



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

# Compliance: New Risks, Challenges, and Approaches

October 21, 2016  
New York University  
School of Law

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



# Program on Corporate Compliance and Enforcement

New York University School of Law

## Faculty Directors

Jennifer H. Arlen

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.



# Compliance: New Risks, Challenges, and Approaches

## Conference Objectives

The goals of the conference are to bring together academics, enforcement officials, compliance officers, general counsels, white collar defense lawyers, and lawyers representing whistleblowers to discuss the changing role of compliance in business enterprise and understand how to harness information (both internal and external) to achieve efficient and effective compliance with the law.

### 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 content received at this PCCE event is not for attribution, in whole or in part.** 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, unless otherwise noted. PCCE does provide a list of participants to conference participants to promote future communication. We also post the conference program, including the speakers, on our website, and take photographs that include speakers and attendees.

### Continuing Legal Education

*This event has been approved for up to 6 New York State CLE credits for attendance at the entire event. It is appropriate for newly admitted attorneys as well as experienced attorneys.*

# Compliance: New Risks, Challenges, and Approaches

## Friday, October 21, 2016

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

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8:30–8:55 A.M.

### Registration and Continental Breakfast

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8:55–9:00 A.M.

### Welcome Remarks

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

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

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9:00–10:05 A.M.

### Sanctioning Compliance Officers: External and Internal Sanctions on Compliance Officers

**Moderator: Edward Rock**, Professor of Law, NYU School of Law

#### Panelists

**Jamal El-Hindi**, Deputy Director, Financial Crimes Enforcement Network

**Jill E. Fisch**, Perry Golkin Professor of Law and Co-Director, Institute for Law and Economics, University of Pennsylvania Law School

**Court E. Golumbic**, Managing Director, Global Head of Financial Crime Compliance, Goldman Sachs

**Anthony S. Kelly**, Co-Chief, Asset Management Unit, Division of Enforcement, U.S. Securities and Exchange Commission

**Betty Santangelo**, Schulte Roth & Zabel

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10:05–10:20 A.M.

### Coffee/Tea Break

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10:20–11:25 A.M.

## Whistleblowing and Compliance: Inducing Internal Reporting and Investigating in the Shadow of External Whistleblowing

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

### Panelists

**Martine M. Beamon**, Partner, Litigation Department, Davis Polk & Wardwell LLP

**Stephen S. Hasegawa**, Partner, Phillips & Cohen LLP

**Elizabeth Wolfe Morrison**, Vice Dean of Faculty and ITT Harold Geneen Professor in Creative Management, Stern School of Business, New York University

**Diana Sands**, Senior Vice President, Office of Internal Governance and Administration, The Boeing Company

**Andrew Weissmann**, Chief, Fraud Section, U.S. Department of Justice Criminal Division

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11:25–11:40 A.M.

## Coffee/Tea Break

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11:40 A.M.–12:45 P.M.

## Harnessing Data Analytics to Enhance Compliance

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

### Panelists

**Thomas Bock**, Executive Managing Director, K2 Intelligence

**John Lucker**, Principal & Global Advanced Analytics Market Leader, Deloitte & Touche LLP

**Barbara Patow**, Global Head of AML, Financial Crime Compliance, HSBC Holdings plc

**Foster J. Provost**, Professor of Information Systems and Andre Meyer Faculty Fellow, Stern School of Business, New York University

**Joseph Sansone**, Co-Chief, Market Abuse Unit, Division of Enforcement, U.S. Securities and Exchange Commission

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12:45–1:55 P.M.

## Networking Luncheon

Lipton Hall, 110 West Third Street

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2:00–3:15 P.M.

## Compliance Beyond Procedures: Understanding Behavioral Compliance and Fostering a Culture of Business Ethics

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

### Panelists

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

**Brad S. Karp**, Partner and Chair, Paul, Weiss, Rifkind, Wharton & Garrison LLP

**Donald C. Langevoort**, Thomas Aquinas Reynolds Professor of Law, Georgetown University Law Center

**Timothy J. Lindon**, Vice President and Chief Compliance Officer, Philip Morris International

**David B. Pitofsky**, General Counsel and Chief Compliance Officer, News Corp.

**Alfred N. Rosa**, Chief Compliance Director and Senior Executive Counsel, General Electric Company

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3:15–3:30 P.M.

## Coffee/Tea Break

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3:30–4:15 P.M.

## Keynote Address: DFS's Contributions to Fostering a Compliance Culture in an Age of Risk

**Maria T. Vullo**, Superintendent, New York State Department of Financial Services

*The speech will be videotaped. The Q&A will not be videotaped and is under our PCCE rule.*

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4:15–5:15 P.M.

