

Red Notice

A monthly update on global investigations and prosecutions

Akin Gump
STRAUSS HAUER & FELD LLP

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ANTICORRUPTION DEVELOPMENTS

Former Unaoil Executives Plead Guilty to FCPA Charges

On October 30, 2019, the Department of Justice (DOJ) announced that three former executives from Unaoil, a Monaco-based oil services company, had previously pleaded guilty to participating in a scheme to make improper payments to government officials in violation of the Foreign Corrupt Practices Act (FCPA). Former CEO Cyrus Ahsani and former COO Saman Ahsani pleaded guilty on March 25, 2019, to one count of conspiracy to violate the FCPA, while former business development director Steven Hunter pleaded guilty on August 2, 2018, to the same charge. The Ahsanis were alleged to have engaged in a conspiracy from 1999 to 2016 to secure oil and gas contracts by funneling millions of dollars in illicit payments to government officials in countries including Algeria, Angola, Azerbaijan, the Democratic Republic of Congo, Iran, Iraq, Kazakhstan, Libya and Syria. Hunter was said to have participated in the scheme from 2009 to 2015 with respect to officials in Libya. As previously covered by [Red Notice](#), Unaoil is also under investigation by the UK Serious Fraud Office.

The Ahsanis are scheduled for sentencing on April 20, 2020, while Hunter's sentencing is scheduled for March 13, 2020. Their cases are pending in federal court in the Southern District of Texas.

More information

- [DOJ Press Release](#)
- [The Wall Street Journal](#)
- [FCPA Blog](#)

Venezuelan Man Sentenced to Four Years' Imprisonment for FCPA Violations

On October 29, 2019, Jesus Ramon Veroes, a Venezuelan national, was sentenced to four years' imprisonment for participating in a conspiracy to violate the FCPA. Veroes

pleaded guilty in June 2019 to conspiring with others to make corrupt payments to government officials at the Venezuelan state-owned and state-controlled electricity company, Corporación Eléctrica Nacional, S.A. (Corpoelec), in order to secure multiple contracts worth more than \$60 million for the benefit of Florida-based companies. Veroes was also ordered to two years of supervised release and is required to forfeit \$5.5 million and a home he owns in Miami.

Luis Alberto Chacin Haddad, Veroes' co-conspirator and a Miami-based businessman, previously pleaded guilty in the scheme and was sentenced to four years' imprisonment in September 2019. Two former officials from Corpoelec—Luis Alfredo Motta Dominguez and Eustiquio Jose Lugo Gomez—have also been charged for their alleged roles in the scheme, including allegations that they laundered illegal proceeds from the scheme through U.S. bank accounts.

More information

- [Law360](#)
 - [DOJ Press Release – June 2019](#)
-

Additional Charges and Pleas in College Admissions Scandal

On October 22, 2019, a Massachusetts grand jury added additional charges for 11 parents previously indicted in connection to DOJ's widespread and ongoing investigation of alleged improper payments related to college admissions. The grand jury returned a superseding indictment containing additional charges of conspiracy, honest services fraud and mail fraud against parents who allegedly sought to make improper payments to university employees and others in order to secure college admission for their children. In return for the improper payments, the indictment alleges the employees would agree to designate the children as athletes or members of other "favored admissions categories" and that other individuals falsified test scores to make the children appear to be more favorable candidates. One defendant, John Wilson of Massachusetts, was also charged with making corrupt payments related to federal programs after allegedly making payments to 2 prominent universities, both recipients of federal funding, to secure admission for his children.

On October 21, 2019, four additional parents pleaded guilty for their roles in the scheme. In addition, Martin Fox, a Texas sports broker and alleged co-conspirator, agreed to plead guilty to a charge of conspiracy to commit racketeering. In total, at least 27 people have already pleaded or announced their intent to plead guilty for their roles in the college admissions scandal out of the 52 defendants charged thus far.

More information

- [DOJ Press Release](#)
 - [The Wall Street Journal](#)
-

U.S. Judge Charged in Alleged Embezzlement Cover Up

On October 11, 2019, a New York state judge, Sylvia Ash, was arrested at LaGuardia Airport on charges of conspiracy to obstruct justice and obstruction of justice. Prosecutors alleged that Judge Ash assisted Kam Wong, the former CEO of New York's Municipal Credit Union (MCU), in covering up an embezzlement scheme. Judge Ash formerly served as chair of the board of directors for the MCU from 2008 to 2016. Specifically, the government alleges that Judge Ash deleted text messages and information from an iPhone to destroy evidence, as well as made false and misleading statements during the investigation of Wong. In November 2018, Wong pleaded guilty to embezzling almost \$10 million from the MCU from 2013 to 2018. Wong is now serving a five and a half year prison sentence.

