17TH NATIONAL CONFERENCE

# FOREIGN CORRUPT PRACTICES ACT

THE PREMIER LEGAL & REGULATORY ANTI-CORRUPTION COMPLIANCE EVENT

### CO-CHAIRED BY

Homer E. Moyer, Jr.
Partner
Miller & Chevalier

### Jennifer M. Daniels

Vice President, Assistant General Counsel and Chief Trust and Compliance Officer IBM Corporation

### Crucial In-House Insights From

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General Electric

Goodyear Tire

L-3 Communications Titan

Lockheed Martin

Motorola

Raytheon

SAIC

Thales Group

# **ENFORCEMENT UPDATE**

### Mark F. Mendelsohn

Deputy Chief, Fraud Section Criminal Division U.S. Department of Justice

### Bruce Karpati

Assistant Regional Director U.S. Securities and Exchange Commission

### Michael J. Anderson

Unit Chief, Public Corruption Federal Bureau of Investigation

# Get "must-have" insights from senior industry executives, FCPA attorneys and government officials on:





- Pros and cons of voluntary disclosures
- Setting up strong internal controls to support FCPA and SOX compliance
- M&A due diligence to prevent the purchase of an FCPA violation
- Ensuring compliance of joint-venture partners and commercial intermediaries
- Avoiding gifts and hospitality pitfalls
- Appointing and working with special compliance monitors
- Implementing a state of the art FCPA compliance program
- Creating a compliance culture and local ownership in foreign operations

### EXCLUSIVE WORKSHOPS — MARCH 26 & 29, 2007

- A The Fundamentals of FCPA Compliance: The Foreign Corrupt Practices Act Demystified
- B Conducting an Effective FCPA Risk Assessment: Key Steps to Identify Risks and Appropriate Response
- C Overcoming FCPA Compliance Challenges in China and India

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### 17TH NATIONAL CONFERENCE

# FOREIGN CORRUPT PRACTICES ACT

FCPA enforcement is becoming more aggressive in all stages, from investigation to prosecution. Companies must be vigilant about preventing, detecting and investigating potential FCPA violations before they damage corporate reputations, affect the bottom line and shareholder value, and result in increasingly harsher penalties.

The Securities and Exchange Commission and the Department of Justice are vigorously policing the activities of U.S. firms to ensure strict compliance with anti-bribery and accounting provisions of the FCPA. They have expanded enforcement and obtained record-high and criminal penalties against companies and individuals for FCPA violations. They also conduct seamless investigations utilizing their joint resources and SEC enforcement actions and DOJ prosecutions are often announced simultaneously. And with the United States and other countries pursuing ways to further discipline companies and individuals making illicit payments in international transactions, there is no escape from these requirements.

Because FCPA enforcement actions tend to be high profile, there can be enormous consequences for targeted companies, including grueling investigations, hefty monetary penalties and negative publicity. U.S. companies must develop effective internal FCPA compliance policy and training programs that facilitate compliance with FCPA requirements and mitigate damage in the event a violation takes place. Civil and criminal penalties are rising, cases are high profile and yesterday's knowledge is simply not enough to make the right decisions today.

Now in its 17th successful year, ACI's National Forum on Foreign Corrupt Practices Act is the event that corporate counsel and compliance officers rely on for comprehensive, insightful, and practical guidance on critical FCPA compliance issues. Benefit from the practical perspective of seasoned corporate FCPA compliance executives from companies such as Exxon Mobil, BP, SAIC, American Express, Thales, Lockheed Martin, Motorola, Continental Airlines and General Electric. Get an update on enforcement and

policy initiatives from **top Government officials and FCPA attorneys** and learn how industry is setting up internal controls to comply in this constantly changing global legal landscape. This year's agenda will include the latest information on:

- The impact of recent FCPA cases on your compliance programs
- Benefits and risks of voluntary disclosures
- How to meet the compliance challenges of gifts and hospitality
- Strategies to convey the ethics and compliance culture to company employees and officials overseas
- When, how, and by whom should internal investigations be conducted
- Resources, tools and techniques leading companies are using to maintain state-of-the-art anti-corruption compliance programs
- How to work with joint-ventures partners that don't share your anti-corruption commitment
- Structuring transactions to mitigate FCPA risk
- Establishing FCPA-compliant internal accounting controls and record-keeping

Participants will also receive a comprehensive set of written materials prepared by the speakers for the conference. These are invaluable reference materials which you will use again and again long after the conference is over.

