

MDB/World Bank Investigations & Sanctions Proceedings

Miller & Chevalier attorneys have significant experience with multi-lateral development bank (MDB), including World Bank, sanctions proceedings. We defend companies under investigation for alleged prohibited practices (fraud, corruption, collusion, coercion, obstruction) before the sanctions systems of the World Bank, Inter-American Development Bank (IDB), and other MDBs.

We have represented companies from a variety of sectors, including power, energy, and infrastructure, in MDB sanctions proceedings. We have advised on negotiated resolutions and represented clients before the World Bank Sanctions Board to overturn debarment decisions.

Miller & Chevalier has also advised MDBs on the design of their sanctions procedures, been retained to develop integrity procedures for specific MDB public-private partnership initiatives, conducted employee misconduct investigations for MDBs, and provided anti-corruption technical assistance for development projects.

Our lead MDB sanctions attorney, Matteson Ellis, served for two years at The World Bank's Integrity Vice Presidency (INT) as an investigator and litigation specialist, building cases against companies and individuals engaged in purported wrongdoing and supporting sanctions and debarment proceedings. He also served as an investigative consultant at the IDB Office of Institutional Integrity (OII), investigating alleged corrupt practices in Latin America and supporting sanctions proceedings there. He was retained by another MDB to conduct a compliance assessment of the highest revenue generating state-owned enterprise in a sub-Saharan African country and to design a technical assistance project to support the enhancement of corporate governance and compliance systems at the company.

Through this varied work on all sides of MDB sanctions processes (investigations, defense, compliance, policy design), Miller & Chevalier is intimately familiar with sanctions and debarment strategies, procurement and consultant guidelines, and integrity compliance guidelines.

Representative Engagements

- Successfully defended a Fortune 500 company in an MDB investigation of alleged prohibited practices, resolving the proceeding with issuance of a non-public Letter of Reprimand by the sanctions board rather than a public debarment advocated by the investigating authority.
- Defended a Central Asian infrastructure company before the World Bank Group Sanctions Board.
- Defended a multinational construction company in an IDB sanctions investigation.
- Advised a European infrastructure company on a negotiated resolution with the World Bank's INT.
- Retained by an MDB to design an anti-corruption integrity framework for a major construction investment project in South America.
- Our lead MDB sanctions attorney investigated the largest global, cross-jurisdictional, anti-corruption case (by settlement amount) in MDB history, which ended in a negotiated resolution.
- For the IDB, our lead MDB sanctions attorney led two investigations in tandem into allegations of improper influence by multiple bidders in a multi-million-dollar procurement process.
- Following a competitive bid process, assisted an MDB with the revision of its sanctions procedures and supported ongoing investigations of alleged corruption, fraud, collusion, and obstruction.
- For an MDB, investigated Eastern European and Central Asian companies involved in a collusion scheme, gathered evidence, and helped build a case that resulted in debarment of the primary bidder, establishing precedent for numerous novel legal issues.

MDB and Government Experience

- Litigation Specialist/Investigator, World Bank Integrity Vice Presidency (INT)
- Investigative Consultant, Inter-American Development Bank Office of Institutional Integrity (OII)
- General Counsel, U.S. Department of Commerce