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## PRACTICES

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

## REGIONS

Europe-Caucasus-Asia

## EDUCATION

J.D., Columbia Law School, 2011

B.A., Barnard College, Columbia University, *magna cum laude*, 2008

Visiting Student, Oxford University, *Philosophy, Politics, and Economics*, 2006

## LANGUAGES

Russian/Hebrew,

## Ann Sultan

MEMBER  
PRACTICE LEAD, EUROPE-CAUCASUS-ASIA

Ann Sultan guides companies and executives through complex cross-border internal and government investigations and creating sustainable risk-based corporate compliance programs. Public companies and private organizations turn to Ms. Sultan for advice on a wide range of enforcement, ethics, and compliance topics, including the Foreign Corrupt Practices Act (FCPA) and anti-money laundering laws and regulations, due diligence, risk management, Department of Justice (DOJ) and Securities and Exchange Commission (SEC) investigations, and interaction with external auditors in the context of accounting and financial reporting matters. Ms. Sultan 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 assists companies doing business in Eastern Europe and Central Asia and individuals who are based in the region.

Ms. Sultan combines her expertise as external counsel with in-house experience, having been detailed to multinational clients to assist on FCPA internal investigation and compliance matters.

Ms. Sultan is a Certified Compliance and Ethics Professional (CCEP-I) by the Society of Corporate Compliance and Ethics. She is involved in leadership positions with the Anti-Corruption Committees of the International Bar Association and the American Bar Association.

Prior to joining Miller & Chevalier, Ms. Sultan practiced as a corporate attorney specializing in corporate governance, mergers and acquisitions, and financing at an AmLaw 200 firm. After graduating from Columbia Law School, Ms. Sultan completed a Postdoctoral Fellowship in Mediation at Columbia Law School.

## 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

- *Legal 500*: Dispute Resolution: International Trade, 2021 - 2022
- *Who's Who Legal*: Investigations - Future Leaders: Partners, 2021 - 2022
- *Washington, DC Super Lawyers*<sup>®</sup>: Rising Star, Criminal Defense: White Collar; International, 2019 - 2022
- *Global Investigations Review*: 40 Under 40, 2020
- *Law360*: Rising Star, Compliance, 2020
- *International Financial Law Review*: Rising Star Awards Americas: White Collar Crime, 2020
- DC Bar Capital Pro Bono Honor Roll, 2017 - 2018
- DC Bar Capital Pro Bono High Honor Roll, 2016, 2020
- Harlan Fiske Stone Scholar, Columbia Law School

## Affiliations

- Certified Compliance & Ethics Professional (CCEP-I), Society of Corporate Compliance and Ethics
- 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
- Leadership Council on Legal Diversity (LCLD) Pathfinder Program, 2018

## **Admissions**

### **STATE ADMISSIONS**

- District of Columbia
- Massachusetts