## Reception

Lester Pollack Colloquium Room and Atrium

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## Keynote Speaker



**Maria T. Vullo**  
**Superintendent, New York**  
**State Department of**  
**Financial Services**

Maria T. Vullo '87 was confirmed by the New York State Senate as Superintendent of Financial Services on June 15, 2016. She was nominated for the position

by Governor Andrew Cuomo. As Superintendent, she is responsible for protecting consumers and markets in New York state from fraud and financial crises, as well as reforming the regulation of financial services to keep pace with the industry's rapid evolution.

Before joining DFS, Vullo was a litigation partner at Paul, Weiss, Rifkind, Wharton & Garrison LLP, where she led civil, criminal, and regulatory investigations before courts and governmental authorities across the country. Vullo also served as Executive Deputy Attorney General for the Division of Economic Justice in the Office of the New York State Attorney General, under then Attorney General Cuomo. There she oversaw the bureaus of Investment Protection, Antitrust, Real Estate Finance, Consumer Frauds, and Internet, leading investigations across New York state to protect investors and consumers from fraud.

Over the course of her career, Vullo has had specific legal experience including litigations and investigations involving the financial services sectors and fraud, real estate, healthcare, insurance, tax, consumer protection, bankruptcy, anti-trust, and constitutional law. An accomplished trial lawyer, Vullo has also argued before the U.S. Supreme Court; the U.S. Courts of Appeals for the Second, Ninth, and 10th Circuits; and the New York State Appellate Division.

Vullo was twice nominated by the New York State Commission on Judicial Nomination as a candidate for Associate Judge of the Court of Appeals. She has been named a New York Super Lawyer by *Super Lawyers* and has been included in numerous leading lawyer lists published by the *National Law Journal* and other leading publications. She recently received the New York Women Making a Difference Award from Eleanor's Legacy, the Humanitarian of the Year Award from the Interfaith Nutrition Network, and the Distinguished Corporate Citizen Award from A Better Balance, among many other awards and professional recognitions.

Vullo earned her J.D. from New York University School of Law, an M.P.A. from the New York University Wagner Graduate School of Public Service, and a B.A. from the College of Mount Saint Vincent. She clerked for the Honorable John A. MacKenzie, U.S. District Court for the Eastern District of Virginia, after law school and before entering private practice.





### Jennifer H. Arlen

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

Professor Jennifer Arlen '86 is one of the nation's leading scholars on corporate liability, medical malpractice, and experimental law and economics. She is a Founder, Director, and Past President of the Society for Empirical Legal Studies. She also is Secretary/Treasurer of the American Law and Economics Association, served on the ALEA Board of Directors (1991-93, 2006-09), and sits on the Editorial Board of the *American Law and Economics Review*. Arlen currently serves as an Associate Reporter for the American Law Institute's Principles of the Law, Compliance, Enforcement, and Risk Management for Corporations, Nonprofits, and Other Organizations Project. She has been a visiting professor at the California Institute of Technology, Harvard Law School, and Yale Law School, and was the Ivadelle and Theodore Johnson Professor of Law and Business at USC Gould School of Law before coming to NYU. Arlen received her B.A. in economics from Harvard College (1982, magna cum laude) and her J.D. (1986, Order of the Coif) and Ph.D. in economics (1992) from New York University. She clerked for Judge Phyllis Kravitch on the U.S. Court of Appeals for the 11th Circuit. Arlen teaches Corporations, Business Crime, and Regulation of Foreign Corrupt Practices.



### Martine M. Beamon

**Partner, Litigation Department,  
Davis Polk & Wardwell LLP**

Martine Beamon, a partner in Davis Polk's Litigation Department and a former federal prosecutor, has successfully represented individuals and institutions in their most critical situations. Her matters have included grand jury and regulatory investigations, representing both companies and individuals in connection with allegations of insider trading, commodities fraud, market manipulation and other securities fraud, foreign corrupt practices, and pharmaceutical marketing violations, among other areas. Her complex civil matters have involved allegations under the False Claims Act, consumer protection and whistleblower provisions, and other state and federal statutes. Beamon has participated in a number of confidential internal investigations on behalf of clients facing potential criminal and regulatory exposure, and she has advised corporate boards of directors and subcommittees on matters of corporate governance and compliance. In addition, the FBI has requested that she train its agents on insider trading.

She also serves, pro bono, on the Criminal Justice Act Panel for the Southern District of New York, representing indigent defendants in federal criminal proceedings. Beamon served as an Assistant U.S. Attorney for the U.S. Attorney's Office, Southern District of New York (1995-2000), where she conducted numerous investigations and criminal trials.

Beamon received her J.D. from the University of Pittsburgh School of Law and her B.A. from the University of Notre Dame.





