



INTERNAL INVESTIGATIONS

500+
ATTORNEYS

23
OFFICES

40+
PRACTICE AREAS

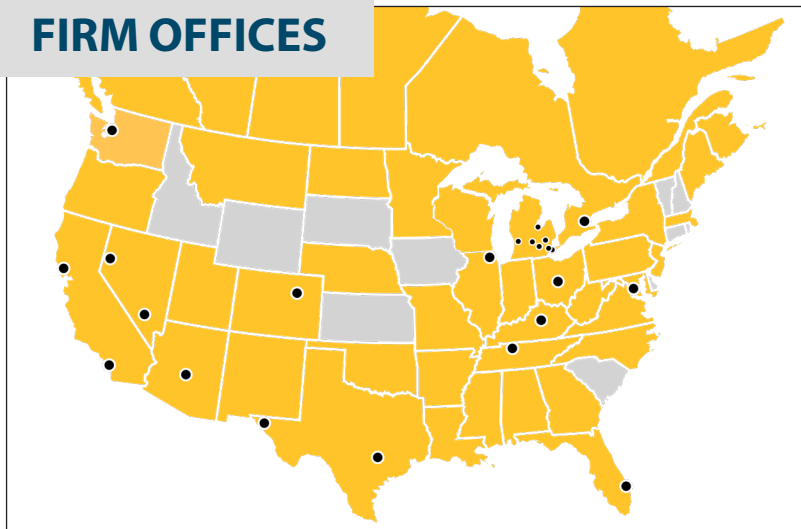
CURRENTLY
REPRESENT

90
COMPANIES ON THE
FORTUNE
500 LIST



TOP 200
LAW FIRM BY
REVENUE

FIRM OFFICES



DICKINSON WRIGHT LOCATIONS

- ANN ARBOR
- AUSTIN
- CHICAGO
- COLUMBUS
- DETROIT
- DENVER
- EL PASO
- FT. LAUDERDALE
- GRAND RAPIDS
- LEXINGTON
- LANSING
- LAS VEGAS
- NASHVILLE
- PHOENIX
- RENO
- SAGINAW
- SAN DIEGO
- SEATTLE
- SILICON VALLEY
- TORONTO
- TROY
- WASHINGTON D.C.
- WINDSOR

RECOGNITIONS & MEDIA COVERAGE

56 LAWYERS **17** PRACTICES

RECOGNIZED BY CHAMBERS USA
AND CHAMBERS CANADA

200+ LAWYERS

RECOGNIZED BY THE
BEST LAWYERS IN AMERICA AND
THE BEST LAWYERS IN CANADA

100+

SUPER LAWYERS AND RISING STARS

CHAMBERS
AND PARTNERS

Best Lawyers



REUTERS

FOX



Bloomberg



WSJ

AP

BBC

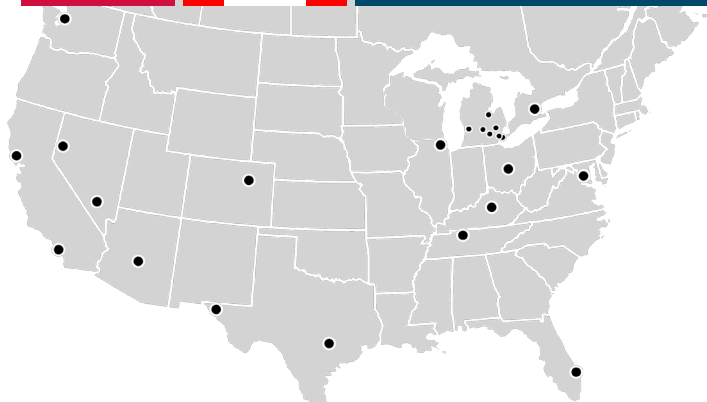
AFP

23 OFFICES ACROSS THE UNITED STATES & CANADA

WWW.DICKINSONWRIGHT.COM



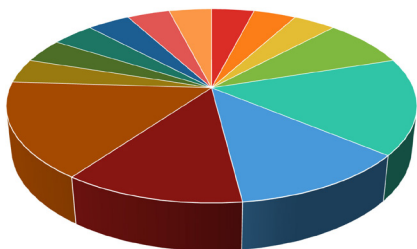
23 OFFICE LOCATIONS



Capabilities: INVESTIGATIONS | REGULATORY COMPLIANCE | FCPA | FARA | WHITE COLLAR DEFENSE | FCA | WHISTLEBLOWER ACTIONS

EXPERIENCE ON BOTH SIDES OF THE AISLE

Our attorneys have decades of investigative experience, much of which comes from prior government service



