

# Red Notice

A monthly update on global investigations and prosecutions

**Akin Gump**  
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## ANTICORRUPTION DEVELOPMENTS

### Telecommunications Company Fined \$12 Million for FCPA Violations

On August 29, 2019, The Securities and Exchange Commission (SEC) instituted cease-and-desist proceedings against California-based Juniper Networks, Inc. (Juniper) following Juniper's submission of an Offer of Settlement to resolve the SEC's investigation of violations of the Books and Records provision of the U.S. Foreign Corrupt Practices Act (FCPA). In addition to agreeing to cease-and-desist any conduct that violates the FCPA, Juniper agreed to pay \$4,000,000 in disgorgement, more than \$1,200,000 in prejudgment interest, and \$6,500,000 in civil penalties.

Specifically, the SEC alleged that employees of the Russian representative office of Juniper's subsidiary, JNN Development Corporation (JNN) agreed with third-party channel providers to increase the discount of its products without passing along that discount to the customers. Rather, the SEC alleged, that delta was used to create a "common fund" that, inter alia, the third-party channel providers used to reimburse government officials for travel and entertainment expenses at least some of which had no discernible business purpose. Separately, the SEC also alleged that certain sales employees of Juniper's Chinese subsidiaries falsified trip and meeting agendas to understate the true value of the entertainment that was provided and that, contrary to Juniper's travel policies, the company's legal department approved numerous trips without adequate review and after the travel had occurred.

As previously reported by [Red Notice](#), in February 2018 Juniper disclosed that the Department of Justice (DOJ) advised that it was closing its investigation of the company without taking any further action.

### More information

- [SEC Order](#)
- [The Wall Street Journal](#)
- [FCPA Blog](#)

- [Law360](#)
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## DOJ Concludes Investigation of Medical Device Manufacturer

On August 16, Misonix Inc. (“Misonix”) announced that the DOJ had closed its investigation of Misonix concerning potential FCPA violation by Misonix’s former distributor in China. Both the DOJ and the SEC opened investigations into Misonix’s conduct in 2016. Misonix subsequently conducted an internal investigation into the matter, and entered into a settlement with the SEC in May 2019, which required that Misonix implement various corporate governance reforms. Misonix announced the conclusion of DOJ’s investigation in its August 16, 2019, 8-K filing.

### More information

- [SEC Settlement](#)
  - [Misonix 8-K](#)
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## Trudeau Implicated by Ethics Report in SNC-Lavalin Investigation

On August 14, the Canadian Ethics Commissioner, Mario Dion, released a report describing that Prime Minister Justin Trudeau had violated the Conflict of Interest law with regard to his role in the ongoing SNC-Lavalin investigation. As previously reported by [Red Notice](#) in February 2019, Canada’s largest construction company has been under investigation since 2012 for allegedly making corrupt payments related to contracts in Libya and in connection with a hospital contract in Montreal. Trudeau has come under fire for allegedly trying to influence the prosecution of SNC-Lavalin, pushing for a deferred prosecution agreement. Trudeau has denied any wrongdoing.

### More information

- [Dion Report](#)
  - [The Wall Street Journal](#)
  - [The New York Times](#)
  - [The Guardian](#)
  - [Toronto Sun](#)
  - [CBC](#)
- 

## Federal Appeals Court Outlines Differences Between the FCPA and U.S. Domestic Bribery Law

On August 9, the 2nd Circuit held in *United States v. Ng* that the “official act” standard applied in *McDonnell v. United States* does not apply under statutes governing corrupt payments involving federal funds (under 18 U.S.C. § 666) or to corrupt payments under the Foreign Corrupt Practices Act (FCPA). Ng Lap Seng (“Ng”) was convicted in 2017 of paying and conspiring to pay bribes and gratuities, money laundering and bribery under the FCPA, for a corrupt scheme that involved payments to United Nations officials so that they would select Ng’s properties for U.N. conferences. The lower court instructed the jury that the government was required to prove under § 666 that Ng “acted with the intent to obtain ‘an official act’ from those agents of the U.N. to whom he had given or offered something of value.” Ng argued on appeal that the FCPA and § 666 require *proof* of an official act, not merely intent. The 2nd Circuit denied Ng’s argument on appeal, stating that the requirement under the *McDonnell* case of an “official act” does not apply to the elements of § 666 and the FCPA antibribery statute.