**Thomas Bock**  
**Executive Managing Director,**  
**K2 Intelligence**

Thomas Bock, an Executive Managing Director and leader of K2 Intelligence's Anti-Money Laundering (AML) and Regulatory Compliance Practice, has more than 20 years of global experience assisting clients with complex anti-money laundering, sanction, regulatory compliance, fraud investigation, and risk management matters. He works with clients to evaluate their existing AML procedures, develop new solutions to minimize risk and costs, and implement new programs to ensure regulatory compliance. His areas of expertise include transaction monitoring and ensuring compliance with the Bank Secrecy Act (BSA), know your customer (KYC) regulations, Foreign Corrupt Practices Act (FCPA), and Office of Foreign Assets Control (OFAC) sanctions.

Before joining K2 Intelligence, Bock was an independent consultant at CIT Group LLC, where he managed a team that designed and implemented a global transaction monitoring system that risk-ranked customers, screened for sanctions, and monitored transactions in order to identify suspected money laundering and terrorist-financed operations.

Bock previously served as Executive Director at Daylight Forensic & Advisory. Before that, he worked at KPMG, where he led anti-money laundering engagements for multinational financial institutions, and at Republic National Bank of New York, where he served as a financial fraud investigator.

Bock earned an M.S. in economic crime management from Utica College and a B.S. in computer information systems and finance from Manhattan College.



**Jamal El-Hindi**  
**Deputy Director, Financial Crimes**  
**Enforcement Network**

Jamal El-Hindi was appointed Deputy Director of the Financial Crimes Enforcement Network (FinCEN), a bureau of the U.S. Treasury Department, in May 2015. El-Hindi oversees FinCEN's work to protect the U.S. financial system from money laundering and other forms of illicit financial activity. El-Hindi came to FinCEN in 2006, serving as Associate Director of the Policy Division and overseeing all regulatory and strategic policy functions for the agency.

Before FinCEN, he served as the Associate Director for Program Policy and Implementation at the Office of Foreign Assets Control (OFAC) in the U.S. Department of the Treasury, overseeing OFAC's compliance, licensing, and policy functions. Previously, he was an Attorney-Advisor in Treasury's Office of General Counsel, serving as a legal advisor on various economic sanctions programs.

El-Hindi was an associate at Patton Boggs LLP in Washington, D.C., practicing on U.S. regulation of international business transactions, representation of foreign sovereigns, and international banking litigation. He is a past president of the Washington Foreign Law Society.

A graduate of the University of Michigan Law School, he also received a Master of Arts in modern Middle Eastern and North African studies from the University of Michigan, a diploma in international relations from the London School of Economics and Political Science, and an undergraduate degree in journalism from the University of North Carolina.



### **Jill E. Fisch**

**Perry Golkin Professor of Law;  
Co-Director, Institute for Law and  
Economics, University of Pennsylvania  
Law School**

Professor Jill E. Fisch is the Perry Golkin Professor of Law and Co-Director of the Institute for Law and Economics at the University of Pennsylvania Law School, where she teaches and writes on corporate law, corporate governance, and securities regulation. Her scholarship has appeared in a variety of publications, including the *Harvard Law Review*, *Yale Law Journal*, *Columbia Law Review*, *University of Pennsylvania Law Review*, and *Texas Law Review*. Recent research focuses on corporate governance, money market fund regulation, and litigation. Fisch is also engaged in a series of experimental projects analyzing retail investor decision-making and financial literacy.

Before joining Penn, Fisch was the T.J. Maloney Professor of Business Law at Fordham University School of Law and Founding Director of the Fordham Corporate Law Center. She has served as a visiting professor at Harvard Law School, Columbia Law School, and the Georgetown University Law Center, and is currently a visiting professor at UC Berkeley School of Law. She has lectured on corporate and securities law in China, Japan, Norway, France, Germany, and the United Kingdom.

Fisch practiced law as a trial attorney with the United States Department of Justice, Criminal Division, and was an associate at the law firm of Cleary Gottlieb Steen & Hamilton. She is a member of the American Law Institute and a director of the European Corporate Governance Institute. She chaired the Corporation Law Committee of the Association of the Bar of the City of New York and the Association of American Law Schools' sections on Securities Regulation and Business Associations. Fisch received her B.A. from Cornell University and her J.D. from Yale Law School.



### **Court E. Golumbic**

**Managing Director, Global Head  
of Financial Crime Compliance,  
Goldman Sachs**

As Global Head of Financial Crime Compliance at Goldman Sachs, Court Golumbic is primarily responsible for administering the firm's enterprise-wide anti-money laundering, anti-bribery, and government sanctions compliance programs. While at Goldman Sachs, Golumbic has held a number of additional positions in compliance, including Head of Compliance for the Global Prime Brokerage and Clearing businesses and Co-Head of Compliance for the firm's Operations, Technology, Finance, Human Capital Management, and Services divisions.

