



Program on
Corporate Compliance
and Enforcement
New York University School of Law

Corporate and Individual Liability for Corporate Misconduct After the Yates Memo

April 8, 2016
New York University
School of Law

Lester Pollack Colloquium Room
245 Sullivan Street (9th Floor)



U.S. Department of Justice
Office of the Deputy Attorney General

Washington, D.C. 20530
September 9, 2015

The Deputy Attorney General

MEMORANDUM FOR THE ASSISTANT ATTORNEY GENERAL, ANTITRUST DIVISION
THE ASSISTANT ATTORNEY GENERAL, CIVIL DIVISION
THE ASSISTANT ATTORNEY GENERAL, CRIMINAL DIVISION
THE ASSISTANT ATTORNEY GENERAL, ENVIRONMENT AND
NATURAL RESOURCES DIVISION
THE ASSISTANT ATTORNEY GENERAL, NATIONAL
SECURITY DIVISION
THE ASSISTANT ATTORNEY GENERAL, TAX DIVISION
THE DIRECTOR, FEDERAL BUREAU OF INVESTIGATION
THE DIRECTOR, EXECUTIVE OFFICE FOR UNITED STATES
TRUSTEES
ALL UNITED STATES ATTORNEYS

FROM:

Sally Quillian Yates 
Deputy Attorney General

SUBJECT:

Individual Accountability for Corporate Wrongdoing

Fighting corporate fraud and other misconduct is a top priority of the Department of Justice. Our nation's economy depends on effective enforcement of the civil and criminal law that protect our financial system and, by extension, all our citizens. These are principles that Department lives and breathes—as evidenced by the many attorneys, agents, and support staff who have worked tirelessly on corporate investigations, particularly in the aftermath of the financial crisis.

Most effective ways to combat corporate misconduct is by seeking to penetrate the wrongdoing. Such accountability incentivizes change



Program on Corporate Compliance and Enforcement

New York University School of Law

Faculty Directors
Jennifer Arlen '86
Geoffrey P. Miller

Executive Director
Serina M. Vash

The Program on Corporate Compliance and Enforcement (PCCE) is a law and policy program dedicated to developing a richer and deeper understanding of the causes of corporate misconduct and the nature of effective enforcement and compliance. Through practical discourse and legal scholarship, PCCE seeks to help shape optimal enforcement policy, guide firms in developing more effective and robust compliance programs, and enhance education in the field of corporate compliance and enforcement.



Corporate and Individual Liability for Corporate Misconduct After the Yates Memo

Conference Objectives

To be effective, corporate criminal and civil enforcement must deter wrongdoing by corporations and the employees operating within them. To do this, criminal and civil liability should ensure that crime does not pay. In the case of publicly held firms, criminal and civil liability also should incentivize firms to adopt and maintain an effective corporate compliance program, report misconduct that might otherwise escape detection, and fully cooperate.

Enforcement agencies (such as the Department of Justice and individual US Attorney's Offices) and regulators (such as the Securities and Exchange Commission, the Federal Reserve System and the Commodity Futures Trading Commission) each have developed policies designed in part to achieve these aims. These policies differ across offices and continuously evolve over time. This conference will bring together academics, enforcement officials, and defense lawyers to discuss criminal, civil, and regulatory enforcement policy for individuals and firms in light of issues raised by the September 9, 2015 memo by Deputy Attorney General Sally Quillian Yates (the "Yates Memo") on Individual Accountability for Corporate Wrongdoing and the November 16, 2015 revisions to the United States Attorney's Manual.

PCCE Conference Rules

To encourage openness and the sharing of information, our conferences and roundtables are governed by the following rule: Participants are free to use the information received, **but all PCCE events are completely not for attribution.** Thus, neither the identity of the person who makes a comment nor their affiliation (including whether they are a government or private-sector employee) may be revealed.

PCCE does not videotape or otherwise record an event done under this rule. PCCE does provide a list of participants to conference participants to promote future communication. We also post the conference program, including the list of speakers, on our website and take photographs that include speakers and attendees. The rules will not apply to the evening keynote address.

Continuing Legal Education

This event has been approved for up to 6.5 New York State CLE credits for attendance at the entire event. It is appropriate for newly admitted attorneys as well as experienced attorneys.

Corporate and Individual Liability for Corporate Misconduct After the Yates Memo

Friday April 8, 2016

New York University School of Law, Lester Pollack Colloquium Room, 9th Floor, 245 Sullivan Street (Furman Hall)

8:00–8:45 A.M.

Registration and Continental Breakfast

Lester Pollack Colloquium Room

8:45–9:00 A.M.

Welcome Remarks

Professor Jennifer Arlen '86, Norma Z. Paige Professor of Law and Director, Program on Corporate Compliance and Enforcement, NYU School of Law

9:00–10:10 A.M.

The Relationship Between Individual and Corporate Liability

Moderator: Professor Kevin Davis, Vice Dean and Beller Family Professor of Business Law, NYU School of Law

Panelists:

Aitan Goelman, Director, Division of Enforcement, US Commodity Futures Trading Commission

Pablo Quiñones, Chief, Strategy, Policy, and Training Unit, Fraud Section, Criminal Division, US Department of Justice

Virginia Chavez Romano, Associate Deputy Attorney General and Executive Director of the Financial Fraud Enforcement Task Force, US Department of Justice, Office of the Deputy Attorney General

John Savarese, Partner, Wachtell, Lipton, Rosen & Katz

Professor Kate Stith, Yale Law School

10:10–10:30 A.M.

Coffee/Tea Break

Lester Pollack Colloquium Room

10:30–11:10 A.M.

