणित प्रथिजैविको अभी सभी भारतीय सरकारी अस्पतालों में प्राथमिक उत्पादों में एक है. कंपनी को इस मुकदर तक पहुंचाने में आपका बहुत बड़ा हाथ है. कम्पनी, यह जानते हुए की आप जर्मन इंजीनियरिंग की पसंदिता है, आपकी मेहनत और सहायता की प्रशंसा की एक छोटा सा प्रतिक, एक नई बीएमडब्ल्यू 7 श्रृंखला सिडैन आपके घर वितरित करने की आज्ञा दी लिया है.

हमें यकीन है कि आपके अस्पताल के प्रशासक सहमत होंगे की हमारे दवाईयां सबसे बेहेतरीन और प्रभावित है और आपका ये निर्णय आपके अस्पताल और मरीजों के लिए उच्चित निर्णय होगा.

अपने परिवार के साथ इस कार का आनंद लीजियेले. मैं उम्मीद करता हूँ कि ये बहुत सालों तक आपको आनंद लायेगा.

आपके मित्र,

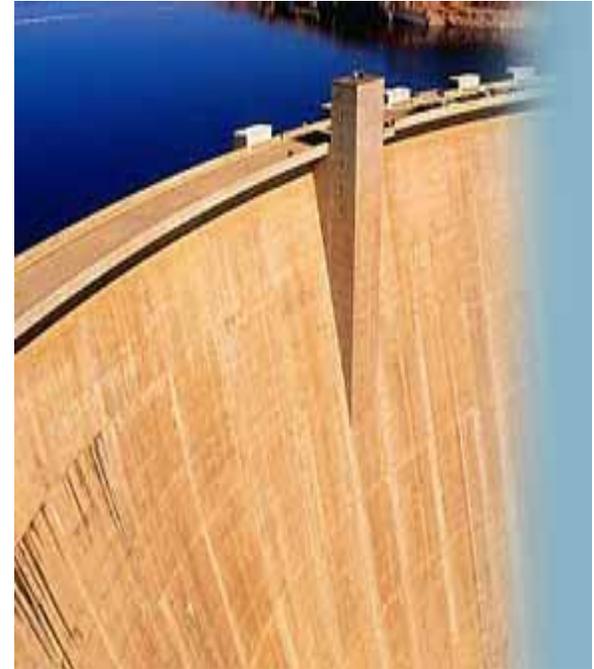
हंस फ्रेइदिगेर

# Catalyst

Secure, hosted software to help corporations and counsel . . .

- Process, analyze and cull native files
- Search, review and produce electronic documents
- Work together on complex cases claims and financial matters
- Reduce litigation and review costs

Over 70 languages including Eastern Asian  
Cyrillic and Western European



Search | Analyze | Review



# Searching Foreign-Language Documents

If a computer could read this sentence...

If  
a  
computer  
could  
read  
this  
sentence



# Searching Foreign-Language Documents

## Token Sample

Words in document	Tokens
Computer	1
USA	1
U.S.A.	3
Mc Intosh	2

# Searching Foreign-Language Documents

## Foreign Language Tokenization

- Some languages based on symbols rather than letters
- Many don't use spaces or punctuation
- Chinese, Japanese, Korean and Arabic

アーティストコープに、ようこそ！  
オウンサウンドアーティストコープは、世界中の訪問者をいつも暖かく歓迎致します。この店では素晴らしい真のカナダ人のアートやクラフト製品が見られます。アーティストコープは、1994年、オウンサウンドのアーティスト達によって、この地域で開店致しました。この店の作品は皆、この地域で造られたもので、私達の活動は、この活気に満ちたアート社会での見本ともされています。アーティストコープは、また、アート、クラフトの町増進の為、案内や宣伝、紹介や教育などにも、携わっております。

How do I recognize when words start and stop?



Search | Analyze | Review

# Searching Foreign-Language Documents

The dog ate my dinner before I could stop him next time I will put him out before I eat

The dog ate my dinner before I could stop him.  
Next time I will put him out before I eat.