From 2002 to 2005, Golumbic was a Senior Managing Director and the Global Head of Anti-Money Laundering Compliance for Bear Stearns. From 1998 to 2002, he served as an Assistant United States Attorney in the U.S. Attorney's Office for the Southern District of New York, where he specialized in prosecuting white collar crime. From 1993 to 1997, Golumbic served as Senior Advisor to the Under Secretary for Enforcement at the U.S. Treasury Department, where he specialized in financial crime policy. While at Treasury, he also served as Deputy Secretary to the Financial Action Task Force on Money Laundering in Paris, France. Golumbic was an associate with the law firm of Richardson, Berlin & Morvillo in Washington, D.C., from 1991 to 1993 and a litigation associate with Jones Day in Austin, Texas, from 1990 to 1991.

Golumbic received a B.S., magna cum laude, from Vanderbilt University in 1986 and a J.D. in 1990 from the University of Virginia School of Law, where he served on the *Virginia Law Review* and the *Virginia Journal of International Law*. He has been an adjunct professor at the University of Pennsylvania Law School and currently teaches a course on white collar crime in the securities industry as an adjunct professor at New York University School of Law.



### **Stephen S. Hasegawa**

**Partner, Phillips & Cohen LLP**

Stephen Hasegawa is a partner at Phillips & Cohen LLP and serves as the firm's General Counsel. He has litigated cases under the False Claims Act and other whistleblower laws for more than 15 years and has practiced whistleblower law exclusively since joining Phillips & Cohen in 2007.

Hasegawa has played a key role in the success of qui tam cases in a variety of industries, including a case against several hospitals allegedly engaged in an improper Medicaid funding scheme, a case involving the application of governmental best-price clauses in contracts held by a national office-supply vendor, and a case against a water-parts manufacturer that allegedly sold valves with more lead than permitted by its customers' specifications.

He graduated with honors from the University of Chicago Law School in 1998.



### **Bonnie B. Jonas**

**Co-Founder, Pallas Global Group LLC**

Bonnie Jonas co-founded Pallas Global Group LLC, a company that provides independent monitoring and claims resolution and administration services to corporations and government agencies worldwide. Previously, Jonas served for 18 years as an Assistant U.S. Attorney in the U.S. Attorney's Office for the Southern District of New York (SDNY). From 2013 to 2016, Jonas was the Deputy Chief of the Criminal Division for the SDNY. 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 at the SDNY, 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.

Previously, Jonas was an attorney with Paul, Weiss, Rifkind, Wharton & Garrison and clerked for the Honorable Reena Raggi of the U.S. District Court in the Eastern District of New York. Earlier, Jonas worked as a consultant at Peterson Consulting, where she evaluated settlement amounts in connection with pending asbestos litigation. She is a graduate of the Wharton School at the University of Pennsylvania and Columbia Law School. Jonas has been recognized with prestigious national awards, including the Director's Award for Superior Performance by a Litigative Team for the WorldCom case; the Council of the Inspectors General on Integrity and Efficiency's Gaston L. Gianni Jr. Better Government Award for the Toyota prosecution; 2014 recipient of the National Association of Former United States Attorneys' Exceptional Service Award; and 2015 recipient of the New York County Lawyers' Association award for outstanding public service.



## **Brad S. Karp**

**Partner and Chair, Paul, Weiss, Rifkind,  
Wharton & Garrison LLP**

Chair of Paul, Weiss since 2008, Brad Karp is one of the country's leading litigators and corporate advisers. He has extensive experience in successfully defending financial institutions and other companies in "bet the company" litigations and regulatory matters. Before being named Chair, Karp chaired the firm's Litigation Department. He currently represents Citigroup, JPMorgan, Bank of America, Wells Fargo, Morgan Stanley, Standard Chartered, HSBC, Bank of New York Mellon, UBS, Bank of Tokyo-Mitsubishi, Deloitte, the National Football League, FIFA, MacAndrews & Forbes, ING, Bloomberg, Ericsson, Newmont Mining, Merck, SICPA, Zurich Capital, and KKR, among others.

Karp's successful representation of financial institutions and other companies in complex litigations and regulatory matters was featured in a 2014 *American Lawyer* cover story, in a 2010 *American Lawyer* story, and in a 2006 *American Lawyer* cover story. In 2003, Karp was profiled in *The American Lawyer* as one of the 45 leading lawyers in the U.S. under age 45. He has been named one of the Most Influential People in the Boardroom by the National Association of Corporate Directors and selected by *Chambers* as the only Star Individual in Nationwide Securities Litigation. *Best Lawyers* named Karp Banking and Finance Litigator of the Year (2014 and 2017) and Securities Litigator of the Year (2012). In 2012, *Financial Times* selected Karp as one of the 10 most innovative lawyers in North America. The following year, the *New York Law Journal* awarded him one of its first Impact Awards, in recognition of his "significant and lasting impact on the legal community in New York."



