

## ATTORNEYS IN THIS PRACTICE

William P. Barry  
Shari A. Brandt  
Eva Marie Carney  
MaryJeanette Dee  
Arthur S. Greenspan  
Wendy A. Harris  
Audrey Laning Ingram  
Paul A. Leder  
Jeffrey A. Lehtman  
Morgan G. Macdonald  
Michael D. Mann  
Matthew M. Riccardi  
Lee S. Richards, III  
Daniel L. Stein  
Sarah P. Swanz  
James Q. Walker  
Daniel C. Zinman

## RELATED PRACTICES

Broker-Dealer Sales Practices  
Financial and Accounting Fraud  
Securities Enforcement, Internal and Government Investigations and Criminal Defense  
Securities Trading and Market Manipulation

## Corruption, Bribery and Money Laundering

RK&O is highly regarded for its capabilities in domestic and cross-border securities enforcement and white collar criminal issues. We advise and defend companies, boards and individuals with respect to the Foreign Corrupt Practices Act (FCPA), RICO, domestic corruption, bribery, money laundering and OFAC issues. Our team includes former prosecutors and officials from the U.S. Attorney's Office for the Southern District of New York and the SEC's Enforcement Division, Office of International Affairs and General Counsel's Office.

Our multi-disciplinary approach makes us unusually efficient in assisting with due diligence and investigations involving cross-border or complex transactional components. We conduct trainings and develop policies and procedures to mitigate the risk of FCPA, money laundering or OFAC violations.

We have a longstanding reputation as a blue-chip white collar criminal defense firm and are frequently sought for matters in which a particularly sophisticated approach is required.

### EXPERIENCE

We currently represent or have recently represented:

- A U.S. public company in connection with investigations by the DOJ Fraud Section, the United States Attorney's Offices for the District of New Jersey and the United States Securities and Exchange Commission regarding alleged violations of the Foreign Corrupt Practices Act.
- The Speaker of the New York City Council in connection with an investigation by the United States Attorney's Office for the Southern District of New York and the NYC Department of Investigations into certain City Council budget practices.
- An international financial services firm in connection with an asset forfeiture proceeding and related DOJ investigation into alleged money laundering.
- Several major hedge funds with respect to internal investigations and due diligence regarding payments made with joint ventures in Russia, China, Thailand, Bulgaria and India.
- Senior executives at a foreign public issuer in connection with a DOJ Fraud Section investigation into alleged violations of the Foreign Corrupt Practices Act.
- An individual in connection with an investigation by the United States Attorney's Office for the Central District of California regarding alleged bribery of government official.
- A global investment bank's referral to the Manhattan DA's Office of embezzlement by operations employee.

## CORRUPTION, BRIBERY AND MONEY LAUNDERING (Cont.)

## PUBLICATIONS

"Anti-Bribery Compliance for Private Fund Managers" by Paul Leder and Sarah Swanz published in *The Hedge Fund Law Report*

"The Implications of the Dodd-Frank Whistleblower Provisions and Recent Decisions and Enforcement Initiatives for FCPA Compliance" by James Walker published in *The International Comparative Legal Guide to Business Crime 2012*

"Strong Medicine: FCPA Compliance for Pharmaceutical Companies" by William Barry and Audrey Ingram published by *Pharmaceutical Compliance Monitor*

"Clamping Down on Kleptocrats" by William Barry and Sarah Swanz published by *Risk Management*

"Fund managers: Prepare for Bribery Act" by Carl Winkworth and William Barry published in *Financial Times*

"Hedge funds and the UK Bribery Act" by Carl Winkworth and William Barry published by *Hedgework* and *Private Equity Wire*

"FCPA Whistleblower Bounty: Ramifications of New Provisions on Corporate Compliance" by William Barry and Audrey Laning Ingram published by *Complanet*

William Barry Contributes to "U.S. and International Anti-Money Laundering Developments" in *The International Lawyer*

"Compliance Strategies for Investment Businesses and Global Corporations - International Anti-Corruption Regulation" by Michael Mann and William Barry

"Challenges For Operating Cross-Border Investment Businesses: Meeting Compliance Expectations on a Global Scale" by Michael Mann and William Barry

"Developments in the Internationalization of Securities Enforcement Part II" by Michael Mann and William Barry

*The International Lawyer, Winter 2005; Volume 39; Number 4; ABA Section of International Law*

## PRESENTATIONS

Daniel Stein and Craig Newman to lead "Civil Enforcement Cases: Emerging Trends and Issues in the Wake of the Financial Crisis" PLI briefing

Richards Kibbe & Orbe LLP to co-sponsor and present at the inaugural Latin American Congress on Ethics, Transparency & Anti-Corruption Compliance

James Walker participates in "Transforming Preparation Into Practice: The Martin Act" sponsored by the New York State Bar Association

William Barry presents "Strong Medicine: Strategies for Anti-Corruption Compliance in the Pharmaceutical Industry" webinar hosted by Pharamlot

William Barry and Jeffrey Lehtman featured in "Money Laundering and Corruption Risks for U.S. Companies in Latin America" *Legal Current* podcast hosted by Thomson Reuters

William Barry presents "FCPA and Pharma/Life Sciences...Prove Compliance, Avoid Prosecution," a webinar hosted by Aravo

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CORRUPTION, BRIBERY AND MONEY LAUNDERING (Cont.)

William Barry moderates DC Bar panel discussion titled "Hot Topics in Corporate Internal Investigations"

NEWS & ANNOUNCEMENTS

William Barry quoted in *New York Times* article "News Corp. Faces Inquiry of Ex-Arm for Bribery"  
*Acquisition International* names RK&O 2011 White-Collar Crime Law Firm of the Year

U.S. News-Best Lawyers awards RK&O "Law Firm of the Year" in White Collar-Government Investigations Law and recognizes firm's other practice areas

James Walker participates in *Financier Worldwide* roundtable discussion "Addressing FCPA Issues In Emerging Market Deals"

Richards Kibbe & Orbe LLP names Jeffrey Lehtman a partner and Catherine Turgeon and Ryan Jackson counsel

William Barry quoted in the *Compliance Week* article "Guidance on Bribery Act Still Disappoints"

James Walker contributes to *Financier Worldwide* article "Dealing With the Foreign Corrupt Practices Act"

MaryJeanette Dee and James Walker appear in *Super Lawyers - Corporate Counsel Edition*

William Barry quoted in the *Silicon Valley Mercury News* article "HP Investigation Sheds Light on Challenges of the Modern Businessworld"

William Barry quoted in *Compliance Week* article "DoJ Tells Pharma to Brace for FCPA"

William Barry provides commentary in BNET article "Changing The Focus Of The Foreign Corrupt Practices Act"

William Barry quoted in *The Wall Street Journal Law Blog* article "The 'Catch 22' Bust: Some Early Takeaways for FCPA Junkies"

Shari Brandt and James Walker give insight on regulatory challenges for public companies in *Financier Worldwide*