



**White-Collar Defense, Internal Investigations
& Corporate Compliance**

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**STRADLEY
SR
RONON**

Our Practice

A white-collar and/or government enforcement investigation can be the most complex legal challenge a company or individual faces, leading to the disruption of business, damage to reputation, dissipation of assets and, most importantly, the potential to lose one's liberty. Today, these challenges can come in the form of criminal prosecution, administrative or legislative hearings, as well as through regulatory and other civil proceedings. The coordination of an effective response to these inquiries from a governmental agency often presents an exceptionally complicated and intimidating problem for any corporate entity or individual. Offering a multidisciplinary approach to these matters, we bring the substantial capabilities of the firm to bear in the robust representation of our clients.



Using skills honed through years of experience, Stradley Ronon's lawyers guide clients through some of their most delicate and potentially damaging situations. Clients regularly call on us to conduct comprehensive internal investigations, create and implement effective corporate compliance programs, and defend against allegations of white-collar crime.

Most of the matters we handle are resolved before the legal action or investigation becomes public, by obtaining declinations of prosecution, deferred prosecution agreements, immunity or other resolutions that enable the client to avoid full-scale litigation. However, when civil, criminal or regulatory litigation commences, our experienced litigation team members are ready to serve as zealous advocates throughout the process. We effectively represent defendants and witnesses in state and federal grand jury proceedings, appearing before licensing boards and investigative commissions and, if necessary, through trial and appeal. Our experience also extends to successfully representing clients

in parallel civil and criminal proceedings and concurrent lawsuits, regulatory actions and government investigations, including shareholder suits, IRS actions and other civil actions stemming from criminal charges or investigations.

As a result of handling thousands of matters over our careers, our white-collar team provides real-world, practical assessments of the potential outcomes associated with the matters we are addressing for a client – not simply worst-case scenarios. Providing advice that identifies the actual, likely consequences of a government/regulatory inquiry allows our clients to properly allocate their time and resources. In addition, the leaders of our white-collar group assess each client matter and build an appropriate team of attorneys to conduct an investigation that is thorough yet focused. Our default choice is to rely on lean, experienced teams, and not throw bodies at a problem. Our approach is not to “boil the ocean.” We conduct targeted investigations, reviewing the necessary documents and interviewing the right people. Calling upon our many years of white-collar and investigations experience, we work to streamline what can otherwise be an overwhelming and cost-prohibitive process into a beneficial and cost-conscious engagement.

Our Services

We provide white-collar representation in three primary categories: criminal defense & government enforcement, internal investigations, and corporate compliance.

OUR EXPERIENCE

Defended a client accused of **felony violation of the State Ethics Act**, resulting in dismissal of the criminal charge and expungement of the client's record upon successful completion of ARD program.

Successfully defended a client charged with **conspiracy to defraud the United States** in amount exceeding \$10 million for allegedly marketing “abusive trust” tax shelters.

Obtained two years of probation for a client facing more than seven years' incarceration in first **Foreign Corrupt Practices Act case** in the Eastern District of Pennsylvania.

Represented a global financial services firm and numerous employees in a **criminal bank fraud and securities fraud investigation** pursued by the Department of Justice Bank Fraud Task Force.

Represented a client in a **criminal securities fraud/penny stock investigation** who received probation, avoiding more serious charges of securities fraud, after being charged with obstruction of justice following a six-hour interview with U.S. Attorney's Office.

Criminal Defense & Government Enforcement

Our white-collar team handles both pre- and post-indictment representation in state and federal court cases as well as matters pending before state and federal regulatory agencies performing government enforcement investigations.