## **Anthony S. Kelly**

**Co-Chief, Asset Management Unit,  
Division of Enforcement, U.S. Securities  
and Exchange Commission**

Anthony Kelly is Co-Chief of the Asset Management Unit in the SEC's Division of Enforcement. Kelly leads a nationwide unit that investigates and pursues misconduct across the asset management industry. He previously served as an Assistant Director in the Asset Management Unit. Kelly joined the SEC in 2000; until 2004, he served as a securities compliance examiner in its Office of Compliance Inspections and Examinations, where he conducted compliance exams of broker-dealers. In 2004, after graduating from law school, he joined the Enforcement Division. Kelly earned his law degree from Georgetown University Law Center and his undergraduate degree from George Washington University.



### **Donald C. Langevoort**

#### **Thomas Aquinas Reynolds Professor of Law, Georgetown University Law Center**

Professor Donald Langevoort is the Thomas Aquinas Reynolds Professor of Law at the Georgetown University Law Center. Langevoort's teaching and research focuses on securities and corporate law. He graduated from Harvard Law School in 1976, was an associate at Wilmer Cutler & Pickering in Washington, and was on the staff of the U.S. Securities and Exchange Commission as Special Counsel in the Office of the General Counsel. Before joining the Georgetown faculty in 1999, he was on the faculty at Vanderbilt Law School, and he has also been a visiting professor at Harvard, the University of Michigan, and the University of Sydney Law School in Australia.

Langevoort is the author of numerous books and articles, many of which incorporate insights from social and cognitive psychology into issues of securities and financial regulation and compliance. Most recently, he is the author of *Selling Hope, Selling Risk: Corporations, Wall Street, and the Dilemmas of Investor Protection* (Oxford University Press, 2016). He has testified numerous times before committees of Congress, been a member of FINRA's National Adjudicatory Council, and served on the SEC's Advisory Committee on Market Information.



### **Timothy J. Linton**

#### **Vice President and Chief Compliance Officer, Philip Morris International**

Timothy Linton '80 is Vice President and Chief Compliance Officer for Philip Morris Inc., based in Lausanne, Switzerland. He previously served as Vice President and Associate General Counsel of Philip Morris Latin America and Canada Inc., based in New York City.

Previously, Linton was Associate General Counsel, Litigation, for Altria Corporate Services Inc. In that position, he was responsible for developing and implementing strategies for litigation issues facing the Altria group of companies, focusing on smoking and health litigation against the group's domestic and international tobacco companies. Before that, he served as Asia Regional Counsel for Philip Morris Inc., based in Hong Kong.

Linton received a B.A. from Tufts University and is a graduate of New York University School of Law. He clerked for the Honorable John D. Butzner Jr. of the U.S. Court of Appeals for the Fourth Circuit before joining Arnold & Porter in Washington, D.C.



## John Lucker

**Principal & Global Advanced Analytics  
Market Leader, Deloitte & Touche LLP**

John Lucker is Deloitte's Global Advanced Analytics Market Leader and a leader for

Deloitte Analytics. He leads the delivery of consulting services to clients for end-to-end strategy, business, operational, and technical consulting services in the areas of advanced business analytics, predictive modeling, data mining, enterprise risk management, risk sensing, regulatory and compliance analytics, scoring and rules engines, and numerous other analytic business solution approaches. His clients are in many industries, including insurance, banking and financial services, retail, consumer products, energy and resources, telecom, healthcare, life sciences, media, hospitality, and others.

Lucker has developed unique advanced analytic business solutions and methods as well as the technical implementation tools to realize the latent value of analytics. He often speaks for industry and professional organizations and writes extensively for a variety of publications. Lucker is a co-inventor of five predictive modeling patents and three pending patents and holds a B.A. and an M.B.A. from the University of Rochester.



## Geoffrey Parsons Miller

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

Professor Geoffrey Miller is author or editor of a dozen books and more than 200 research papers on topics in business law, compliance and risk management, financial institutions, securities law, the legal profession, ancient law, and legal theory. Miller received his B.A. magna cum laude from Princeton University in 1973 and his J.D. from Columbia Law School in 1978, where he was editor-in-chief of the Columbia Law Review. He clerked for Judge Carl McGowan of the U.S. Court of Appeals for the D.C. Circuit and Justice Byron White of the U.S. Supreme Court. After two years as an Attorney Advisor at the Office of Legal Counsel of the U.S. Department of Justice and one year with a Washington, D.C., law firm, he joined the faculty of the University of Chicago Law School in 1983, where he served as associate dean, director of the Program in Law and Economics, and editor of the *Journal of Legal Studies*.

He came to NYU School of Law in 1995. Miller has been a visiting professor or visiting scholar at universities and facilities of higher learning around the world. He is a founder of the Society for Empirical Legal Studies. Miller serves on the Board of Directors of State Farm Bank, chairs its Audit Committee, and is a member of the Compensation and Risk committees. He is a 2011 inductee into the American Academy of Arts and Sciences.



