

# Red Notice

A Monthly Update on Global Investigations and Prosecutions



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## ANTICORRUPTION DEVELOPMENTS

### Final Judgments Entered Against Seven Former DAP Employees; Four Ordered to Pay

The Securities and Exchange Commission (SEC) [announced](#) earlier this month that on April 6 and 7, 2016, the Southern District of New York entered final judgments against seven former employees of Direct Access Partners (DAP), a New York-based Wall Street brokerage firm that engaged in a business trading scheme that generated

more than \$60 million in fees. See [January 2016 Red Notice](#). DAP employees used roughly \$5 million of that revenue to bribe a former official at a state-sponsored Venezuelan bank. As a result of the judgments, Iuri Rodolfo Bethancourt, Benito Chinae, Tomas Alberto Clarke Bethancourt, Josephy DeMeneses, Jose Alejandro Hurtado, Ernesto Lujan and Haydee Leticia Pabon are now enjoined from violating Section 17(a) of the Securities Act of 1933 and Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5.

Additionally, the court ordered Chinae, Clarke, DeMeneses, Hurtado and Lujan to pay \$42.5 million in disgorgement and interest. However, those amounts were deemed satisfied by the forfeiture orders resulting from related criminal cases brought by the U.S. Attorney's Office for the Southern District of New York for the same conduct.

For additional information, see [coverage](#) in the *FCPA Blog* and the [article](#) in *The Wall Street Journal*.

## **Financial Consulting Executive Pleads Guilty to Paying \$3.5 Million in Bribes to Development Bank**

On April 20, 2016, the Department of Justice (DOJ) [announced](#) that the former owner and president of Chestnut Consulting Group Inc., Dmitrij Harder, has pled guilty to two counts of violating the Foreign Corrupt Practices Act (FCPA) for allegedly bribing a European Bank for Reconstruction and Development (EBRD) official to direct hundreds of millions of dollars in business to clients. According to the admissions made in connection with his plea, Harder paid \$3.5 million to the official in exchange for approving financing applications for two Chestnut Group clients. Harder's sentencing is scheduled for July 21, 2016. The United Kingdom's Crown Prosecution Service has charged the EBRD official, Andrey Ryjenko, and his sister, Tatjana Sanderson, with accepting bribes and money laundering.

To learn more, read *The Wall Street Journal* [article](#) and our [January 2015](#) issue covering Harder's indictment.

## **UK Logistics Company to Pay More Than £2 Million for Bribery-Related Conduct**

Braid Logistics (UK) ("Braid UK"), part of Braid Group Holdings Limited ("Braid"), will pay £2.2 million under a [civil settlement](#) reached with Scotland's prosecution service, The Crown Office and Procurator Fiscal Service (COPFS), for paying bribes to obtain business. After the Glasgow-based logistics company learned of the potentially illicit activities, it conducted an internal investigation that revealed illegal conduct in connection with two Braid UK contracts. The company self-reported to COPFS, admitting breaches of the Bribery Act 2010. Braid UK's group financial director, Alasdair Davidson, stated that the company is taking steps to implement more robust procedures to prevent future misconduct.

For additional information, see [coverage](#) on *BBC*.

## **Nevada Casino Subject to Million-Dollar Penalty for Violating Anti-Money Laundering Provisions**

FinCEN [imposed](#) a \$1 million civil penalty on Nevada casino Sparks Nugget, Inc. d/b/a John Ascuaga's Nugget ("Sparks Nugget") due to willful violations of the anti-money laundering provisions of the Bank Secrecy Act (BSA) stemming from an ineffective internal compliance program. Sparks Nugget admitted that it excluded its BSA compliance manager from auditing and exam processes and failed to file Suspicious Activity Reports (SARs) for transactions at its facilities. To address SAR compliance issues, Sparks Nugget created a pro forma committee that never met—in fact, several members were unaware that they were part of the group. Nevada Gaming Commissioner Michonne Ascuaga, Sparks Nugget's former CEO, resigned in February 2016 amid news of FinCEN's investigation.

To read more, see the [article](#) in *The Wall Street Journal*.