Along with Judge Ash, retired police officer, Joseph Guarliardo, was also charged. He is accused of controlling a sham company that received \$250,000 from MCU without providing legitimate services. Judge Ash was released on a \$500,000 bond and is due

back in court on November 1, 2019. The Office of Court Administration announced that Judge Ash has been suspended with pay and relieved of her duties at this time.

More information

- [The New York Times](#)
-

Guilty Plea for Financial Advisor in Ecuador Scheme

On October 11, 2019, Frank Roberto Chatburn Ripalda (“Chatburn”) pleaded guilty to participating in a money laundering scheme in violation of the FCPA concerning corrupt payments made to employees of Ecuador’s state-owned oil company, PetroEcuador. Chatburn, a U.S.-Ecuadorian citizen based in Miami, is alleged to have conspired with Ecuadorian oil services contractor Galileo, for whom he served as a financial advisor, to provide corrupt payments to Ecuadorian officials in exchange for contracts with PetroEcuador. Chatburn is alleged to have set up shell companies to make and conceal the payments, including establishing Swiss bank accounts on behalf of then-PetroEcuador officials. Separately, Chatburn is also alleged to have been implicated in the widespread scheme associated with Odebrecht S.A., as previously covered by [Red Notice](#), in which he allegedly helped an Ecuadorian official conceal money the official received from Odebrecht. Chatburn’s sentencing is scheduled for December 18, 2019.

More information

- [DOJ Press Release](#)
 - [Plea Agreement](#)
 - [The Wall Street Journal](#)
 - [Law360](#)
-

DOJ Closes Investigation of Shell Relating to Nigeria Offshore Oil Block Deal

On October 2, 2019, Royal Dutch Shell announced that DOJ had ended its investigation without bringing charges regarding the company’s involvement in making allegedly corrupt payments associated with the acquisition of drilling licenses in an offshore oil field in Nigeria, known as OPL 245. Together with Italian oil company, Eni, Shell paid \$1.3 billion to the Nigerian government to acquire rights to OPL 245 in 2011, much of which was subsequently paid to individual Nigerian government officials. These subsequent payments prompted law enforcement officials in Italy, the Netherlands and the United States to closely scrutinize the transaction. The day before Shell’s announcement, Eni also announced that DOJ had ended its investigation without charges. Shell and Eni are currently facing charges in Italian courts relating to the acquisition of OPL 245.

More information

- [The Wall Street Journal](#)
 - [Reuters](#)
-

Former Oil Executive Sentenced for Wire Fraud in Inflated Payments Scheme

On October 1, 2019, U.S. District Judge Nancy Atlas of the Southern District of Texas sentenced Guillermo Capacho, former vice president of a Texas-based oil company unnamed in court filings, to two years in prison for his role in a multimillion dollar corrupt payment scheme. Capacho, who pleaded guilty to conspiracy to commit mail and wire fraud, was also ordered to forfeit \$3.4 million. Along with two co-conspirators, Cesar Rivera and Miguel Garcia, Capacho engaged in improper transactions that involved procuring Capacho’s employer’s overpayment for oil rigs. In exchange for more than \$4 million in kickbacks, Capacho arranged deals in which Capacho’s company would purchase oil rigs from Rivera’s company for an inflated price, including one deal where \$63 million was paid for the purchase of 14 oil rigs of lesser value. Garcia, a Colombian citizen and associate of

Capacho's, is said to have used his bank accounts to conceal the payments. Rivera previously pleaded guilty to conspiracy to commit mail and wire fraud and was sentenced to four months' imprisonment in September 2019. Garcia's sentencing is scheduled for December 2019.

More information

- [Law360](#)

SEC Issues Whistleblower Determination

On October 11, 2019, the SEC announced a whistleblower determination denying a claim for an award. In its order, the SEC found that the claimant submitted two “largely-duplicative” tips regarding conduct unrelated to the agency’s enforcement action and that was further deemed not to violate any applicable rules or regulations.

Whistleblower awards—provided for under the Dodd-Frank Act—can range from 10 to 30 percent of the money collected from monetary sanctions in an eligible enforcement action exceeding \$1 million. Notices of Covered Actions—enforcement actions with sanctions greater than \$1 million—are posted on the [SEC](#) and [CFTC](#) websites, and claims must be submitted within 90 days of such posting.