**Elizabeth Wolfe Morrison**  
**Vice Dean of Faculty and**  
**ITT Harold Geneen Professor in**  
**Creative Management, Stern School**  
**of Business, New York University**

Professor Elizabeth Wolfe Morrison is the ITT Harold Geneen Professor in Creative Management and the Vice Dean of Faculty at the Stern School of Business at New York University. Morrison's research focuses on the relationship and interaction between employees and their organizations. She has conducted research on a variety of different ways in which employees behave proactively and take initiative at work, and the conditions that motivate and enable such behavior. She is a leading scholar in the area of employee voice and silence and, in particular, is interested in understanding why employees are often reluctant to speak up about problems and concerns, and how organizations can create climates that are more open to employee input and honest upward communication.

Morrison has published her work in a wide range of academic journals and has won several awards and recognitions for her research. She has been Chair of the Organizational Behavior Division of the Academy of Management and an Associate Editor for the *Academy of Management Journal* and is currently an Associate Editor for *Behavioral Science and Policy*.

Morrison holds a B.A. in psychology from Brown University and a Ph.D. in organizational behavior from Northwestern University. She teaches Leadership, Management, Collaboration, and Negotiation to M.B.A. students and executives. Morrison has been Vice Dean of Faculty since 2012.



**Barbara Patow**  
**Global Head of AML, Financial Crime**  
**Compliance, HSBC Holdings plc**

Barbara Patow became the Global Head of AML, Financial Crime Compliance at HSBC in July 2015. She is responsible for defining HSBC's policy for the AML and counterterrorist financing risk management framework in line with external requirements and legislation. Under Patow's leadership, the AML team works with global functions and businesses across the bank to ensure consistent and effective implementation of AML policy, procedures, and controls.

Since joining HSBC in 2011, Patow has also held the role of Global Head of Financial Crime Compliance for Global Banking & Markets, having successfully led the development and enhancement of its risk management framework and financial crime controls. She has a wealth of banking knowledge, having worked in banking for 26 years in a mixture of both front office and compliance roles.





## David B. Pitofsky

**General Counsel and Chief Compliance Officer, News Corp.**

As General Counsel, David Pitofsky oversees global legal operations including litigation, mergers and acquisitions, ethics, and corporate governance matters. As Chief Compliance Officer, he chairs the company's Compliance Steering Committee. He joined News Corp. in 2013 as Deputy General Counsel and Deputy Chief Compliance Officer.

Previously, Pitofsky was a partner at Goodwin Procter LLP, focusing on white collar defense, government and internal investigations, and securities litigation and enforcement. His high-profile matters included representing a former Big Four accounting partner who was acquitted at trial in what was then billed as the largest tax fraud case in U.S. history. He also represented Kenneth R. Feinberg '70 in his role as Claims Administrator for the Gulf Coast Claims Facility, which was established following the Deepwater Horizon incident. From 1996 to 2005, Pitofsky was an Assistant U.S. Attorney in the Eastern District of New York, rising to the level of Deputy Chief of the Criminal Division. While in that office, Pitofsky was invited to make a presentation to the President's Corporate Fraud Task Force regarding a prosecution that he spearheaded of a national computer software company and several of its senior executives.

Pitofsky is a member of the Board of Directors of New York Lawyers for the Public Interest, a member of the Executive Committee of the Federal Bar Council, and an officer of the Federal Bar Foundation. In June 2015, he was recognized on the Attorneys Who Matter list by Ethisphere Institute, the global leader in defining and advancing the standards of ethical business practice.

Pitofsky is a graduate with high honors of the University of Michigan and of Georgetown University Law Center, where he was an Executive Editor of the *Georgetown Journal of Legal Ethics*. He is a member of the New York Bar.



## Foster J. Provost

**Professor of Information Systems and Andre Meyer Faculty Fellow, Stern School of Business, New York University**

Professor Foster Provost has published many highly cited data science papers, and his research has won many awards, including the INFORMS ISS Design Science Award, IBM Faculty Awards, and Best Paper awards at the top data science conference (ACM SIGKDD) across three decades. He is co-author of the best-selling data science book *Data Science for Business* and has three of the top five most downloaded papers in the broadly read journal *Big Data*. Provost previously was Editor-in-Chief of the journal *Machine Learning*.

For more than 20 years, Provost has studied and built data-driven systems for detecting and deterring bad behavior, including systems for compliance, employee surveillance and investigation, fraud detection, counterterrorism, and posting unsavory Web content. He is a co-founder of NYC-based Detectica, which supports compliance, surveillance, and supervision efforts within the financial, legal, and intelligence industries. Previously, he was a co-founder of advertising technology companies Integral Ad Science and Dstillery.



