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## PRACTICES

Anti-Money Laundering  
Coronavirus Task Force  
FCPA & International Anti-Corruption  
Internal Investigations  
International Trade Remedies  
MDB/World Bank Sanctions Proceedings  
Securities Enforcement  
White Collar Defense

## EDUCATION

- J.D., Columbia Law School, 2011
- B.A., Barnard College, Columbia University, magna cum laude, 2008

## LANGUAGES

Hebrew, Russian

## Ann Sultan

### MEMBER

Ann Sultan's practice focuses on internal and government investigations, corporate compliance, and white collar defense related primarily to the Foreign Corrupt Practices Act (FCPA) and anti-money laundering laws and regulations. Ms. Sultan advises clients, including public companies and senior executives, on a wide range of topics, such as compliance assessments, due diligence, risk management, Department of Justice (DOJ) and Securities and Exchange Commission (SEC) enforcement actions, and interacting with external auditors in the context of accounting and financial reporting matters. Ms. Sultan works with companies on the design and implementation of ethics and compliance programs and currently serves in a leadership role on an Independent Monitor team focusing on human resources issues, including harassment and discrimination, on behalf of a regulatory agency in Massachusetts.

As a Russian speaker, Ms. Sultan often assists companies doing business in Eastern Europe and Central Asia. While at Miller & Chevalier, Ms. Sultan has spent time detailed to a client's European headquarters to assist on FCPA internal investigation and compliance matters.

Prior to joining Miller & Chevalier, Ms. Sultan practiced as a corporate attorney specializing in corporate governance and mergers and acquisitions and financings at an international firm. After graduating from Columbia Law School, Ms. Sultan completed a Postdoctoral Fellowship in Mediation at Columbia Law School.

While at Columbia Law School, Ms. Sultan served as the East European Law Editor of the *Columbia Journal of European Law*. Ms. Sultan was also the president of IMPACT, Columbia's student group dedicated to electoral participation and empowerment, and an officer of the Columbia Law Women's Association. During college, Ms. Sultan was a visiting student in Politics, Philosophy and Economics at St. Peter's College of Oxford University.

## REPRESENTATIVE ENGAGEMENTS

- Core team member on a large FCPA internal investigation, which involved the collection of relevant data across a range of nations in Europe and Central Asia, disclosures to the relevant government agencies and external auditor, related remediation efforts, coordination with counsel for board and other jurisdictions, representation of multiple employees in government interviews, and eventual multi-lateral international resolution including a 45 percent reduction from Sentencing Guidelines fine range.
- Investigation into accounting and internal governance/compliance issues at a non-U.S. headquartered company and its U.S. subsidiary, reporting results to the company's external auditor.
- Investigation into allegations of improper payments by employees and a third party of a U.S. company's Ukrainian subsidiary. Representation included reporting to the DOJ and

- resulted in no action taken against our client, the parent company, and its subsidiary.
- Investigation into multiple allegations of wrongdoing from various employees against senior management at a Russian subsidiary of a multinational oilfield services company, at the direction of its American parent company.
- Anti-corruption compliance risk assessment for an international oil company.
- Pro bono representation of a client who was unjustly discharged from the Army under "other than honorable" conditions. Miller & Chevalier secured a discharge upgrade, which enabled our client to receive needed medical benefits.

## **RANKINGS AND RECOGNITION**

- *Global Investigations Review*: 40 Under 40, 2020
- *Washington, DC Super Lawyers*<sup>®</sup>: Rising Star, Criminal Defense: White Collar, International, 2019 - 2020
- DC Bar Capital Pro Bono Honor Roll, 2017 - 2018
- DC Bar Capital Pro Bono High Honor Roll, 2016
- Harlan Fiske Stone Scholar, Columbia Law School

## **AFFILIATIONS**

- Programming Officer, Anti-Corruption Committee, International Bar Association
- Member, Steering Committee, and Newsletter Editor, Russia/Eurasia Committee, Section of International Law, American Bar Association
- Member, Steering Committee, Anti-Corruption Committee, Section of International Law, American Bar Association
- Member, U.S.-Russia Business Council
- Member, Young Lawyer's Committee, Women's White Collar Defense Association
- Board Member, Friends of CEELI Institute

## **ADMISSIONS**

### **Bar Admissions**

- District of Columbia
- Massachusetts

### **Court Admissions**

- United States Court of Appeals for the Sixth Circuit