



Program on Corporate Compliance and Enforcement
Corporate Law in the Public Interest

Achieving Safe and Responsible Enterprise: Principles of Effective Compliance and Emerging Enforcement Policy

May 8, 2015
New York University School of Law

Lester Pollack Colloquium Room
245 Sullivan Street, 9th Floor



Program on Corporate Compliance and Enforcement

The Program on Corporate Compliance and Enforcement 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.

Faculty Directors: Jennifer Arlen '86 and Geoffrey P. Miller

Executive Director: Serina M. Vash



Conference Objectives

The conference will bring together academics, compliance officials, risk-management officers, general counsels, enforcement officials, and private attorneys to discuss principles of effective compliance, balancing compliance and business objectives, and understanding the impact of organizational structure and organizational behavior in achieving compliance with the law. From an enforcement perspective, the conference will consider how enforcement policy can best

be structured to support, promote, and reward effective corporate compliance efforts.

The afternoon discussion will provide an opportunity for dialogue among conference participants and the reporters for the newly announced American Law Institute project, Principles of the Law, Compliance, Enforcement, and Risk Management for Corporations, Nonprofits, and Other Organizations.



Agenda

Achieving Safe and Responsible Enterprise: Principles of Effective Compliance and Emerging Enforcement Policy

New York University School of Law, Lester Pollack Colloquium Room

This event has been approved for up to 8.5 New York State CLE credits, 1.5 of which are ethics credits.

It is appropriate for newly admitted attorneys as well as experienced attorneys.

Chatham House Rule: *Participants are free to use the information received, but neither the identity nor the affiliation of the speaker(s) may be revealed. The rule will not apply to the luncheon keynote address.*

Friday, May 8, 2015

8:00–9:00 a.m.

Registration and Continental Breakfast

9:00–9:15 a.m.

Opening Remarks

Trevor W. Morrison, Dean and Eric M. and Laurie B. Roth
Professor of Law

9:15–10:15 a.m.

Principles of Effective Compliance

Moderator: Geoffrey P. Miller, Stuyvesant P. Comfort
Professor of Law and Faculty Co-Director, Program on
Corporate Compliance and Enforcement, New York
University School of Law

Jeff Benjamin '71, Senior Vice President, General Counsel,
and Chief Ethics and Compliance Officer, Avon Products, Inc.

Jeffrey H. Knox, Partner, Simpson Thacher & Bartlett

Jules B. Kroll, Chairman and CEO, Kroll Bond Rating Agency

Kathryn Reimann '82, Chief Compliance Officer,
Global Consumer Group, Citigroup

10:15–10:30 a.m.

Coffee/Tea Break

10:30–11:30 a.m.

Who's in Charge? The Interplay of Corporate Control Offices in Achieving Effective Compliance

Moderator: James A. Fanto, Gerald Baylin Professor of Law,
Brooklyn Law School

Martine M. Beamon, Partner, Davis Polk & Wardwell

E. Scott Gilbert, Senior Vice President and Chief Risk and
Compliance Officer, Marsh & McLennan Companies

Lisa K. Polsky, Executive Vice President and Chief Risk
Officer, CIT Group

11:30–11:45 a.m.

Coffee/Tea Break

11:45 a.m.–1:00 p.m.

Attaining Reasonable and Effective Compliance: An Enforcement Perspective

Moderator: Jennifer Arlen '86, Norma Z. Paige Professor of Law and Faculty Co-Director, Program on Corporate Compliance and Enforcement, New York University School of Law

Daniel Alter, Senior Fellow, NYU Program on Corporate Compliance and Enforcement, and Former General Counsel, New York State Department of Financial Services

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

Marshall L. Miller, Acting Principal Deputy Assistant Attorney General and Chief of Staff, Criminal Division, United States Department of Justice

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

Richard B. Zabel, Deputy United States Attorney for the Southern District of New York

1:00–2:30 p.m.

Luncheon Keynote Address

Lipton Hall, 110 West Third Street

Introduction: Geoffrey P. Miller

Keynote Speaker: Donald C. Langevoort, Thomas Aquinas Reynolds Professor of Law, Georgetown University Law Center

The lunchtime keynote address will be presented by Georgetown Law Professor Donald Langevoort, the nation's leading scholar in the field of behavioral compliance and law.

2:30–5:45 p.m.

