

Anti-Corruption / FCPA

AT A GLANCE

OVERVIEW

Shearman & Sterling's anti-corruption experience began in 1976 during the investigation into Lockheed Aircraft Corporation's foreign marketing practices. Pursuant to a consent decree, the SEC appointed our chief of litigation as a Special Counsel in that matter, and the investigation, together with the report we generated, was an impetus to the FCPA's adoption in 1977.

Since that engagement, Shearman & Sterling has played a leading role in many major investigations and in developing anti-corruption compliance procedures. We provide a wide range of anti-corruption services to clients throughout the world, including:

- Anti-corruption Compliance Programs Design and Implementation
- Anti-corruption Controls Audits
- M&A Due Diligence
- Due Diligence on Third-Party Agents
- Government Investigations (DOJ, SEC, non-US Authorities)
- Internal Investigations
- Parallel Civil Litigation
- FCPA Independent Compliance Monitors
- FCPA Review Requests

REPRESENTATIVE ENGAGEMENTS

THE ANTI-CORRUPTION PRACTICE GROUP HAS REPRESENTED PARTIES IN MANY OF THE LARGEST INVESTIGATIONS INVOLVING POTENTIAL VIOLATIONS OF THE FCPA AND THE ANTI-CORRUPTION LAWS OF OTHER COUNTRIES.

Norsk Hydro in connection with an investigation arising out of the merger of its oil and gas activities with **Statoil Hydro**.

Nokia Oy in a multi-jurisdictional compliance review involving **Siemens AG**, Nokia's joint venture partner in **Nokia Siemens Networks**.

Volvo Group in SEC and DOJ proceedings arising from the "Oil for Food" investigation.

ABB Ltd. and its upstream oil and gas subsidiaries in SEC and US criminal investigations in connection with the subsidiaries' marketing practices in 103 countries. The investigation led to civil and criminal prosecutions arising out of events in Nigeria, Angola and Kazakhstan.

Independent Monitor for **Baker Hughes** and **York International** pursuant to DOJ deferred prosecution agreements and SEC consent orders mandating reviews of each company's compliance programs.

Various parties in the SEC and DOJ investigations of **Titan Corporation**, **Daimler AG**, the **Bonny Island Nigeria** matter, **Faro Technologies, Inc.**, **Oil States International, Inc.**, **Magyar Telekom**, and **Talecris**.

REPRESENTATIVE CLIENTS

ABB Ltd.
Baker Hughes
Bechtel Corporation
Daimler AG
Nokia Oy / Nokia Siemens Networks
Norsk Hydro
Statoil
Titan Corporation
Volvo Group

ACCOLADES

Two out of the five "Best FCPA Lawyers" outside of the Beltway.
— *mainjustice.com*, 2011

"The firm is most reverentially respected within the field of securities and white collar issues . . ."
— *Benchmark Litigation*, 2011

Stephen Fishbein is praised, "for being a 'deep and tough litigator who knows how to win cases' . . ."
— *Legal 500*, 2010

"Ranked among the top litigation practices in the US for White Collar Crime & Government Investigations."
— *Chambers USA*, 2009

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