Don't miss this timely and topical event and learn from the experts how to implement a successful FCPA compliance strategy. Register now by calling 1-888-224-2480; by faxing your registration form to 1-877-927-1563 or by registering online at www.AmericanConference.com/fcpa.

# A Must-Attend Event For

- General Counsel
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- Trade Counsel
- Compliance Officers
- Ethics Officers
- Directors, Import/Export Compliance
- Directors, Business Conduct and Investigations

- International Contract
  Managers
- Private Practice Attorneys specializing in
  - international trade
  - corporate compliance
  - white collar crime
  - internal investigations

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This course has been approved in accordance with the requirements of the New York State Continuing Legal Education Board in the amount of 15.5 hours, of which 1.5 will apply to ethics. An additional 4.0 hours will apply to each workshop.

ACI certifies that this activity has been approved for CLE credit by the **State Bar of California** in the amount of 13.25 hours, of which 1.25 will apply to ethics. An additional 3.5 will apply to each workshop.

# Main Conference Agenda

# Tuesday, March 27, 2007

### Continental Breakfast and Registration 💻

### 8:30 **OPENING REMARKS FROM CO-CHAIRS**



Homer E. Moyer, Jr. Partner, Miller & Chevalier Chartered (Washington, DC)



Jennifer M. Daniels Vice President, Assistant General Counsel and Chief Trust and Compliance Officer IBM Corporation (Armonk, NY)

### 8:45 THE YEAR IN REVIEW: PROSECUTORS SPEAK ON RECENT FCPA INVESTIGATIONS AND PROSECUTIONS



Mark F. Mendelsohn Deputy Chief, Fraud Section, Criminal Division U.S. Department of Justice (Washington, DC)

Bruce Karpati Assistant Regional Director U.S. Securities and Exchange Commission Northeast Regional Office (New York, NY)



Roger M. Witten Partner Wilmer Cutler Pickering Hale and Dorr LLP (New York, NY)

- How recent FCPA cases will impact compliance programs: Tyco, Titan, Monsanto, InVision, ABB, DPC (Tianjin) and Schering-Plough
- Standards for deciding whether violations have occurred
- How the SEC and DOJ assess the scope and magnitude of violations
- Deciding whether a case is criminal or civil
- Interagency coordination
- Aggravating and mitigating factors

### 10:15 NETWORKING COFFEE BREAK

### 10:30 AFTERMATH OF AN ENFORCEMENT ACTION: Appointing and Working With Special COMPLIANCE MONITORS



John Scriven Of Counsel

Homburger Rechtsanwaelte (Zurich, Switzerland)



Jan Lawrence Handzlik Partner, Howrey LLP (Los Angeles, CA)

Impact of the expanded use of Compliance Monitors

- Is the increased reliance on Monitors good enforcement policy?
- Privilege and work product in connection with a Monitor
- What is the role of a Monitor?
- Assessing the costs of a Monitor
- Establishing an effective working relationship with a Monitor
- Who monitors the Monitor?