## **FinCEN Issues Final Rule Identifying FBME Bank Ltd. as Financial Institution of Primary Money Laundering Concern**

FBME Bank Ltd. continues to [contest](#) FinCEN's rulemaking that prohibits U.S. financial institutions from opening or maintaining a correspondent banking relationship with FBME. This is the second time FinCEN has issued a final rule designating FBME a financial institution of primary money laundering concern pursuant to Section 311 of the USA PATRIOT Act, finding that FBME used inadequate compliance procedures to identify illicit activities, facilitated sanctions evasion and financed terrorism and transnational organized crime. Last year FBME successfully challenged FinCEN's first final rule by obtaining a preliminary injunction in the District Court for the District of Columbia to prevent FinCEN's rulemaking from taking effect. The court granted FinCEN's request to revise the rulemaking, and on March 25, 2016, FinCEN published a similar rule imposing the same penalties.

FBME said that it would seek an injunction against the new rule as well and claimed that FinCEN had failed to redress the evidentiary and procedural issues previously identified.

For additional information, see [coverage](#) in *The Wall Street Journal*.

## **DOJ Fraud Section Releases FCPA Enforcement Plan and Guidelines; Launches New FCPA Pilot Program**

On April 5, 2016, the DOJ Criminal Division's Fraud Section [released](#) its FCPA Enforcement Plan and Guidance [Memorandum](#) (the "Fraud Section Memo"). The plan builds on the DOJ's recent enhancements to its FCPA enforcement efforts and also includes the launch of a new, one-year FCPA Pilot Program. Intended to motivate companies to voluntarily self-disclose misconduct, the Pilot Program provides guidance on the resolution of FCPA cases.

The Fraud Section Memo explains that companies that voluntarily and adequately self-disclose, fully cooperate, and timely remediate misconduct may receive credit of up to a 50 percent reduction off the U.S. Sentencing Guidelines fine range. Additionally, pursuant to the Pilot Program, the DOJ will not require the appointment of a monitor for cooperators where "a company has, at the time of resolution, implemented an effective compliance program." In cases of complete cooperation, the DOJ will consider a declination of prosecution. Full cooperation without voluntary self-disclosure will limit a company to no more than a 25 percent reduction. The Fraud Section Memo makes it clear that it does not supplant the USAM Principles, but rather sets forth circumstances in which a company can receive additional credit in FCPA matters.

## **The World Bank Announces Seven Debarments**

On April 5, 2016, the World Bank [announced](#) the one-year debarment of 6M Insulation Panel Co., Ltd.; Huu Nghi Engineering Corporation; TST Co., Ltd.; Sai Gon Insulation Co., Ltd.; Sea Refrigeration Electrical Engineering Company; and Asia Refrigeration Industry Co., Ltd. The World Bank's Integrity Vice President's (INT) investigation revealed that the companies submitted fraudulent documents to win grants to phase out ozone-depleting substances under a project in Vietnam. This investigation is part of a Negotiated Resolution Agreement (NRA).

On April 13, 2016, the World Bank also [announced](#) the three-year debarment of Nihon Kohden Europe (NKE). The company acknowledged that it made €373,761 in bribe payments to secure contracts for medical equipment in connection with a World Bank-financed health project in Romania. The debarment is part of an NRA, under which NKE will continue its cooperation with INT and also pay €400,000 in restitution. Nihon Kohden Corporation, NKE's parent company, will also enhance its global compliance program. This debarment qualifies for cross-debarment with other Multilateral Development Banks pursuant to the Agreement of Mutual Recognition of Debarments, dated April 2010.

## **Various Companies Disclose Bribery-Related Investigations Across the Globe**

In its first [quarter 10-Q](#), Newmont Mining, one of the world's largest gold producers, disclosed that it is working with the SEC and DOJ to investigate "certain business activities of the Company and its affiliates and contractors outside the United States." While the company did not disclose the locations under investigation, its [website](#) lists non-U.S. operations and projects in Peru, Suriname, Ghana, Indonesia, Australia and New Zealand. According to the filing, Newmont entered into a one-year agreement with the SEC tolling the statute of limitations and recently also signed a similar agreement with the DOJ.

To read more, see the [post](#) in the *FCPA Blog* and [article](#) on *MINING.com*.

