



Corporate Monitorships

In an age of heightened regulatory scrutiny, corporate monitorships allow companies to satisfy legal obligations and safeguard against future wrongdoing. WMH has a history of successfully fulfilling government-ordered monitor positions, combining strong industry relationships, deep subject matter knowledge, and a proven commitment to transparency.

Companies and government agencies alike value our ability to lead monitorships with diligence, efficiency, and integrity. To foster transparency, we create comprehensive work plans to minimize unnecessary conflict and surprises. We then identify key deficiencies, root causes, and recommend workable solutions to build effective and sustainable compliance programs. WMH also has substantial experience understanding and addressing the unique challenges international entities face when their internal compliance practices are subject to a Department of Justice (DOJ)-imposed monitor.

Many senior lawyers at WMH served as prosecutors at the DOJ or the New York County District Attorney's Office, giving us keen insight into government agency operations. Our practice chair has extensive technical experience in financial crimes, money laundering, Foreign Corrupt Practices Act (FCPA) violations, sanctions, corruption, and cybercrime, strengthening our monitorship work across the banking and financial sectors.

Experience

- **Served as the DFS appointed independent monitor for an international bank.** Conducted a comprehensive review of the BSA/AML and sanctions compliance program of the bank, an 18-month lookback review of U.S. dollar clearing transactional activity through its local branch, and undertook a continuous monitoring program.
- **Served on the leadership team of the Independent Monitor of Höegh Autoliners.** Appointed in March 2018 by the DOJ, Antitrust Division, pursuant to a plea agreement and a plea to a criminal conspiracy to engage in bid-rigging and price-fixing in the market for international shipping services for roll-on, roll-off cargo.
- **Served on the leadership team appointed to monitor General Motors as part of a** deferred prosecution agreement with the United States Attorney's Office for the Southern District of New York following the company's failure to disclose a safety defect to the National Highway Traffic Safety Administration.



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Practice Head



John F. Curran
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