### WEIGHING THE PROS AND CONS 11:30 OF VOLUNTARY DISCLOSURES



### Mark F. Mendelsohn

Deputy Chief, Fraud Section, Criminal Division U.Ŝ. Department of Justice (Washington, DC)

### Bruce Karpati

Assistant Regional Director U.S. Securities and Exchange Commission Northeast Regional Office (New York, NY)



Timothy L. Dickinson

Partner, Paul, Hastings, Janofsky & Walker, LLP (Washington, DC)



Lucinda Ann Low Partner

Steptoe & Johnson LLP (Washington, DC)

- Identifying the value of making a voluntary disclosure
- Comparing and contrasting SEC and DOJ approaches
- What are the aggravating and mitigating factors?
- How government agencies evaluate voluntary disclosures
- Possibility of a warning letter
- Fines: how the government determines fines, penalties
- What can be learned from recent voluntary disclosures
- Public relations impact of a voluntary disclosure

### 12:45 NETWORKING LUNCHEON FOR DELEGATES AND SPEAKERS



### ENSURING FCPA COMPLIANCE 2:00 FOR FOREIGN OPERATIONS



Katherine M. Choo

Senior Counsel, Litigation & Legal Policy General Electric Company (Fairfield, CT)



Liam McCollum

General Counsel, Middle East Africa General Electric International, Inc. (Dubai, UAE)

- Creating a compliance culture and local ownership in foreign operations
- Harmonizing U.S. and foreign anti-corruption compliance obligations
  Reviewing the global compliance program
- Preventing, detecting and responding to FCPA issues locally
- How to overcome ombuds program challenges
- Managing remote sites' acquisitions
- Ensuring compliance of foreign third party intermediaries
- Working with state-owned enterprises and government customers

### 3:00 Dos and Don'ts of Hosting, Traveling, Entertaining AND LODGING FOREIGN OFFICIALS



Richard J. Battaglia

Senior Attorney and Legal Advisor to Group Compliance & Ethics, BP Plc (Warrenville, IL)

Jeffrey Cottle

Associate General Counsel – International BAE Systems Inc. (Arlington, VA)



Jane L. Wexton - Panel Moderator Compliance Practices and Advisory Services Group Leader, Akerman Senterfit LLP (New York, NY)

# Main Conference Agenda

- How to handle contractually-mandated hospitality and what is reasonable?
- Spouses and children: when is hospitality permitted?
- Pure hospitality ("relationship building"): when is it "promotion, demonstration, or explanation of products and services"?
- Gifts and meals
  - scope of the problem: air shows, Eid and "little red envelopes"
  - defining "reasonable and customary"
  - addressing local law restrictions: when their problem becomes your problem
  - cost vs. value: Super Bowl tickets and airline upgrades
  - widely-attended events: establishing value without counting plates
  - when third party intermediaries pick up the bill
- Best practices for business travel
  - customer requests for travel
  - the Disneyland dilemma
  - ensuring transparency: who needs to know?
- per diem vs. pre-paid expenses the frills: first class and family members
- Solving problems before they arise

### 4:15 Refreshment Break **P**

### 4:30 **INTERNAL INVESTIGATIONS: CONTROLLING** COSTS AND DIRECTING THE INVESTIGATION



Susan M. Frank

Deputy General Counsel and Vice President for Legal SAIC (McLean, VA)



Homer E. Moyer, Jr.

Miller & Chevalier Chartered (Washington, DC)



Danforth Newcomb

Partner

Shearman & Sterling LLP (New York, NY)

### Howard Sklar

Vice President, Compliance and Ethics (Travel) American Express Company (New York, NY)

- When, how, and by whom should internal investigations be conducted?
- Factors in maximizing credibility to the government
- How to conduct internal investigations cost-effectively
- How the paradigm for internal investigations is changing
  - waiver of privileges
  - admonitions to witnesses
  - Audit Committee involvement
- written report(s)
- How much is enough in trying to learn the facts?
- Disclosure before, during, or after?

### 5:45 CONFERENCE ADJOURNS FOR THE DAY

"Very informative look at practical" application of FCPA."

