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## *Business and Financial Integrity*

We help clients navigate the complex world of financial crimes compliance.

Businesses and financial institutions operating in the US and abroad face a complex web of regulatory and enforcement risks related to financial crimes compliance. Our interdisciplinary team helps clients identify and mitigate financial crime risks that may lead to corporate and individual criminal liability, civil penalties, asset forfeiture and administrative sanctions, as well as the reputational harm that can compound legal and regulatory consequences. Clients rely on the firm's renowned capabilities in anti-money laundering, trade and financial sanctions, export controls, the Foreign Corrupt Practices Act, and related anti-bribery/anti-corruption laws—as well as our unmatched familiarity with key regulatory and enforcement agencies—to develop and implement effective compliance, training and global ethics programs that safeguard clients' interests. When enforcement actions loom or are commenced, our lawyers bring an intimate knowledge of how government works, having served in senior government positions in the United States, Europe and multilateral organizations. Drawing on the firm's premier global investigations practice, we skillfully conduct internal and agency-initiated investigations, and vigorously defend clients against regulatory and enforcement challenges.

Our lawyers possess a deep understanding of the legal framework and technology behind the FinTech revolution, including blockchain and distributed ledgers, mobile payments and tokenization, and fast-payment technology. Since helping to launch the first online bank during the dot-com era, our lawyers have provided counsel to some of the most innovative and successful financial services ventures, including new product development for prominent peer-to-peer, mobile and online-only lending and payment platforms. And we actively advise intermediaries and trading platforms on FinTech and cryptocurrency matters, including aiding in the formation of the first-ever US government-approved crypto currency Swap Execution Facility.

Cybersecurity is a global concern, and our internationally recognized team is equipped to handle companies' thorniest data security issues. We counsel clients on every aspect of information security, including cyber incident preparation, response and recovery, and assist companies and boards in managing these issues. We have counseled clients following some of the largest publicly reported cybersecurity and data breach incidents in history, and have addressed complex cybersecurity investigations that have never been publicly revealed.

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## *Key Contacts*



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## *Related Solutions*

FinTech

Cybersecurity and Privacy

Foreign Corrupt Practices Act  
and Anti-Corruption

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## *Areas of Focus*

Anti-Money Laundering

Economic Sanctions, Anti-  
Boycott and Export Controls

Foreign Corrupt Practices Act  
and Anti-Corruption

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## *Experience*

Conducting a comprehensive risk assessment and gap analysis of a compliance program for both anti-corruption and export sanctions issues for a major infrastructure and engineering company.

Advising on the creation of a compliance program, including best practices related to anti-money laundering, sanctions and anti-corruption compliance for a sovereign wealth fund in an emerging market country.

Conducting a comprehensive assessment of a compliance program, including policies, procedures, personnel and resources focused on anticorruption, sanctions, export, trade compliance and anti-money laundering for a major media and entertainment company.

Advising on an internal investigation and possible contact with US regulators regarding potentially improper payments made to sanctioned parties.

Advising one of Europe's largest private banks on a challenging FinCEN regulatory action.

Advising a Germany-based financial institution on the legal and factual basis for OFAC designations, conducting an internal investigation as to alleged dealings with Iran and grounds for delisting, and representing the client in a successful delisting proceeding before OFAC.

Advising a client on the legal and policy grounds for designated parties to maintain a presence on social media platforms and assisting in the preparation of a position paper and engagement strategy to seek a change in OFAC regulations to permit such presence.

Assisting an oil and gas company headquartered in Dubai with the extraterritorial application of US sanctions to overseas energy exploration operations and with compliance measures to address applicable US sanctions requirements.

Assisting a client with a comprehensive US export control and sanctions risk assessment for the international distribution of US parts and equipment in the EMEA region and preparing a global compliance policy to address such risks.

Providing advice to a Lebanon-based company in connection with performing risk assessments of potential FCPA and export/sanctions liabilities, establishing compliance policies to address those risks and conducting compliance training of company personnel with respect to such risks.

Representing a European bank in a regulatory action brought by the Treasury Department involving allegations of money laundering, sanctions evasion and bribery.

Conducting an internal investigation for a multi-national privately held company into allegations of terrorist financing, money laundering, sanctions violations, bribery and tax evasion.

Assisting a Lebanese-owned re-seller of defense trade-controlled products in navigating its contractual relationships with suppliers seeking to mitigate US export control, sanctions and anti-corruption risks in the Middle East, including through

licensing and the development of a comprehensive compliance program.

Representing Analogic in its 2016 settlements with the DOJ and SEC related to conduct in Russia and elsewhere.

Representing PTC, Inc. in its 2016 settlements with the DOJ and the SEC related to conduct in China.

Representing a large international financial institution in connection with inquiries from law enforcement and regulators in different countries about multiple matters implicating financial crime concerns, including money laundering, economic sanctions, offshore tax evasion and public corruption.

Representing a bank in connection with an investigation by a US Attorney's Office into criminal violations of the Bank Secrecy Act, as well as related regulatory investigations by FinCEN and the Office of the Comptroller of the Currency.

Representing a large US bank in responding to criminal and civil inquiries from the DOJ, SEC, FINRA, FinCEN and multiple state financial regulators related to the implementation and reasonableness of anti-money laundering and insider trading policies and controls. Recently, the firm secured a favorable settlement on the bank's behalf with the SEC and FINRA related to suspicious activity reporting.

Representing an international financial institution in connection with an AML by the New York State Department of Financial Services.

Providing an analysis of the data security requirements and expectations of financial regulators in 20 countries around the globe, including China, Singapore, Hong Kong, Korea, Japan, Israel, Saudi Arabia and Ghana, on behalf of a major provider of cloud services to financial companies.

Conducting a comprehensive evaluation of a large health insurance company's cyber incident response capabilities and plans, and advising on governance structure, incident planning and related issues.

Designing the first bilateral bitcoin contract (as far as we have been able to ascertain) based on International Swaps and Derivatives Association definitions.

Representing a cash exchange and Index purveyor in a CFTC Division of Enforcement inquiry.

Advising several virtual currency businesses on US federal and state licensing and regulatory requirements and AML and money transmitter license requirements (both federal and state).

Advising on an Initial Coin Offering implemented as an Ethereum-based token, and on other ICOs.

Representing a block chain solutions developer in drafting and negotiating a licensing agreement to use the technology in various applications.