裁判所はどこにありますか？

Where is the courthouse?

アーティストコープに、ようこそ！  
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Search | Analyze | Review

Sea

Fo

China

中國

Middle country

Chinese

中國人

Middle country person

界中の  
店では  
ト製品  
994  
って、  
は皆、  
、この  
ていま  
、クラ  
音など

# Language Issues



Typical Japanese sentence

既に大量に同規格の物を作って販売しておりますが、

Japanese words are often compound...

販売しております

Selling

販売(to sell)

して(to do)

おります(to be)

# Language Issues



German words are often compound as well

Landtagsabgeordneter (member of parliament)

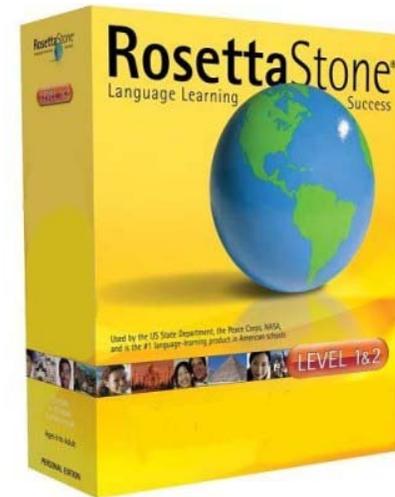
Landtags (state parliament)

abgeordneter (member)

Understanding this is key to search . . .

# Tips for Dealing With Foreign-Language Documents

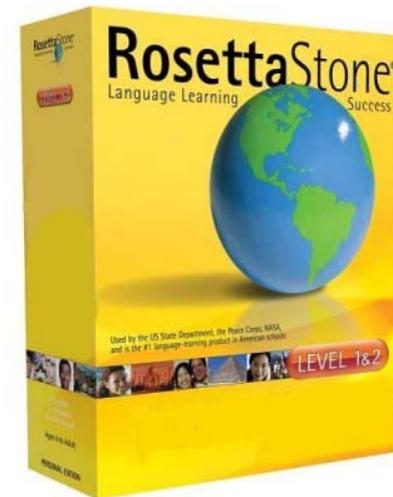
1. Review begins with search. . .





# Tips for Dealing With Foreign-Language Documents

1. Review begins with search. . .
2. Make sure your processing is done right



Form: Review

- (A) - ReviewedStatus
  - ForFurtherReview
  - NotResponsive
  - NotReviewed
  - Responsive

(C) - HotDoc

- No
- NR
- Yes

(D) - Issue

- Anti-Competitive
- Damages
- Fraud
- Licensing
- Malfeasance
- test\_issue

(E) - Privileged

- 4-FinalPriv
- 5-Final Priv & Redact
- Not-Privileged
- NR-Priv
- Potentially-Privileged
- Privileged

Preview Native

Subject: 930R...  
 Subject: ...  
 Subject: ...  
 =====  
 BO reviewer comment and reply  
 Subject: ...

