



Dewey & LeBoeuf

Global Anti-Corruption Practice

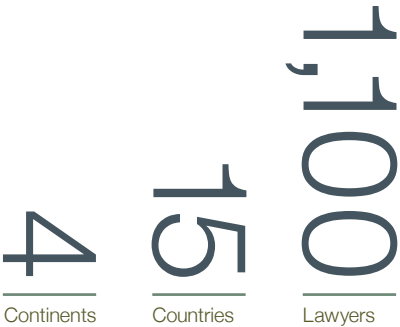


Global Anti-Corruption Practice

Dewey & LeBoeuf has decades of experience advising major companies on anti-corruption issues in the context of investigations, litigations and corporate transactions. These efforts have been led by the firm's Litigation and International Trade and Compliance practices.

The growth of corporate criminal and regulatory enforcement in the United States and around the world has led to new and challenging demands on organizations. Corporations now face heightened requirements for corporate compliance programs, changing expectations regarding voluntary disclosure of employee misconduct, erosion of attorney-client privilege standards and powerful incentives for companies to “cooperate” in government investigations. Dewey & LeBoeuf lawyers routinely advise companies and individuals on these matters. While a focal point of this work is anti-corruption compliance, our representations often extend to other measures that restrict international business, such as export controls, customs rules, anti-money laundering laws, embargoes and other economic sanctions and anti-boycott regulations.

We are frequently called upon to conduct anti-corruption internal investigations on behalf of companies, their boards of directors and audit committees and other board committees. We have negotiated deferred prosecution agreements and corporate integrity agreements, and have been retained as independent monitors under such agreements. Because a criminal or regulatory matter can impact a client's reputation and access to capital, our approach also takes account of media relations, investor relations and public relations.



Global Anti-Corruption Practice (cont'd)

The firm's anti-corruption experience goes far beyond the US Foreign Corrupt Practices Act (FCPA) to include the new UK Bribery Act and other domestic measures based on the Antibribery Convention of the Organization for Economic Cooperation and Development. Our lawyers have experience working in multinational teams to handle litigations and investigations across multiple jurisdictions. We are one of only a select few major law firms with truly wide-reaching investigative and compliance capacity. Our lawyers include several former US federal prosecutors, a former general counsel of the US Securities and Exchange Commission (SEC),

The firm also has a depth in action needed successfully to complete major corporate transactions in the face of challenges under anti-corruption measures. We have the experience to design and implement compliance due diligence plans that are calibrated and appropriate for the circumstances of any given transaction. We commonly pursue in-depth due diligence regarding anti-corruption issues that arise in the context of transactions and develop safeguards, including special contract protections, to facilitate closings depending on investigatory findings. As needed, we have disclosed information to and worked with enforcement authorities to achieve resolutions necessary to consummate transactions. As needed to complete one recent transaction, the firm obtained a favorable opinion under the FCPA pursuant to a seldom-used Department of Justice (DOJ) opinion procedure.

Global Anti-Corruption Practice

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Further, the firm has developed specialized experience in an area that has become a particular challenge for multinational companies: engagement of and work with third-party agents and other business partners. As with our anti-corruption transactional practice, this work tends to be concentrated in areas such as Africa, China and the Middle East, which present particular anti-corruption challenges.

Finally, Dewey & LeBoeuf has designed and implemented anti-corruption compliance programs for some of the largest, most sophisticated companies in the world. The firm develops arrangements that simultaneously satisfy best practice standards, such as those of the US Federal Sentencing Guidelines, and that are well tailored to preserve efficient operations.

Representative Transactions

- Representation of a major multinational company in an internal investigation of potential violations of the FCPA and in related inquiries by the DOJ and SEC regarding activities spanning Asia, Europe, Russia, and the CIS countries
- Representation of a major LNG system in Africa involving the interests of some of the largest energy companies in the world. Our lawyers have advised the LNG system on all of its anti-corruption matters
- Representation of a foremost technology company involving in-depth anti-corruption due diligence in China, Korea, Taiwan and elsewhere to facilitate the client's acquisition of a software security company
- Representation of a major defense contractor involving anti-corruption issues in the context of the sale of a missile system
- Representation of a leading oil and gas company involving a broad investigation to enable it properly to address a shareholder derivative suit based on one of the largest anti-corruption settlements on record
- Representation of a major oil company in enforcement investigations and litigation centering on anti-corruption issues
- Representation of one of the world's largest Internet search and advertising companies in conducting an internal investigation of potential violations of the FCPA and in related inquiries by the DOJ and the SEC
- Representation of a top multinational industrial company involving a "Halliburton Opinion" due diligence effort in concert with the DOJ to facilitate the client's acquisition of a US company in the oil and gas sector

Representative Transactions

(cont'd)

- Representation of the Audit Committee of global advertising and marketing service companies in connection with its oversight and evaluation of over 40 internal investigations conducted worldwide, involving allegations of, among other things, violations of the anti-corruption laws, accounting irregularities and money laundering; the issuance of related financial restatements; the company's development and implementation of related remediation programs; and related SEC inquiries
- Representation of leading oil and gas companies to facilitate their retention of an international agent to pursue a major natural gas project. This representation entailed our securing a favorable DOJ opinion under the FCPA
- Representation of a global insurance company in connection with an internal investigation of potential violations of anti-corruption laws and the establishment of a global compliance program
- Representation of a Fortune 500 company in connection with the FCPA, export control and government contracting investigations regarding newly acquired information technology sales operations in Eastern Europe
- Representation of an executive of a major US corporation with worldwide operations in connection with a DOJ criminal investigation of alleged violations of the FCPA
- Representation of a US private company in connection with potential violations of the FCPA and UK anti-corruption laws and subsequent disclosure to the UK Serious Frauds Office. This representation resulted in our securing a favorable opinion from the UK Serious Frauds Office under UK anti-corruption laws

Representative Transactions

(cont'd)

- Representation of a leading US-based insurance company with respect to investigation of suspected anti-corruption irregularities within its Japanese operations (the largest non-Japanese owned insurance operations in Japan)
- Representation of an executive of a major oilfield services company in connection with SEC and DOJ FCPA investigations into payments provided to foreign government officials
- Representation of an individual before the U.S. Attorney's Office for the Southern District of New York in regard to alleged FCPA violations
- Representation of a group of petroleum companies in a matter involving hospitality benefits and other benefits to foreign officials
- Representation of the CEO of a private medical device company in a DOJ FCPA investigation involving the company's alleged payments to Chinese physicians and hospitals. The matter concluded with a written declination of prosecution
- Representation of witnesses in connection with the UN investigation of the Oil-for-Food Program

About Dewey & LeBoeuf



Dewey & LeBoeuf is a leading global law firm providing our diverse client base with national and cross-border solutions to all of their legal requirements. We have also earned a reputation for our deep firm-wide experience in numerous sectors, including energy, financial services, insurance and technology.

With more than 1,100 lawyers in 26 offices spanning major financial markets around the world, we are one of the largest law firms in New York City and one of the largest US firms located in London.

As a firm that frequently advises our clients on assignments that span multiple practice areas and jurisdictions, we have well-established strengths in the emerging markets. Over a third of our lawyers are based outside of the US in exciting areas of growth, including China, Russia, Kazakhstan, the United Arab Emirates, Qatar, Saudi Arabia and South Africa. This is complemented by our well-established network of offices across Asia, Europe and the United States.

For more information, please visit dl.com.

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