> Francesca Maestroni WesternGeco

# Wednesday, March 28, 2007

### 8:30 RECAP FROM DAY 1 AND OPENING REMARKS FROM CO-CHAIRS

### 8:45 IMPLEMENTING ANTI-CORRUPTION COMPLIANCE PROGRAMS: KEYS TO MEETING NEW FCPA COMPLIANCE STANDARDS



Dominique Lamoureux

Secretary General Thales Group (Paris, France)



William P. Romenius

Director - FCPA Compliance Integration The Boeing Company (Arlington, VA)



Vincent T. O'Connor

Vice President, Compliance and Ethics L-3 Communications Titan Corporation (Reston, VA)



Jessica Rossman Martin - Panel Moderator Senior Attorney

Continental Airlines, Inc. (Houston, TX)

- Resources, tools and techniques are leading companies using to maintain state-of-the-art anti-corruption compliance programs
- How compliance standards in the 2004 U.S. Sentencing Guidelines amendments affect your FCPA compliance program
- Compliance implications of recent enforcement actions
- Best use of outside counsel and advisors in designing and implementing your program
- Training techniques to make sure the message sinks in with employees and third parties
- Getting senior management on board
- The role of the audit committee in creating a compliance culture
- How senior management can credibly instill a compliance ethic
- How to get the message to permeate a large organization

### 10:00 Networking Coffee Break 💻

10:15 Representing Individuals Under Investigation: The Tension Between THE INDIVIDUAL AND COMPANY'S INTERESTS



Reid H. Weingarten

Partner

Steptoe & Johnson LLP (Washington, DC)



Martin J. Weinstein

Willkie, Farr & Gallagher LLP (Washington, DC)

- Representing current and former employees
  - parallel proceedings: external and internal

  - assertion of Fifth Amendments rights employment implications of non-cooperation
  - joint defense arrangements
  - relationship with company counsel
  - access to evidence
  - indemnification of legal fees

# Main Conference Agenda

- attorney-client privilege
- What the ŚEC/DOJ expect from your company
- How to represent a company under investigation
- Handling individual employees of your company
- When and how to provide separate counsel for individuals
- What to do when individual and corporate interests collide

### 11:15 CONDUCTING FCPA DUE DILIGENCE IN M&AS



Peter B. Clark

Partner

Cadwalader, Wickersham & Taft LLP (Washington, DC)



Gary DiBianco

Skaďden, Arps, Slate, Meagher & Flom LLP (Washington, DC)



### Frederic R. Miller

Partner, Investigations and Forensic Services PricewaterhouseCoopers (Washington, DC)

- What to look for in a target's FCPA compliance
  - pre-merger due diligence
  - internal controls
  - FCPA compliance program
- What to do if pre-merger due diligence reveals problems disclosure to the DOJ and SEC

  - conduct of a joint investigation
  - role of outside counsel
  - forensic auditors
  - interviews/evidence summaries/real time updates
- Securing a disposition prior to closing and other transactional issues
  - DOJ issues/timing plea and sentencing DOJ FCPA opinion procedure
- SEC consent plus
- Post-closing issues
  - continuing cooperation and disclosures
  - disciplinary actions
  - compliance programs and internal controls in the new entity

### 12:30 NETWORKING LUNCH FOR DELEGATES AND SPEAKERS



### 1:45 KEYNOTE ADDRESS: FBI'S ROLE IN FCPA INVESTIGATIONS

Michael J. Anderson

Unit Chief, Public Corruption Federal Bureau of Investigation (Washington, DC)

### 2:15 INTERNAL CONTROLS: DEVELOPING BEST IN CLASS FCPA & SOX SOPS



### Paul R. Berger

Debevoise & Plimpton LLP (Washington, DC)



Partner, Investigations and Forensic Services PricewaterhouseCoopers (New York, NY)



### Paul V. Gerlach

Sidley, Austin, Brown & Wood (Washington, DC)

What are adequate internal controls post-Sarbanes Oxley?

- COSO standards and Enterprise Risk Management
- Key controls to prevent improper payments
- Fraud and financial disclosure controls
- Evaluating your internal controls
- Is SOX testing enough?
- Testing internal controls in FCPA compliance auditing
- Materiality
  - when is it relevant?
  - "qualitative" materiality: what does it mean?