=====

From pylee@nsc.gov.tw ... Wed Aug 18 18:39:19 2004  
 Subject: 930R...  
 To: ... <arthur@mail.novelhall.org.tw>, ... <nutr2031@mails.fju.edu.tw>, ... <chengyen@nkuucc.nku.edu.tw>, ... <duenruey@contract.shu.edu.tw>, ... <game@mail.cju.edu.tw>, ... <umami@mail.cju.edu.tw>, ... <leu@tea.ntptc.edu.tw>, ... <leey@mail1.tmtc.edu.tw>, ... <zenpin@mail.npttc.edu.tw>, ... <jameschan@missun1.mis.sjsmit.edu.tw>, ... <joum@cc.ntnu.edu.tw>, ... <kate@mails.fju.edu.tw>, ... <plfan@tea.ntptc.edu.tw>, ... <tshih@cs.tku.edu.tw>, ... <hsucami@mail.tku.edu.tw>, ... <aldychang@mdu.edu.tw>, ... <yflou@mail.ckitc.edu.tw>, ... <sheu2000@ms10.hinet.net>, ... <cchuang@mail.cgu.edu.tw>, ... <yufen@mail.chihlee.edu.tw>, ... <japa2025@mails.fju.edu.tw>, ... <flcg1009@mails.fju.edu.tw>, ... <twhuang@mail.ncyu.edu.tw>, ... <ywlin@mail.ncyu.edu.tw>, ... <dcyang@mail.ncyu.edu.tw>, ... <sslaiw@mail.cmu.edu.tw>, ... <tlyeh@cc.ncu.edu.tw>, ... <fcc@cc.ncu.edu.tw>, ... <jglee@emc.nctu.edu.tw>, ... <hong.jc@msa.hinet.net>, ... <chhsiao@ym.edu.tw>, ... <lochsieh@sunws.nhit.edu.tw>, ... <hsyan@mail.ncku.edu.tw>, ... <sshshiau@cc.ncu.edu.tw>, ... <jimti@cc.shu.edu.tw>, ... <ychen@cc.shu.edu.tw>, ... <hcliu@mx.nthu.edu.tw>, ... <jschang@cs.nthu.edu.tw>, ... <clouliu@mxu.edu.tw>, ... <shshao@tea.ntate.edu.tw>

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- 5-Final Priv & Redact
- Not-Privileged
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- Privileged

Preview Native

Subject: 93嗜複位內嗜箴嗜箱嗜頭嗜篆嗜範嗜罵嗜議嗜禱塚蕭  
 Subject: 嗜誹們構嗜頭嗜諸已嗜篇嗜緬嗜盤嗜璫嗜璽嗜瘡嗜罷嗜締嗜嗜篇嗜緘嗜箴嗜瘡嗜瘰  
 Subject: 嗜蹀嗜嗜蹀嗜嗜罵嗜嗜嗜嗜蹀嗜嗜編嗜緘嗜箴嗜諷請殷蕭PDF嗜禱製嗜璫嗜蹀嗜蹀嗜緘嗜蹀  
 ==== BO reviewer comment and reply  
 Subject: 嗜磅嗜蹀嗜嗜蹀嗜932EL嗜緘嗜箴

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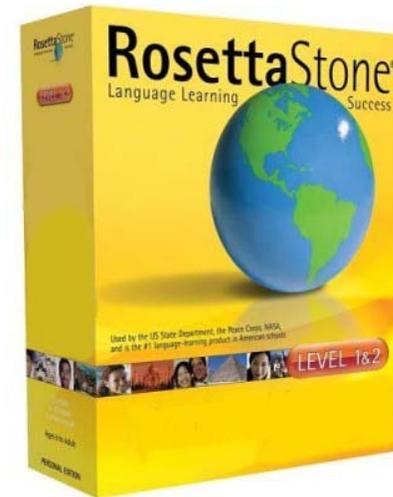
From pylee@nsc.gov.tw 嗜蹀嗜嗜嗜嗜 Wed Aug 18 18:39:19 2004

Subject: 93嗜複位內嗜箴嗜箱嗜頭嗜篆嗜範嗜罵嗜議嗜禱塚蕭

To: 嗜蹀嗜嗜嗜嗜嗜嗜 <arthur@mail.novelhall.org.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <nutr2031@mails.fju.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <chengyen@nknucc.nknu.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <duenruey@contract.shu.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <game@mail.cju.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <umami@mail.cju.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <leu@tea.ntptc.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <leey@mail1.tmtc.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <zenpin@mail.ntptc.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <jameschan@missun1.mis.sjsmit.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <joum@cc.ntnu.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <kate@mails.fju.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <plfan@tea.ntptc.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <tshih@cs.tku.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <hsucami@mail.tku.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <aldychang@mdu.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <yflou@mail.ckitc.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <sheu2000@ms10.hinet.net>, 嗜蹀嗜嗜嗜嗜嗜嗜 <cchuang@mail.cgu.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <yufen@mail.chihlee.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <japa2025@mails.fju.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <flcg1009@mails.fju.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <twhuang@mail.ncyu.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <ywlin@mail.ncyu.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <dcyang@mail.ncyu.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <ssliaw@mail.cmu.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <tlyeh@cc.ncu.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <fcc@cc.ncu.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <jglee@emc.nctu.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <hong.jc@msa.hinet.net>, 嗜蹀嗜嗜嗜嗜嗜嗜 <chhsiao@ym.edu.tw>, 嗜蹀嗜嗜嗜嗜嗜嗜 <lochsieh@sunws.nhit.edu.tw>

