



# Foreign Corrupt Practices Act

Responding to claims under the anti-bribery and accounting provisions of the Foreign Corrupt Practices Act (FCPA) demands a specialized team of lawyers with distinct investigative and defense experience. WMH's FCPA team is well equipped to address inquiries made by the U.S. Department of Justice (DOJ) as well as the Securities and Exchange Commission (SEC). This includes conducting internal investigations based on whistleblower allegations, assisting organizations to remediate legal complaints, and strengthening compliance programs to avoid a recurrence of FCPA claims.

## Experience

- **Represented a senior Hong Kong-based executive of a major U.S. bank** in connection with an investigation by the DOJ, SEC, and Federal Reserve Bank of New York into possible charges under the FCPA, as well as the bank's associated internal investigation.
- **Represented the former Head of Sales of an offshore drilling company in a** multiyear FCPA investigation by the DOJ and secured a non-prosecution agreement for our client.
- **Represented the Chief Compliance Officer of a major multinational investment bank** and financial services company and its Hong Kong subsidiary in connection with a joint DOJ and SEC investigation concerning alleged violation of the FCPA. Neither the DOJ nor the SEC acted against the client.

## Practice Head



**Adam P. Cohen**  
Partner