The SEC has made 67 whistleblower awards totaling approximately \$387 million since it first began the practice in 2012. Similarly, since issuing its first award in 2015, the Commodity Futures Trading Commission (CFTC) has awarded more than \$90 million to whistleblowers. Neither agency discloses the identities of whistleblowers nor details regarding the covered actions in which they assisted.

More information

- [SEC Order](#)

EXPORTS, SANCTIONS AND CUSTOMS ENFORCEMENTS

Turkish Bank Charged in Multibillion-Dollar Iranian Sanctions Evasion Scheme

On October 15, 2019, TÜRKİYE HALK BANKASI A.S (“Halkbank”) was charged in a six-count indictment with fraud, money laundering and sanctions offenses related to the bank’s participation in a multibillion-dollar scheme to evade U.S. sanctions on Iran.

According to the indictment, from approximately 2012 until 2016, Halkbank and its officers used money service businesses and front companies in Iran, Turkey, the United Arab Emirates (UAE) and elsewhere to violate and evade prohibitions against Iran’s access to the U.S. financial system, restrictions on the use of proceeds of Iranian oil and gas sales and restrictions on the supply of gold to the government of Iran and Iranian entities and persons. The indictment also alleges that Halkbank knowingly facilitated the scheme, participated in the design of fraudulent transactions intended to deceive U.S. regulators and foreign banks and lied to U.S. regulators about Halkbank’s involvement.

Also according to the indictment, high-ranking government officials in Iran and Turkey participated in and protected the scheme. Some officials allegedly received bribes worth tens of millions of dollars paid from the proceeds of the scheme so that they would promote the scheme, protect the participants and help to shield the scheme from the scrutiny of U.S. regulators.

The DOJ has previously charged nine individual defendants, including bank employees, in connection with the scheme. One of the defendants, former Halkbank deputy general manager Memet Hakkan Atilla, was convicted by a jury of five of the six counts with which he was charged, as reported by [Red Notice](#) in January 2018.

More information

- [DOJ Press Release](#)

- [Indictment](#)
-

General Electric Settles Alleged Violations of CACR for \$2.7 Million

On October 1, 2019, the Department Treasury's Office of Foreign Assets Control (OFAC) announced a \$2,718,581 settlement with The General Electric Company (GE), which signed the settlement on behalf of three subsidiaries: Getsco Technical Services Inc., Bentley Nevada and GE Betz (collectively, the "GE Companies"). The settlement is in regards to potential civil liability GE and the GE Companies faced for 289 apparent violations of § 515.201(b) of the Cuban Assets Control Regulations (CACR).

According to OFAC's web notice, on 289 occasions between December 2010 and February 2014, the GE Companies accepted payment from The Cobalt Refinery Company ("Cobalt") for goods and services provided to a Canadian customer of GE. Cobalt was added to OFAC's List of Specially Designated Nationals and Blocked Persons (SDN List) in June 1995. The GE Companies approved Cobalt as a third-party payer and deposited all checks received from Cobalt into GE's bank account at a Canadian financial institution. The checks contained Cobalt's full legal entity name as it appears on OFAC's SDN List, as well as "Corefco," an acronym for Cobalt, but the GE Companies' sanctions screening software, which screened only the abbreviation of the SDN's name, never alerted on Cobalt's name. OFAC found that GE "did not undertake sufficient diligence into their customer's activities" and failed to recognize the "significant and widely published" relationship between Cobalt and the Canadian customer, which had a publicly known joint venture with Cuba, substantial ties to the Cuban mining industry and a longstanding relationship with Cobalt.

OFAC considered aggravating and mitigating factors when evaluating the settlement in this case. Aggravating factors included that (i) GE is a sophisticated company; (ii) the GE Companies failed to take proper or reasonable care by receiving payments that were, on their face, from a Cuban SDN and providing goods and services to such SDN; (iii) the actions caused substantial harm to the objectives of the Cuba sanctions program; (iv) GE's disclosures to OFAC left substantial uncertainty about the totality of the benefits conferred to Cobalt; (v) GE had reason to know of its customer's relationship with Cobalt; and (vi) GE's primary submissions to OFAC were unclear, disorganized and contained numerous inaccuracies. Mitigating factors included that (i) the GE Companies had no prior violation history in the preceding five years; (ii) GE implemented remedial measures, including new sanctions compliance procedures and training; and (iii) GE cooperated with OFAC by entering multiple tolling agreements.