# Tips for Dealing With Foreign-Language Documents

1. Review begins with search. . .
2. Make sure your processing is done right
3. Time Zone Issues can be tricky



Message Adobe PDF

DEFE0010144~001\_DEFE0010144\_RE: D8 info. - Message (Plain Text)

Reply Reply Forward to All Delete Move to Folder Create Rule Other Actions Block Sender Not Junk Safe Lists Junk E-mail Categorize Follow Up Mark as Unread Options Find Related Select Find

Extra line breaks in this message were removed.

From: Ray Simpson Sent: Fri 4/9/2004 6:06 AM  
To: Ramon Figueroa  
Cc:  
Subject: DEFE0010144~001\_DEFE0010144\_RE: D8 info.

-----Sent UTC 4/9/2004 10:06:20 AM-----  
-----Sent Iraq Time 4/9/2004 2:06:20 PM-----

----- Original Message -----  
From: Ray Simpson  
Date: 4/9/2004 10:06:20 AM  
To: Ramon Figueroa  
Cc:  
Subject: DEFE0010144\_RE: D8 info.

-----Sent UTC 4/9/2004 10:06:20 AM-----  
-----Sent Iraq Time 4/9/2004 2:06:20 PM-----

Thanks Ray...

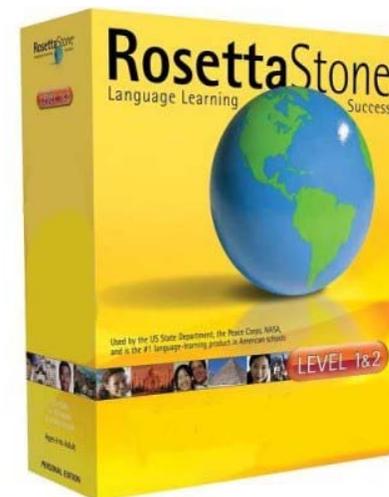
v/r

Security Manager, Southern Region (Iraq/Kuwait) Theater Transportation Mission |  
979-1293  
Email: |

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# Tips for Dealing With Foreign-Language Documents

1. Review begins with search. . .
2. Make sure your processing is done right
3. Time Zone Issues can be tricky
4. Get a linguist involved with your searches



आप और आपके परिवार के लिए एक उपहार - Message (HTML)

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Categorize Follow Up Mark as Unread Options

Find Related Select Find

From: Hans Freidiger Sent: Mon 6/1/2009 10:55 PM  
To: Rakesh Bhatt  
Cc:  
Subject: आप और आपके परिवार के लिए एक उपहार

भेजा: शुक्रवार 3/4/2009 10:01

प्रिय राकेश,

आपको यह बताते हुए बहुत गर्व महसूस हो रहा है की हमारे द्वारा निर्माणित प्रथिजैविको अभी सभी भारतीय सरकारी अस्पतालों में प्राथमिक उत्पादों में एक है. कंपनी को इस मुकदर तक पहुंचाने में आपका बहुत बड़ा हाथ है. कम्पनी, यह जानते हुए की आप जर्मन इंजीनियरिंग की पसंदिता है, आपकी मेहनत और सहायता की प्रशंसा की एक छोटा सा प्रतिक, एक नई बीएमडब्ल्यू 7 श्रृंखला सिडैन आपके घर वितरित करने की आज्ञा दी लिया है.

