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FCPA Update

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United States v. Green: An FCPA Spotlight Shines on Filmmakers

The conviction last month of Hollywood filmmakers Gerald and Patricia Green for violations of the FCPA highlights foreign corruption risks in the media and entertainment industry, continues a trend of FCPA prosecutions of individuals, and illustrates some of the many weapons – including a cooperating witness wearing a wire, a mutual legal assistance treaty (MLAT) request, and money laundering charges that carry potentially severe sentences – that U.S. authorities may use in investigating and prosecuting alleged FCPA offenses.

In *United States v. Green*, No. CR 08-59-GW (C.D. Cal., jury verdict Sept. 11, 2009), the Greens were convicted after a jury trial on charges of conspiracy and substantive violations of the FCPA and U.S. money laundering laws. Patricia Green was also convicted of tax fraud. The charges related to alleged bribes of $1.8 million paid over four years to obtain contracts in Thailand worth $14 million, including a contract to help run the annual Bangkok International Film Festival. The government alleged that the Greens made illegal payments to Juthamas Siriwan, the governor of the Tourism Authority of Thailand, largely via international wire transfers between the bank accounts of the Greens' Los Angeles businesses and overseas accounts in the names of Siriwan's daughter or friend.

The Green case is the first FCPA action against defendants in the entertainment industry. It demonstrates that, as the entertainment business becomes increasingly global, U.S. issuers and domestic concerns need to be aware of corruption risks and take steps to prevent FCPA violations. In recent years, film and television production outside the U.S. has soared, for reasons that include cost-control and the artistic desire for more location shoots.[1] Tight production deadlines and budgets, location shoots in countries with poor

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[1] *See, e.g.*, Center for Entertainment Industry Data and Research, "The Global Success of Production Tax Incentives and the Migration of Feature Film Production from the U.S. to the World," at 2 (2005) ("The dollar volume of Theatrical Releases filmed outside the U.S. more than doubled[,] growing from $1,630 million in 1998 to $3,828 million in 2005...."), http://www.ceidr.org/2005CEIDRReport.pdf; Christina Klein, "The Asia Factor in Global Hollywood," *Yale Global Online Magazine* (Mar. 25, 2003) (reporting that cost-cutting efforts have led to more overseas film production in China), http://yaleglobal.yale.edu/content/asia-factor-global-hollywood.

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In this issue...

News from the BRICs

Brazil: The FCPA, China, and the Olympics

Brazil boasts Latin America's largest economy and is an important trading partner of all the leading industrialized nations. Two developments – one gradual and one sudden – suggest the need for particular attention to the requirements of the FCPA for certain Brazilian companies, as well as generally for international companies doing business in Brazil.

The first is the emergence of fellow BRIC country China as Brazil's largest trading partner, having recently surpassed the U.S. in that category.[1] This presents possible ongoing and increasing FCPA liability concerns for Brazilian issuers of U.S. securities. The significant role that China now plays in Brazil's economy is exemplified by transactions such as Petrobras's recent conclusion of a $10 billion loan with the China Development Bank and a sales agreement with the state-owned Chinese oil company Sinopec to supply significant amounts of crude oil to China.[2] Another leading company in Brazil, Embraer, also has significant operations in China, its third largest market after creating a joint venture with Chinese entity Harbin Aircraft Industry Group in 2002.[3] As issuers under the 1934 Securities Exchange Act, Petrobras, Embraer, and dozens of other Brazilian firms face increasing risk of scrutiny for their dealings in China, a country where improper payments to government officials have resulted in more than 20 FCPA enforcement actions.

The second development is the recent award of the 2016 Olympics to Rio de Janeiro, with the attendant significant potential for FCPA violations in the run-up to the Olympics. The award of the games to Rio de Janeiro is likely not only to spur high-volume investments in public infrastructure projects in and around Rio, but also to produce enormous potential for FCPA violations. Allegations of corruption, bribery, and kickback schemes associated with the 2004 and 2008 Olympic Games highlight the myriad opportunities for foul-play in the run-up to the 2016 Games.[4] The awards of lucrative contracts for design, construction and renovation of stadiums and other Olympic facilities, transportation infrastructure improvements, and public security and telecommunications systems will be subject to immense global competition. Issuers of U.S. securities, as

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1 *See* Malcolm Moore, "China Overtakes the U.S. as Brazil's Largest Trading Partner," *Telegraph* (May 9, 2009), http://www.telegraph.co.uk/finance/economics/5296515/China-overtakes-the-US-as-Brazils-largest-trading-partner.html.

