

21<sup>ST</sup> NATIONAL CONFERENCE

# FOREIGN CORRUPT PRACTICES ACT

THE PREMIER LEGAL & REGULATORY ANTI-CORRUPTION COMPLIANCE EVENT

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INTERACTIVE WORKSHOPS — MARCH 23 & 26, 2009

- A** The Foreign Corrupt Practices Act Demystified: Compliance Fundamentals and Best Practices
- B** Conducting Effective FCPA Compliance Assessments
- C** Overcoming FCPA Compliance Challenges in China
- D** Overcoming FCPA Compliance Challenges in India

KEYNOTE SPEAKER

*Peter Y. Solmssen*  
General Counsel  
Member of the  
Managing Board  
Siemens AG

ENFORCEMENT UPDATE

*Mark F. Mendelsohn*  
Deputy Chief  
Fraud Section  
Criminal Division  
U.S. Department of Justice

*Fredric D. Firestone*  
Associate Director,  
Division of Enforcement  
U.S. Securities and  
Exchange Commission

*Steve Tyrrell*  
Chief, Fraud Section  
Criminal Division  
U.S. Department of Justice

*Hank Walther & Charles Duross*  
Assistant Chiefs, Fraud Section  
Criminal Division  
U.S. Department of Justice

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

- Minimizing risk when working with state-owned entities
- Preparing for heightened scrutiny of facilitating payments
- Conducting cost effective internal investigations while maximizing credibility to the government
- Implementing robust fraud risk internal controls
- Voluntary disclosures: criteria to determine when to disclose, or not
- Responding to a multi-jurisdictional government investigation
- Collateral litigation for foreign corrupt practices: latest RICO, shareholder and contract cases
- Conducting effective third party due diligence

PLUS! An update on the impact of the Siemens case and other recent landmark cases and settlements

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# Do not miss the FCPA event that everyone is talking about

21<sup>ST</sup> NATIONAL CONFERENCE

## FOREIGN CORRUPT PRACTICES ACT

Vigorous enforcement of the Foreign Corrupt Practices Act continues to be a priority for the US Department of Justice and the US Securities and Exchange Commission, across industries and around the globe.

The past 12 months produced the largest number of FCPA cases, the largest criminal fine to date and the largest combined sanction ever imposed for violations of the FCPA. Recent settlements have resulted in heavy civil and criminal penalties for both individuals and corporate offenders, disgorgement of profits and, increasingly, the imposition of independent monitors. Foreign governments, primarily in Europe, are also cracking down on corruption and actively cooperating with US enforcement officials.

The increase of FCPA enforcement makes prevention an even higher priority than it may have been in the past. The absence of preventative measure is almost certain to result in substantially increased penalties if an issue arises. This makes an effective anti-corruption compliance program essential for all companies. With record-setting sanctions involving well-known companies, global organizations have to reassess their own anti-corruption measures to prevent lapses that might lead to damaging and costly enforcement actions.

Now in its 21<sup>st</sup> successful year, the **American Conference Institute's National Conference on the FOREIGN CORRUPT PRACTICES ACT** is the event that corporate counsel, compliance officers, outside counsel and consultants rely on for comprehensive, insightful, and practical guidance on

critical FCPA compliance issues. Benefit from the practical perspective of seasoned corporate FCPA compliance executives, 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:

- Changes you need to make to your compliance program as a result of recent cases against companies and individuals
- How government agencies evaluate voluntary disclosures
- The FCPA's definition of facilitating payments: when grease becomes a bribe
- Deciding whether you've investigated "enough": how much is enough in trying to learn the facts?
- Risks and concerns when a joint-venture partner is a governmental entity
- What your system of fraud risk internal controls needs to accomplish
- Communicating with government authorities: balancing cooperation with maintaining an effective defense

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ACI will apply for Continuing Professional Education credits for all conference attendees who request credit. There are no pre-requisites and advance preparation is not required to attend this conference.

Course objective: Update on the Foreign Corrupt Practices Act and procedures to prevent inappropriate payments. Recommended CPE Credit: 15.5 hours + 4 hours for each workshop.