ALI Principles of the Law, Compliance, Enforcement, and Risk Management for Corporations, Nonprofits, and Other Organizations

Discussion Facilitator: Serina M. Vash, Executive Director, Program on Corporate Compliance and Enforcement, New York University School of Law

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2:30–3:15 p.m.

Compliance

Chief Reporter: Geoffrey P. Miller

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3:15–4:00 p.m.

Risk Management

Associate Reporter: **Claire A. Hill**, James L. Krusemark Chair
in Law, University of Minnesota Law School

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4:00–4:15 p.m.

Coffee/Tea Break

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4:15–5:00 p.m.

Governance

Associate Reporter: **James Fanto**

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5:00–5:45 p.m.

Enforcement

Associate Reporter: **Jennifer Arlen ’86**

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5:45–7:00 p.m.

Reception

Lester Pollack Colloquium Atrium

Acknowledgements

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The Program on Corporate Compliance and Enforcement
would like to thank the following people for their help. This
conference would not have been possible without them:

- | | |
|-------------------------|------------------|
| Dean Trevor W. Morrison | Jerome Miller |
| Cheryl Hark | Gina Rodriguez |
| Josie Haas | Cassy Rodriguez |
| Ashley Jacques | Elizabeth Thomas |
| Maria Micale | Bruce White |

Keynote Speaker



Donald C. Langevoort

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

Before joining the Georgetown University Law Center faculty in 1999, Donald Langevoort was the Lee S. and Charles A. Speir Professor at Vanderbilt Law School, where he joined the faculty in 1981. The courses Professor Langevoort teaches are Contracts, Securities Regulation, various seminars on corporate and securities issues, and Corporations. Professor Langevoort has received the Frank F. Flegal Excellence in Teaching Award at Georgetown and the Paul J. Hartman Award for Excellence in Teaching at Vanderbilt. He has been a visiting professor at Harvard Law School and the University of Michigan Law School and a lecturer at the Washington College of Law, American University. After practicing for two years at Wilmer, Cutler & Pickering in Washington, DC, he joined the staff of the US Securities and Exchange Commission as special counsel in the Office of the General Counsel. Professor Langevoort is the co-author, with Professors James Cox and Robert Hillman, of *Securities Regulation: Cases and Materials* (Wolters Kluwer Law & Business) and the author of a treatise titled *Insider Trading: Regulation, Enforcement, and Prevention* (West Group). He has also written many law review articles, a number of which seek to incorporate insights from social psychology and behavioral economics into the study of corporate and securities law and legal ethics. Professor Langevoort has testified numerous times before congressional committees on issues relating to insider trading and securities litigation reform.

Conference Speakers



Daniel Alter

Senior Fellow, NYU Program on Corporate Compliance and Enforcement, and Former General Counsel, New York State Department of Financial Services

Daniel Alter is presently an adjunct professor and senior fellow in the Program on Corporate Compliance and Enforcement at New York University School of Law. Immediately before receiving those appointments, he was the general counsel for the New York State Department of Financial Services (DFS). In addition to serving as the agency's chief legal officer, Professor Alter oversaw the department's international sanctions enforcement program, led the agency's initiative to strengthen the autonomy and objectivity of independent consultants employed in support of financial services regulation, and co-directed the DFS investigation into global FX rate manipulation. He was also one of the primary architects of the department's effort to regulate virtual currencies, such as bitcoin. Professor Alter earned his JD from Yale Law School, where he was a Coker Fellow in constitutional law, and he received his BA from Columbia College.



Jennifer Arlen '86

Norma Z. Paige Professor of Law and Faculty Co-Director, Program on Corporate Compliance and Enforcement, New York University School of Law

Jennifer Arlen 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 is founder and co-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; former director of the American Law and Economics Association (1991-93, 2006-09); editorial board member of the American Law and Economics Review; and chair of the Law and Economics, Remedies, and Torts and Compensation Systems sections of the Association of American Law Schools. Before coming to NYU 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 Eleventh Circuit. At NYU Law, she teaches Corporations, Business Crime, and a seminar on Corporate Crime and Financial Misdealing: Legal and Policy Analysis. Professor Arlen received her BA in economics from Harvard College magna cum laude and her JD (Order of the Coif) and PhD in economics from New York University.