- SEC Enforcement Division
- DOJ Executive Management
- Federal Prosecutors
- State Prosecutors
- DOJ Antitrust Division
- FINRA Market Surveillance
- State Director of Securities Enforcement and Investigations
- Independent Counsel
- DOJ Supervisors
- IRS and DOJ Trial Attorneys
- Elite Law Firm Practitioners
- FBI
- State AG's Office
- Corporate Counsel

KEY INDUSTRIES

- SECURITIES
- BANKING
- HEALTH CARE
- AML COMPLIANCE
- AUTOMOTIVE
- MANUFACTURING
- INTELLECTUAL PROPERTY



ONE OF THE 1ST LAW FIRMS IN THE WORLD TO RECEIVE THE ISO/IEC 27701:2019 PRIVACY MANAGEMENT CERTIFICATION.

CLIENT COMMENTS

"Great to see Dickinson Wright doing so well. Compliments to Mike Hammer on your leadership and driving the firm's growth and expansion."

— Stephen Kim, Chief Legal Officer at a publicly-traded biopharmaceutical company with operations and sales in 22 countries

CHAMBERS USA SAYS:

- "The firm serves us exceptionally well. They are knowledgeable, timely, patient and polite. They always look out for us and give us our options."
- "Superb client service," with sources highlighting that "it really knows how to service a client and what deliverables a client is looking for."
- "A particular strength is that they work as a team and communicate with each other, and with us, throughout the process. Everyone is aware of developments and I never have to recap any settled issues."
- "Good interrelationship between the partners" and "fantastic network worldwide."



DIVERSITY EFFORTS

- Scored a **PERFECT 100** in the Human Rights Campaign (HRC) Corporate Equality Index Survey 7 years running.

OUR GROWING PRACTICE

Dickinson Wright's investigations practice is growing. Its members represent companies and senior executives in a variety of investigations, including internal, civil, regulatory, criminal, and parallel investigations.

With a strong presence in Washington, D.C., and a wide reach across North America to our offices in San Diego, Silicon Valley, and Seattle, our lawyers successfully and cost-effectively assist our clients with complex issues. This is especially true in the context of investigations initiated by the U.S. Securities and Exchange Commission (SEC), the U.S. Department of Health and Human Services (HHS), and the U.S. Department of Justice (DOJ). Our lawyers have the skill, experience, and temperament to resolve serious issues and maintain a competitive advantage, often without recourse to expensive litigation.

Too often, the same events can lead to civil, administrative, or criminal issues. Dickinson Wright's investigations lawyers are able to draw on the skills and resources of more than 500 other attorneys within the firm, allowing them to address clients' issues collaboratively and seamlessly across a range of practice areas on a single platform. Corporate directors and officers have trusted their judgment and insight in the past, and regulators and prosecutors know that they will litigate when the situation demands.

The growth of the global economy has led to an increase in the number of cross-border investigations, including those involving sanctions, tariffs, the Bank Secrecy Act, money laundering, and extraditions to and from the United States. Our experienced team works closely with lawyers in different countries throughout the world, assembling the strongest international team to advance our clients' interests in all jurisdictions where there is potential exposure or liability.

Dickinson Wright's lawyers take challenging facts—whether raised by the company, the government, a whistleblower, or the media—and advocate aggressively and creatively to secure favorable outcomes. Our attorneys understand the lines between administrative, civil, and criminal liability, and are familiar with the internal decision-making process of federal investigative agencies, including the SEC, HHS, and DOJ. Dickinson Wright's lawyers offer judgment and insight from both the defense and government perspectives.

Our attorneys are experienced with pre-investigation compliance, internal investigations, defense of a government investigation, and resolution through settlement or trial. They investigate in a prudent, confidential, and cost-effective manner to reduce risks faced by clients.