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TUESDAY, MARCH 24, 2009

7:30 Continental Breakfast and Registration 

8:30 **Opening Remarks from the Chair**



*Homer E. Moyer, Jr.*  
Miller & Chevalier Chartered

8:45 **The FCPA Year in Review: The SEC and DOJ Speak on Recent FCPA Investigations and Prosecutions**



*Mark F. Mendelsohn*  
Deputy Chief, Fraud Section – Criminal Division  
U.S. Department of Justice

*Fredric D. Firestone*  
Associate Director, Division of Enforcement  
U.S. Securities and Exchange Commission



*Timothy L. Dickinson*  
Paul, Hastings, Janofsky & Walker LLP

- Which industries have the most risk and why
- Oil for food cases: understanding the relationship between UN sanctions and national programs
- Developments in the criteria for imposition of a compliance monitor – guidelines and what can be expected for future cases
- Lessons learned from high profile investigations of non-US based companies
- Current enforcement priorities from the DOJ and SEC: what's on the horizon
- How does the government determine civil from criminal liability: what conduct takes it over the brink
- Coordination of both inter-agency and international investigations: what are the consequences to those investigated
- Latest trends in dispositions: How the SEC and DOJ assess the scope and magnitude of violations

10:00 **The Impact of Recent Landmark Cases and Settlements**



*Peter Clark*  
Cadwalader Wickersham & Taft LLP



*Roger M. Witten*  
Wilmer Cutler Pickering Hale and Dorr LLP

- Lessons learned regarding internal controls and FCPA compliance expectations
- Insights into when a company faces overlapping investigations/prosecutions in multiple jurisdictions
- What these cases teach about penalty levels in the US
- Do these landmark cases suggest that the US model of company-financed internal investigation has become the global norm?

10:45 Coffee Break 

11:00 **The Reality of Having a Special Compliance Monitor: Setting the Boundaries and Making the Relationship Work**

*Kevin G. Matthews*  
Senior Counsel  
GE Oil & Gas



*Alfredo Avila*  
Assistant General Counsel  
Monsanto Company



*Richard W. Grime* – Panel Moderator  
O'Melveny & Myers LLP

- Choice of Monitor: what to look for and the government's role in choosing the Monitor
- What is the role of a Monitor: a compliance guardian or a company-financed probation officer?
- Negotiating the scope of the Monitor's work plan
- Establishing an effective working relationship with a Monitor
- Controlling the Monitor's costs
- Who monitors the Monitor?
- The effect of the Monitor on privilege and work product
- Protecting the confidentiality of the Monitor's report and the company's operations

11:45 **Facilitating Payments, Small Bribes and Extortion: How to Distinguish Them, and the Management Problems They Cause**

*Steve Tyrrell*  
Chief, Fraud Section – Criminal Division  
U.S. Department of Justice



*Lucinda A. Low*  
Stephoe & Johnson LLP



*Howard M. Sklar*  
Vice President, Compliance & Global Anti-Corruption Leader  
American Express Company

- The FCPA's definition of facilitating payments: when does grease become a bribe?
- Posture of international conventions and other countries
- How strong is the trend against such payments and can they really be eliminated?
- Satisfying US law recordation requirements without increasing your foreign exposure
- What are the outer monetary limits of facilitating payments?
- Monitoring facilitating payments and third parties, such as formalities contractors, customs brokers, and the like
- Extortion, duress, and custom and practice - are they defenses?

12:45 Luncheon for Attendees and Speakers

2:00 **Keynote Address – The Challenges of Changing Corporate Culture: How to Restore Confidence and Enhance Compliance**



*Peter Y. Solmssen*  
General Counsel  
Member of the Managing Board  
Siemens AG

**2:30 Internal Investigations: What Is a Reasonable, Yet Responsible, Way to Investigate Suspected and Alleged Violations**

*Hank Walther*

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



*Saul M. Pilchen*

Skadden, Arps, Slate, Meagher & Flom LLP



*Susan Ringler*

Senior Counsel for International Compliance  
ITT Corporation



*Frederic R. Miller*

Partner, Investigations and Forensic Services  
PricewaterhouseCoopers LLP



*Homer E. Moyer, Jr. – Panel Moderator*

Miller & Chevalier Chartered

- Assessing the potential risk and defining the scope appropriately
- Coordinating the investigation between the company, outside counsel, and accounting firms
- How to conduct internal investigations cost-effectively
- Factors in maximizing credibility to the government
- How the paradigm for internal investigations is changing
  - timing for completing
  - maintaining or waiving privileges
  - admonitions to witnesses
  - Audit Committee involvement
  - recommending remediation and compliance enhancements
  - testing whether problem is systemic
  - dealing with inconclusive findings
- Deciding whether you've investigated "enough": how much is enough?
- Whether and how to prepare a report of the investigation