2 *See* Iuri Dantas and Jeb Blount, "Petrobras Gets $10 Billion China Loan, Sinopec Deal," *Bloomberg* (Feb. 19, 2009), http://www.bloomberg.com/apps/news?pid=newsarchive&sid=aUcQstVre0Po.

3 *See* "Brazil's Embraer Increases Investment in China," en.Av-Buyer.com.cn (Feb. 19, 2008), http://www.avbuyer.com.cn/e/2008/20705.html.

4 *See* Jim Yardley, "Beijing Olympics Building Chief May be Executed for Corruption," *The New York Times* (Oct. 20, 2008), http://www.nytimes.com/2008/10/20/sports/olympics/20beijing.html; *see also* George Hatzidakis, "Greek Prosecutor Files Charges in Siemens Case," *Reuters U.K.* (July 2, 2008), http://uk.reuters.com/article/idUKL0242308320080702?pageNumber=1&virtualBrandChannel=0; Nicholas Rummell, "Olympics Seen as Biz Bribe Tar Pit," *Financial Week* (Aug. 11, 2008) (describing potential FCPA compliance concerns relating to run-up to and execution of Beijing Olympics), http://www.financialweek.com/apps/pbcs.dll/article?AID=/20080811/REG/747196074.

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Lost in Translations:
FCPA Training Programs for a Multinational Workforce

The recent posting on the internet by the U.S. Department of Commerce of "unofficial" translations of the FCPA into Arabic, Chinese, Russian, and Spanish undoubtedly is a welcome event, particularly for in-house legal staff and compliance officers at multinational companies subject to the FCPA.[1]

At the same time, this new resource raises once again the issue of what is really required to train a genuinely global workforce in order to reasonably minimize the risk of FCPA violations. Is training in the listed languages enough? And once one decides upon which languages in which to train, what should a training program look like?

The answers start with the usual factors bearing on right-sizing a compliance program, including a company's size, places of operation and general risk profile, including such matters as whether it conducts business in high-risk jurisdictions.

A company's genuine and good-faith understanding, based on a reasonable assessment, that a particular class of employees will truly understand a set of training materials written and presented in English or one of the other principal languages should be respected. Most large multinational companies, however, will appreciate that it is simply too big a risk to assume that employees whose first language is not English do not need training in their native language. It is therefore common at such companies for anti-bribery training materials to be distributed in as many as two dozen languages or more.

Beyond ensuring that FCPA training is understood by non-English speakers, there are several key steps that should be taken in designing training materials. First, when training employees outside of the United States, references to the U.S. statutory phrase "foreign officials" should be converted to references to local officials in the countries of concern, or, better, "non-U.S. officials." It is surprising how many FCPA training materials designed for U.S.-based employees are simply sent overseas with unexplained references to "foreign officials," leaving employees in, say, Indonesia, wondering why they are being trained not to make improper payments to officials outside Indonesia.

In addition, training materials should make clear that the "officials" addressed by the FCPA include not only national government officials at all levels but also employees of state-owned enterprises, provincial and city officials, political candidates, political party officials and employees, and employees of international organizations such as the U.N., E.U., World Bank and the like. Training should make clear that payments to non-U.S. political parties are treated essentially as payments to government officials, party officers, or political candidates. Above all, it should be made clear that local law definitions of who is an "official" are not determinative of relationships and transactions governed by the FCPA.

A robust FCPA training program will educate employees not only about the FCPA but about local anti-bribery laws as well. Although in no case should employees be authorized to follow a local standard less strict than the FCPA, often the best way to prevent an FCPA violation is to comply with local law prohibitions, many of which are more strict than the FCPA. For example, all OECD countries prohibit under local law the kind of expediting payments for "routine governmental action," also known as "facilitating payments," which are exempt from the FCPA's prohibitions.[2] Many major multinational firms prohibit facilitating payments globally as a matter of policy, subject such payments to strict internal controls and approval procedures, or limit them to cases in which such payments are necessary to protect life, health, or property from imminent physical harm – situations akin to those in which an extortion defense is available. If a company has such policies, they should be disseminated via the training program.

Indeed, the key feature of a quality training program, as opposed to a general "off the shelf" program that can all too often lead to confusion or a perception that the FCPA is irrelevant, is that the program is geared very specifically to the risks of the company's business, with training not only on the law but on company policies, procedures, and practical guidance as to the handling of specific and recurring issues. Companies seeking to minimize the risks of FCPA violations, as well as the expense of costly "re-dos" of training programs that do not meet current benchmarks, may wish to work with outside compliance counsel familiar with current trends and expectations by relevant regulators. ■

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1 *See* U.S. Dep't of Commerce, Office of General Counsel, Transparency and Anti-Bribery Initiatives, http://www.ogc.doc.gov/trans_anti_bribery.html (last visited Oct. 16, 2009).