In response to internal complaints, third-party issues, or government inquiries, corporate counsel may initiate internal investigations. These investigations often aim to address regulatory compliance, alleged corruption, data breaches, whistleblower actions, lawsuits, or even human resource concerns. The following is a structured approach to effectively manage such risks:

A. Scope of the Investigation

- Identify initial purpose and scope of the investigation
- Allow for adjustments as evidence develops

B. Initial Considerations

- Administrative Considerations
 - Review insurance coverage
 - Review internal guidance
 - Establish a budget
- Preservation Considerations
 - Identify information sources
 - Identify information locations
 - Suspend document retention policy
 - Draft a document governing information preservation
 - Secure essential information
 - Consider forensic imaging of phones, computers

C. Identify Essential Parties

- Board involvement
 - What board members will be involved
 - What committees, if any
- Who will supervise?
- Who will conduct?
- Who will support?
- Who will receive updates?
- Consider using outside counsel
 - Especially when senior officials are involved
 - Especially when independence is critical

D. Investigation

- Develop and approve a work plan
- Ensure privilege preservation
- Conduct thorough document and data reviews
 - Content, context, connections
- Conduct employee interviews:
 - Determine timing, location, participants
 - Interview current employees, former employees, known whistleblowers, as appropriate
 - Address legal representation and warnings (*Upjohn, Garrity/Kalkines*)

E. Conclusions

- Document conclusions and findings
 - Facts and law
- Decide on oral or written reporting
- Consider internal and external sharing
- Begin any necessary internal actions or remediation
- Share only high-level summaries to protect attorney-client privilege

F. Special Situations: Government Investigations

- Respond timely to inquiries from government authorities
- Consider media communications policy/protocols
- Consider privacy laws/issues
- Coordinate internally, as appropriate
- Involve compliance departments early
- Determine whether there is an administrative, civil, or criminal emphasis
- Consider corporate counsel involvement in interviews
- Manage whistleblower treatment and confidentiality
- Consider opportunities for “cooperation,” but maintain independence
- Share only high-level summaries when cooperating

G. Special Considerations: Interested Parties

- Internal:
 - Board of Directors, committee chairs
 - Senior officers
 - Shareholders
 - Compliance and other internal departments, auditors
 - Communications teams
 - Employees, union leader
- External:
 - Government entities
 - Independent auditors, consultants, contractors
 - Business partners, lenders
 - Shareholders, investors
 - Counsel
 - Clients, customers
 - Distributors, suppliers
 - Media, the public

DIVERSE EXPERIENCE



Mike Beckwith | Former Assistant United States Attorney, Chief of Transnational Organized Crime. 20 jury trials.

- Led international public corruption investigations in a number of countries, including Romania, Hungary, the Czech Republic, Afghanistan, and Iraq.
- Led international financial investigations involving offshore companies offering anonymity services to evade global reporting requirements and launder money through international trusts, bank accounts, and corporate structures.
- Led dozens of attorneys, agents, and analysts in a billion-dollar securities fraud investigation involving a major U.S. financial institution.
- Collaborated with the U.S. Treasury Department's Office of Foreign Asset Control (OFAC) to secure formal sanctions against two Russian oligarchs.



Frank Borger | Former Top Securities Regulator for the State of Tennessee.

- Representing private equity firms in middle-market acquisitions across various industries.
- Representing an investment advisory firm in a dispute before Financial Industry Regulatory Authority (FINRA).
- Led investigations into suspected cases of insurance and securities fraud, including multi-million dollar schemes.



John Cunningham | Former Associate General Counsel and Chief Compliance Officer for the Americas for a Global 500 company.

- Representing companies before the U.S. Department of Justice (DOJ), Securities and Exchange Commission (SEC), Financial Crimes Enforcement Network (FinCEN), OFAC, and other agencies.
- Represented a global hospitality company in the restructuring of its regulatory compliance program.



Bob Driscoll | Former Deputy Assistant Attorney General and Chief of Staff at the DOJ.

- Represented a White House chief of staff in connection with impeachment-related matters.
- Represented an individual alleged to be acting as a foreign agent in a high-profile investigation and prosecution by DOJ's National Security Division.
- Led internal investigations for both publicly traded and privately held companies, advising corporate entities and Boards of Directors on responding to allegations raised by whistleblowers or minority shareholders.



Jacob Frenkel | *Group Chair* | Former Senior Counsel for the SEC's Enforcement Division. Over 25 jury trials.

- Argued before World Bank on behalf of two international tech companies accused of conflict of interest and corruption.
- Represented the CEO and CFO of a NYSE-listed company with a billion dollar market cap after forensic auditors reported financial fraud.



Dan Goldfine | Former Trial Attorney with the DOJ's Antitrust Division.

- Represented numerous companies in connection with government investigations, including Apollo Group, Honor Health, Mayo Hospital, Phoenix Children's Hospital, Source Refrigeration, Phoenix Mart, Arizona Free Enterprise Club, A&K Railroad, Swift Transportation, a regional electrical provider, and a point of sale company.
- Represented numerous individuals in connection with government investigations, including corporate executives at a healthcare staffing company, a HVAC company, a consumer products company, the Arizona Free Enterprise Club, a congressional staff member during the Abramoff investigation, and an Air Force general.