The 2nd Circuit also upheld Ng’s conviction under § 666 finding that an “organization” under that statute includes nongovernment public international organizations, such as the United Nations (corrupt payments to U.N. officials are already prohibited under the FCPA). [Red Notice](#) previously reported on the Ng and events in this U.N. scheme in the [April](#) and

### More information

- [Second Circuit Opinion](#)
  - [Law360](#)
  - [National Law Review](#)
  - [The Wall Street Journal](#)
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### UK SFO Issues New Guidance

On August 6, 2019, The U.K.'s Serious Fraud Office (SFO) joined an increasing number of U.S. regulators in issuing guidance advising companies that their cooperation with SFO investigations would be taken into consideration when the agency makes charging decisions (the guidance was subsequently updated on August 16, 2019). The Guidance defines cooperation as "identifying suspected wrong-doing and criminal conduct together with the people responsible, regardless of their seniority or position in the organisation; reporting this to the SFO within a reasonable time of the suspicions coming to light; and preserving available evidence and providing it promptly in an evidentially sound format." The Guidance goes on to provide "indicators of good practice," which includes recommendations for records collection and retention and the financial analysis of pertinent records. The Guidance also reiterates the SFO's practice of seeking a waiver of privilege and copies of any relevant witness "accounts," including internal memoranda summarizing witness interviews.

### More information

- [SFO Corporate Co-operation Guidance](#)
  - [The Wall Street Journal](#)
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### Anti-Corruption Spotlight: World Bank Announces Debarments

On August 14, the World Bank announced the 15-month debarment of Beijing Jingold Construction Co., Ltd. (BJC), a Chinese construction company, based on a "fraudulent practice" involving a World Bank project in Samoa. BJC—who had a history of contract nonperformance—was deemed to have committed fraudulent practices after it knowingly misrepresented this fact when it bid on a \$38 million contract to improve airport infrastructure. Ultimately, BJC was not awarded the contract.

The World Bank also announced the debarment of BJC's subsidiaries Beijing Jingold Sunshine Engineering Technology Co., Ltd. and Beijing Jingold Airport Construction (Liaoning) Co. Under the settlement agreement, BJC has committed to fully cooperate with the World Bank Group Integrity Vice Presidency. These debarments qualify for cross-debarment by the African Development Bank, the Asian Development Bank, the European Bank for Reconstruction and Development, and the Inter-American Development Bank.

### More information

- [World Bank Press Release](#)
- [FCPA Blog](#)
- [Samoa Aviation Investment Project](#)

## 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](#)

## EXPORTS, SANCTIONS AND CUSTOMS ENFORCEMENTS

### PACCAR Inc. Settles Apparent ITSR Violations with OFAC for \$1,709,325

On August 6, 2019, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) announced a \$1,709,325 settlement with PACCAR Inc. (PACCAR) to settle potential civil liability for 63 apparent violations of the Iranian Transactions and Sanctions Regulations (ITSR) by DAF Trucks N.V. (DAF), a wholly owned subsidiary of PACCAR.

DAF's alleged sanctions violations involved the sale of 63 trucks to customers in Europe from 2013 to 2015 that DAF knew or had reason to know were ultimately intended for buyers in Iran. In one sale, DAF employees received a pricing request and subsequent order from a Hamburg-based dealer for trucks with particular specifications for an Iranian company located in Iran. DAF employees informed the dealer that DAF could not sell trucks destined for Iran then, later that day, received a pricing request from the same dealer for a new order destined for end-use in Russia. DAF processed the order despite it being virtually identical to the prior Iran-related order, including the same types of trucks, specifications, and delivery point. In another sale, DAF employees received drafts of invoices from a Netherlands-based trader that referenced buyers in Iran. Along those lines, OFAC noted in the settlement announcement that DAF employees ignored red flags suggesting that the trucks were ultimately destined for Iran, failing to conduct adequate inquiry or take reasonable steps in response to the warning signs.