हमें यकीन है कि आपके अस्पताल के प्रशासक सहमत होंगे की हमारे दवाईयां सबसे बेहेतरीन और प्रभावित है और आपका ये निर्णय आपके अस्पताल और मरीजों के लिए उच्चित निर्णय होगा.

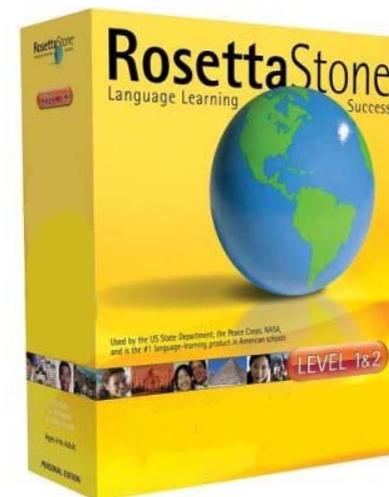
अपने परिवार के साथ इस कार का आनंद लीजियेले. मैं उम्मीद करता हूँ कि ये बहुत सालों तक आपको आनंद लायेगा.

आपके मित्र,

हंस फ्रेइदिगेर

# Tips for Dealing With Foreign-Language Documents

1. Review begins with search. . .
2. Make sure your processing is done right
3. Time Zone Issues can be tricky
4. Get a linguist involved with your searches
5. Use computer assisted translation but for gist only



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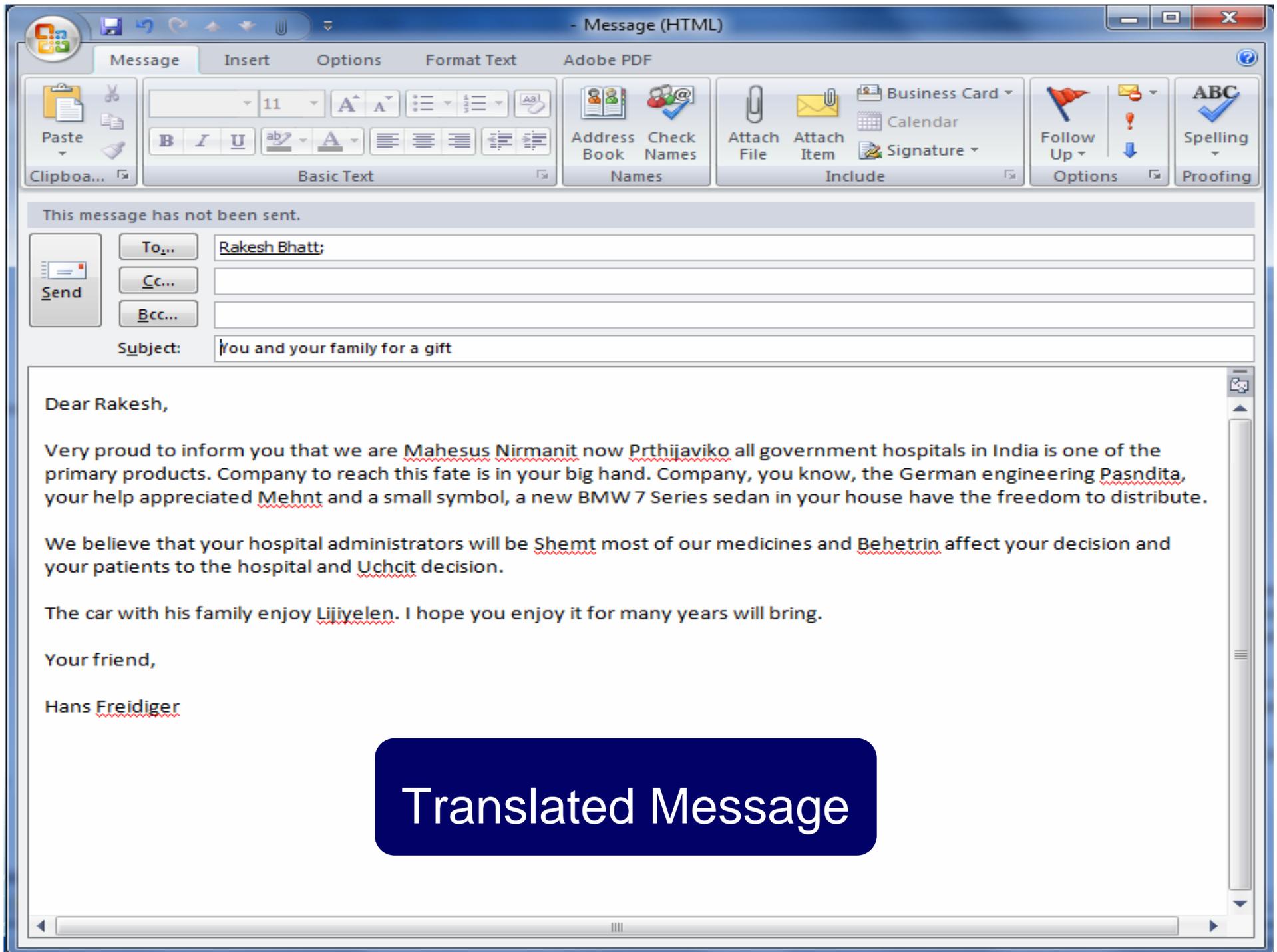
हमें यकीन है कि आपके अस्पताल के प्रशासक सहेमत होंगे की हमारे दवाईयां सबसे बेहेतरीन और प्रभावित है और आपका ये निर्णय आपके अस्पताल और मरीजों के लिए उच्चित निर्णय होगा.