## Edward Rock

### **Professor of Law, NYU School of Law**

Professor Edward Rock's main areas of teaching and research are corporate law and corporate governance. In his 50 or so articles, he has written about poison pills, politics and corporate law, hedge funds, corporate voting, proxy access, corporate federalism, and mergers and acquisitions, among other things.

Rock spent the first part of his teaching career at the University of Pennsylvania, where he served as Co-Director of the Institute for Law and Economics (1998-2010), Associate Dean (2006-08), and Senior Advisor to the President and Provost and Director of Open Course Initiatives (2012-15). He was a visiting professor at NYU in Fall 2011 and has also visited at Columbia Law School and the Hebrew University of Jerusalem, where he was a Fulbright Senior Scholar.



## Alfred N. Rosa

### **Chief Compliance Director and Senior Executive Counsel, General Electric Company**

As Chief Compliance Director and Senior Executive Counsel, Al Rosa is responsible for developing and implementing processes that maintain and strengthen GE's integrity culture (including leadership engagement, training, risk assessments, and communications) throughout all of GE's industries and worldwide operations. He also is responsible for GE's Global Ombuds Organization, which includes a network of 500 full- and part-time leaders. He reports to GE's General Counsel, Alex Dimitrief.

From November 2002 to April 2005, Rosa was the Senior Global Regulatory and Compliance Manager for GE Money, reporting to GE Money's Chief Compliance Officer. He was responsible for developing worldwide processes for anti-money laundering, insurance selling, and numerous other processes for a leading global financial institution. From July 1999 to November 2002, Rosa was a Litigation Counsel with GE Money, responsible for a broad range of class action, individual, and commercial disputes. Earlier, he was Litigation Specialist for GE Money, responsible for individual escalated customer disputes and litigation matters, from May 1998 through June 1999. Before joining GE in 1998, he was an Associate with Prudential Insurance.

In 2014, Rosa received GE's Chairman's Award, the company's highest managerial award. He also has been named five times to Ethisphere's Attorneys Who Matter list as one of the "top ethics and compliance officers" in the global legal field. In addition, Rosa is the leader of GE's companywide initiative on regulatory excellence.

Rosa graduated from Connecticut College with a B.A. cum laude in political science (1992) and received his J.D. from the George Washington University National Law Center (1996). He is a member of the New York Bar and is a Connecticut Authorized House Counsel.



## Diana Sands

**Senior Vice President, Office of Internal Governance and Administration, The Boeing Company**

Diana Sands is Senior Vice President of the Office of Internal Governance and Administration for The Boeing Company and a member of the company's Executive Council. She is responsible for the advancement and effective implementation of Boeing's internal governance policies and plans, and for providing common infrastructure and business services across the enterprise.

As the company's chief ethics and compliance officer, Sands leads Boeing's ethics, compliance, corporate audit, and trade controls activities. She reports to the Chairman and Chief Executive Officer and to the Audit Committee of the Board of Directors. She also oversees the administration function, including Boeing Shared Services, an organization with more than 7,000 employees that provides common internal services in support of the company's global operations.

Previously, Sands was Corporate Controller and Vice President of Finance, where she was Boeing's principal interface with the Board of Directors' Audit Committee. Prior to this, she was Vice President of Investor Relations, Financial Planning, and Analysis. Sands previously worked in corporate treasury, where she was responsible for financial modeling and analysis related to capital structure, equity and fixed-income valuation, pensions, and cash deployment.

Sands joined Boeing in 2001 from General Motors Co., where she served as Director, Corporate Financial Planning and Reporting, and had various brand finance roles. Before that, she held financial positions at Ameritech Communications, Helene Curtis, and Arthur Andersen.

A certified public accountant, Sands has an M.B.A. from Northwestern University's Kellogg Graduate School of Management and a bachelor's of business administration with an emphasis in accounting from the University of Michigan. Sands serves on the boards of the Ounce of Prevention Fund, World Business Chicago, and the Catherine Cook School.



## Joseph Sansone

**Co-Chief, Market Abuse Unit, Division of Enforcement, U.S. Securities and Exchange Commission**

Joseph Sansone is Co-Chief of the SEC Division of Enforcement's Market Abuse Unit, a specialized group that investigates complex insider-trading rings and other abusive trading schemes and misconduct. His work there includes recent actions charging more than 40 defendants in a scheme to trade on nonpublic information hacked from news wire services and numerous insider-trading cases against corporate insiders, investment bankers, brokers, hedge fund traders, and other types of defendants. In addition, Sansone has supervised SEC enforcement actions against individuals and firms that engaged in manipulative trading practices including layering and spoofing.

He has also been actively involved in the SEC's efforts to expose misconduct by operators of exchanges and other trading venues and to hold them accountable for such violations. Recent Market Abuse Unit cases in this area have resulted in substantial penalties against prominent dark pool operators for misusing subscriber trading data to aid their own proprietary trading efforts, for providing enhanced trading functionality to select customers, and for failing to follow through on efforts to protect customers from predatory traders as promised.