2 *See* 15 U.S.C. §§ 78dd-1(b), 78dd-2(b), 78dd-3(b) (2006).

SEC and DOJ Officials Address FCPA Enforcement Trends and Procedural Changes

Glenn S. Gordon, Director of the Miami Regional Office of the SEC, and Laura Perkins, an attorney in the Fraud Section of the Criminal Division, Department of Justice ("DOJ"), addressed a number of enforcement changes and trends in remarks on October 1, 2009, at the American Conference Institute "FCPA Boot Camp" in Miami, Florida.[1]

Consistent with remarks made by their superiors at other conferences, these comments reiterated the importance of anti-bribery compliance, strong internal controls, and the benefits of cooperation with the U.S. government if errant conduct is identified.

At the SEC:

1. Since January 1, 2008, the SEC has filed roughly 15 FCPA actions against issuers under the 1934 Securities Exchange Act. Since 2007, the agency collected more in civil penalties and disgorgement than in the previous 30 years of FCPA enforcement.

2. The SEC's new FCPA enforcement unit will be staffed with specialists in anti-bribery and internal controls enforcement. Although most SEC FCPA cases are self-reported presently, Gordon said, he expects the percentage of cases acted on by the SEC being reported from other sources to increase in the coming year.

3. Tolling agreements with the SEC will be entered into only in rare cases and with stricter deadlines than may have been available in the past. SEC cases and DOJ cases may now be on different tracks if the DOJ does not follow suit in any particular case. Tolling agreements at the SEC will be approved by the Director of the Enforcement Division in Washington, DC.

4. SEC subpoenas will no longer require Commission approval; more subpoenas will issue as regional offices and central office staff are able to seek their issuance and obtain a subpoena without requiring action by the Commission. Resistance to providing information voluntarily without the issuance of a subpoena may result in a subpoena issuing more quickly than in the past.

5. The Commission's processes for acting on cases is being streamlined, and a program is being developed under which action memoranda prepared by staff will be more succinct to permit faster enforcement action.

6. Creating a less hierarchical organization, the SEC has eliminated or reduced management responsibilities for a number of attorneys, returning them to running cases and participating in investigations and proceedings in a highly active way; there will be more senior counsel making day-to-day decisions.

7. Following the lead of the DOJ, the SEC is looking at the possibility of initiating industry-wide investigations, looking at many companies in a single sector.

8. Also following DOJ's steps, the SEC now has personnel stationed in other countries to increase the Commission's access to evidence and improve cooperation with counterparts in enforcement agencies abroad.

9. Consistent with a new DOJ emphasis on prosecutions of individuals, the SEC is looking to develop a set of charging factors for cases that the Commission brings against individuals, akin to the factors identified in the "Seaboard" report[2] used to determine whether and how to charge companies with breaches of securities laws.

10. Generally, communication within the Enforcement Division will be improved, increasing the likelihood that an FCPA violation uncovered in an unrelated investigation, into, say, insider trading, will be identified as such and acted upon.

At DOJ:

11. Perkins noted that roughly sixty percent of DOJ's FCPA investigations do not involve self-reported violations, but rather are initiated based on evidence that comes to the DOJ through other sources, including whistleblowers,

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1 *See* American Conference Institute, "FCPA Boot Camp" (Oct. 1, 2009), http://image.exct.net/lib/fef31178736702/d/1/805L10%201795.pdf.

2 *See* Securities Exchange Act of 1934 Rel. No. 44969, Accounting and Auditing Enforcement Rel. No. 1470 (Oct. 23, 2001), http://www.sec.gov/litigation/investreport/34-44969.htm.

Enforcement Trends and Procedural Changes ■ Continued from page 4

former employees, cross-industry investigations, or non-U.S. enforcement agencies. This trend has significance for those companies and individuals who do not self-report and therefore do not gain the significant benefits that flow from self-reporting.

12. The DOJ intends to bring more cases against individuals. Perkins noted that many more individuals have been charged in the past two to three years than in the past and this trend will continue. The DOJ will continue to look to individual defendants and potential defendants as a source of evidence against their employers and others about whom the individuals may have evidence.
13. The Fraud Section, which oversees FCPA prosecutions, has recently added two prosecutors dedicated solely to FCPA matters, bringing the total of such dedicated enforcement attorneys to four. Those who might think that this number is small should not forget that there are many other attorneys at the Department, as well as at U.S. Attorneys' offices, who handle FCPA cases along with other cases.
14. The FBI has dedicated ten agents to assisting the Section on FCPA cases. They are in addition to resources that the DOJ draws upon from the IRS and other law enforcement agencies. FBI agents are also leveraging their resources by training their counterparts abroad.
15. International cooperation, through Mutual Legal Assistance Treaty requests and other modes of assistance, is on the increase, with response times to requests by DOJ shrinking; anti-bribery prosecutions in other countries are also increasing.

