

Our Foreign Corrupt Practices Act (FCPA) & Anti-Corruption team has extensive experience representing clients in all facets of compliance, investigations and enforcement.

Orrick Worldwide Investigations and Compliance Map



When clients face corruption allegations or need to address related risk, Orrick's FCPA and Anti-Corruption team can assist. We are a market leader in FCPA and anti-corruption representation. We counsel our clients in the detection and prevention of FCPA violations and achieve positive results in the face of anti-corruption enforcement by governments and multilateral development banks. Our team has extensive knowledge and experience in all aspects of FCPA and investigations, risk assessments, government investigation, compliance counseling, developing policies, anti-corruption diligence and integration plans, and more. We focus on representing multinational companies, and we represent individuals as well.

We bring unique experience to both government enforcement and compliance matters. Our lawyers draw strength from having served on every side of the table: as defense lawyers, prosecutors and in-house counsel. Our practice includes best-in-class experience with DOJ and SEC-imposed corporate compliance monitorships, including the monitorship of an international petrochemical company.

WHAT THE MARKET IS SAYING

Ranked in California, New York and Washington for
Litigation: Corporate Crime & Government Investigations



Recognized Nationwide in
FCPA



Ranked as a top firm for
FCPA/Fraud and Litigation



"Highly Recommended" FCPA
Practice



SELECT REPRESENTATIVE EXPERIENCE

Brazilian Petrochemical Company | Partner Guy Singer served as co-independent compliance monitor to one of the largest petrochemical companies in the world, having been appointed by the DOJ, SEC, and Brazilian MPF. As an independent compliance monitor, a team from Orrick assessed and evaluated the Company's global compliance program and worked closely with the Company to understand the risk areas and related internal controls.

Compliance Program Assessment | Our team was engaged by a major healthcare multinational to conduct an independent assessment of the company's global anti-bribery and anti-corruption compliance program in the midst of an SEC/DOJ investigation.

Dental Manufacturer | The firm is engaged by the General Counsel and Chief Compliance Officer to perform an end-to-end assessment of the Company's global ethics and anti-corruption compliance program. The engagement includes evaluating compliance policies, procedures, and resources, and performing onsite assessments to measure the effectiveness of the global compliance program.

E-Cigarette Company | Our team conducted supply chain integrity, compliance, and FCPA investigations for our client. In parallel, our team advised our client's commercial, human resources, legal, and compliance teams regarding best practices in data privacy/data management and helped design key policies and internal controls.

Employees of Multinational Pharmaceutical Company | Our team represented the clients in an FCPA investigation by the DOJ and SEC relating to allegations that the Company had bribed government officials in Latin America in order to increase product sales. The investigations expanded to include business practices and transactions in Russia, Eastern Europe, and other countries.

Executive at Japanese Manufacturer | We represented the former Chief Compliance Officer of an optics and reprography products manufacturer in connection with an investigation by the United States Department of Justice.

Global Asset Management Company | Our team is conducting an anti-corruption and anti-bribery risk assessment for a major international broker-dealer in securities with operations in Asia, the Americas and

Europe. The risk assessment is intended to identify vulnerabilities in the financial institutions anti-corruption policies and tailor revisions and adjustments to address those vulnerabilities.

Global Insurance Provider | We conducted an internal investigation into allegations of widespread bribery of potential customers, including government officials.

Global Life Sciences Company | We are go-to counsel for a major life sciences multinational in a number of internal FCPA investigations spanning Argentina, Brazil, Chile, India, China and Turkey, among other countries. The investigations have necessitated reviewing hundreds of thousands of documents, conducting in-country interviews, working with forensic accountants to review hundreds of transactions and interfacing with the DOJ and SEC, as appropriate.

Global Private Equity Firm | Our D.C. white collar team was recently retained to conduct an investigation for one of the world's largest private equity funds into potentially corrupt conduct in Southeast Asia. This matter came to us by referral, directly because of our work in obtaining a declination by the DOJ for an oil and gas exploration company.

Healthcare Company | We conducted a global anti-bribery and anti-corruption risk assessment, focusing on distributor relationships, product registrations, travel and hospitality, HCP consultants, sponsorships, and discounts/rebates.

International Cruise Line | Investigated kickbacks paid to a long-serving senior executive by some of the company's joint venture partners in Turkey, Mexico and other countries. We discovered sufficient evidence of the misconduct that allowed the company to terminate the executive for cause. The investigation also led the company to sever, reevaluate, and/or modify several of its business relationships, including with the joint venture partners at issue in this case.

Investment Company | Our client retained Orrick to conduct compliance diligence, specifically FCPA compliance, on third parties.

SELECT REPRESENTATIVE EXPERIENCE (CONT'D)

Multinational Pharmaceutical Company | We represent a former senior executive of a multinational pharmaceutical company in an FCPA investigation by the DOJ and SEC. We also represent a former marketing employee and a current finance employee in the same investigation. The investigation covers risk areas including distributorships owned by HCPs and government officials, PMS studies, discounts/rebates, travel and hospitality, and JV arrangements. Our work relates to Latin America, Eastern Europe, Africa, and the Middle East.

Oil & Gas Company | We recently served as compliance and FCPA counsel to one of the most successful oil and gas exploration companies in the world. The company first came under DOJ scrutiny after it made one of the largest oil finds in this century.

Publicly Traded Banking Technology Company | We served as the independent monitor to a publicly traded banking technology company, with operations in China, in connection with an agreement between DOJ, SEC, and the company relating to potential FCPA violations. At the appointment of DOJ and SEC, we evaluated the company's anti-corruption compliance program and internal controls, and suggested enhancements to improve the same.

Publicly Traded Technology Company | During the past year, the team has conducted internal investigations focused upon overseas sales activity and cybersecurity issues. In addition, Orrick conducted a risk assessment to inform the third-party anti-corruption due diligence program. The Orrick team also provides compliance

advice concerning FCPA, foreign trade, and data privacy related issues.

Shipping Company | We assisted our client with an international compliance issue after complaints emerged from a series of whistle-blowers regarding corruption and the misuse of corporate assets at the Mexican subsidiary of an oil field services company.

Wireless Networking Company | Our team conducted an internal investigation for a wireless networking company and subsidiary of a multinational enterprise information technology company into revenue recognition and accounting issues.

Zimmer Biomet Holdings Inc. | We have represented Zimmer, a leading medical device company, since 2008, and successfully obtained declination letters from the DOJ and SEC on the company's behalf in the industry-wide FCPA sweep. We also represented them in a Monitorship, and interfaced with DOJ and SEC on their behalf. The circumstances of the Monitorship are unique, as this is the Company's second in conjunction with Biomet's 2012 DPA and because the subsequent conduct occurred post-acquisition. Our team counseled the Company in the Monitorship, including advising it on compliance matters, as well as in navigating this complex history.

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