Sansone joined the SEC in 2007 after working as a litigator at a law firm in New York and serving as a law clerk to the Honorable Nathaniel R. Jones on the U.S. Court of Appeals for the Sixth Circuit. He received his J.D. from Harvard Law School and his undergraduate degree from Harvard College.



## Betty Santangelo

### Schulte Roth & Zabel

Betty Santangelo focuses her practice at Schulte Roth & Zabel on white collar criminal defense and securities/bank enforcement. In addition to advising financial institutions on AML/OFAC/FCPA corporate compliance issues, she represents those institutions, corporate entities, and individuals before the U.S. Attorney's offices, state and local prosecutors, and regulatory agencies (including FinCEN, the SEC, OFAC, bank regulatory agencies, the CFTC, and FINRA) and conducts internal investigations. She has also served as an independent consultant in SEC enforcement matters. Before joining SRZ as a partner in 1997, she served as an Assistant U.S. Attorney for the Southern District of New York.

Nationally recognized for her expertise in corporate compliance issues, Santangelo is listed in a range of ranking publications, including *The Best Lawyers in America*, *IFLR Guide to the World's Leading Women in Business Law*, and *International Who's Who of Business Crime Defence Lawyers*. She has served as the Securities and Futures Industry's representative on the Bank Secrecy Act Advisory Group of the U.S. Department of the Treasury and as counsel to the Anti-Money Laundering and Financial Crimes Committee of the Securities Industry and Financial Markets Association (SIFMA). In 2014, Santangelo was honored by SIFMA for her extraordinary contributions to the committee and recognized for her dedication to improving industry compliance. She is the 1998 recipient of FinCEN's Director's Medal for Exceptional Service, and she represented the U.S. securities industry at the Financial Action Task Force (FATF) meeting in Brussels. In 2002, Santangelo represented SIFMA, the Futures Industry Association, and the Investment Company Institute at the FATF meeting in Paris.



## 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 has two decades of practical experience and a passion for tackling the issue of deterring crime. Before joining NYU, Vash served for 12 years in the U.S. Attorney's Office for the District of New Jersey. While there, 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, she was named the first-ever Chief of the Office's General Crimes Unit. Vash 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, 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 United States District Court for the District of New Jersey. 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*. Vash has lectured throughout the country on criminal investigations, criminal prosecution, and crime prevention. She is a member of the bars of the states of New York, New Jersey, and Connecticut; the District of New Jersey; Southern District of New York; Eastern District of New York; and the United States Supreme Court.



## **Andrew Weissmann**

### **Chief, Fraud Section, U.S. Department of Justice Criminal Division**

Andrew Weissmann was selected in January 2015 as Chief of the Criminal Division's Fraud Section of the U.S. Department of Justice. Before that, he taught criminal and national security law at New York University School of Law. Weissmann previously served as General Counsel for the Federal Bureau of Investigation from 2011 to 2013 and, before that, as Special Counsel to FBI Director Mueller in 2005. He was a partner at Jenner & Block in New York City from 2006 to 2011, where he was Co-Head of the White Collar Criminal Law Group and on the firm's Management Committee. From 2002 to 2005, Weissmann served as the Deputy and then the Director of the Enron Task Force in Washington, D.C., where he supervised the prosecution of more than 30 individuals in connection with the company's collapse. Weissmann was a federal prosecutor for 15 years in the Eastern District of New York, where he served as the Chief of the Criminal Division. He prosecuted numerous members of the Colombo, Gambino, and Genovese families, including the bosses of the Colombo and Genovese families. In addition, Weissmann won the largest Financial Industry Regulatory Authority arbitration award in history.

He holds a Juris Doctor degree from Columbia Law School and was on the Managing Board of the *Columbia Law Review*. Weissmann has a Bachelor of Arts degree from Princeton University and attended the University of Geneva on a Fulbright Fellowship.

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### Compliance & Enforcement Blog

Last spring, PCCE launched its blog:

*Compliance & Enforcement*.

*Compliance & Enforcement* ([wp.nyu.edu/compliance\\_enforcement](http://wp.nyu.edu/compliance_enforcement)) presents commentary and analysis on corporate compliance and enforcement written by leading academics, practitioners, and other thought leaders. PCCE is dedicated to bringing together knowledgeable experts in the fields of compliance and enforcement to promote discussion of effective enforcement policy and compliance. *Compliance & Enforcement* enables PCCE to bring the conversation to a broader audience and, in turn, have a greater impact.

New posts are added to the blog and emailed to subscribers weekly. To become a subscriber, suggest a topic, or inquire about submitting a post, contact PCCE at [law.pcce@nyu.edu](mailto:law.pcce@nyu.edu).

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