Martine M. Beamon

Partner, Davis Polk & Wardwell

Martine Beamon, a partner in Davis Polk's Litigation Department and a former federal prosecutor for the Southern District of New York, 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, and foreign corrupt practices violations, among other areas. Ms. Beamon has participated in a number of confidential internal investigations on behalf of clients facing potential criminal and regulatory exposure and has advised corporate boards of directors and subcommittees on matters of corporate governance and compliance. Her complex civil matters have involved allegations under consumer protection and whistleblower provisions, the False Claims Act, and other state and federal statutes. Ms. Beamon received her JD from the University of Pittsburgh School of Law and her BA from the University of Notre Dame.



Jeff Benjamin '71

**Senior Vice President, General Counsel,
and Chief Ethics and Compliance Officer,
Avon Products, Inc.**

Jeff Benjamin joined Avon in 2012; in addition to being senior vice president, general counsel, and chief ethics and compliance officer, he also serves on the company's Executive Committee. Before joining Avon, Mr. Benjamin had been enjoying retirement for nine months after a 37-plus-year career at Novartis that included a variety of general counseling and ethics and compliance positions. Before the consummation of the merger between Ciba-Geigy and Sandoz that created Novartis, Mr. Benjamin was general counsel of Ciba-Geigy, representing the company in Federal Trade Commission proceedings that ultimately led to the largest corporate merger in history up until that time. He also helped institute the company's first formal compliance program. In 2012, Mr. Benjamin served on the Ethics Resource Center's Advisory Group with respect to the 20th anniversary of the Federal Sentencing Guidelines for Organizations. Since 2002, he has been a member of the Advisory Board and Dinner Committee of the Brennan Center for Justice. From 2005 through 2011, Mr. Benjamin served as a member of the board of directors of the Ethics & Compliance Officer Association (he was recognized with emeritus status and remains a member). More recently, in 2015, Mr. Benjamin agreed to serve as an adviser to the American Law Institute's Principles of the Law, Compliance, Enforcement, and Risk Management Project. He also became a member of the board of the National Center for Ethics and Social Responsibility at St. Thomas Aquinas College. Mr. Benjamin began his formal legal career as a litigation associate with Kronish, Lieb, Shainswit, Weiner & Hellman. He received his JD cum laude from New York University School of Law (Order of the Coif) and a BA in government from Cornell University.



Andrew J. Ceresney

**Director, Division of Enforcement,
Securities and Exchange Commission**

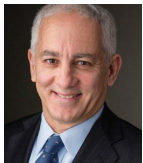
Andrew Ceresney is director of the SEC's Enforcement Division, which has more than 1,300 people throughout the country focused on enforcing the securities law. Before joining the SEC in April 2013, Mr. Ceresney served as a partner in the law firm of Debevoise & Plimpton, where he was co-chair of the 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 United States 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, chief judge of the US Court of Appeals for the Second Circuit, and as law clerk to the Honorable Michael Mukasey, formerly chief judge of the US District Court for the Southern District of New York. He is a graduate of Columbia College and Yale Law School.



James A. Fanto

**Gerald Baylin Professor of Law,
Brooklyn Law School**

James Fanto is Gerald Baylin Professor of Law at Brooklyn Law School and co-director of the school's Center for the Study of Business Law & Regulation. He teaches courses on agency and partnership, banking, compliance, corporate and securities law, corporate finance, and comparative and international corporate law and governance. Professor Fanto is the author of *Directors' and Officers' Liability* (Practising Law Institute) and *Corporate Governance in American and French Law* (LGDJ/Montchrestien), and he is the co-author (with Norman Poser) of *Broker-Dealer Law and Regulation* (Aspen Publishers). He is an editor of an electronic journal in the Social Science Research Network, *Corporate and Financial Law: Interdisciplinary Approaches*, and a co-editor in chief of *Practical Compliance & Risk Management* for the Securities Industry. Before becoming a law professor, he practiced with Davis Polk & Wardwell in Washington, Paris, and New York. Professor Fanto was a law clerk to Judge Louis H. Pollak of the US District Court for the Eastern District of Pennsylvania and to Justice Harry A. Blackmun of the US Supreme Court. He received his BA from the University of Notre Dame, his MA and PhD from the University of Michigan, and his JD from the University of Pennsylvania.