Evidence on DOJ and SEC Enforcement Policy

Moderator: Marshall Miller, Of Counsel, Wachtell, Lipton, Rosen & Katz and Senior Fellow, Program on Corporate Compliance and Enforcement

Guilty Pleas vs. DPAs and NPAs

Cindy Alexander, Research Fellow, Law and Economics Center, George Mason University

SEC Enforcement Policy Update

Stephen Choi, Murray and Kathleen Bring Professor of Law and Director, Pollack Center, NYU School of Law

NYU Law students, Pollack Center Project on Securities Fraud Litigation

11:00–11:10 a.m.

Questions

11:10 A.M.–12:10 P.M.

Enforcement Agencies' Treatment of Firms That Self-Report

Moderator: Jennifer Arlen, Norma Z. Paige Professor of Law and Director, Program on Corporate Compliance and Enforcement, NYU School of Law

Panelists:

Andrew J. Ceresney, Director, Division of Enforcement, US Securities and Exchange Commission

Douglas Lankler, Executive Vice President and General Counsel, Pfizer

Sung-Hee Suh, Deputy Assistant Attorney General, Criminal Division, US Department of Justice

Brent Snyder, Deputy Assistant Attorney General, Antitrust Division, US Department of Justice

Bruce Yannett, Deputy Presiding Partner and Chair, White Collar and Regulatory Defense Practice Group, Debevoise & Plimpton

12:10–1:25 P.M.

Networking Luncheon

Lipton Hall, 110 West Third Street

1:30–2:55 P.M.

Independent Consultants and Monitors

Moderator: Geoffrey P. Miller, Stuyvesant P. Comfort
Professor of Law and Director, Program on Corporate
Compliance and Enforcement, NYU School of Law

Panelists:

Hon. John Gleeson, Partner, Debevoise & Plimpton

Bonnie B. Jonas, Co-Founder, Pallas Global Group

Daniel S. Kahn, Assistant Chief, Fraud Section, Criminal
Division, US Department of Justice

Professor Veronica Root, University of Notre Dame Law
School

Bart M. Schwartz '71, Chairman, Guidepost Solutions

F. Joseph Warin, Partner, Gibson, Dunn & Crutcher

2:55–3:10 P.M.

Coffee/Tea Break

Lester Pollack Colloquium Room

3:10–4:20 P.M.

Coordination Across Enforcement Agencies

Moderator: Serina M. Vash, Executive Director, Program on
Corporate Compliance and Enforcement, NYU School of Law

Panelists:

Thomas C. Baxter Jr., Executive Vice President and General
Counsel, Federal Reserve Bank of New York

Joyce R. Branda, Deputy Assistant Attorney General, Civil
Division, US Department of Justice

Stephen M. Cutler, Executive Vice President and Vice
Chairman, JPMorgan Chase & Co.

Sandra Leung, Executive Vice President and General Counsel,
Bristol-Myers Squibb Company

Winston Paes, Chief, Business and Securities Fraud Section,
US Attorney's Office for the Eastern District of New York

4:20–5:10 P.M.

Keynote Address: David Green, Director, Serious Fraud Office (UK)

5:15–6:15 P.M.

Reception

Lester Pollack Colloquium Room and Atrium

Conference Keynote Speaker



David Green CB QC

Director, Serious Fraud Office (UK)

David Green CB QC was appointed director of the Serious Fraud Office in April 2012. Mr. Green was called to the bar in 1979, appointed recorder in 1996, and took silk in 2000. After 25 years of prosecuting and defending at the criminal bar, he was appointed the first director of the Revenue and Customs Prosecutions Office in April 2005, until the department was merged with the Crown Prosecution Service in January 2010. He returned to the bar in April 2011 and was appointed CB in the Queen's Birthday Honours that year.



Cindy R. Alexander

Research Fellow, Law and Economics Center, George Mason University

Cindy Alexander co-heads the empirical project on DOJ deferred prosecution agree-

ments at the Law and Economics Center (LEC). She is affiliated with the Division of Economics and Risk Analysis at the SEC. Her interest in corporate crime research began while at the DOJ, before joining the SEC as a financial economist in November 2003. She had been serving as senior economist at the Council of Economic Advisers, where she specialized in the economics of corporate governance reform. Ms. Alexander received her PhD in economics from UCLA, where she studied financial economics, industrial organization and the theory of the firm, and the economics of law. She has served on the faculty of the Owen Graduate School of Management of Vanderbilt University and as a research fellow at the University of Chicago Law School and the Yale Law School Center for the Study of Corporate Law. Ms. Alexander's published research appears in journals including the *Review of Financial Studies*, *Journal of Accounting and Economics*, *Journal of Law & Economics*, the *Journal of Economic & Management Strategy*, and the *Journal of Corporate Finance*. She also has articles in the *Federal Sentencing Reporter* and the *Yale Journal on Regulation*.



Jennifer H. Arlen

**Norma Z. Paige Professor of Law and
Director, Program on Corporate
Compliance and Enforcement,
NYU School of Law**

Jennifer Arlen '86 is one of the nation's leading scholars on corporate liability, specializing in corporate crime, vicarious liability, and securities fraud. She also has written extensively on medical malpractice liability and experimental law and economics. Professor Arlen received her BA in economics from Harvard College (1982, magna cum laude) and her JD (1986, Order of the Coif) and PhD in economics (1992) from New York University. She is co-founder and director of the NYU Program on Corporate Compliance and Enforcement. She also is a co-founder, director, and past president of the Society for Empirical Legal Studies, is a former director of the American Law and Economics Association (1991-93, 2006-09), serves on the editorial board of the *American Law and Economics Review*, and chaired the Law and Economics, Remedies, and Torts sections of the Association of American Law Schools. Before coming to NYU School of Law, Professor Arlen was the Ivadelle and Theodore Johnson Professor of Law and Business at the University of Southern California Gould School of Law. She clerked for Judge Phyllis Kravitch on the US Court of Appeals for the 11th Circuit. Professor Arlen teaches Corporations, Business Crime, and a seminar on Corporate Crime and Financial Misdealing: Legal and Policy Analysis.