OFAC determined that PACCAR voluntarily disclosed the apparent violations and that the apparent violations constitute a non-egregious case. PACCAR and DAF implemented a variety of compliance-related policies and procedures to minimize the risk of similar conduct in the future. DAF's disregard of relevant warning signs related to the potential sale, the large economic benefit conferred onto Iran by the sale and PACCAR's status as a sophisticated entity were considered by OFAC to be aggravating factors. Mitigating factors included lack of previous sanctions history, disclosure and subsequent cooperation with OFAC and completion of remedial steps and corrective actions.

#### More information

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

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### Dual Citizen Arrested and Charged with Illegally Exporting Prohibited Manufacturing Equipment to Iran

On August 20, 2019, the Department of Justice (DOJ) announced the arrest of Mehdi Hashemmi ("Hashemi"), a resident of Iran and dual citizen of the United States and Iran, in relation to a 21-count indictment for conspiring to violate the International Emergency and Economic Powers Act (IEEPA) and U.S. sanctions against Iran.

According to the indictment, from at least June 2015 to April 2018, Hashemi conspired to illegally export to Iran computer numerical control (CNC) machines, which alter a blank piece of material, such as metal or plastic, to meet precise specifications based on programmed instructions. He allegedly purchased CNC machines and related equipment from U.S. and Canadian suppliers and arranged for them to be shipped to the United Arab Emirates (UAE) using false and forged invoices and packing lists. Hashemi would then arrange for the CNC machines to be sent to a company in Iran.

The charges in the indictment included conspiring to violate and violating IEEPA, smuggling, money laundering, unlawful export information activities, and making false statements. If convicted of all 21 charges in the indictment, Hashemi faces a statutory maximum penalty of 320 years in federal prison.

## More information

- [DOJ Press Release](#)
  - [Indictment](#)
  - [Law360](#)
- 

### Atradius Trade Credit Insurance, Inc. Settles Apparent Violations of the Kingpin Act with OFAC for \$345,315

On August 16, 2019, OFAC announced a \$345,315 settlement with Atradius Trade Credit Insurance, Inc. (ATCI), a trade credit insurer in Hunt Valley, Maryland and a subsidiary of Atradius N.V., related to apparent violations of the Foreign Narcotics Kingpin Sanctions Regulations (“Kingpin Act”).

According to OFAC’s web notice, in October 2016, a cosmetics company located in the United States assigned ATCI the right to collect on a \$5,730,680.33 debt owed by Grupo Wisa, S.A. (“Grupo Wisa”), a party designated by OFAC pursuant to the Kingpin Act on May 5, 2016. In June 2017, ATCI received a \$4,043,174.25 payment from the liquidation of Grupo Wisa’s assets. OFAC determined that ATCI did not voluntarily self-disclose, and the apparent violations constitute a non-egregious case.

OFAC considered aggravating and mitigating factors when evaluating the settlement. Aggravating factors included that ATCI: (i) did not undertake meaningful analysis or seek to confirm whether the activity was permissible; and (ii) is a subsidiary of a sophisticated, global trade credit insurance and collections conglomerate. Mitigating factors included that ATCI: (i) had not received a Penalty Notice or Finding of Violation from OFAC in the preceding five years; (ii) voluntarily conducted a full internal investigation, provided documents to OFAC in the course of its investigation and took voluntary remedial action; and (iii) agreed to undertake certain compliance commitments.