E. Scott Gilbert

Senior Vice President and Chief Risk and Compliance Officer, Marsh & McLennan Companies

In addition to being senior vice president and chief risk and compliance officer of Marsh & McLennan Companies, the premier global professional services firm providing advice and solutions in risk, strategy, and human capital. E. Scott Gilbert is a member of its Executive Committee. Through market-leading brands Marsh, Mercer, Guy Carpenter, and Oliver Wyman, more than 55,000 colleagues in more than 100 countries help clients identify, plan for, and respond to critical business issues and risks. Mr. Gilbert reports to CEO Dan Glaser and the Audit Committee of the board of directors. In his role as chief risk and compliance officer, he also oversees the firm's global security, business resiliency, and global technology infrastructure functions. Mr. Gilbert joined Marsh & McLennan Companies in January 2005 from General Electric, where he was chief compliance counsel. Before joining GE in 1992, Mr. Gilbert served for five and a half years as an assistant US attorney in the Southern District of New York, where he was a member of the Securities and Commodities Fraud Task Force investigating criminal violations of federal securities laws. Mr. Gilbert is a graduate of Harvard College and received his JD from Harvard Law School.



Claire A. Hill

James L. Krusemark Chair in Law, University of Minnesota Law School

Claire Hill is founding director of the University of Minnesota Law School's Institute for Law and Rationality, associate director of its Institute for Law and Economics, and an affiliated faculty member of the university's Center for Cognitive Sciences. She is also a research associate at the European Research Centre for Economic and Financial Governance. She teaches corporate law, mergers and acquisitions, contracts, and a seminar in law and economics. Professor Hill's research interests include corporate governance, capital structure, structured finance, rating agencies, secured debt, contract theory, law and language, and behavioral economics. She has published numerous articles on these and other topics; her articles have appeared in law reviews as well as journals in finance and psychology. Professor Hill is completing a book with Richard Painter, to be published by University of Chicago Press, titled *Better Bankers, Better Banks*, and a mergers and acquisitions textbook (with Brian Quinn and Steven Davidoff Solomon), to be published by West.



Jeffrey H. Knox

Partner, Simpson Thacher & Bartlett

Jeff Knox is a litigation partner at Simpson Thacher & Bartlett. He focuses his practice on high-stakes criminal and regulatory matters, government investigations, and compliance counseling. Mr. Knox is former chief of the DOJ's Fraud Section. As head of the Fraud Section and before then, as principal deputy chief, he supervised a team of nearly 100 prosecutors in the investigation and prosecution of complex corporate crime. Mr. Knox oversaw criminal enforcement of all FCPA cases in the United States and several of the Justice Department's most significant corporate securities fraud, health care fraud, defense procurement fraud, international money laundering, and financial fraud cases. Before joining the Fraud Section, Mr. Knox was an assistant US attorney in the Eastern District of New York, where he served as chief of the Violent Crimes and Terrorism Section, and was one of the nation's leading national security prosecutors.



Jules B. Kroll

Chairman and CEO, Kroll Bond Rating Agency

Jules Kroll is the founder of Kroll Inc. (NASDAQ: KROL) and is the acknowledged founder of the modern investigations, intelligence, and security industry. In 1972, he established Kroll Associates Inc. and created the prototype for a new breed of professional services firm dedicated to mitigating risk. His firm ultimately reached annual revenues of \$1 billion in 2008. By employing former prosecutors, law enforcement officials, journalists, and academics who used sophisticated fact-finding techniques to address decision-makers' needs for accurate information, Mr. Kroll established investigations and risk consulting as valuable corporate services. In the early 1990s, Mr. Kroll gained worldwide renown for his firm's success in searching for assets hidden by Jean-Claude Duvalier, Ferdinand and Imelda Marcos, and Saddam Hussein. Since 1997, his vision of providing clients with a full spectrum of risk consulting services propelled the firm's growth as a public company, in particular, its acquisition of employee screening, forensic accounting, data recovery, and corporate advisory and restructuring firms. This vision was fully realized in July 2004 when Kroll was acquired by Marsh & McLennan Companies (NYSE: MMC) for \$1.9 billion.

Mr. Kroll was honored with the US Entrepreneurial Award by BritishAmerican Business in 2002, named Entrepreneur of the Year by Cornell University in 2003, and received the John Carroll Award from Georgetown University in 2009. Mr. Kroll began his career as an assistant district attorney in Manhattan. He currently serves as chairman of the John Jay College of Criminal Justice Foundation. Mr. Kroll received a BA from Cornell University and an LLB from Georgetown University Law Center.