Jamie Halavais | Former partner at an AmLaw 50 firm.

- Representing companies, boards, and directors in a wide variety of government and internal investigations, including alleged violations of policy, regulations, the securities laws, antitrust laws and the racketeering laws.
- Guided a publicly-traded internet company through DOJ and SEC investigations relating to backdating of stock options.



Peggy Kozal | Former partner at an AmLaw 100 firm.

- Represented numerous healthcare providers in FCA investigations.
- Regularly providing compliance advice to healthcare providers in the context of complex regulatory structures.



Angelique Neal | Former Trial Attorney in the Office of Chief Counsel to the IRS.

- Represented multi-million dollar manufacturing company with multi-tiered structure in IRS civil examination and litigation
- Represented numerous companies in penalty negotiations with IRS.
- Represented over 50 captive insurance companies in IRS examinations, appeals, and litigation.



Andrew Sparks | Former Assistant United States Attorney, Chief of White Collar Crime. Over 20 jury trials.

- Represented numerous healthcare institutions navigating FCA allegations initiated by the DOJ.
- Conducted an internal review into allegations of bribery at a Fortune 500 Company.



Jua Tawah | Former FINRA Investigator.

- Representing clients on regulatory issues before the SEC, Commodity Futures Trading Commission (CTFC), FinCEN, FINRA, and the National Futures Association (NFA).
- Led multiple investigations of high-frequency trading firms, dark pools, and other broker-dealers for potential violations of federal securities law and FINRA and exchange rules.

Areas of Practice

- Administrative Investigations
- AML/BSA compliance reviews
- Antitrust Actions
- Banking & Financial Institution Investigations & Fraud
- Congressional Oversight Investigations and Hearings
- Civil & Criminal Investigations
- Data Privacy & Cyber Actions
- DOJ & SEC Enforcement Actions
- Environmental Violations
- Export & Import Violations
- Government Contracts Investigations & Fraud
- Grand Jury Investigations
- Health Care Investigations & Fraud
- Intellectual Property Crimes
- Internal Investigations
- Money Laundering Investigations and Actions
- Procurement Investigations & Fraud
- Regulatory Investigations
- Securities Investigations & Fraud
- Tax Investigations, both Civil & Criminal
- Trials & Appeals, both State & Federal
- Whistleblower Actions

ADDITIONAL EXPERIENCE

- Led internal investigation for a New York Stock Exchange (NYSE)-listed textiles company; disproved internal findings of a Special Committee by identifying exculpatory evidence.
- Served as sole U.S. Counsel to the Independent Auditor (a corporate monitor) in Volkswagen settlement with U.S. Environmental Protection Agency.
- Represented corporate and individual clients in congressional investigations before multiple committees.
- Secured no charges for the Chairman, CEO, and Controller of NYSE-listed healthcare company in a DOJ criminal investigation and a parallel SEC investigation.
- Led internal investigation on behalf of an African Government, refuting a report by United Nations Monitoring Group damaging the client's public reputation.
- Secured no charges against the CEO and CFO of a billion-dollar, NYSE-listed company after forensic auditors reported financial fraud to the SEC.
- Led internal investigation for the audit committee of a NYSE-listed real estate development company and discovered possible corruption of a government official.
- Represented Middle Eastern public figure in a DOJ corruption investigation, enabling the client to avoid trial in the Middle East and securing no charges in the United States.
- Secured no charges against the CEO of an offshore company in the sale of electronic devices governed by export regulations.
- Led internal investigation for the audit committee of NASDAQ-listed infrastructure company; reviewed allegations of embezzlement corruption in overseas operations.
- Led internal investigation for high-profile, not-for-profit organization to address allegations of misuse of corporate assets by corporate officers.
- Led internal investigation on behalf of a publicly traded, Fortune 500 company to assess allegations of accounting fraud and the improper realization of assets.
- Led internal investigation on behalf of a publicly traded company to assess allegations of accounting fraud and the misuse of corporate funds.
- Led internal investigation on behalf of an international association to assess allegations related to the misuse of funds and a hostile work environment.
- Represented a fintech company in the assessment of BSA regulatory compliance.
- Represented a cybersecurity company regarding potential sanctions violations.
- Representing a fintech executive in connection with a government investigation of a cryptocurrency service provider.
- Representing a Tier 1 automotive supplier in an international False Claims Act (FCA) investigation.
- Representing the former CEO of a global payment processing company in an investigation initiated by a European government.