OFAC stated this action highlights sanctions risks associated with both accepting payments from third parties and conducting transactions in foreign currency or at foreign financial institutions. OFAC also emphasized that this action "demonstrates the importance of conducting appropriate due diligence . . . when *initiating* and *renewing* customer relationships" and that "[o]ngoing compliance measures should be taken throughout the life of commercial relationships."

More information

- [OFAC Recent Actions](#)
 - [OFAC Web Notice](#)
-

Owner of Florida Company Indicted for Smuggling and Illegally Exporting Goods to Libya

On October 29, 2019, Peter Sotis, the 55-year-old owner and principal of Florida-based diving company Add Helium, was arrested and charged with conspiracy to violate and attempted violation of export controls under the International Emergency Economic Powers Act (IEEPA) and Export Administration Regulations (EAR), as well as smuggling.

According to the indictment, from April to October 2016, Sotis and co-defendant Emily Voissem conspired to violate and knowingly and willfully violated export control laws by arranging the export of four rebreathers to Libya without the required license from the U.S.

Department of Commerce (Commerce). A Commerce special agent allegedly instructed Sotis and Voissem not to export such dual-use items while a license determination was pending, and Add Helium's shipping company advised Voissem that it would not ship the items to Libya without approval from Commerce. Sotis and Voissem proceeded to have an intermediary company arrange to pick up and export the controlled items to Libya without a license.

The charges of conspiracy to violate IEEPA, attempted export without a license and smuggling carry maximum sentences of 5, 20 and 10 years in prison, respectively.

More information

- [DOJ Press Release](#)
 - [Indictment](#)
-

Ohio Executive Sentenced to 20 Months for Illegally Exporting Goods to Iran

On October 24, 2019, Behrooz Behroozian, a 64-year-old U.S. citizen and the owner and operator of Ohio-based computer parts supplier Comtech International ("Comtech"), was sentenced to 20 months in prison for sending dual-use items to Iran in violation of IEEPA.

According to the sentencing memorandum, from January 2004 to March 2016, Behroozian, through Comtech, exported industrial equipment to a UAE-based intermediary company, Sumar Industrial Equipment ("Sumar"), in order to disguise the further exportation of such dual-use equipment to an Iranian company, Arman Pisaro Sanao ("Arman"), in violation of Iran sanctions. Behroozian profited between \$35,000 to \$40,000 per year by exporting manifolds, valves and connectors for use in oil and gas pipelines. Behroozian additionally received \$247,601 in "hawalas," an informal Middle Eastern value transfer system used to further conceal Arman's payments to Behroozian.

More information

- [DOJ Press Release](#)
 - [Sentencing Memorandum](#)
-

DOJ Announces Forfeiture of North Korean Cargo Vessel Connected to Sanctions Violations

On October 21, 2019, the DOJ announced an entry of a judgment of forfeiture regarding the M/V Wise Honest ("Wise Honest"). As reported by [Red Notice](#) in May 2019, the Wise Honest, a 17,061-ton single-hull ship, was one of North Korea's largest bulk carriers and the first-ever seizure of a North Korean cargo vessel for violation of U.S. and international sanctions programs.

According to the DOJ press release, from at least November 2016 to April 2018, Korea Songi Shipping Company ("Songi Shipping Company"), an affiliate of Korea Songi General Trading Corporation ("Songi Trading Company"), used the Wise Honest to export coal from North Korea to foreign purchasers and import machinery to North Korea. Songi Trading Company was designated by OFAC on June 1, 2017, for its involvement in the sale, supply or transfer of coal from North Korea. Additionally, Songi Shipping Company representatives allegedly made numerous payments for improvements, equipment purchases and service expenditures for the Wise Honest in U.S. dollars and through U.S. financial institutions. Payments made related to a March 2018 coal shipment through U.S. financial institutions totaled more than \$750,000. Those responsible for the Wise Honest and its activity allegedly attempted to conceal the ship's North Korea affiliation on shipping documentation by listing inaccurate nationalities and countries of origin for the coal.

Only two sets of parties, Cynthia and Fredrick Warmbier and Han and Yong Seok Kim, filed petitions claiming an interest in the Wise Honest, both of which were resolved with the United States. As no other parties claimed interest by the statutory deadline, the Wise Honest was forfeited to the United States to be disposed of according to law.