### Refreshment Break 💻 3:30



### Ensuring Compliance of Commercial Intermediaries and Joint Venture Partners TO MINIMIZE RISK OF THIRD PARTY LIABILITY



3:45

### Anne P. McAdams

Senior Counsel, Special Projects Law Exxon Mobil Corporation (Houston, TX)



# Kathleen E. Troy

Senior Counsel

Raytheon Company (Arlington, VA)



### Howard O. Weissman

Assistant General Counsel - International Lockheed Martin Corporation (Bethesda, MD)



# Alexandra A. Wrage - Panel Moderator

Trace International (Annapolis, MD)

- Is there such a thing as "enough" due diligence?
- Can companies safely take a "tiered" approach to due diligence after InVision?
- Forced marriage: how can risk be managed when your JV partner is a government entity?
- What type of training is practical?
- How concerned should you be about local law?
- Your good work has uncovered a "red flag" now what?
- Do contractual provisions, certifications and audit rights help?
- Can you draft termination language that doesn't require proof of bribery?

### 5:00 CO-CHAIRS' CLOSING REMARKS AND CONFERENCE ENDS

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Benjamin Greenzweig, Director of Business Development, U.S. (212) 352-3220 ext. 238 or

B.Greenzweig@AmericanConference.com



# THE FUNDAMENTALS OF FCPA COMPLIANCE: THE FOREIGN CORRUPT PRACTICES ACT DEMYSTIFIED

1:30 p.m. – 5:00 p.m. (Registration Opens 1:00 p.m.)



Partner

Miller & Chevalier Chartered (Washington, DC)

Kinga E. Doris

Division Counsel-Eastern Hemisphere Pride International, Inc. (Houston, TX)

Do you need an immersion in the FCPA and the elements involved in the key cases? This highly rated pre-conference workshop is designed to provide you with a comprehensive introduction to FCPA and cover all the bases: the anticorruption and anti-bribery elements of the statute, internal controls and accounting requirements, and intersections with Sarbanes-Oxley and SEC reporting requirements. Delegates consistently give it top marks for both content and presentation.

This interactive and practical working session brings together highly experienced attorneys from the anti-corruption, internal investigations and compliance / controls bar. They will discuss core issues related to the statute and focus on the "nuts & bolts" and supply you with a foundation for dealing with dayto-day issues, including:

- Who is covered by the FCPA?
  what constitutes a "instrumentality"
  what constitutes a "government owned entity"

- Permissible and impermissible payments
  - anything "of value"
  - facilitating payments: limits on "grease"
  - political contributions
  - charitable contributions
- What constitutes activity deemed to "obtain or retain business"?
- Reasonable and bona fide expenses under the statute
- What triggers U.S. government anti-bribery investigations?
- Books and records requirements: a potential "Achilles Heel"
- Internal controls inaccuracies and public disclosure under the FCPA
- The FCPA paper trail: inaccurate books and records
- The intersection of Sarbanes-Oxley and FCPA
- The legal elements in the most significant cases from the past year: the stakes
- Fundamentals of an FCPA compliance program

Whether you are new to the field of FCPA or are a seasoned veteran with substantial experience seeking a comprehensive refresher, you will find this workshop invaluable for getting up to speed and maximize your benefit from the advanced discussions that are the hallmark of the main conference.

# Be part of the event that in-house counsel, compliance executives and outside counsel rate as the preeminent

# FCPA event of the year!

Join your colleagues from industries including:

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ACI understands that gaining perspectives from - and building relationships with - your fellow delegates during the breaks can be just as valuable as the structured conference sessions. ACI strives to make both the formal and informal aspects of your conference as productive as possible.



## CONDUCTING AN EFFECTIVE FCPA RISK ASSESSMENT: KEY STEPS TO IDENTIFY RISKS AND APPROPRIATE RESPONSE

9:00 a.m. – 12:30 p.m. (Registration Opens 8:30 a.m.)



