# DICKINSON WRIGHT

### **INTERNAL INVESTIGATIONS**

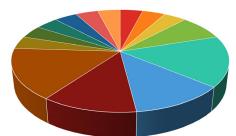




Capabilities: INVESTIGATIONS | REGULATORY COMPLIANCE | FCPA | FARA | WHITE COLLAR DEFENSE | FCA | WHISTLEBLOWER ACTIONS

#### **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

#### **KEY INDUSTRIES**

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

- Independent Counsel
- DOJ Supervisors
- IRS and DOJ Trial Attorneys
- Elite Law Firm Practitioners
  FBI
- State AG's Office
- Corporate Counsel

ISO/IEC 27701:2019

PECB MS

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ONE OF THE ST 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."



ARIZONA CALIFORNIA COLORADO FLORIDA ILLINOIS KENTUCKY MICHIGAN NEVADA OHIO TENNESSEE TEXAS WASHINGTONDC TORONTO WINDSOR

# SOPHISTICATED EXPERIENCE



<u>Mike Beckwith</u> | 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 Gilligan** | 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 over 50 Fortune 500 companies in the creation or defense of their regulatory compliance programs.



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

- Represented a White House chief of staff in connection with impeachmentrelated 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.



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

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- 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.



- **Seth Waxman** | Former Assistant United States Attorney. Over 60 jury trials.
- Led an internal investigation into accounting fraud and improper realization of assets for a publicly-traded, Fortune 500 company.
- Represented the Chief Financial Officer of a publicly traded company that allegedly engaged in improper revenue recognition and securities fraud.
- Represented a foreign national in the *Unaoil* case, a multi-million dollar international bribery scandal.

#### **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

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- 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.
- 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.



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