



Jeffrey A. Lehtman

MEMBER

Jeffrey Lehtman is a member of Miller & Chevalier Chartered. His practice focuses on assisting clients with internal and government investigations, regulatory compliance, and complex cross-border litigation.

Mr. Lehtman has particular experience in counseling clients with regard to civil, criminal, and regulatory issues arising in their international operations, ranging from compliance strategies to mitigate potential risk to internal and government investigations. He has conducted internal investigations on behalf of audit committees and special committees concerning potential violations of the Foreign Corrupt Practices Act (FCPA), anti-money laundering (AML) regulations, and economic sanctions laws as well as allegations relating to potential accounting and disclosure irregularities, instances of potential insider trading, and allegations of sexual harassment and other workplace misconduct.

Mr. Lehtman has represented multinational companies, financial institutions, technology companies, international development banks, and their officers and directors in connection with investigations before the U.S. Securities and Exchange Commission (SEC), the U.S. Department of Justice (DOJ), the Financial Industry Regulatory Authority (FINRA), and numerous other domestic and foreign regulatory and government bodies. In addition, he has unique experience advising clients in connection with international extradition matters and international assistance among regulatory authorities (MLATs).

While he has broad experience advising clients across a range of industries, Mr. Lehtman dedicates a significant amount of his practice to representing companies within the technology and fintech sectors in connection with international compliance matters and internal and government investigations.

Prior to joining Miller & Chevalier Chartered, Mr. Lehtman was a partner at an AmLaw 200 firm in Washington, DC, and was a partner and co-chair of the litigation department at a leading white collar boutique. In addition, Mr. Lehtman was previously Senior Regional Counsel at Citibank, overseeing regulatory, litigation, and corporate matters involving Latin America. He also served as a trial attorney in the Office of International Affairs within the DOJ's Criminal Division.

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PRACTICES

Anti-Money Laundering
FCPA & International Anti-Corruption
Internal Investigations
MDB/World Bank Sanctions Proceedings
Securities Enforcement

REGIONS

Latin America

EDUCATION

- J.D.
The University of Michigan
Law School
cum laude
2000
- B.A.
Vanderbilt University
summa cum laude
1997

REPRESENTATIVE ENGAGEMENTS

- Represented leading Latin American sports marketing and production company in connection with DOJ and local investigations pertaining to allegations of bribery, fraud, and money laundering arising out of the FIFA corruption scandal.
- Represented multinational public technology company in connection with compliance risk assessments and the design and implementation of a cross-border corporate compliance program.
- Represented global technology company in the design and implementation of its anti-

LANGUAGES

Spanish

- corruption compliance program for its U.S. operations and Chinese joint venture in anticipation of an initial public offering.
- Represented late-stage private technology company in connection with third-party risk management issues and the implementation of its corporate compliance program in preparation for an initial public offering.
- Represented senior executives in connection with SEC and FINRA investigations relating to allegations of market manipulation, insider trading and accounting and disclosure improprieties.
- Represented one of Latin America's largest industrial conglomerates in connection with internal and government investigations relating to the *cuadernos* scandal in Argentina.
- Represented the Inter-American Development Bank (IDB) to enforce loan guarantees extended by the Argentine affiliates of a Brazilian-based borrower. Obtained a favorable outcome on summary judgment for more than US\$168 million.
- Represented senior executives in connection with the DOJ's widespread investigation into allegations of bribery and corruption involving the Venezuelan state-owned oil and gas company, PDVSA.
- Represented a multinational financial institution in connection with a cross-border internal investigation relating to issues in Brazil that ranged from potential embezzlement to issues arising under U.S. and local anti-corruption legislation.
- Represented a prominent international law firm in connection with allegations by one of its clients that a partner in a foreign office had engaged in conduct that violated the FCPA.
- Represented the head equities trader of a multinational investment bank in connection with an investigation by a foreign regulator that the bank's trading had violated local securities laws as well as follow-on U.S. investigations by FINRA and the SEC.
- Represented a global financial services firm in an internal investigation into improper trading by a foreign exchange specialist on its Latin American trading desk.
- Represented the former senior officer of the Latin American region of a global financial group in connection with a DOJ investigation into allegations that the global financial group had operated as a multi-jurisdictional Ponzi scheme.

GOVERNMENT EXPERIENCE

- Trial Attorney, Office of International Affairs, U.S. Department of Justice, 2004 - 2005

IN-HOUSE EXPERIENCE

- Senior Regional Counsel, Latin America, Citibank, 2005 - 2007

RANKINGS AND RECOGNITION

- *Chambers Global: Corporate Investigations* (Latin America-wide), 2020
- *Chambers Latin America: Corporate Crime & Investigations* (International Counsel), 2017, 2019 - 2020, 2022

- *Latinvex*: Latin America's Top 100 Lawyers, 2018, 2021
- *Benchmark Litigation U.S.*: National Practice Star in Securities, 2021
- *Benchmark Litigation U.S.*: Local Litigation Star (New York) in Securities, 2021
- *The National Law Journal*: White Collar Crime Trailblazer, 2018
- *Legal 500*: Corporate Investigations and White-Collar Criminal Defense, 2012, 2015 - 2018
- *Benchmark Litigation*: National Star, White Collar Crime and Securities Litigation, 2017 - 2018
- *Latin Lawyer* Anti-Corruption Survey, 2013

ADMISSIONS

Bar Admissions

- District of Columbia
- Florida (inactive)