**3:45 Refreshment Break**

**4:00 Working With State-Owned Entities: How to Manage Risk**



*Daniel T. Kessler*

Chief Counsel, International Trade Controls  
Wyeth



*Alexandra A. Wrage*

President

Trace International

- Forced marriages: what it means for compliance when you can't choose your partners
- How much government ownership is enough to interest the DoJ?
- Entities in transition: the dilemma posed by the privatization process
- Does the private/public ownership distinction still make sense
- What have we learned from Schnitzer Steel

**4:45 Representing Individuals under Investigation: Walking the Fine Line to Preserve Corporate Interests**



*Reid M. Figel*

Kellogg, Huber, Hansen, Todd, Evans & Figel, PLLC



*Peter H. White*

Mayer Brown LLP

- What to do when individual and corporate interests collide
- When and how to provide separate counsel for individuals
- 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
  - attorney-client privilege

**5:45 Conference Adjourns for the Day**

**WEDNESDAY, MARCH 25, 2009**

**8:30 Opening Remarks from the Chair**

**8:45 Re-Engineering Global Compliance Programs: The Case Study of Siemens**



*Dr. Klaus Moosmayer*

Compliance Operating Officer  
Siemens AG

**9:15 Implementing Effective Fraud Risk Internal Controls**



*Jeffrey Harwin*

Director, Global Monetary and Financial Control Group  
Merrill Lynch

*Michael W. Ward*

Director, Global Compliance and Ethics  
McKesson Corporation



*Manny Alas*

Partner, Investigations and Forensic Services  
PricewaterhouseCoopers LLP



*Paul R. Berger – Panel Moderator*

Debevoise & Plimpton LLP

- What your system of fraud risk internal controls needs to accomplish
- How fraud controls and financial controls intersect
- Key controls to prevent improper payments and fraud
- Document retention policies that work and those that do not
- Leveraging your financial accounting system to identify fraud and questionable payments

**10:15 Coffee Break ☞**

**10:30 Voluntary Disclosures: Criteria to Determine When to Disclose, or Not**



*Laurence A. Urgenson*

Kirkland & Ellis LLP



*Martin Weinstein*

Willkie, Farr & Gallagher LLP



**Jay G. Martin**

Vice President, Chief Compliance Officer & Senior Deputy General Counsel  
Baker Hughes

- Pros and cons of making a voluntary disclosure
- Comparing and contrasting SEC and DOJ approaches
- How government agencies evaluate voluntary disclosures
- What are the aggravating and mitigating factors?
- Tracking the voluntary disclosure
- The impact of voluntary disclosure on fines and penalties
- What can be learned from recent voluntary disclosures

**11:30 Responding to a Multi-Jurisdictional Government Investigation: How to Deal with Enforcement Agencies, Minimize Cost and Management Distraction**



**Scott W. Muller**

Davis, Polk & Wardwell



**Glenn T. Ware**

Managing Director, Anti-Corruption Practice Group  
PricewaterhouseCoopers LLP



**Nicola W. Palmieri**

General Counsel  
Parmalat

- Meeting demands of law enforcers working beyond their national reach
- Managing conflicting requirements of national and foreign agencies
- Communicating with government authorities: balancing cooperation with maintaining an effective defense
- Implementing the best strategy to deal with multiple investigations
  - EU investigations vs. SEC and DOJ investigations
  - what law governs and when
  - reciprocity and mutual assistance between regulators
- Responding to press inquiries

**12:30 Luncheon for Attendees and Speakers**

**1:45 Collateral Litigation for Foreign Corrupt Practices: Latest RICO, Shareholder and Contract Cases, and How to Defend your Company**



**Mark J. MacDougall**

Akin Gump Strauss Hauer & Feld LLP



**Danforth Newcomb**

Sherman & Sterling LLP

- Private anti-corruption actions and how they may work
- The FCPA, sovereign damage claims and the role of parallel criminal and civil proceedings
- The risks of cross-border anti-corruption litigation
- Evolution of class and derivative suits aimed at recovering losses due to corrupt payments
- Debarment for foreign corruptions

**2:45 Conducting Effective Third Party Due Diligence: Making Your Process Fit the Risk**



**Brady K. Long**

Chief Compliance Officer & Deputy General Counsel  
Pride International



**Howard Weissman**

Vice President and Assistant General Counsel - International  
Lockheed Martin Corporation



**William B. Jacobson**

Fulbright & Jaworski, LLP

- How to design and implement due diligence for a prospective foreign third party relationship
- What enforcement agencies will expect you to have in your files
- What to do when your company is proceeding in the face of a known risk involving a third party
- How concerned should you be about local law?
- Reducing risks when political pressure from government officials to use a specific commercial intermediary
- Your good work has uncovered a "red flag" - now what?
- Is it possible to rehabilitate an intermediary with a shady past? Do you need to?
- Do contractual provisions, certifications and audit rights solve the problem?