## More information

- [OFAC Web Notice](#)
  - [OFAC Recent Actions Notice](#)
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### Iranian Citizen Pleads Guilty to Conspiring to Facilitate the Illegal Export of Technology to Iran

On August 8, 2019, Negar Ghodskani (“Ghodskani”) pleaded guilty to conspiring to export controlled technology from the United States to Iran. According to the plea agreement, from 2008 until late 2011, Ghodskani was an employee of Fanavar Moj Khavar (“Fana Moj”), an Iran-based company that specializes in broadcast and microwave communications and was designated by OFAC in 2017 for providing support to the Iranian Revolutionary Guard Corps. In 2009, Ghodskani helped establish Green Wave Telecommunications Sdn Bhn (“Green Wave”) in Malaysia, which operated as a front for Fana Moj. From at least August 2010 to 2011, Ghodskani falsely represented herself as a Malaysia-based Green Wave employee to U.S. companies to illegally acquire controlled technology on behalf of Fana Moj. In doing so, Ghodskani concealed Iran as the ultimate destination and Fana Moj as the ultimate end-user. Once acquired, the technology would be repackaged at Green Wave’s office in Malaysia and re-shipped to Iran. According to the plea agreement, Ghodskani acted on the specific directions and instructions of Fana Moj employees.

Ghodskani faces up to 5 years in prison and a fine of up to \$250,000. Other charges in the indictment were dismissed and included smuggling, false statements and money laundering.

## More information

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



## Client Alert: New U.S. Sanctions Penalties Spotlight Sanctions and Export Controls Scrutiny of False and Incomplete Statements

On August 8, 2019, OFAC issued Findings of Violation to two U.S. companies, DNI Express Shipping Company (DNI) and Southern Cross Aviation, LLC (“Southern Cross”), in relation to administrative subpoenas with follow-up responses deemed by OFAC to be inaccurate or incomplete.

The Finding of Violation for DNI involved an administrative subpoena issued by OFAC to DNI in May 2015, investigating DNI’s involvement in facilitating the shipment, supply and sale of farm equipment to Sudan in apparent violation of the now-defunct Sudanese Sanctions Regulations. According to OFAC’s web notice, upon reviewing DNI’s responses submitted through outside counsel, OFAC determined that several responses were “contradictory, false, materially inaccurate, incomplete, and contained misleading statements.” OFAC followed up with DNI’s outside counsel by email in July 2016, in part requesting clarification regarding DNI’s version of events, its supporting documents and whether DNI understood its obligations under OFAC’s Reporting, Procedures and Penalties Regulations (RPPR). Once again, OFAC found DNI’s subsequent email response through outside counsel to be “contradictory, false, materially inaccurate, incomplete, and misleading.” Additionally, OFAC found that the email response presented new information responsive to the subpoena but not included in the original response.

The Finding of Violation for Southern Cross involved two administrative subpoenas issued by OFAC to Southern Cross in 2016. According to its web notice, OFAC issued the first subpoena in June 2016 to investigate Southern Cross’s involvement in sales of helicopters destined for Iran through an Iranian businessman who was located in Ecuador. The subpoena directed Southern Cross to submit detailed information and documents related to those or any other dealings with Iran in the last five years. In an email response from the president of Southern Cross to OFAC, the company denied knowing of, or conducting, any business dealings with Iran. However, in a subsequent written response, Southern Cross stated that one of its sales representatives in Ecuador sent technical details to an Ecuadorian group related to a potential sale of helicopters to an Iranian group for operation in Ecuador. As documentation, Southern Cross only provided its internal Export Management Manual. OFAC issued a second administrative subpoena in October 2016, seeking similar information and documentation, particularly related to the potential sale. In its response, Southern Cross submitted email correspondence related to the potential sale between the Ecuadorian representative, the Ecuadorian group and the Iranian businessman who was the subject of the initial inquiry. Southern Cross had not produced these emails in response to the first administrative subpoena.