As do other remarks by U.S. regulators, these comments make clear the importance of robust anti-bribery compliance programs and internal controls, as well as the need to understand quickly facts underlying a case of non-compliance, so that a well-informed decision whether to self-report a violation to authorities can be made. ■

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well as other companies with operations in the U.S. market, are well advised to strengthen their compliance practices in anticipation of the scrutiny associated with efforts to win a piece of the Olympic pie in a country known to carry significant FCPA compliance risks.[5]

Acts of bribery committed by Brazilian issuers regulated under the 1934 Act or their subsidiaries may trigger primary anti-bribery liability under the FCPA if a sufficient nexus to U.S. interstate commerce exists.[6] U.S.-based issuers and other domestic concerns, including individuals, could well face primary anti-bribery liability for improper payments connected to Brazil irrespective of an additional "U.S. nexus."[7] Issuers under the 1934 Act, based in the U.S., Brazil, or elsewhere, all may face books and records and internal controls liability for improper payments in these contexts.[8] Prudent in-house counsel and compliance personnel will well understand that the increasing Brazil-China trade requires continued vigilance regarding compliance with U.S. anti-bribery standards and will not lose sight of the risks associated with Rio's selection as the host city for the Olympics – even if the Games are seven years away. ■

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5 Since 2000, numerous enforcement actions have been initiated by the SEC or DOJ for alleged FCPA violations in Brazil, illustrating the relatively high compliance risks of conducting business in Brazil. *See, e.g.*, *SEC v. Nature's Sunshine Products, et al.*, Case No. 2:09-cv-00672 (D. Utah July 31, 2009) (Brazilian subsidiary alleged to have made cash payments to government officials to circumvent reclassification requirements), http://www.sec.gov/litigation/litreleases/2009/lr21162.htm; *U.S. v. Covino*, Case No. 8:08-cr-00336 (C.D. Cal. Dec. 17, 2008) (conspiracy to make corrupt payments to foreign officials in Brazil and other countries); *U.S. v. Hioki*, Criminal No. 4:08-cr-00795 (S.D. Tex. Dec. 8, 2008) (same); *SEC v. Tyco Int'l Ltd.*, 06 CV 2942 (S.D.N.Y. filed April 17, 2006) (agents of subsidiary in Brazil alleged to have made payments to Brazilian officials to obtain or retain business for Tyco), http://www.sec.gov/litigation/litreleases/2006/lr19657.htm; *In the Matter of Baker Hughes, Inc.*, Securities Exchange Act of 1934 Rel. No. 44784, Accounting and Auditing Enforcement Rel. No. 1444, Admin. Proceeding File No. 3-10572 (Sept. 12, 2001) (payments allegedly authorized to agents in India and Brazil without making adequate inquiry as to whether agents might give payments to foreign officials), http://www.sec.gov/litigation/admin/34-44784.htm.

6 *See* 15 U.S.C. § 78dd-1(a) (2006).

7 *See id.* §§ 78dd-1(g)(1), 78dd-2(i)(1).

8 *See id.* § 78(m)(b)(2).

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rankings on the Transparency International Corruption Perceptions Index, and local officials with the power to permit or impede shoots can add up to serious bribery risks.[2] Such risks are also increasing as movie and television companies derive more revenue from non-U.S. distribution channels.[3]

The Green case demonstrates that, as the entertainment business becomes increasingly global, U.S. issuers and domestic concerns need to be aware of corruption risks and take steps to prevent FCPA violations.

The Green case underscores the ongoing focus of federal prosecutors on prosecuting individuals for FCPA offenses. Trials of individuals on FCPA charges, rare for many years, have become familiar in recent months. Investor Frederic Bourke was tried and convicted in the Southern District of New York of conspiracy to violate the FCPA in July (see August 2009 *FCPA Update*),[4] and, a few weeks later, former Congressman William Jefferson was acquitted by a jury in the Eastern District of Virginia of a substantive FCPA violation, but convicted of conspiracy and other charges. The DOJ views individual prosecutions of company executives as a means of deterring FCPA violations. Mark Mendelsohn, Deputy Chief of the Fraud Section of the Criminal Division of the DOJ, recently was quoted as saying: "To really achieve the kind of deterrent effect we're shooting for, you have to prosecute individuals … [W]hen people's liberty is at stake, it resonates in new ways."[5]