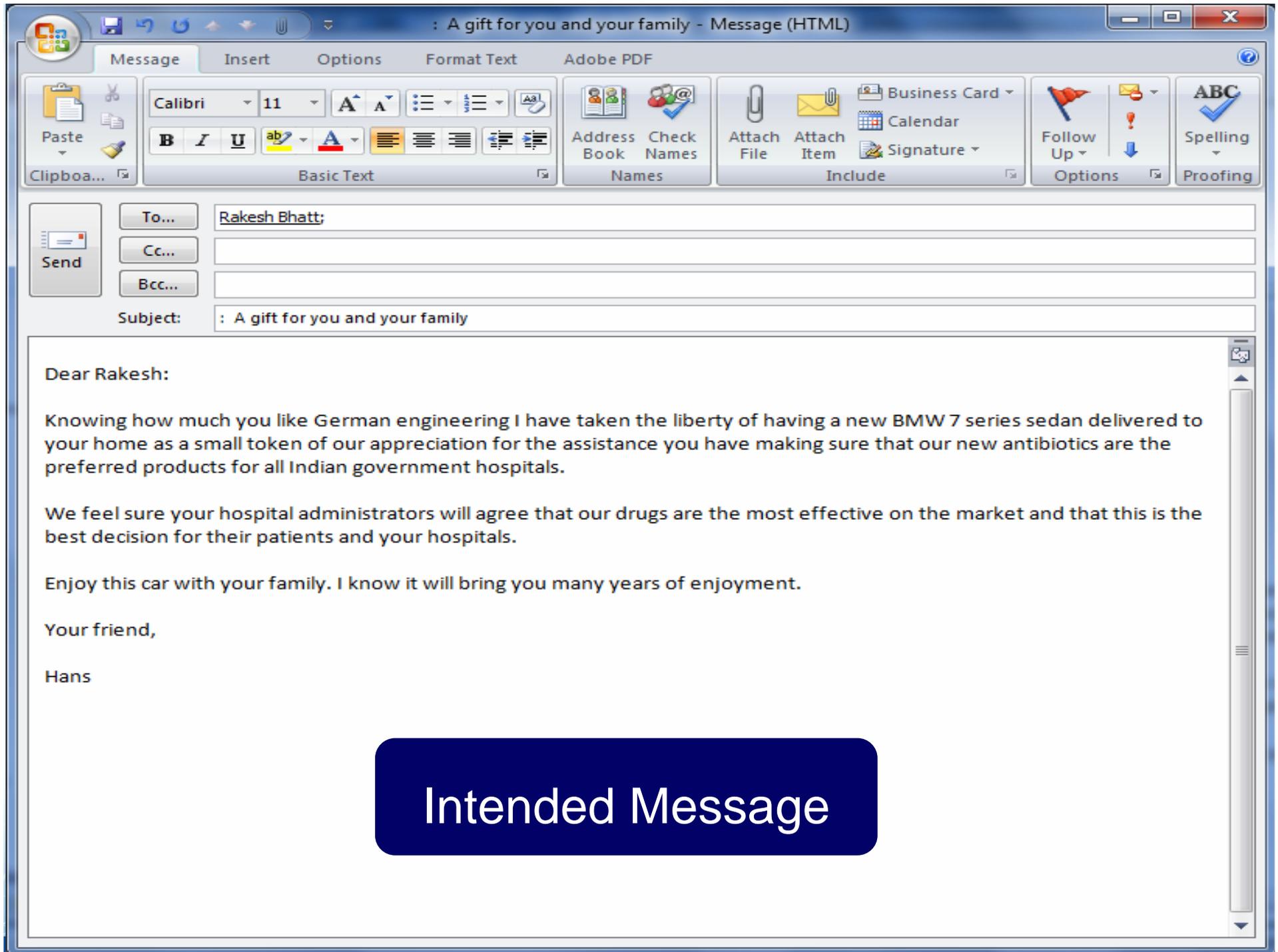
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आपके मित्र,