Thomas C. Baxter Jr.

**Executive Vice President and
General Counsel, Federal Reserve
Bank of New York**

Thomas C. Baxter Jr. is the general counsel and executive vice president of the Legal Group at the Federal Reserve Bank of New York. He supervises day-to-day operation of the group, which includes the Federal Reserve Law Enforcement Unit, the corporate secretary's office, the compliance and ethics function, and the banking applications function. He also serves on the bank's Management Committee. Mr. Baxter serves as deputy general counsel of the Federal Open Market Committee. He has published myriad articles concerning legal aspects of banking and has written several books. Mr. Baxter earned his BA from the University of Rochester and a JD from Georgetown University Law Center.



Joyce R. Branda
Deputy Assistant Attorney General,
Civil Division, US Department of Justice

Joyce R. Branda is the deputy assistant attorney general for the Commercial Litigation branch of the Department of Justice, the Civil Division's largest component, with approximately 300 attorneys. She directs all areas of commercial litigation, including False Claims Act and qui tam cases; federal contract, grant, and loan disputes; bankruptcy and reorganization proceedings; international trade; patent and copyright infringement; and other litigation in both foreign and domestic courts. In addition, she provides important advice to senior officials of the department and represents the assistant attorney general in communications and negotiations with other departments and members of Congress. Ms. Branda joined the Civil Division in 1982, serving first as a trial attorney, then as an assistant director, and as deputy director of the Fraud Section. From 2007 to 2012, before her appointment as deputy assistant attorney general, she served as director of the section, supervising 100 attorneys in the investigation and litigation of cases under the False Claims Act and its qui tam provisions. In 2001, she received a Presidential Meritorious Executive Award as well as the Attorney General's Award for Exceptional Service, the highest recognition conferred by the Department of Justice, and in 2015 she received the Attorney General's Mary C. Lawton Lifetime Service Award. She has lectured extensively and appeared on panels on healthcare fraud, procurement fraud, and the False Claims Act and civil enforcement.



Andrew J. Ceresney
Director, Division of Enforcement,
US Securities and Exchange Commission

Andrew Ceresney is director of the SEC's Enforcement Division, which has more than 1,300 people throughout the country focused on enforcing the federal securities law. Before joining the SEC in April 2013, Mr. Ceresney served as a partner in the law firm of Debevoise & Plimpton, where he was co-chair of the White Collar Group and focused on representing entities and individuals in white collar criminal and SEC investigations, complex civil litigation, and internal corporate investigations. Before joining Debevoise, Mr. Ceresney served as an assistant US attorney in the US Attorney's Office for the Southern District of New York, where he was a deputy chief appellate attorney and a member of the Securities and Commodities Fraud Task Force and the Major Crimes Unit. As a prosecutor, Mr. Ceresney handled numerous white collar criminal investigations, trials, and appeals, including matters relating to securities fraud, mail and wire fraud, and money laundering. Mr. Ceresney served as a law clerk to the Honorable Dennis Jacobs of the US Court of Appeals for the Second Circuit (1997-98), and to the Honorable Michael Mukasey, formerly Chief Judge of the US District Court for the Southern District of New York (1996-97). He is a graduate of Columbia College and Yale Law School.



Stephen M. Cutler

**Executive Vice President and
Vice Chairman, JPMorgan Chase & Co.**

Stephen M. Cutler joined JPMorgan Chase & Co. in February 2007 and served as its general counsel until December 2015. Previously, he was a partner at Wilmer Cutler Pickering Hale and Dorr in Washington, DC, and co-chair of the firm's Securities Department. From 2001 to 2005, Mr. Cutler served as director of the Securities and Exchange Commission's Division of Enforcement, where he oversaw the SEC's investigations of Enron and WorldCom, as well as those involving NYSE specialists, research analyst conflicts, and mutual fund market timing and revenue sharing. Before joining the SEC as deputy director of enforcement in 1999, Mr. Cutler was a partner at Wilmer, Cutler & Pickering in Washington, DC. Mr. Cutler is on the boards of the Legal Action Center, the National Women's Law Center, and the Metropolitan Museum of Art. He is also currently a visiting lecturer in Law at Yale Law School, where he is co-teaching a class called Global Inside Counsel: The Challenges of an In-House Counsel in an Increasingly Integrated World. Mr. Cutler earned a JD from Yale Law School, where he served as an editor of the *Yale Law Journal*, and a BA summa cum laude from Yale University.



Kevin Davis

**Vice Dean and Beller Family Professor
of Business Law, NYU School of Law**

Kevin Davis teaches courses at NYU Law on contracts, regulation of foreign corrupt practices, secured transactions, and law and development, as well as seminars on financing development and contract theory. His current research is focused on contract law, anticorruption law, and the general relationship between law and economic development. Professor Davis received his BA in economics from McGill University in 1990. After graduating with an LLB from the University of Toronto in 1993, he served as law clerk to Justice John Sopinka of the Supreme Court of Canada and later as an associate in the Toronto office of Torys, a Canadian law firm. After receiving an LLM from Columbia University in 1996, he was appointed an assistant professor at the University of Toronto and in 2001 was promoted to associate professor. Professor Davis has also been a visiting assistant professor at the University of Southern California, a visiting fellow at Cambridge University's Clare Hall, and a visiting lecturer at the University of the West Indies in Barbados.