Geoffrey P. Miller

**Stuyvesant P. Comfort Professor of Law
and Faculty Co-Director, Program on
Corporate Compliance and Enforcement,
New York University School of Law**

Geoffrey Miller is an author or editor of 10 books and more than 200 articles in the fields of compliance and risk management, financial institutions, contract law, corporate and securities law, constitutional law, civil procedure, legal history, jurisprudence, and ancient law. He has taught a wide range of subjects including law and economics, corporations, property, regulation of financial institutions, land development, securities law, the legal profession, and legal theory. Professor Miller clerked for Judge Carl McGowan of the US Court of Appeals for the District of Columbia Circuit and Justice Byron White of the US Supreme Court. After two years as an attorney adviser at the Office of Legal Counsel of the US Department of Justice and one year with a Washington, DC, law firm, he joined the faculty of the University of Chicago Law School in 1983 and NYU School of Law in 1995. Professor Miller is a founder of the Society for Empirical Legal Studies, a scholarly organization devoted to promoting statistical and other empirical techniques in the study of legal institutions. He is founder and director of NYU School of Law's Center for Financial Institutions, co-director of NYU's Program on Corporate Compliance and Enforcement, a member of the board of directors and interim audit committee chair of State Farm Bank, and a fellow of the American Academy of Arts and Sciences. Professor Miller received his BA from Princeton University and his JD from Columbia University Law School, where he was a Stone Scholar and editor-in-chief of the Columbia Law Review.



Marshall L. Miller

**Acting Principal Deputy Assistant
Attorney General and Chief of Staff,
Criminal Division, United States
Department of Justice**

Marshall Miller was appointed to serve as acting principal deputy assistant attorney general and chief of staff of the Criminal Division of the Department of Justice (DOJ) on April 17, 2014. He joined DOJ's Criminal Division from the US Attorney's Office for the Eastern District of New York (EDNY), where he most recently served as chief of the Criminal Division. Mr. Miller has conducted and supervised the prosecution of numerous complex cases, ranging from terrorism and violent crime prosecutions to corruption and fraud cases, including significant corporate fraud prosecutions that have resulted in convictions of corporations and executives. For his work, Mr. Miller has received a number of the DOJ's highest awards, including an Attorney General's Award for Excellence in Furthering the Interests of US National Security and a Director's Award for Superior Performance. He has also received awards from the New York City Bar Association, the Director of National Intelligence, and the Federal Law Enforcement Foundation. In 2009, Mr. Miller was recognized for the most outstanding performance by an AUSA at the Department of Justice by the National Association of Former United States Attorneys. Before joining the department, Mr. Miller clerked for the Honorable Allyne R. Ross, US District Judge for the Eastern District of New York. He earned both his JD and BA degrees from Yale. Mr. Miller has also engaged significantly in the teaching of law at NYU and Fordham law schools.



Lisa K. Polsky

Executive Vice President and Chief Risk Officer, CIT Group

Lisa Polsky oversees CIT Group's Risk Management Group, which includes credit and asset risk management (transaction approval, portfolio management, problem loan management), enterprise risk (market risk; liquidity risk; operational risk; HR risk; industry, country and counterparty risk; stress testing and risk analytics; data and reporting), IT risk, model validation, risk governance, and policy. In conjunction with the Audit and Risk Committees of the board, she also oversees the firm's corporate compliance function and loan and risk review. Before CIT, Ms. Polsky worked at Jane Street Capital, a quantitative proprietary trading firm, and Duff Capital Advisors, where she was a partner and head of risk and investment solutions. She spent six years consulting, specializing in risk management. Before founding her consulting firm, Ms. Polsky served as managing director and head of client financing services with Merrill Lynch & Co., and before that as managing director, chief risk officer at Morgan Stanley. Ms. Polsky was head of the hedge fund business and head of derivatives in the US and Europe at Bankers Trust Company. She began her career at Citibank NA, where she started the FX options business and later co-headed Citibank's derivative business in North America. Ms. Polsky received her bachelor's degree in international business and economics from New York University. She has served on the board of ISDA and as chair of the SIFMA Risk Committee. She currently serves on the board of Piper Jaffray.