After [settling](#) FCPA-related allegations concerning conduct of two Chinese subsidiaries with the SEC, Novartis has disclosed in its first-quarter securities [filing](#) that South Korean prosecutors have launched a criminal investigation into Novartis Korea regarding the use of medical journals to "provide inappropriate economic benefits to healthcare professionals." According to the company's email statement received by the *WSJ*, Novartis is conducting its own investigation into these claims and is cooperating with authorities.

To read more, see the [article](#) in *The Wall Street Journal* and [coverage](#) in the *FCPA Blog*.

Chemical & Mining Company of Chile Inc. (SQM) disclosed in its April 21, 2016, [20-F filing](#) that it has reported the results of a foreign bribery investigation to U.S. and Chilean regulators. The findings of this investigation, which were first presented by an Ad-Hoc Committee to the Board of Directors in December 2015, concluded that while authorized payments lacked supporting documentation, "no evidence was identified that demonstrated that the payments were made in order to induce a public official to act or refrain from acting in order to assist SQM in obtaining economic benefits." These same results were voluntarily shared with authorities in Chile and the United States, including the SEC and DOJ, and SQM continues to cooperate with both governments.

For additional information, see [coverage](#) in *The Wall Street Journal*.

PTC, Inc., a Massachusetts-based provider of industrial and retail software, has disclosed in a recent [8-K filing](#) that Chinese authorities are now investigating the company in connection with the same allegations that the company previously resolved in [February 2016](#) as part of civil and criminal settlements with the DOJ and SEC. According to the DOJ and SEC settlements, PTC's Chinese subsidiaries provided approximately \$1.5 million in improper travel and gifts to Chinese officials employed by state-owned entities in exchange for contract awards. PTC states that the China Administration for Industry and Commerce, an agency "authorized to issue fines and assess other civil penalties" initiated the investigation, which is not "necessarily limited" to the U.S. matter, on

March 2, 2016.

To read more, see the [article](#) in *The Wall Street Journal*.

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## EXPORT CONTROL AND SANCTIONS ENFORCEMENT

### **D.C. Circuit Court of Appeals Overrules District Court in Fokker Services Case**

On April 5, a three-judge panel of the D.C. Circuit Court of Appeals reversed the D.C. District Court's rejection of a multimillion dollar settlement agreement between the DOJ and Fokker Services B.V. stemming from alleged sanctions violations. As we reported in June 2014 and February 2015, Fokker had agreed to pay \$21 million as part of a global settlement agreement with the Treasury Department's Office of Foreign Assets Control (OFAC), the U.S. Department of Commerce's Bureau of Industry and Security (BIS), and the U.S. Attorney's Office for the District of Columbia regarding more than 1,100 alleged violations of the U.S. sanctions with Iran and Sudan. The settlement agreement was rejected by Judge Leon of the D.C. District Court, who called the penalty "grossly disproportionate to the gravity of Fokker Services' conduct in a post-9/11 world." Both Fokker and the DOJ argued that the rejection unduly interfered with the DOJ's prosecutorial discretion. In overruling the district court, the panel held that the "Judiciary generally lacks the authority to second-guess those Executive determinations, much less to impose its own charging preferences."

For additional information, see the D.C. Circuit's [opinion](#) and [coverage](#) in *The Wall Street Journal*, as well the [February 2015](#) and [June 2014](#) editions of *Red Notice*.

### **Singapore Man Extradited to US to Face Charges of Unlicensed Exports to Iran**

On April 4, the DOJ announced that Steven Lim, a citizen of Singapore, had been extradited from Indonesia to the United States in connection with criminal sanctions violations. The extradition follows a 2010 conspiracy indictment against Lim and other defendants for illegally exporting to Iran U.S.-origin radio frequency modules with sophisticated wireless data transmission capabilities. Such devices are commonly found in commercial applications, such as printers and computers, but are subject to export controls due to potential use in the remote detonation systems of improvised explosive devices (IEDs). Lim and others exported more than 6000 modules between June 2007 and February 2008 from the United States to Iran through Singapore—at least 16 of which were later found in unexploded IEDs in Iraq. According to the DOJ, to conceal illegal activity, Lim misrepresented to the Minnesota firm that manufactured the devices that Singapore was the final destination of the items. This misrepresentation caused the firm to file false documents with the U.S. government.

