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Areas of Practice

- Anti-Money Laundering
- Business and Human Rights
- Crisis Management
- Economic Sanctions
- Export Controls
- FCPA/Anti-Corruption
- International Regulation & Compliance
- Worldwide Arbitration & Dispute Resolution

Languages

- Spanish
- French
- Portuguese

Education

- UCLA School of Law, J.D., 1977
- Pomona College, B.A., 1973

Bar & Court Admissions

- District of Columbia

Lucinda A. Low

Lucinda A. Low is a partner in the Washington office of Steptoe & Johnson LLP, where she is a member of the International Department, heads the firm's FCPA practice, and serves on the firm's Executive Committee. She has a practice focusing on US and international anti-corruption laws, advising clients on matters ranging from preventive work to representation in internal investigations and enforcement matters worldwide. She is a widely recognized authority in the US Foreign Corrupt Practices Act (FCPA) and related international conventions from the OECD, OAS, United Nations, and European Union.

Ms. Low's FCPA practice includes internal compliance program development and implementation for multinational companies, including establishing workable compliance policies and procedures; training for company management and employee personnel; benchmarking and auditing programs for best practices and effectiveness; due diligence in mergers and acquisitions, third-party relationships, and other transactions; developing risk-mitigation strategies; conducting internal investigations, audits, and risk assessments; dealing with parallel proceedings; opinions and expert testimony; and representing clients before enforcement agencies and bodies, such as the SEC, the US Department of Justice, and other authorities. Her clients include companies, boards of directors, individuals, and other professional firms.

Ms. Low's practice also includes legal advice and counsel in other international regulatory compliance areas, such as export controls, economic sanctions, and anti-money laundering laws. In addition, Ms. Low has represented companies in World Bank investigations, audits, and sanctions proceedings in cases involving anti-corruption rules in World Bank-financed projects. She also has significant experience in investment disputes between foreign investors and host governments, and commercial arbitration, including serving as counsel, arbitrator, and an expert witness.

Ms. Low also assists in the creation and supervision of the International Law Guides, a web-accessible compliance tool designed to provide corporate subscribers and their employees with detailed information on local anti-corruption laws around the globe.

Ms. Low is a member of the Board of Directors of Transparency International - USA, and the Secretary of State's Advisory Committee on International Law. She is a former Chair of the ABA Section of International Law, and former Vice President and member of the Executive Committee of the American Society of International Law. She was the 2003 recipient of the William Ray Vallance Award presented by the Inter-American Bar Foundation, presented to an individual who has made a significant contribution toward improving the law and jurisprudence of the Western Hemisphere.

Lucinda A. Low

Ms. Low graduated from the University of California at Los Angeles School of Law, where she was Editor-in-Chief of the UCLA Law Review. She was an Adjunct Professor at American University, Washington College of Law in 1993 and at the University of Colorado School of Law in 1987 and 1989.

Noteworthy

- Ranked, *Chambers USA 2011* — International Trade: FCPA Experts (US)
- Received a #1 Ranking in *Chambers USA 2010: America's Leading Business Lawyers*; International Trade: FCPA Experts (Nationwide)
- Noted, *Chambers Global 2010 - 2011; The World's Leading Lawyers for Business*, International Trade/WTO: Global
- Listed in Ethisphere's 2010 - 2011 Attorneys Who Matter as a Top Gun and 2009 Attorneys Who Matter for FCPA Compliance
- Listed in *Best Lawyers in America 2010* for International Arbitration, and International Trade and Finance Law
- Served as arbitrator appointed by the United States in *The Canadian Cattlemen for Fair Trade (CCFT) v. The United States of America*, a multi-million dollar, multiple-claim UNCITRAL arbitration arising under the NAFTA. In addition to Ms. Low, James L. Bacchus and Prof. Dr. Karl-Heinz Böckstiegel served on the Tribunal.
- Chair, ABA Section of International Law & Practice, 1996-1997

Select Seminars & Events

Settling FCPA Enforcement Action: Contrasting NPAs, DPAs and Plea Agreements, 26th National FCPA Conference, November 9, 2011

Cartels, Corruption and Irregular Business Practices, October 6, 2011

Whistleblowers and the FCPA – Minimizing Internal Risk, July 27, 2011, (*A Steptoe-Sponsored Event*)

C5's 11th European Forum Anti-Corruption Conference, June 28, 2011

Lucinda Low to Speak at 25th National Conference on FCPA, April 12, 2011

Lucinda Low to Speak on Anti-Bribery in Latin America, February 22, 2011

Lucinda A. Low

Selected Publications

What Sets SciClone's FCPA Derivative Suit Apart
November 28, 2011, *Law360*

SciClone Shareholders Require Stringent Anti-Corruption Compliance Measures in Proposed Settlement of Derivative Suit
November 7, 2011

“Bribery Is Us”: Court Rejects Costa-Rican SOE’s Attempt to Claim Victim Status in Alcatel-Lucent Bribery Scheme (October 5, 2011)
October 5, 2011

Racing to a Locked Door? SEC Issues Final Whistleblower Bounty Rule and Announces First Deferred Prosecution Agreement, Revealing Competing Incentives for Corporate Self Reporting
June 7, 2011

“State-Owned Enterprises” Under the FCPA
June 3, 2011

UN Guiding Principles for Business & Human Rights: Issuance of Ruggie Principles Portends Increasing Need for Multinational Businesses to Focus on Human Rights Compliance
April 20, 2011

UK Ministry of Justice Publishes Guidance to the UK Bribery Act; Announces Act to Enter into Force on July 1, 2011
March 30, 2011

FCPA Year in Review 2010
March 15, 2011

Professional Affiliations

Board of Directors, Transparency International - USA

Secretary of State's Advisory Committee on International Law, 2002-2010

Global Anti-Corruption Advisory Board for the American Conference Institute

International Bar Association

Inter-American Bar Association, 1998-2008; Chair, Working Group on Corruption and Money Laundering, 2000-2010

Lucinda A. Low

Nanda Center for International and Comparative Law Board, University of
Denver Sturm College of Law, 2010

American Bar Association