John Gleeson

Partner, Debevoise & Plimpton

John Gleeson is a litigation partner in the White Collar & Regulatory Defense and Commercial Litigation groups. His practice focuses on internal investigations, white collar defense, and complex civil litigation. Previously, Mr. Gleeson was a US District Judge in the Eastern District of New York. While a judge, Mr. Gleeson authored more than 1,500 published opinions (including 14 opinions for the US Court of Appeals for the Second Circuit, sitting by designation). He also presided over more than 200 civil and criminal jury trials. Mr. Gleeson was assigned numerous multidistrict litigations and served on the Judicial Conference Committee on Defender Services for nine years (including three as chair). Before his appointment to the bench in 1994, Mr. Gleeson was a federal prosecutor for 10 years. He served as chief of appeals, chief of special prosecutions, chief of organized crime, and chief of the Criminal Division. Mr. Gleeson received the Attorney General's Distinguished Service Award for his service as lead prosecutor in *United States v. John Gotti*. For the past 21 years, Mr. Gleeson has taught courses in complex federal investigations and sentencing at NYU School of Law. Before that, he taught at Brooklyn Law School and was the John A. Ewald Jr. Distinguished Visiting Professor of Law at the University of Virginia School of Law. Mr. Gleeson is a member of the American Law Institute, a trustee of the Vera Institute of Justice, a member of the board of directors of the NYU Institute of Judicial Administration, and a member of the advisory board of the PCCE. Mr. Gleeson earned his JD from the University of Virginia School of Law in 1980 and his BA from Georgetown University in 1975.



Aitan Goelman

Director, Division of Enforcement, US Commodity Futures Trading Commission

Aitan Goelman became director of the Commodity Futures Trading Commission's Division of Enforcement in June 2014. After graduating from Yale Law School in 1993, Mr. Goelman spent a year clerking for Justice Aharon Barak on the Supreme Court of Israel before beginning his career in the DOJ Attorney General's Honors Program. As an honor graduate, he was initially a trial lawyer in the Terrorism and Violent Crime Section in the Department of Justice's Criminal Division. After the Oklahoma City bombing in 1995, Mr. Goelman was appointed special attorney to the US Attorney General on the OKBomb Task Force and served as a trial lawyer in the federal trials of Timothy McVeigh and Terry Nichols, for which he was awarded the Attorney General's Award for Distinguished Service. From 1998 until 2003, Mr. Goelman was an assistant US attorney for the Southern District of New York, where he investigated and prosecuted various federal crimes, including RICO; conspiracy; and wire, mail, bank, and securities fraud. From 2003 until 2014, he was a litigation partner at Zuckerman Spaeder in Washington, DC, where his practice focused on white collar crime and complex commercial litigation. He is an adjunct law professor at George Washington University, where he teaches a course on the role of the federal prosecutor. In his 20 years practicing law, Mr. Goelman has tried more than 50 cases to verdict.



Bonnie B. Jonas

Co-Founder, Pallas Global Group

Bonnie Jonas co-founded Pallas Global Group, a company that provides independent monitoring and claims resolution and administration services to corporations and government agencies worldwide. Previously, Ms. Jonas served for 18 years as an assistant US attorney in the Southern District of New York. Most recently, she was deputy chief of the Criminal Division (2013-16). She also served as the SDNY's financial fraud coordinator for President Obama's Financial Fraud Enforcement Task Force and as co-chief of the General Crimes Unit. During her tenure in the SDNY, Ms. Jonas investigated and prosecuted many of the Department of Justice's most historic and complex matters. She investigated and prosecuted individuals at WorldCom, Royal Ahold, Aurora Foods, and Commerzbank and prosecuted and oversaw reforms through corporate monitorships of Deutsche Bank, Toyota, and General Motors. Ms. Jonas was an attorney with the law firm Paul, Weiss, Rifkind, Wharton & Garrison and a law clerk for the Honorable Reena Raggi of the US District Court for the Eastern District of New York. Ms. Jonas is a graduate of the Wharton School at the University of Pennsylvania and Columbia University Law School. She has been a keynote speaker, lecturer, and panelist for investment professionals, lawyers, business school students, and law enforcement officials on corporate governance, corporate culture, and enforcement trends in the financial industry. Ms. Jonas has received national awards including the Director's Award for Superior Performance by a Litigative Team for the WorldCom case; Council of the Inspectors General on Integrity and Efficiency Gaston L. Gianni Jr. Better Government Award for the Toyota prosecution; the National Association of Former United States Attorneys' Exceptional Service Award; and New York County Lawyers' Association award for Outstanding Public Service.

Daniel S. Kahn

Assistant Chief, Fraud Section, Criminal Division, US Department of Justice

Daniel Kahn has been with the Department of Justice's Criminal Division Fraud Section since 2010 and has been an assistant chief in the Foreign Corrupt Practices Act Unit since 2013. Mr. Kahn has tried and convicted a number of individuals in FCPA, securities fraud, and other white collar cases, and he was the lead prosecutor on 10 corporate FCPA resolutions, including the largest-ever fine by the DOJ in an FCPA case. Mr. Kahn earned the Assistant Attorney General's Award for Exceptional Service for his work on the Alstom case and the Assistant Attorney General's Award for Distinguished Service for his part in prosecuting a bribery scheme involving the state-owned and state-controlled telecommunications company in Haiti. In connection with that case, Mr. Kahn was co-counsel in the first conviction at trial of a foreign government official for laundering proceeds of FCPA violations. Before joining the Department of Justice, Mr. Kahn spent six years at Davis Polk & Wardwell. Among other cases, he helped secure the retrial and acquittal of a defendant wrongfully convicted of murdering a Bloods kingpin, and then first-chaired a trial against the state of New York and secured the second-largest-ever award under New York's wrongful conviction statute. Mr. Kahn was twice selected by the New York Police Department Executive Development Division to present on the prevention of wrongful convictions, and he assisted the New York Justice Task Force in investigating wrongful convictions. Mr. Kahn graduated summa cum laude from Cornell University and cum laude from Harvard Law School.