The Green case provides a primer on some of the tools available to prosecutors for investigating and prosecuting alleged FCPA violations. After federal authorities executed a search warrant at the Greens' office, but before the couple was indicted, prosecutors persuaded the financial manager of the Greens' company, who allegedly had helped Patricia Green make and track "commission" payments to Siriwan, to cooperate with the investigation and wear a concealed wire to record conversations with the Greens and several of their employees. For her cooperation and testimony at trial, the financial manager was granted immunity. Prosecutors also made an MLAT request to Swiss authorities to obtain and introduce at trial Swiss bank records linking Siriwan to overseas accounts held in her daughter's name.[6] Switzerland provided the records six months after the request was made – a relatively short turnaround.[7]

Finally, prosecutors won convictions against both Greens on money laundering charges, increasing their potential sentences. The statutory maximum prison term for

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2 *See* Michael Garrahan and Brooke Masters, "Fraud Spotlight on Hollywood," *Financial Times* (Aug. 9, 2009) ("Cash inducements to local officials are common in overseas shoots and such payments have hitherto been subject to only patchy scrutiny in Hollywood's notoriously opaque accounting system."), http://www.ft.com/cms/s/0/4f79c900-8508-11de-9a64-00144feabdc0.html; Glenn Bunting, "$78 Million of Red Ink?," *The Los Angeles Times* (Apr. 15, 2007) (reporting that line items in budget of one movie shot in foreign country included "local bribes"), http://www.latimes.com/entertainment/news/business/la-fi-movie15apr15,1,369487,full.story?coll=la-headlines-business-enter.

3 Frank Segers, "Overseas B.O. Breaks Record with $9.9 Bil.," *The Hollywood Reporter* (Jan. 1, 2009) (reporting that Hollywood film distributors grossed record overseas box office profits in 2008), http://www.hollywoodreporter.com/hr/content_display/news/e3i7fcfe6ddd3b5d6c2fd0f8ffaf2d6be15.

4 *See* http://www.debevoise.com/files/Publication/3143fa0a-ebbb-4dff-a8e1-28b53eb18152/Presentation/PublicationAttachment/842874c6-e886-4a04-89b4-28e58f03e031/FCPA_Update_August09v12.pdf.

5 Dionne Searcy, "To Combat Overseas Bribery, Authorities Make It Personal," *The Wall Street Journal* (Oct. 8, 2009), http://online.wsj.com/article/SB125495862894771979.html; *see also* "DOJ's Mendelsohn Notes Recent Enforcement Trends," FCPA Update, Vol. 1, No. 2 at 7 (Sept. 2009), http://www.debevoise.com/files/Publication/b576a274-9024-4ab5-880d-92867dc42922/Presentation/PublicationAttachment/c096af80-8948-49ce-90a8-952b6f54ec1d/FCPAUpdateNumber2.pdf.

6 *See* U.S.- Switzerland Treaty on Mutual Assistance in Criminal Matters, 27 U.S.T. 2019, T.I.A.S. No. 8302 (entered into force Jan. 23, 1977); Gov't Motion in Limine Re Admissibility of Swiss Bank Records, at 1-2 (Aug. 3, 2009).

7 *See* Gov't Motion in Limine Re Admissibility of Swiss Bank Records, at 1-2 (Aug. 3, 2009).

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money laundering is 20 years, compared to five years for an FCPA violation.[8] The jury found that the Greens violated 18 U.S.C. § 1956(a)(2)(A), which prohibits the transfer of funds into or out of the U.S. "with the intent to promote" certain specified unlawful activity, including bribery of a public official, by transmitting bribe payments from accounts in Los Angeles to overseas accounts. The jury also found a violation of 18 U.S.C. § 1957(a), which prohibits knowingly engaging in monetary transactions in criminally derived property worth more than $10,000, based on the Greens' reinvestment of proceeds from their illegally obtained Thai contracts into a Bangkok-based business venture.

The Green case illustrates how bribery problems can arise in the media and entertainment industry and reinforces the DOJ's efforts to send a strong enforcement message by way of prosecuting individuals. Both individuals and businesses can expect that the U.S. authorities will continue to rely on cooperating witnesses, relationships with foreign counterparts, and the charging of multiple offenses as tools in combating foreign bribery. ■

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8 *Compare* 15 U.S.C. § 78dd-2(g)(2)(A) (2006) *with* 18 U.S.C. § 1956(a)(3)(A) (2006).

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