We are particularly adept at guiding entities and individuals through the complexities of state and federal grand jury investigations and proceedings. Some of the types of matters we routinely handle for our clients include:

- Antitrust
- Bank Secrecy Act
- Bankruptcy Fraud
- Bribery
- Embezzlement
- Environmental Crimes
- False Claims Act – Civil & Criminal
- Financial/Securities Industry Regulatory and Enforcement Actions
- Foreign Corrupt Practices Act
- Government Procurement or Contracting Fraud
- Health Care Fraud
- Honest Services Fraud
- Insurance Fraud
- Mail Fraud
- Money Laundering
- Public Corruption
- RICO – Civil & Criminal
- Securities Fraud
- Tax – State and Federal
- Wire Fraud

Internal Investigations

In today's world of heightened

government enforcement and regulation, internal investigations are a vital tool for companies and other entities to self-police, ensure compliance in a wide variety of industries, address whistleblower claims and effectively respond to law enforcement investigations. Our internal investigations experience runs the gamut from examining allegations of financial fraud to analyzing compliance with relevant employment laws. By virtue of the firm's preeminent financial services practice, we have broad experience conducting internal investigations in matters involving securities, financial regulations and a broad spectrum of related state and federal crimes. Our lawyers have also worked with clients on investigations pertaining to Medicare and Medicaid fraud and abuse, as well as various federal and state regulations on a variety of other issues.

With the technological savvy needed to operate in today's digital environment, our firm is well-versed in conducting large-scale document review that is

necessary in many investigations; we are nimble and can quickly – and cost-effectively – sift through volumes of data to identify relevant documents. We conduct internal investigations relative to state and federal regulatory matters, as well as criminal investigations initiated by local district attorney's offices, state attorneys general and the Department of Justice.

Corporate Compliance

For our corporate and nonprofit clients, we design and implement comprehensive compliance programs to prevent, detect and rectify misconduct. To meet our clients' business needs, we implement robust training sessions and audit procedures to minimize the risk of future investigations or allegations of wrongdoing. Such compliance programs are often aimed at avoiding violations related to the Foreign Corrupt Practices Act (FCPA), tax regulations, the False Claims Act (FCA), environmental regulations and health care regulations.

Our Clients

Stradley Ronon's white-collar team represents individuals, professionals, public officials, corporations, closely held companies, nonprofits and other entities across a wide array of industries, including:

Accounting & Tax Preparation
Banking
Environmental
Financial Services
Food & Beverage
Government Contracting

Health Care
Investment Management
Life Sciences
Pharmaceuticals
Retail
Securities

Represented a **high-level former government official from a Central American country in a criminal FCPA investigation** run out

of the Department of Justice and the U.S. Attorney's Office for the Eastern District of Virginia.

Represented investment advisers, fund administrators and individuals in connection with **SEC investigations** involving performance advertising, collateralized debt obligations, private-equity funds, revenue-sharing arrangements, various conflicts of interest, and compliance policies and procedures.

Successfully represented a **multinational technology company in an investigation into whether the company had violated the Buy America Act**, in which no charges were ever brought.

Represented broker-dealers, supervisory and compliance personnel, and other individuals in **SEC and FINRA investigations** concerning insider trading and other compliance policies and procedures, sales practices, supervision, equity-indexed and variable annuities, Regulation S-P, and Regulation SHO.

Represented public company audit committees, banks, investment advisers, mutual fund independent trustees, broker-dealers and insurance companies regarding financial fraud, accounting issues, loan-loss assessment, cross-trading, trade allocation, valuation procedures, selling away and outside business activities.

For more information on our White-Collar Defense, Internal Investigations & Corporate Compliance practice, visit www.stradley.com/white-collar.



CONTACTS

Michael J. Engle
215.564.8737
mengle@stradley.com

Steven D. Feldman
212.404.0659
sfeldman@stradley.com

ABOUT STRADLEY RONON

For more than 95 years, Stradley Ronon has helped private and public companies – from small businesses to Fortune 500 corporations – achieve their goals. With nine offices and more than 200 attorneys, Stradley Ronon is proud to help companies manage their legal challenges and grow their businesses.

www.stradley.com

LOCATIONS

Pennsylvania
Washington, D.C.
New York
California
New Jersey
Illinois
Delaware



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