Douglas Lankler
Executive Vice President and
General Counsel, Pfizer

At Pfizer, Douglas Lankler reports to the chief executive officer and is a member of Pfizer's executive leadership team. Before being named general counsel, Mr. Lankler was Pfizer's chief compliance and risk officer, a role he assumed in 2006. Mr. Lankler has been with Pfizer since 1999. Before joining the company, he worked with the United States Department of Justice as an assistant US attorney in the Southern District of New York. Mr. Lankler was a recipient of the United States Attorney General's Distinguished Service Award. Before joining the Department of Justice, he worked in the Litigation Department of Simpson Thacher & Bartlett in New York. Mr. Lankler graduated from the State University of New York at Albany and Cornell Law School.



Sandra Leung
Executive Vice President and General
Counsel, Bristol-Myers Squibb Company

Sandra Leung leads Bristol-Myers Squibb's worldwide Law Department and is responsible for a wide range of legal areas, including intellectual property, commercial and regulatory law, litigation, corporate governance, and securities, and transactions including licensing, acquisitions, and divestitures. She also has responsibility for environment, health and safety, corporate security and corporate philanthropy. Ms. Leung joined Bristol-Myers Squibb in 1992 as a staff attorney in the Litigation Department. She was promoted to positions of increasing responsibility and was elected corporate secretary in 1999. In September 2006, she was appointed interim general counsel. Six months later, she was named general counsel. Ms. Leung began her legal career as assistant district attorney at the Manhattan District Attorney's Office, where she was an original member of the Child Abuse Bureau. She ended her prosecutorial career, after trying more than 40 jury trials to verdict, as a member of the prestigious Homicide Investigations Unit, where she conducted investigations of unsolved homicides linked with drug gang activity. Ms. Leung is on the board of directors of the Asian American Legal Defense and Education Fund, a trustee of the NALP Foundation, and on the board of directors of the Minority Corporate Counsel Association. Among other awards, Ms. Leung was named one of America's 50 Outstanding General Counsels by the *National Law Journal* in 2014 and received the Excellence in Corporate Practice Award from the Association of Corporate Counsel. She is a graduate of Tufts University and Boston College Law School.



Geoffrey P. Miller

Stuyvesant P. Comfort Professor of Law and Director, Program on Corporate Compliance and Enforcement, NYU School of Law

Geoffrey Miller received his BA magna cum laude from Princeton in 1973 and his JD from Columbia in 1978, where he was a Stone Scholar and editor-in-chief of *Columbia Law Review*. He clerked for Judge Carl McGowan of the US Court of Appeals for the DC Circuit and Justice Byron White of the US Supreme Court. After working as an attorney adviser at the Office of Legal Counsel of the US Department of Justice and as an associate with a Washington, DC, firm, Professor Miller joined the faculty of the University of Chicago Law School in 1983, where he served as Kirkland & Ellis Professor and associate dean. Professor Miller came to NYU Law in 1995. A 2011 inductee into the American Academy of Arts and Sciences, he is chief reporter for the American Law Institute's Principles of the Law, Compliance, Enforcement, and Risk Management for Corporations, Nonprofits, and Other Organizations. He is a director of the NYU Center on Civil Justice and its Center for Financial Institutions. He has been a visiting professor or visiting scholar at Columbia University, Harvard University, University of Minnesota, University of Basel (Switzerland), University of Genoa (Italy), Collegio Carlo Alberto (Italy), University of St. Gallen (Switzerland), University of Frankfurt (Germany), University of Sydney (Australia), University of Auckland (New Zealand), and the Bank of Japan. Professor Miller is author or editor of more than a dozen books and 200 research papers. He is a founder, past director and president, and current fellow of the Society for Empirical Legal Studies, a scholarly organization devoted to promoting statistical and other empirical techniques in the study of legal institutions. Professor Miller serves as Audit Committee chair and sits on the Compensation and Risk committees of the State Farm Bank board of directors.



Marshall Miller

Of Counsel, Wachtell, Lipton, Rosen & Katz and Senior Fellow, Program on Corporate Compliance and Enforcement, NYU School of Law

Marshall L. Miller is of counsel to Wachtell, Lipton, Rosen & Katz. He is also a senior fellow at NYU Law's Program on Corporate Compliance and Enforcement, where he advises on white collar enforcement and compliance efforts. Until July 2015, Mr. Miller served as the principal deputy assistant attorney general and chief of staff of the Criminal Division of the Department of Justice. In that position, he supervised more than 600 federal prosecutors and oversaw DOJ's highest-profile criminal prosecutions. Mr. Miller helped determine and implement DOJ priorities and policies, testifying on Capitol Hill and advising executive branch officials. He previously worked as an AUSA at the US Attorney's Office for the Eastern District of New York, where he ultimately served as chief of the Criminal Division. Mr. Miller has conducted and supervised the successful prosecution of some of the world's most significant corporations, corporate executives, cybercriminals, and international terrorists. For his work, he has received a number of DOJ's highest awards, as well as awards from law enforcement groups and bar associations. Mr. Miller co-founded the EDNY Federal Criminal Prosecution Clinic at NYU Law and taught as a full-time and adjunct professor at NYU from 2003 through 2012. He clerked for US District Judge Allyne R. Ross and earned both his JD and BA from Yale.