For additional information, see the DOJ [press release](#) and [coverage](#) in *The Wall Street Journal*.

### **Former Owner of New Jersey Contracting Businesses Sentenced to 57 Months in Prison for Unlicensed Exports to India**

Earlier this month, the former owner of two New Jersey contracting firms, Hannah Robert, was sentenced to 57 months in prison for violating the Arms Export Control Act. According to documents filed in the case in U.S. District Court, between June 2010 and October 2012, Robert engaged in a conspiracy to export military technical data to India without U.S. State Department licenses. The technology in question involved technical drawings used to develop parts for torpedo systems used in nuclear submarines, military attack helicopters and F-15 fighter aircraft. Robert transmitted the military drawings for these parts to India by posting the technical data to the password-protected website of a New Jersey church where she was a volunteer web administrator.

For additional information, see the DOJ [press release](#).

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## EXPORT CONTROL AND SANCTIONS DEVELOPMENTS

### **OFAC Authorizes Certain Commercial Passenger Aircraft Transactions with Iran**

On March 24, OFAC issued General License I authorizing U.S. persons to engage in certain transactions ordinarily incident to the negotiation of, and entry into, contingent contracts for licensable activities under the Statement of Licensing Policy for Activities Related to the Export or Reexport to Iran of Commercial Passenger Aircraft and Related Parts and Services (SLP). This new general license addresses lingering uncertainties surrounding the SLP, which established a policy of favorable treatment for license applications connected to commercial aircraft transactions in January 2016. Although the SLP generated significant industry interest, it left unclear whether U.S. persons were authorized under the ITSR to engage in transactions related to negotiating,

and entering into, contracts authorized under the licensing policy.

Under General License I, U.S. persons may engage in all transactions “ordinarily incident” to the negotiation of, and entry into, “contingent contracts” for activities eligible for authorization under the SLP. The license specifies that contingent contracts include executory contracts, executory pro forma invoices, agreements in principle, executory offers capable of acceptance” (i.e., bids or proposals responding to public tenders), binding memorandums of understanding and “any other similar agreement” in which performance is made expressly contingent upon the issuance of a specific OFAC license authorizing the activities to be performed. Notwithstanding, General License I does not authorize dealings with persons whose property and interests are blocked by OFAC on the Specially Designated Nationals (SDN) List or the export or reexport of any aircraft or related parts or services to Iran.

For additional information, see the [OFAC Notice](#), as well as [discussion](#) in the AG Trade Law Blog.

## **OFAC Adopts New Sanctions Targeting Hizballah’s Financial and Logistics Networks**

On April 15, OFAC issued the Hizballah Financial Sanctions Regulations (HFSR) pursuant to the Hizballah International Financing Prevention Act of 2015. The regulations are intended to disrupt Hizballah’s global logistics and financial networks by imposing sanctions on foreign financial institutions that engage in prohibited transactions connected to Hizballah. When invoked, the sanctions would prohibit, or significantly limit, the ability for U.S. financial institutions to open or maintain correspondent or payable-through accounts on behalf of the foreign financial institution in the United States.

Notable features of the regulations include:

- a broad definition of “financial institution,” which includes not only banks, exchange houses, investment companies and branches of foreign financial institutions in the United States, but also any “dealer in precious metals, stones, or jewels,” as well as any “business engaged in vehicle sales, including automobile, airplane, and boat sales”
- restrictions on both opening and maintaining accounts for foreign financial institutions, which may expose U.S. financial institutions to penalties for failing to timely close an account affected by the sanctions
- a broad restriction on activities conducted “in any location or currency”; accordingly, foreign financial institutions must ensure that none of their activities globally (not just those that touch the United States or involve the U.S. dollar) run afoul of the HFSR
- civil penalties for U.S. financial institutions of \$250,000 or twice the transaction value, as well as criminal penalties of \$1 million and/or 20 years of imprisonment per violation.

For additional information, see the [OFAC Final Rule](#) implementing the HFSR and [discussion](#) in the Akin Gump Client Alert.