हंस फ्रेइदिगेर

Message in Hindi





Intended Message

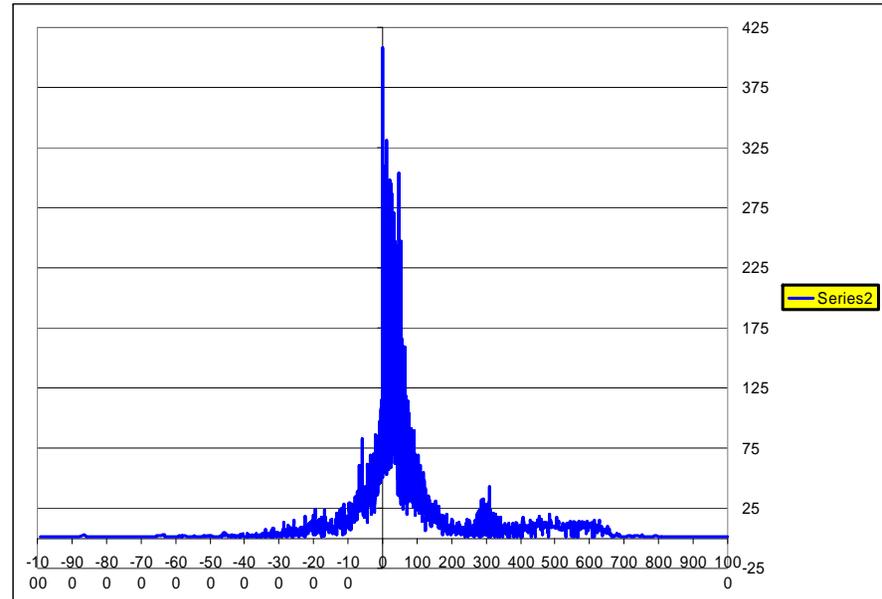
# More Tips for Foreign-Language Documents

- Group documents by language for more efficient review.
- Indexing system can recognize primary and secondary languages.



# Language Detection

- Identify the primary language or languages
- One primary language for tokenization
- Look for multiple languages
- Use search to rank documents by languages



← en

ja→

# More Tips for Foreign-Language Documents

- Group documents by language for more efficient review.
- Indexing system can recognize primary and secondary languages.
- Some docs may need double review.



Search | Analyze | Review



## Managing Electronic Data in an FCPA Investigation

Strategies for Searching and Reviewing  
Foreign-Language Documents

John Tredennick  
Catalyst Repository Systems