Winston Paes

Chief, Business and Securities Fraud Section, US Attorney's Office for the Eastern District of New York

Winston Paes joined the US Attorney's Office in March 2008 and was appointed to the Business and Securities Fraud Section one year later. Mr. Paes has investigated and prosecuted a wide variety of criminal matters, specializing in fraud involving publicly traded companies, corporate executives, hedge funds, investment advisers, broker-dealers, insider trading, market manipulation, offshore tax havens, and violations of the Foreign Corrupt Practices Act and the False Claims Act. He was appointed deputy chief of the section in June 2014 and promoted to chief in March 2015. Mr. Paes has successfully prosecuted some of the office's most significant white collar cases. He received the 2014 Department of Justice Director's Award for Superior Performance by a Litigative Team and the 2013 Council of the Inspectors General on Integrity and Efficiency Award for Excellence in Investigation for his role in the prosecution of biotechnology giant Amgen for misbranding an anemia drug. This prosecution resulted in Amgen's pleading guilty to misdemeanor misbranding and paying \$762 million to resolve its criminal and civil liability. Mr. Paes was the lead prosecutor in the successful investigation and conviction, after trial, of Aéropostale's former chief merchandising officer for engaging in a \$350 million fraud scheme that involved \$25 million in kickback payments. Mr. Paes was also a member of the team that prosecuted bribes and kickbacks in the securities-lending industry, which resulted in the conviction of 33 individuals, including the conviction, after trial, of the head of Morgan Stanley's domestic securities lending desk. Before joining the US Attorney's Office, Mr. Paes was an associate at Morgan, Lewis & Bockius, New York. He graduated magna cum laude from Brooklyn Law School in 2003.



Pablo Quiñones

Chief, Strategy, Policy, and Training Unit, Fraud Section, Criminal Division, US Department of Justice

Pablo Quiñones serves as chief of the Strategy, Policy, and Training Unit and a deputy chief of the Fraud Section. From 2004 to 2012, he served as an assistant United States attorney in the Southern District of New York, where he played a leading role in handling a number of significant cases involving investment fraud and stock manipulation, insider trading, accounting fraud, tax fraud, and other complex fraud schemes. Mr. Quiñones also has extensive experience in the private sector. Upon leaving the US Attorney's Office in 2012, for example, he served as a litigation partner of a global law firm, where he represented companies and individuals in civil litigation, criminal investigations, and regulatory enforcement proceedings and, subsequently, worked as the general counsel of an investment management company, where he oversaw legal and compliance matters. Mr. Quiñones graduated from Cornell University and Michigan Law School.

Virginia Chavez Romano

**Associate Deputy Attorney General
and Executive Director of the Financial Fraud
Enforcement Task Force, US Department of Justice,
Office of the Deputy Attorney General**

Virginia Chavez Romano joined the Office of the Deputy Attorney General in July 2014 as an associate deputy attorney general and executive director of the Financial Fraud Enforcement Task Force. In addition to managing the task force, Ms. Romano is involved in formulating and instituting department-wide policy initiatives in the area of financial fraud. From May 2012 until June 2014, she was a deputy attorney general for economic justice in the New York State Office of the Attorney General. In this role, Ms. Romano's responsibilities included supervising residential mortgage-backed securities investigations and litigations brought under the Martin Act. Her work was done in connection with the Financial Fraud Enforcement Task Force's RMBS Working Group, which was established by President Obama in early 2012 and is co-chaired by New York Attorney General Eric T. Schneiderman. Ms. Romano was an assistant US attorney for the Southern District of New York from 2002 until 2012; she served as lead prosecutor in dozens of investigations and prosecutions for offenses ranging from international drug trafficking and money laundering to complex financial crimes. From 2008 until 2012, Ms. Romano was a member of the Securities and Commodities Fraud Task Force of the US Attorney's Office. Before joining that office, she was a litigation associate in the New York office of Willkie Farr & Gallagher. Ms. Romano is a 1994 graduate of Princeton University and a 1997 graduate of Stanford Law School.



Professor Veronica Root

University of Notre Dame Law School

Veronica Root writes about and researches issues related to corporate compliance, drawing on scholarship from the areas of

professional ethics, corporate governance, employment law, and corporate social responsibility. She investigates the institutional mechanisms that private firms can use to improve long-term compliance with legal and regulatory requirements and strengthen antidiscrimination norms. Professor Root's research on monitors has appeared in the *Virginia Law Review*, the *Yale Journal on Regulation*, and the *University of Pennsylvania Journal of Business Law* (co-authored). Her research on antidiscrimination efforts within large law firms has appeared in the *University of Michigan Journal of Law Reform*. Professor Root currently teaches Corporate Compliance & Ethics, Professional Responsibility, and Contracts. In 2015, the Notre Dame Black Law Students Association presented her with the Charles F. Crutchfield Award. Before joining the law school faculty, she was a clerk on the US Court of Appeals for the Fifth Circuit and an attorney at Gibson Dunn in Washington, DC. Professor Root is a graduate of the University of Chicago Law School and Georgetown University.