## **OFAC Acting Under Secretary Adam Szubin Remarks on U.S. Sanctions Programs**

On April 15, Adam Szubin, OFAC Acting Under Secretary for Terrorism and Financial Intelligence, spoke at the Center for a New American Security (CNAS) on key lessons learned from U.S. sanctions programs. In this discussion, he called out the following three key lessons as particularly important in guiding agency action relating to the implementation and enforcement of sanctions:

- For a sanctions program to be effective, international buy in is key. This is because multilateral sanctions programs are easier to enforce than unilateral programs given the incentives for compliance and the limited opportunities for circumvention, as demonstrated by the Iran and Cuba sanctions programs, which are on opposite ends of this spectrum.
- The effectiveness of sanctions programs relies on well-defined objectives and criteria for removal. Without these elements, sanctions lose their ability to encourage sanctions targets, such as governments, entities and individuals, to alter their behavior.
- Effective sanctions programs require calibration. This is aided by cooperation with governments and international organizations (e.g., IMF and the World Bank), as well as through dialogue with the private sector on the effectiveness of sanctions in meeting their objectives.

With respect to U.S. sanctions policy going forward, Mr. Szubin noted a concerted effort by OFAC to take into account the costs of sanctions to U.S. interests abroad, given their impact on diplomatic relations, commercial activity and the risk of retaliation. He also noted that these costs were particularly high in the context of secondary sanctions, which primarily target foreign persons and have been received with a great deal of skepticism by the international community. In light of this, Mr. Szubin proposes a future sanctions strategy that sees use of “sanctions only in tandem with other tools, and only when the intended policy goal is important enough to justify sustaining the associated costs.” Assuming that this policy is continued, this could result in a shift away from unilateral sanctions, as well as more limited use of secondary sanctions.

To read Adam Szubin’s remarks, see the OFAC [press release](#).

## **Publication of Burundi Sanctions Regulations**

On April 6, OFAC issued regulations pursuant to Executive Order 13712 from November 22, 2015, which authorized sanctions on certain persons connected to civil unrest in Burundi. The regulations provide definition and interpretive guidance and authorize certain limited activity, such as legal and emergency medical services, to designated individuals. OFAC intends to supplement the regulations with a comprehensive set of regulations in the future.

For additional information, see the OFAC [press release](#).

## **OFAC Update to Cuba Sanctions Frequently Asked Questions**

On April 21, OFAC announced updates to its Frequently Asked Questions (FAQs) related to Cuba. These clarify the scope of permissible activities that U.S. persons may engage in with respect to "U-Turn" financial transactions (#62-63), authorized exports and re-exports (#67-68), insurance-related services (#80-81), grants to state-owned entities (#93), and leasing and purchasing property in Cuba (#97).

For additional information, see OFAC's [updated FAQs](#) on Cuba sanctions.

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## **WRITING AND SPEAKING ENGAGEMENTS**

On May 3, partner [Jim Benjamin](#) is speaking on "Hypothetical: Ethical Issues" at PLI's The Foreign Corrupt Practices Act and International AntiCorruption Developments 2016. For more information, see [here](#).

On May 4, partner [Dan Feldman](#) will speak at the Council on Foreign Relations' symposium "The New Geopolitics of China, India, and Pakistan" in Washington, D.C.

On May 5, partner [Shiva Aminian](#) will be speaking on "Building a World Class Trade & Export Compliance Program" at nielsonsmith's EU Trade Controls for U.S. Companies 2016 conference on May 4-5 in Washington, DC. Learn more [here](#).

On May 10, partner [Mike Asaro](#) is speaking on the Ethics Panel at Managed Funds Association's annual regulatory and compliance conference 'Compliance 2016.' For more information, see [here](#).

On May 12, partners [Jim Benjamin](#), [Robert Hotz](#) and [Parvin Moyne](#) will present an ethics CLE titled "Internal Investigations Under the Yates Memo: Best Practices and Ethical Considerations" at Akin Gump's New York office. For more information, please contact [jstuddard@akingump.com](mailto:jstuddard@akingump.com).

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 Mandy Warfield at [mwarfield@akingump.com](mailto:mwarfield@akingump.com) or +1 202.887.4464.

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The "Anticorruption Developments" section of Red Notice is edited by [Jonathan Vukicevich](#). The "Export Control and Sanctions Developments and Enforcement" sections are edited by Johann Strauss, Law Clerk.

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