**3:45 Gifts & Hospitality: What You Can Do**

**Charles Duross**

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



**Kathleen Edmond**

Chief Ethics Officer  
Best Buy

**Jannette E. Hasan**

Senior Counsel - International  
Northrop Grumman Corporation



**Mark Snyderman**

Chief Ethics and Compliance Officer & Assistant General Counsel  
The Coca-Cola Company

- Gifts and meals: defining “reasonable and customary”, and who decides?
- Overcoming challenges of cultural sensitivity: Christmas gifts and “little red envelopes”
- Addressing local law restrictions
- When your agent is picking up the bill: solving problems before they arrive
- How to handle customer requests for travel
- The frills: first class and family members – when is hospitality permitted?
- How to balance the need for internal controls with the expectations of customers in their target markets

**5:00 Chair’s Closing Remarks and Conference Ends**

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# A

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

## THE FOREIGN CORRUPT PRACTICES ACT DEMYSTIFIED: COMPLIANCE FUNDAMENTALS AND BEST PRACTICES



*Simeon Kriesberg*  
Mayer Brown LLP

Do you need an immersion in the FCPA, including both the fundamentals of the law and the best practices to achieve compliance? This highly rated pre-conference workshop is designed to cover all the bases: the accounting and anti-bribery parts of the statute, the exceptions and affirmative defenses, the transactional red flags, the key elements of an effective compliance program, and intriguing case studies. Delegates consistently give this workshop top marks for both content and presentation.

This interactive and practical working session is led by a highly experienced practitioner who will discuss the practical challenges in FCPA compliance and tips for meeting those challenges, supplying you with a foundation for dealing with day-to-day issues, including:

- How the accounting and anti-bribery provisions interact
- Who is covered by the FCPA: what constitutes “instrumentality” and “government owned entity”
- What types of payments are permissible
  - anything “of value”

- facilitating payments: limits on “grease”
- political contributions
- charitable contributions
- When are expenditures “reasonable”?
- What triggers U.S. government anti-bribery investigations?
- How do Sarbanes-Oxley and the FCPA intersect?
- What enforcement authorities will expect of your books and records and internal controls
- What do the most significant cases from the past year signal about enforcement trends
- What lessons can be drawn from recent DOJ opinion releases
- The most common impediments to an effective FCPA compliance program and how can you overcome them

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 maximizing your benefit from the focused discussions that are the hallmark of the main conference.

# B

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

## CONDUCTING EFFECTIVE FCPA COMPLIANCE ASSESSMENTS



*John E. Davis*  
Miller & Chevalier Chartered

*Jannette E. Hasan*  
Senior Counsel - International  
Northrop Grumman Corporation

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.



*David Karas*  
Senior Director, Compliance  
Hitachi Data Systems

- What is the process 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
  - 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
- How can you evaluate the effectiveness of your response?

## C

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

### OVERCOMING FCPA COMPLIANCE CHALLENGES IN CHINA



*Amy L. Sommers*

Squire, Sanders & Dempsey LLP (Shanghai)

#### 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 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

- Enforcing Chinese law through the backdoor: US companies are effectively forced by the FCPA to comply with Chinese bribery laws that are generally not enforced by China itself
- 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?

#### Compliance Programs for China

- 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
- To self-report or not?

## D

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

### OVERCOMING FCPA COMPLIANCE CHALLENGES IN INDIA



*Anand Dayal*

Koura & Company, Advocates (New Delhi, India)



*Julia K. Bailey*

Assistant General Counsel,  
International Transactions and Compliance  
Honeywell International

#### FCPA Landscape in India

- Causes of corruption in India
- 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
- Dealing with extortionist government functionaries
- Suggestions for compliance procedures in India
  - conducting due diligence in India
  - representations and warranties
  - compliance reports and certifications

#### Compliance Programs for 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 India
- To self-report or not?



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THE PREMIER LEGAL & REGULATORY ANTI-CORRUPTION COMPLIANCE EVENT

**A** The Foreign Corrupt Practices Act Demystified: Compliance Fundamentals and Best Practices

**B** Conducting Effective FCPA Compliance Assessments

**C** Overcoming FCPA Compliance Challenges in China

**D** Overcoming FCPA Compliance Challenges in India

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