John Savarese

Partner, Wachtell, Lipton, Rosen & Katz

John F. Savarese has been a partner in the Litigation Department of Wachtell, Lipton, Rosen & Katz for the past 25 years. He has represented numerous *Fortune 500* corporations, major financial institutions, and senior SEC executives and other regulatory enforcement proceedings, as well as white collar criminal investigations, complex securities litigations, and internal investigations. His extensive experience includes major investigations arising out of the financial crisis of 2008, plus accounting fraud, insider trading, criminal tax, and criminal antitrust allegations. Mr. Savarese joined Wachtell Lipton in 1988, after working in the US Attorney's Office for the Southern District of New York, where he tried numerous jury trials, received the Attorney General's John Marshall Award for Outstanding Legal Achievement, and served as chief appellate attorney. Mr. Savarese served as a law clerk to Justice William J. Brennan of the US Supreme Court and to the Honorable Louis H. Pollak of the US District Court for the Eastern District of Pennsylvania. Mr. Savarese teaches a course on white collar criminal law and procedure at Harvard Law School. He serves on the Executive Committee of the New York City Bar Association and was the first chairman of the association's White Collar Criminal Law Committee. He is a member of the American Law Institute and serves as adviser to the ALI's project on Principles of the Law, Compliance, Enforcement, and Risk Management. Mr. Savarese graduated magna cum laude from Harvard University in 1977 and received his JD cum laude in 1981 from Harvard Law School, where he was an editor of the Harvard Law Review. Mr. Savarese is regularly recognized as one of the world's top litigators, including being selected for *International Who's Who of Business Lawyers*, *Chambers USA Guide* and *Lawdragon's 500 Leading Lawyers in America*.



Bart M. Schwartz

Chairman, Guidepost Solutions

Described by the New York Times as the person "often sought out in ... thorny situations" by corporations, Bart M. Schwartz has wide experience providing advice and support to corporations, governments, and individuals. He is currently the federal monitor of General Motors. Mr. Schwartz served under US Attorney Rudolph Giuliani as chief of the Criminal Division in the Southern District of New York. In that post, he had responsibility for overseeing prosecutions related to financial and business fraud, organized crime, narcotics, and other types of criminal activity. Mr. Schwartz has served as a trial lawyer, corporate adviser, and CEO of a private company and a unit of a public company. He is currently the chairman of Guidepost Solutions and serves on the board of HMS Holdings (NASDAQ:HMSY), where he is chairman of its Compliance Committee and a member of its Audit Committee. He is also chairman of the board of managers of Kadmon Corporation, a biopharma company, and is on the board of directors of the Stuyvesant High School Alumni Association and the Police Athletic League. For more than 30 years, Mr. Schwartz has managed complex investigations, prosecutions, and security assessments. In addition to being the GM monitor, he has served as an integrity monitor or independent compliance consultant for Point72 Asset Management (formerly SAC Capital Advisors), BP, Milberg Weiss, Deutsche Bank, HP, DHL, and others.



Brent Snyder

**Deputy Assistant Attorney General,
Antitrust Division, US Department
of Justice**

Brent Snyder serves as deputy assistant attorney general for criminal enforcement in the Antitrust Division of the United States Department of Justice. Mr. Snyder has served in the division since 2003, first as a trial attorney in its National Criminal Enforcement Section (2003-11), then in its San Francisco office (2011-13). He has been a deputy assistant attorney general since November 2013. Mr. Snyder has played a key role in some of the Antitrust Division's most important recent investigations and trials, including thin-film transistor liquid crystal display panels, coastal water freight, and air transportation. Mr. Snyder twice has received the Attorney General's Award for Distinguished Service; he has been awarded an Antitrust Division Award of Distinction; and most recently, *California Lawyer* named him a California Attorney of the Year in 2013. Mr. Snyder is a 1989 graduate of Seattle Pacific University and a 1992 graduate of the University of Texas School of Law, where he served on the *Texas Law Review*. Before joining the Antitrust Division in 2003, Mr. Snyder completed a federal judicial clerkship and practiced law at Paul, Hastings, Janofsky & Walker in Los Angeles and Perkins Coie in Seattle.



Professor Kate Stith

Yale Law School

Kate Stith is the Lafayette S. Foster Professor at Yale Law School, where she teaches and writes in the areas of criminal law, criminal procedure, constitutional law, sentencing, and prosecutorial ethics. She is the primary author of *Fear of Judging: Sentencing Guidelines in the Federal Courts* (with J.A. Cabranes; University of Chicago Press, 1998) and is a co-author of *Defining Federal Crimes* (with D. Richman and W. Stuntz; Aspen, 2014). Previously, she served as an assistant United States attorney in the Southern District of New York, as a special assistant to the chief of the Criminal Division at the Department of Justice in Washington, and as an economist at the Council of Economic Advisers in the Executive Office of the President. Professor Stith is serving or has served on the board of governors of the Yale Press, as an adviser to the ALI's Model Penal Code Sentencing Project, on the National Research Council's Committee on Law and Justice, on the Advisory Committee for the Federal Rules of Criminal Procedure, on the Dartmouth College board of trustees, on the Federal Bar Council Foundation board of trustees, as vice-chair of the Connecticut Bar Committee on Professional Responsibility, as faculty sponsor of the Women's Campaign School at Yale, as deputy dean and acting dean of Yale Law School, and on the editorial boards of four legal journals. Professor Stith is a graduate of Dartmouth College, the Kennedy School of Government, and Harvard Law School. She served as a law clerk to US Supreme Court Justice Byron R. White.



Sung-Hee Suh
Deputy Assistant Attorney General,
Criminal Division, US Department
of Justice

Sung-Hee Suh is the deputy assistant attorney general overseeing the Fraud, Appellate, and Capital Case Sections in the Criminal Division of the US Department of Justice. Her responsibilities include supervising cases involving the Foreign Corrupt Practices Act, securities and commodities fraud, healthcare fraud, and government program fraud. She also works on formulating and implementing federal enforcement policies on white collar crime and coordinating interagency, multidistrict, and international law enforcement efforts. Ms. Suh rejoined the Justice Department in September 2014 after 15 years at Schulte Roth & Zabel, where she was a partner in the Litigation Group and handled numerous securities and commodities fraud, FCPA, Bank Secrecy Act, anti-money laundering, and economic sanctions matters. Before joining Schulte Roth, she served as an assistant US attorney in the Eastern District of New York from 1994 to 1999, including as deputy chief of the Organized Crime and Racketeering Section. She previously worked as an associate at Davis Polk & Wardwell and as a law clerk to US District Judge Robert L. Carter in the Southern District of New York. Ms. Suh is a graduate of Harvard College, Harvard Graduate School of Arts and Sciences, and Harvard Law School.