In both actions, OFAC considered aggravating factors to be that the companies: (1) demonstrated reckless disregard for sanctions requirements by failing to provide accurate, complete information in subpoena responses; (2) had actual knowledge, or reason to know, of the apparent violations at issue, rendering the responses false, materially inaccurate, materially incomplete and misleading; and (3) as a result of providing false and misleading statements, did not fully cooperate with OFAC’s investigation. Additionally, DNI did not correct or amend the statements in response to OFAC’s follow-up email. Mitigating factors for both companies included that they were not large businesses and had no prior OFAC sanctions history. An additional mitigating factor for DNI was that it filtered its responses through an outside attorney.

To mitigate the risk of an enforcement action related to such responses and disclosures, companies should develop detailed and stringent internal investigation procedures to ensure that any official government submissions are thorough, complete and accurate to the best of the reporting personnel’s knowledge and material information is not omitted. Additionally, companies should use standardized tools or methods for recording information to substantiate key statements and assumptions in government submissions. Finally, working with experienced outside counsel mitigates potential internal conflicts of interest in the course of self-initiated or government investigations.

- [Akin Gump Client Alert](#)
  - [OFAC Web Notice to DNI Express Shipping](#)
  - [OFAC Web Notice to Southern Cross](#)
  - [Law360](#)
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## Chinese Businessman Indicted in U.S. in Alleged Tariff-Evasion Scheme

On July 31, 2019, the DOJ unsealed a 24-count indictment charging a Chinese businessman and his Chinese-based company with conspiracy, wire fraud and passing false and fraudulent papers through a customs house related to an alleged aluminum smuggling scheme.

The indictment alleges that Liu Zhongtian used his Chinese-based company, China Zhongwang Holdings Ltd. ("China Zhongwang"), and related shell companies to import aluminum into the United States using inappropriate tariff classifications. The incorrect classifications allowed Liu and China Zhongwang to fraudulently avoid \$1.8 billion in U.S. antidumping and countervailing duties from 2011 to 2014.

The relevant U.S. antidumping and countervailing duties were imposed in 2011 on certain aluminum imports from several Chinese companies, including China Zhongwang, after the U.S. Department of Commerce (Commerce) concluded as part of an anti-dumping and countervailing duties investigation that the companies were selling aluminum at artificially low prices in the U.S. while receiving subsidies back home.

According to the indictment, Liu evaded the tariffs by shipping aluminum to the United States in the form of pallets, a finished product not on the list of items covered by Commerce's investigation. However, a majority of the pallets were not finished products and therefore should have been subject to the antidumping and countervailing duties. Liu and his associated companies imported 2.2 million fake pallets, thereby evading about \$1.8 billion in antidumping and countervailing duties.

The Wall Street Journal notes that Liu is "one of the world's wealthiest aluminum magnates" and that the case is "one of the largest tariff-related cases ever brought by the Justice Department." Mr. Liu faces a maximum prison sentence of 465 years if convicted.

### More information

- [DOJ Indictment](#)
- [The Wall Street Journal](#)
- [Law360](#)

## EXPORTS, SANCTIONS AND CUSTOMS DEVELOPMENTS

### Client Alert: Commerce Extends and Revises Temporary General License Authorizing Specified Transactions with Huawei and its Affiliates; Adds Additional Huawei Entities to Entity List

On August 19, 2019, the Commerce Department's Bureau of Industry and Security (BIS) added 46 additional affiliates of Huawei Technologies Co., Ltd. ("Huawei") to the Entity List. The export, reexport and transfer to these entities of commodities, software and technology subject to the Export Administration Regulations (EAR) is now prohibited without an export license.

Concurrently, BIS extended until November 18, 2019, a revised and narrowed Temporary General License (TGL) authorizing exports, reexports and transfers to Huawei and other listed affiliates of specific types of items that are relevant to third parties. However, before one may ship an item subject to the EAR under the amended TGL, the Huawei entity that would receive the items must first certify how the transaction satisfies the TGL's terms and commit to comply with the EAR's recordkeeping provisions. BIS removed the authorization in the first TGL to engage in otherwise prohibited transactions with the Huawei listed

entities in the development of 5G standards, noting that existing provisions of the EAR suffice for purposes of addressing the application of the Entity List-based license requirements to activities in connection with standards development bodies. BIS issued an advisory opinion in its FAQs under “Published Technology and Software” relating to standards development activities. BIS also amended, defined, and revised several other aspects of the TGL, including prohibiting the export of software under the TGL that would “enhance the functional capacities” of the original software or equipment already in Huawei’s possession.