DeWitt R. Rogers

Troutman Sanders LLP (Atlanta, GA)

Larry V. Buel

Director - International

Raytheon International Incorporated (Arlington, VA)

Risk assessment is the starting point for determining the incentives and opportunities that could lead to an FCPA violation, and the appropriate responses. Participants in this interactive workshop will examine practical steps for designing an effective process to assess the risks presented in the internal and external environments in which the company operates. With emphasis on the key operational risks presented by international business representatives, participants will then consider how to move from assessment to response.

 What are the options for processes for conducting a risk assessment?

- How often should you perform the assessment, and when can you quit?
- Who should conduct, and whom should they talk to?
- Types of documentation to review/create
- What can you reasonably do to mitigate risks, once identified?
  - criteria for selection of international business representatives
  - what sorts of business decisions and transactions should be addressed?
  - procedures for vetting, monitoring and re-qualifying
  - training of company sales and marketing personnel
     establishing review thresholds as the size and/or percentage of proposed commissions grows
  - contract provisions
  - management and Board oversight processes
  - ongoing auditing programs
- How can you evaluate the effectiveness of your response



### OVERCOMING FCPA COMPLIANCE CHALLENGES IN CHINA AND INDIA

1:45 p.m. – 5:15 p.m. (Registration Opens 1:15 p.m.)



Maryann Clifford

Corporate Vice President, Law Department, Asia Pacific and Chief Ethics & Compliance Officer Motorola, Inc. (Schaumburg, IL)



Danish Hamid

Winston & Strawn LLP (Washington, DC)



Patrick M. Norton
Partner, O'Melveny & Myers LLP

(Washington, DC)



Kenneth Tung

Director Legal Affairs, Asia Pacific Region Goodyear Tire & Rubber Company (Shanghai, China)

### FCPA LANDSCAPE IN CHINA

- Officers and directors of State-Owned Enterprises: businessmen or government officials?
- Partners and agents: risks of leaving government contacts to the locals
- The delicate art of gift-giving and entertaining in China: balancing politeness and the letter of the law
- Peripatetic government officials: Disneyland and Las Vegas on every draft itinerary
- An uneven playing field: Are US companies alone required to comply with anti-corruption laws in China?

# Intersection of the FCPA and Local Chinese Anti-Bribery Laws

• Is the DOJ now requiring cooperation with Chinese criminal investigative agencies as a condition to settling US FCPA cases?

 A double whammy: Are Chinese authorities being forced by publicity from US prosecutions to investigate violations they would otherwise ignore?

### FCPA LANDSCAPE IN INDIA

- Causes of corruption
- Transparency efforts in public procurement transactions
- Ministry of Defense Guidelines on representatives and brokers
- Investigation agencies dealing with corruption
- Legislation addressing demand-side and supply-side corruption
- Various checks and balances in India to prevent corruption
- The role of the Indian Enforcement Directorate
- Suggestions for compliance procedures in India
  - conducting due diligence in India
  - representations and warranties
  - compliance reports and certifications

### COMPLIANCE PROGRAMS FOR CHINA AND INDIA

- Adapting training to local conditions: the importance of language and cultural issues
- Effective whistleblower procedures
- Appropriate contractual procedures for agents and distributors
- Investigating possible violations in China and India
- To self-report or not?

Lunch will be served for delegates attending both workshops B and C



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### MARCH 27 & 28, 2007 | THE WALDORF ASTORIA, NEW YORK

17TH NATIONAL CONFERENCE

# FOREIGN CORRUPT PRACTICES ACT

THE PREMIER LEGAL & REGULATORY ANTI-CORRUPTION COMPLIANCE EVENT

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☐ YES! Please register the following delegate(s) for the

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**EXCLUSIVE WORKSHOPS** March 26 & 29, 2007

- The Fundamentals of FCPA Compliance: The Foreign Corrupt Practices Act Demystified
- B Conducting an Effective FCPA Risk Assessment: Key Steps to Identify Risks and Appropriate Response
- Overcoming FCPA Compliance Challenges in China and India

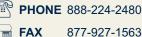
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**VENUE:** ADDRESS:

**Waldorf Astoria** The Waldorf Astoria 301 Park Avenue New York, NY 10022

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Cancellation and Refund Policy

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