Serina M. Vash
Executive Director, Program on
Corporate Compliance and Enforcement,
NYU School of Law

A seasoned former federal prosecutor and litigator, Serina M. Vash brings with her two decades of practical experience and a passion for tackling the issue of deterring crime. Before joining NYU Law, Ms. Vash served for 12 years in the United States Attorney's Office for the District of New Jersey. While at the US Attorney's Office, she supervised and prosecuted a wide range of federal crimes, including cases involving securities fraud, money laundering, structuring, organized crime and racketeering, cybercrime, national security, and other financial frauds. In 2010, Ms. Vash was named the first-ever chief of the office's General Crimes Unit. During her tenure, she also served as acting deputy chief of the Criminal Division, senior litigation counsel in both the Organized Crime/Gang Unit and the National Security Unit, and a member of the office's Trial Mentorship Program. Before becoming an assistant United States attorney in 2002, Ms. Vash was a litigation associate at Cahill Gordon & Reindel in New York from 1995 to 1999. From 1999 to 2001, she served as the first law clerk to the Honorable Faith S. Hochberg of the US District Court for the District of New Jersey. Ms. Vash graduated in 1992 from Duke University and graduated cum laude in 1995 from St. John's University School of Law, where she was associate editor of the Law Review. She has lectured throughout the country on criminal investigations, criminal prosecution, and crime prevention.



F. Joseph Warin

Partner, Gibson, Dunn & Crutcher

F. Joseph Warin is chair of the Litigation Department in the Washington, DC, office of Gibson, Dunn & Crutcher and serves as co-chair of the firm's White Collar Defense and Investigations Practice Group. He served as assistant US attorney in Washington, DC, from 1976 to 1983. In that capacity, Mr. Warin was awarded a Special Achievement award by the Attorney General. As a prosecutor, he tried more than 50 jury trials. Mr. Warin's areas of expertise include white collar crime and securities enforcement, including Foreign Corrupt Practices Act investigations, False Claims Act cases, special committee representations, compliance counseling, and complex class action civil litigation. Mr. Warin has been the only lawyer ever to serve three times as an FCPA monitor or counsel to a monitor, including his selection as US counsel for the Siemens monitorship. He also has represented many companies that have been subject to monitors. He has contributed to the academic discourse on monitorship with his articles. Mr. Warin is consistently ranked as a leading FCPA, white collar criminal defense, securities regulation, and enforcement attorney by Chambers USA, and in 2015 and 2016 he was selected by Chambers Latin America as a top-tier lawyer, Latin America-wide, in fraud and corporate investigations. Mr. Warin received the Chambers USA Award for Excellence in 2014 in the category of Litigation: White Collar Crime & Government Investigations. In 2015 he was named to *Who's Who Legal and Global Investigations Review* list of the World's Ten-Most Highly Regarded Investigations Lawyers. He leads the global White Collar Defense and Investigations practice of Gibson Dunn, which was ranked by *Global Investigations Review* as the No. 1 investigative law firm in the world. Mr. Warin graduated in 1975 from the Georgetown University Law Center and received his Bachelor of Arts degree cum laude from Creighton University in 1972.



Bruce Yannett

Deputy Presiding Partner and Chair, White Collar and Regulatory Defense Practice Group, Debevoise & Plimpton

Bruce Yannett '85 focuses on white collar criminal defense, regulatory enforcement, and internal investigations. He represents a broad range of companies, financial institutions, and their executives in matters involving securities fraud, accounting fraud, foreign bribery, insider trading, and money laundering. He has extensive experience representing corporations and individuals outside the United States in responding to inquiries and investigations. Chambers USA 2015 recognizes Mr. Yannett as a Band 1 practitioner for both white collar criminal defense and FCPA matters. *The Legal 500 US* calls him a "superstar," *Lawdragon* recognizes him as one of the 500 leading lawyers in America, and *Benchmark Litigation* names him a Litigation Star. In selecting Debevoise as Litigation Department of the Year in 2014, *The American Lawyer* stated that Mr. Yannett's work on the groundbreaking Siemens FCPA internal investigation, which spanned 34 countries, and settlement with US and German authorities, "cemented his credibility with regulators." He has written and lectured extensively on white collar criminal defense and regulatory enforcement issues. He is an editor of the firm's monthly FCPA Update and a member of the board of editors of the *Financial Fraud Law Report* and of the editorial board of *Global Investigations Review*. Mr. Yannett co-authored a chapter on the FCPA in *Defending Corporations and Individuals in Government Investigations*, published in 2011 and 2013. He received his BA magna cum laude from Brown University in 1980, Phi Beta Kappa, and earned his JD cum laude from New York University School of Law in 1985, where he was elected to the Order of the Coif and was executive editor of the *New York University Law Review*.

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New York University School of Law

New York University School of Law
40 Washington Square South, Suite 411
New York, NY 10012
(212) 992-8821
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Jennifer H. Arlen
jennifer.arlen@nyu.edu

Geoffrey P. Miller
geoffrey.miller@nyu.edu

Jerome Miller
jerome.miller@nyu.edu

Serina M. Vash
serina.vash@nyu.edu