BIS did not announce the issuance of any individual licenses authorizing exports to Huawei or other listed entities in order to implement the President’s G-20 directive on the topic.

### **More information**

- [Akin Gump Client Alert](#)
  - [Federal Register Final Rule](#) – Entity List Additions
  - [Federal Register Final Rule](#) – Temporary General License
  - [BIS Advisory Opinion](#)
- 

## **Client Alert: President Trump Issued New Executive Order Blocking all Property of the Government of Venezuela**

On August 5, 2019, the Trump administration issued Executive Order 13884, “Blocking Property of the Government of Venezuela” (“EO 13884”) imposing new economic sanctions that broadly prohibit U.S. persons from dealing with the Government of Venezuela or its property absent a license issued by OFAC. It also provides grounds for targeted imposition of secondary sanctions on any person (U.S. or non-U.S.) that materially assists, sponsors or provides financial, material or technological support for, or goods or services to or in support of the Government of Venezuela.

Along with the issuance of EO 13884, OFAC amended 12 of the 16 pre-existing general licenses and issued 13 new general licenses, including a wind-down general license, that allow U.S. persons to continue to engage in certain narrow categories of business with the Government of Venezuela for a limited period of time. In addition, OFAC issued new FAQs providing additional guidance and clarification regarding the new measures as well as guidance regarding provision of humanitarian assistance and support for the general population of Venezuela.

This action does not impose a comprehensive “embargo” on Venezuela of the kind seen in connection with other territory- or country-based U.S. sanctions programs, such as U.S. sanctions affecting Crimea, Cuba, Iran, North Korea and Syria. Nevertheless, these measures are likely to have a disruptive effect on the interests and commercial activities of both U.S. and non-U.S. companies with business associated with Venezuela given the Venezuelan Government’s significant role and entanglement in the country’s economy, generating added compliance, political and business risks, as well as related management burdens for the continuation of established activities involving Venezuela.

### **More information**

- [Akin Gump Client Alert](#)
  - [OFAC Web Notice](#)
  - [Executive Order](#)
  - [OFAC FAQs](#)
  - [New and Amended General Licenses](#)
  - [Guidance Related to the Provision of Humanitarian Assistance and Support to the Venezuelan People](#)
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## **President Trump Designates Brazil a Major Non-NATO Ally**

On July 31, 2019, President Trump designated Brazil as a major non-NATO ally of the



United States for the purposes of the Foreign Assistance Act of 1961 and the Arms Export Control Act.

The designation grants Brazil formal benefits to include more favorable terms on some arms deals, the ability to use U.S.-based financing for purchasing certain military equipment and priority access to U.S. military surplus. Brazil can now also participate in joint training and counterterrorism exercises with the United States, share cooperative research and development deals with the Department of Defense (DOD) and have its companies bid on DOD repair and maintenance deals for military equipment kept outside the United States, among other benefits.

The Trump Administration did not provide any further explanation of the designation.

### More information

- [Presidential Memorandum](#)
- [Law360](#)

## GLOBAL INVESTIGATIONS RESOURCES

- [Second Round of U.S. Sanctions on Russia Pursuant to the Chemical and Biological Weapons Control](#)
- [Agencies Release Interim Final Rule Implementing First Phase of 2019 NDAA Section 889](#)

## WRITING AND SPEAKING ENGAGEMENTS

On September 25, 2018, [James Joseph Benjamin Jr.](#) will co-chair the PLI White Collar Crime 2019 and [Michael A. Asaro](#) will be a speaker panelist on "Policing the Markets: Updates on Securities Investigations and Enforcement" in New York, NY.

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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