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**PRACTICES**

FCPA & International Anti-Corruption

Internal Investigations

MDB/World Bank Sanctions Proceedings

Securities Enforcement

**REGIONS**

Latin America

**EDUCATION**

J.D., Harvard Law School, 2001

B.A., Columbia University, 1998

**LANGUAGES**

Spanish

## Alejandra Montenegro Almonte

MEMBER  
VICE CHAIR, INTERNATIONAL DEPARTMENT

Member and Vice Chair, International Department, Alejandra Montenegro Almonte's practice focuses on internal corporate compliance, internal investigations, and government enforcement actions across a variety of business-critical areas, including anti-corruption, internal controls, and other ethics and compliance violations. Ms. Montenegro Almonte also has extensive experience advising clients on remediation to prevent violation from recurring. She is a native Spanish-speaker and regularly conducts legal matters in both English and Spanish.

Ms. Montenegro Almonte's compliance practice focuses on the design and implementation of risk-based internal compliance programs for a wide range of companies. She designs and performs compliance audits and assessment, performs compliance due diligence in mergers and acquisitions, joint ventures, and other strategic partnerships, and advises companies on the design of safeguards to mitigate compliance risks arising from complex business transactions and third-party engagements. Currently, Ms. Montenegro Almonte serves as an Independent Compliance Monitor on behalf of a regulatory agency in Massachusetts and recently served in a leadership role in a monitorship team in an FCPA disposition.

Before joining Miller & Chevalier, Ms. Montenegro Almonte was General Counsel for the North American and Latin American Division of *gategroup*, a global provider of products, services, and solutions related to the onboard experience of airline and rail passengers. In that role, she oversaw all legal affairs for eight of *gategroup*'s subsidiaries and was the strategic advisor to the senior and executive management teams of the United States, Canada, and Latin America on all legal, regulatory, and employment matters arising in North America and Latin America. While at *gategroup*, Ms. Montenegro Almonte developed and implemented compliance programs across her Division, including on anti-corruption and employment. As Chair of *gategroup*'s North American and Latin American Business Compliance Committees, she led a cross-functional management team to proactively manage compliance matters across the Americas.

Ms. Montenegro Almonte's roles as in-house and external counsel provide her unique experience and a broad perspective. She has first-hand experience in advising legal and business teams across multiple business lines, corporate functions, and jurisdictions, and swiftly triaging situations to minimize client exposure. Ms. Montenegro Almonte understands crisis management and protecting her clients' interests vis-a-vis multiple stakeholders.

Ms. Montenegro Almonte began her career as a litigation associate at two Am Law 100 firms. While at Harvard Law School, she served as president of the Harvard Legal Aid Bureau.

Ms. Montenegro Almonte is a frequent speaker on compliance and litigation issues at

national and international conferences, including the American Conference Institute (ACI) and American Bar Association (ABA).

## Representative Engagements

- Represented a multinational technology and manufacturing company before the U.S. Securities and Exchange Commission and the U.S. Department of Justice in an investigation of alleged FCPA violations arising from its Southeast Asian operations.
- Represented a Latin America-based national oil company before the U.S. Securities and Exchange Commission and the U.S. Department of Justice in an investigation into allegations of \$4B in cost overruns in connection with the construction of a refinery by one of its subsidiaries.
- Represented one of the world's largest multinational food producers in an internal review of certain cross-border transactions and food quality operations in Latin America.
- Led a global review of a Fortune 10 energy company's anti-corruption compliance program and related internal accounting controls against applicable statutory standards and best practices, in the context of ongoing investigations in multiple jurisdictions.
- Led a review of Fortune 100 information technology company's global anti-corruption program, with the goal of tailoring the compliance program to fit the company's needs following a corporate restructuring.
- Represented a multinational company in relation to alleged OFAC sanctions violations arising from its Latin American operations.
- Represented a European company with worldwide subsidiaries in a criminal proceeding under the International Traffic in Arms Regulations (ITAR). The matter was resolved in favor of client with no criminal charges.
- Defended the Republic of Ecuador in an investor-state arbitration alleging a breach of the Canada – Ecuador Bilateral Investment Treaty. The Tribunal dismissed the case against Ecuador.

## In-House Experience

- Division General Counsel, gategroup, 2011 - 2016

## Rankings and Recognition

- *Legal 500*: Dispute Resolution: International Trade, 2021 - 2022
- *Legal 500 Latin America*: International Firms: Compliance and Investigations, 2021

- *Latinvex* Latin America's Top 100 Female Lawyers: FCPA & Fraud, 2017 - 2020
- *Global Investigations Review: Women in Investigations*, 2021
- DC Bar Capital Pro Bono High Honor Roll, 2020
- DCA Live Emerging Women Leaders in Private Practice, 2019

## **Affiliations**

- Leadership Council on Legal Diversity (LCLD) Fellow, 2017
- Board Member, DC Law Students in Court, 2015 - present
- Member, Global Legal Task Force Meeting, District of Columbia Bar, 2015 - 2018
- Board Member, Lagniappe Education Foundation, 2006 - present
- Co-Coordinator of HBA-DC Mentorship Program, Hispanic Bar Association, 2001 - 2002

## **Admissions**

### **STATE ADMISSIONS**

- District of Columbia
- New York
- Virginia