



jtillen@milchev.com
(202) 626-6068

PRACTICES

Anti-Money Laundering
Business and Human Rights
FCPA & International Anti-Corruption
Internal Investigations
MDB/World Bank Sanctions Proceedings
Securities Enforcement
White Collar Defense

REGIONS

Europe-Caucasus-Asia
Latin America

EDUCATION

- J.D.
The George Washington University Law School
with honors
1999
- B.A.
University of Connecticut
magna cum laude
1996

James G. Tillen

MEMBER
CHAIR, INTERNATIONAL DEPARTMENT

James Tillen is Chair of the International Department. His practice focuses on matters involving the Foreign Corrupt Practices Act (FCPA), money laundering, business and human rights, and other areas of international corporate compliance. He has had significant experience with every facet of an FCPA enforcement matter, from inception to completion, including developing work plans for internal investigations, conducting internal investigations (including in-country witness interviews and document collections and reviews), developing remediation strategies (including employee discipline, compliance program enhancements, and employee training), disclosing issues to the U.S. government, negotiating resolutions with the U.S. government, developing strategies for collateral issues (including public relations and related litigation), selecting independent monitors, and interfacing with independent monitors on behalf of clients.

Mr. Tillen also has conducted anti-corruption due diligence reviews and compliance audits, drafted numerous anti-corruption compliance programs, developed training programs, and performed training for client operations throughout the world. He has created anti-money laundering compliance programs for a variety of multinational financial and non-financial institutions. In the area of business and human rights, Mr. Tillen has conducted risk assessments, advised on transactions presenting human rights risks, and developed corporate human rights policies.

Who's Who Legal and *Global Investigations Review* recognized Mr. Tillen as one of the world's leading investigations lawyers, and one source said he "knows FCPA enforcement better than anyone I've ever come across." The "very business savvy" James Tillen is "practical, responsive and has excellent, highly particularized experience," according to clients who were quoted by *Chambers USA* and *Chambers Global*.

REPRESENTATIVE ENGAGEMENTS

- Conducting an investigation of an oil and gas services company's transactions with Petrobras. The matter involves interviews, audits of third parties, forensic imaging and extensive document review in Portuguese and English. The investigation has been disclosed to the DOJ and SEC.
- Led a global assessment of a client's FCPA, export controls, and Code of Conduct compliance program. The assessment involved site visits to domestic and international operations in Africa and Europe, dozens of interviews with employees and review of the company's paper compliance program. Presented findings and recommendations to the client's Board of Directors.
- For a multinational energy exploration company, assisted with a variety of anti-corruption matters: reviewed and revised the policies and procedures comprising the company's global anti-corruption compliance program; performed due diligence on potential business partners in a number of countries (including on-the-ground interviews in West Africa and the United Kingdom); and conducted on-the-ground risk assessments of the company's

operations in West Africa and the Middle East.

- For a global professional services firm, conducted a risk assessment involving interviews with dozens of employees and the review of existing compliance program and controls, designed and implemented an enhanced compliance program and internal controls program to address the risks detected in the assessment; and provided transactional and investigative counseling.

RANKINGS AND RECOGNITION

- *Chambers USA*: FCPA (Nationwide), 2015 - 2021
- *Chambers Global*: FCPA (USA), 2016 - 2021
- *Chambers Global*: Corporate Investigations (Latin America-wide), 2015 - 2021
- *Chambers Latin America*: Corporate Crime & Investigations (International Counsel), 2015 - 2022
- *Legal 500 Latin America*: International Firms: Compliance and Investigations, 2021 - 2022
- *Legal 500*: Dispute Resolution: International Trade, 2017 - 2021
- *The Best Lawyers in America*[®]: International Trade and Finance Law, 2020 - 2022
- *Who's Who Legal*: Business Crime Defence, 2017 - 2020
- *Who's Who Legal*: Investigations, 2014 - 2021
- *Who's Who Legal*: Thought Leaders – GIR, 2019
- DC Bar Capital Pro Bono Honor Roll, 2016, 2018, 2020
- Ethisphere Institute's Attorneys Who Matter (Specialists - Private Practice), 2014
- *Latin Lawyer* Anti-Corruption Survey: Top Lawyer, 2013

AFFILIATIONS

- Member, Editorial Board, *Global Investigations Review*
- Co-Chair, Anti-Corruption Committee, International Bar Association, 2014 - 2015
- Vice-Chair, Anti-Corruption Committee, International Bar Association, 2013
- North American Regional Officer, Anti-Corruption Committee, International Bar Association, 2012
- Secretary, Anti-Corruption Committee, International Bar Association, 2008 - 2011

ADMISSIONS

Bar Admissions

- District of Columbia