



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

# Wading into the Gray: Compliance and Enforcement Lessons When Good People Make Bad Decisions

A Panel Discussion with Rashmi Airan, Richard Bistrong,  
Walt Pavlo, and FBI SSA William McMurry  
Moderated by PCCE Executive Director Serina M. Vash

November 30, 2016  
5:00-7:00 p.m.  
New York University School of Law

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

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## Panelists



### **Rashmi Airan**

#### **Motivational Speaker and Writer**

Rashmi Airan is a trailblazer spreading her message that our relationships and connections empower us to overcome extreme adversities in life. Airan was named Kent Scholar for achieving highest academic honors at Columbia Law School. Before law school, she worked for Morgan Stanley Investment Bank after graduating from the University of North Carolina at Chapel Hill. Airan began her career in nationally recognized law firms and later as an Attorney for Miami-Dade County. She eventually opened her own legal practice in real estate law. While juggling being a mother of two infants and running her own law practice, one of her developer clients began some shady business practices. Airan's involvement landed her in federal prison for five and a half months. An inspirational and motivational speaker, she is sharing the brave story of her vulnerability and strength through this journey.

Contact Rashmi Airan at [rashmi@rashmiairan.com](mailto:rashmi@rashmiairan.com).



### **Richard Bistrong**

#### **CEO, Front-Line Anti-Bribery LLC**

#### **Former FCPA Violator and FBI/U.K.**

#### **Cooperator; Anti-Bribery Consultant,**

#### **Writer, and Speaker**

Richard Bistrong spent much of his career as an international sales executive in the defense sector and currently consults, writes, and speaks on foreign bribery and compliance issues from that frontline perspective. In 2007, Bistrong was targeted by the U.S. Department of Justice in part due

to an investigation of a UN supply contract and was terminated by his employer. In that same year, as part of a cooperation agreement with the U.S. Department of Justice and subsequent immunity from prosecution in the United Kingdom, Bistrong assisted the United States, Great Britain, and other governments in their understanding of how FCPA, bribery, and other export violations occurred and operated in international sales. Bistrong's cooperation, which spanned three years of covert cooperation and two years of trial preparation and testimony, was one of the longest in a white collar criminal investigation. In 2012, Bistrong was sentenced as part of his own plea agreement and served 14 and a half months at a federal prison camp. He was released in December 2013. Bistrong now consults, writes, and speaks about current frontline anti-bribery compliance and ethics issues. He shares his experience on anticorruption and ethical challenges from the field of international business, reflecting on his own perspective and practice. Bistrong consults with organizations through his company, Front-Line Anti-Bribery LLC, and welcomes the opportunity to exchange and share perspectives on real-world anti-bribery and compliance challenges. Bistrong has shared his experience, through keynotes and panels, with the OECD, World Bank, International Anti-Corruption Academy, major multinationals, and leading academic institutions.

Contact Richard Bistrong at [richardtjbistrong@gmail.com](mailto:richardtjbistrong@gmail.com).



**William McMurry**  
**Supervisory Special Agent,**  
**Federal Bureau of Investigation**

Supervisory Special Agent William McMurry has been a Special Agent with the FBI for more than 20 years. He has spent the majority of his career investigating international organized crime. McMurry was selected in July 2015 as the supervisor of a newly formed International Corruption Squad in the New York Field Division. He supervises investigations involving violations of the Foreign Corrupt Practices Act, international money laundering related to kleptocracy/foreign corruption, and international antitrust matters.



**Walt Pavlo Jr.**  
**Founder/President, Prisonology**

Walt Pavlo Jr. is the Founder and President of Prisonology.com, a consulting and expert testimony firm for lawyers and defendants on the post-conviction process of the federal justice system. In addition, Pavlo is a nationally recognized speaker who discusses the many fraud cases he has covered as a contributor to Forbes.com over the past five years. His work has earned him appearances on *American Greed* and CNBC documentaries (*White Collar Convicts: Life on the Inside and (Dis)Honesty*). Pavlo co-authored a popular book, *Stolen Without a Gun* (co-authored with Neil Weinberg; Etika Books). Pavlo is recognized as one of the leading speakers on white collar crime and federal criminal cases. He has made appearances for the FBI, the U.S. Attorney's Office, Big Four accounting firms, top-ranked MBA schools, law schools, and major corporations throughout the country. Pavlo earned his B.S. in industrial engineering from West Virginia University and his MBA in finance from Mercer University. He was also a Journalist Law School Fellow at Loyola Law School (2014).

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**Serina M. Vash (Moderator)**  
**Executive Director, Program on Corporate**  
**Compliance and Enforcement**  
**New York University School of Law**

Serina M. Vash is the Executive Director of NYU Law's Program on Corporate Compliance and Enforcement. A seasoned former federal prosecutor and litigator, Vash brings with her 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 United States Attorney's Office for the District of New Jersey. While at the U.S. Attorney's Office, Vash 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, Vash was named the first Chief of the Office's General Crimes Unit, where she was responsible for training and mentoring all new AUSAs in the district. 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 her government service, Vash was a litigator at Cahill Gordon & Reindel in New York and served as the first law clerk to Judge Faith S. Hochberg of the United States District Court for the District of New Jersey. Vash has lectured throughout the country on criminal investigations, criminal prosecution, crime prevention, and business ethics.

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