More information

- [DOJ Press Release](#)
- [Judgment of Forfeiture](#)

Chinese National Sentenced to 40 Months for Conspiring to Illegally Export Military- and Space-Grade Technology from the United States to China

On October 16, 2019, Tao Li, a 39-year old Chinese national, was sentenced to 40 months in prison plus three years of supervised release after previously pleading guilty to conspiring to export military- and space-grade technology to China without a license in violation of IEEPA.

According to the plea agreement, between December 2016 and January 2018, Li, who resided in China, used multiple aliases to contact individuals in the United States to try to purchase radiation-hardened power amplifiers and supervisory circuits and illegally export them from the United States to China. The components Li sought were capable of withstanding significant levels of radiation and extreme heat, technological capabilities which could make a significant contribution to a foreign country's military and space programs. Li and his co-conspirators agreed to pay a "risk fee" to illegally export the electronic components to China, and in furtherance of his procurement activities, Li wired money from a bank account in China to a bank account in Arizona. Li was arrested in September 2018 at Los Angeles International Airport when he attempted to travel from China to Arizona to meet with one of the undercover agents who arrested him.

More information

- [DOJ Press Release](#)
- [Plea Agreement](#)

EXPORTS, SANCTIONS AND CUSTOMS DEVELOPMENTS

Treasury and State Announce New Mechanism to Facilitate Humanitarian Trade with Iran; FinCEN Designates Iran as Jurisdiction of Primary Money Laundering Concern

On October 25, 2019, the U.S. Departments of the Treasury and State jointly announced a new mechanism that will allow businesses to engage in humanitarian trade with Iran without triggering sanctions.

Concurrently, Treasury's Financial Crimes Enforcement Network (FinCEN) identified Iran as a jurisdiction of primary money laundering concern under Section 311 of the USA PATRIOT Act. Under this authority, FinCEN issued a final rule that (1) prohibits the opening or maintaining of correspondent accounts on behalf of Iranian financial institutions and (2) prohibits the use of foreign financial institutions' correspondent accounts at covered U.S. financial institutions to process transactions involving Iranian financial institutions. On top of existing sanctions prohibitions, this designation requires U.S. financial institutions to apply special due diligence to their correspondent accounts to guard against improper use by Iranian banks and subjects U.S. financial institutions to penalties under the Bank Secrecy Act if they violate provisions of the final rule.

Considering this designation, the new mechanism seeks to ensure that funds associated with legitimate humanitarian trade are not diverted to support terrorism or finance other malign activities sponsored by the Iranian regime. This mechanism is designed solely for commercial exports of agricultural commodities, food, medicine and medical devices to Iran. Per OFAC guidelines, participating governments and financial institutions are required to conduct enhanced due diligence and provide to Treasury specific information, with appropriate disclosure and use restrictions, on a monthly basis. The framework also includes various safeguards to prevent sanctionable Iran-related dealings with persons on the SDN List. In addition to strict reporting requirements, the mechanism also enables financial institutions to seek written confirmation from Treasury and State regarding

sanctions compliance.

More information

- [FinCEN Final Rule](#)
 - [Treasury Press Release](#)
 - [OFAC Guidance: Enhanced Due Diligence and Reporting Expectations](#)
-

OFAC Issues Amended Venezuela-Related General License

On October 24, 2019, OFAC issued an amended General License 5A (GL-5A) – *Authorizing Certain Transactions Related to the Petróleos de Venezuela, S.A. 2020 8.5 Percent Bond on or After January 22, 2020*. On January 28, 2019, OFAC added Petróleos de Venezuela, S.A. (PdVSA) to the SDN List. As a result of this designation, U.S. persons are prohibited from engaging in nearly all dealings with PdVSA absent authorization from OFAC. Under General License 5 (GL5), the PdVSA 2020 bondholders were able to seize collateral if there was a default on the payment. However, GL-5A suspends GL5 and, accordingly, between October 24, 2019 and January 22, 2020, the PdVSA 2020 bondholders cannot seize the collateral if there is a default on the 2020 bonds. Specifically, transactions related to the sale or transfer of CITGO shares in connection with the PdVSA 2020 bond are prohibited until January 22, 2020, unless specifically authorized by OFAC. This is confirmed by FAQ 595. OFAC notes in FAQ 595 that “[t]o the extent an agreement may be reached on proposals to restructure or refinance payments due to the holders of the PdVSA 2020 8.5 percent bond, additional licensing requirements may apply. OFAC would encourage parties to apply for a specific license and would have a favorable licensing policy toward such an agreement.”