Kathryn Reimann '82

Chief Compliance Officer, Global Consumer Group, Citigroup

Kathryn Reimann is the chief compliance officer and managing director for Citi's Global Consumer Businesses and Citibank NA. In this role, she leads the compliance function covering retail and commercial banking, credit cards, secured and unsecured lending, and other consumer finance and investment businesses globally. Ms. Reimann joined Citi in August 2006 from American Express, where she had been senior vice president, chief compliance and ethics officer. Before joining American Express in 1998, she was senior vice president, chief compliance officer and a senior counsel of Lehman Brothers. Ms. Reimann began her career as a litigation attorney, initially with the firm of Curtis, Mallet-Prevost, Colt & Mosle, and thereafter in the general counsel's office of Dean Witter Reynolds. Previously, she clerked for Associate Justice Stewart G. Pollock of the New Jersey Supreme Court. A graduate of Princeton University, Ms. Reimann completed her undergraduate degree and thesis with honors at Princeton's Woodrow Wilson School of Public and International Affairs. She received her JD from New York University School of Law.



John F. Savarese

Partner, Wachtell, Lipton, Rosen & Katz

John 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 executives in SEC 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, as well as 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 received the Attorney General's John Marshall Award for Outstanding Legal Achievement and served as chief appellate attorney. Before that, 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 Crime Committee. Mr. Savarese also is chairman of the Board of Trustees of the Vera Institute of Justice, a member of the Dean's Advisory Board at Harvard Law School, a member of the board of the Lawyers' Committee for Civil Rights Under Law, and former president of the Board of Trustees of the Brearley School. Mr. Savarese graduated magna cum laude from Harvard University and received his JD cum laude from Harvard Law School, where he was an editor of the Harvard Law Review. He has been selected for the International Who's Who of Business Lawyers, Chambers USA Guide, and Lawdragon's 500 Leading Lawyers in America.



Serina M. Vash

Executive Director, Program on Corporate Compliance and Enforcement

Serina M. Vash joined NYU School of Law as the Executive Director of the Program on

Corporate Compliance and Enforcement in September 2015. A seasoned former federal prosecutor, Serina Vash served for 12 years in the United States Attorney's Office for the District of New Jersey. There, she supervised and prosecuted a wide range of federal crimes, including cases involving securities fraud, money laundering, structuring financial transactions to evade reporting requirements, 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. 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 US 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 United States District Court for the District of New Jersey. Ms. Vash has lectured throughout the country on criminal investigations, criminal prosecution, and crime deterrence and prevention. She graduated from Duke University and cum laude from St. John's University School of Law where she was Assistant Editor of the Law Review.



Richard B. Zabel

Deputy United States Attorney for the Southern District of New York

Richard Zabel is currently the deputy United States attorney at the US Attorney's Office for the Southern District of New York. From October 2009 until October 2011, he was chief of the Criminal Division. Mr. Zabel previously served for eight years as an assistant US attorney in the same office; during his tenure, he prosecuted a variety of cases involving securities fraud, obstruction of justice, racketeering, murder, firearms, and narcotics charges, and argued numerous cases before the US Court of Appeals for the Second Circuit. Mr. Zabel served as chief of the Narcotics Unit there and has received numerous awards, including the Attorney General's Award for Distinguished Service and the Department of Justice Director's Award for Superior Performance as an Assistant US Attorney. From 1999 until 2009, before rejoining the US Attorney's Office, Mr. Zabel was a partner at the law firm Akin Gump Strauss Hauer & Feld, where he was co-head of the firm-wide litigation practice. His practice focused on white collar criminal defense, SEC investigations, corporate internal investigations, complex civil litigation, and appeals. He teaches as an adjunct professor of national security and terrorism investigations and prosecutions at Columbia Law School. He has also taught criminal law at the Fordham University School of Law. Mr. Zabel received his AB summa cum laude from Princeton University, where he was a member of Phi Beta Kappa. He was a Fulbright Scholar to France. He received his JD from Harvard Law School, where he was an Ames Moot Court winner and Best Oralist.

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Contribute

The Program on Corporate Compliance and Enforcement welcomes tax-deductible donations to further its mission of promoting effective policies concerning corporate compliance and enforcement, as well as its mission of enhancing the opportunities and training available to NYU students and alumni interested in these areas. We were founded with seed money from the Law School and must transition to being self-sustaining over the next two years.

To contribute, please go to law.nyu.edu/giving. When you reach the second page of the process, enter the amount of your contribution in the Other Designations box; in the text field below that, enter "Program on Corporate Compliance and Enforcement." Or send us an e-mail directly at law.pcce@nyu.edu.

Contact

To find out more about PCCE or to comment on our projects, news, or blog posts, visit us on our website at www.law.nyu.edu/pcce or e-mail us at law.pcce@nyu.edu.



Program on Corporate Compliance and Enforcement

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