More information

- [Announcement](#)
 - [GL-5A](#)
 - [OFAC FAQ 595](#)
-

Client Alert: U.S. Government Authorizes Economic Sanctions on Turkey; Adds then Removes Sanctions on Turkish Ministries and Ministers

On October 14, 2019, President Trump signed Executive Order (E.O.) 13894 authorizing U.S. sanctions related to the military conflict between Turkey and Syria, providing broad authority to impose sanctions against Turkish government agencies, officials and entities operating in the Turkish economy, as well as other persons contributing to the instability in Syria.

Under this authority, OFAC added two Turkish ministries and three Turkish ministers to the SDN List, prohibiting U.S. companies from dealing with these ministries and ministers, as well as entities owned 50 percent or more by them. Three General Licenses were issued, authorizing U.S. companies to wind-down existing business with these ministries and ministers by November 13, 2019, and to continue to engage in transactions and activities for the official business of the U.S. government, the United Nations and other specified international organizations on an ongoing basis.

Then on October 23, 2019, OFAC removed the two Turkish government ministries and three ministers from the SDN List after a ceasefire agreement. Although the sanctions designations previously imposed on the Turkish ministries and ministers are no longer in effect, E.O. 13894 remains in effect. This provides established legal authority that the Trump administration can use to quickly re-impose these sanctions listings and to designate additional Turkish parties if it determines that Turkey has resumed military operations or otherwise finds cause to subject the country to further sanctions as a matter of U.S. interest.

Given changing conditions on the ground in Syria and the administration’s actions to ease sanctions on Turkey, it remains to be seen how four proposed sanctions bills in Congress

will progress.

More information

- [Akin Gump Client Alert](#) regarding E.O. 13894 and designations
 - [Executive Order](#)
 - [OFAC Press Release on Designations](#)
 - [Akin Gump Client Alert](#) regarding removals
 - [GL-1](#), [GL-2](#) and [GL-3](#)
 - [OFAC Press Release on Removal of Sanctions](#)
-

BIS Adds 28 Chinese Entities to Entity List over Human Rights Abuses of Uighur, Kazakh and Other Minority Groups in the Xinjiang Uighur Autonomous Region

On October 9, 2019, the Department of Commerce, Bureau of Industry and Security (BIS) announced the addition of 28 Chinese entities to the Entity List that were determined to be “acting contrary to the foreign policy interests of the United States.” The entities include the Xinjiang Uighur Autonomous Region (XUAR) People’s Government Public Security Bureau, 18 subordinate public security bureaus and one other subordinate institute, plus eight technology companies. According to the Federal Register Notice, these entities have been implicated in human rights violations regarding China’s “campaign of repression, mass arbitrary detention, and high-technology surveillance” against Muslim minority groups in the XUAR.

More information

- [Federal Register Notice](#)
- [The New York Times](#)

GLOBAL INVESTIGATIONS RESOURCES

- [OFAC Removes Sanctions on Turkish Ministries and Ministers; U.S. Executive Order Providing a Basis for Sanctions on Turkey Remains in Place](#)
- [Recent ECT Claims - Impact for Energy Investors and Governments](#)
- [U.S. Government Authorizes Economic Sanctions on Turkey](#)

FCPA RESOURCES

For a complete record of all FCPA-related enforcement actions, please visit the following websites maintained by U.S. Regulators:

- [DOJ Enforcement Actions \(2019\)](#)
- [DOJ Declinations](#)
- [SEC Enforcement Actions](#)

WRITING AND SPEAKING ENGAGEMENTS

On November 19, 2019, [Christian Davis](#), [Scott Heimberg](#) and [Andrew Schlossberg](#) will be presenting on "Collateral Damage: How are Canadian Businesses Impacted by US Trade Sanctions?" at Cassels Brock & Blackwell LLP in Toronto, ON.

On November 21, 2019, [Melissa Schwartz](#) and [Christian Davis](#) will be presenting "Cross-Border M&A: The Government Has A Seat at the Table" at the Houston Bar Association's M&A Section Meeting in Houston, TX.

If you would like to invite Akin Gump lawyers to speak at your company or to your group about anticorruption law, compliance, cybersecurity, enforcement and policy or other international investigation and compliance topics, please contact Jaime Sheldon at +1 212.407.3026 or [email](#).

[More information](#) for lawyers in the global investigations and compliance practice.

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