



Lucinda A. Low

Partner
llow@step toe.com

1330 Connecticut Avenue, NW
Washington, DC 20036

+1 202 429 8051 direct
+1 202 429 3902 fax

Areas of Practice

- Anti-Money Laundering
- Business and Human Rights
- Crisis Management
- Economic Sanctions
- Export Controls
- FCPA / Anti-Corruption
- Government & Internal Investigations
- International Arbitration
- International Regulation & Compliance

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 is a partner in Steptoe's Washington office, where she is a member of the firm's Management Committee and head of the Compliance, Investigations, Trade and Enforcement Department. Her practice focuses 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

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local anti-corruption laws around the globe.

Ms. Low is a member of the Board of Directors of Transparency International - USA, now known as the Coalition for Integrity, and also a member of the Secretary of State's Advisory Committee on International Law. She is President of the American Society of International Law and a former Chair of the ABA Section 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.

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

- Band 1, *Chambers USA*, International Trade: FCPA Experts (Nationwide), 2010-2017
- *Chambers Global*, International Trade: FCPA Experts (US), 2010-2017 (Band 1); Fraud and Corporate Investigations (Latin America), 2016-2017
- *Chambers Latin America*, Fraud & Corporate Investigations: Latin America-wide, 2016-2017
- Listed, *Global Investigations Review's* Women in Investigations: One Hundred Investigation Specialists from Around the World, 2015
- *The Best Lawyers in America*, International Arbitration: Governmental and International Trade and Finance Law, 2001-2018
- Washington, DC *Super Lawyers*, International, 2013-2017
- *Latinvex*, Top 100 Female Lawyers, 2017
- *The Legal 500 US*, Dispute Resolution: International Trade, 2016-2017
- *The Legal 500 US*, Litigation: International Trade, 2012
- *The Legal 500 US*, Litigation: White-Collar Criminal Defense, 2015
- *Euromoney's* Expert Guide to Women in Business Law, 2013, 2015
- *Euromoney's* Expert Guide to the World's Leading International Trade Lawyers, 2015
- Named to Ethisphere's Attorneys Who Matter Hall of Fame, 2012

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- 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

What to Do When Conducting Business with a Third Party Revealed to be Involved in *Lava Jato*, 7th Brazil Summit on Anti-Corruption, May 24, 2017

Twenty Eighth ITF Public Conference: Economic Crime and International Investment Law, British Institute of International and Comparative Law, May 12, 2017

Women's Economic Empowerment: Innovations for Impact, ABA Section of International Law 2017 Spring Meeting, April 26, 2017

US Participation in Global Trade Agreements, International Law and the Trump Administration: A Live Online Briefing Series, March 15, 2017

International Compliance Issues for CGIAR Webinar, Consultative Group on International Agricultural Research, January 25, 2017

FCPA Year in Review 2016, TRACE Webinar, December 14, 2016

Selected Publications

In the Wake of *Kokesh v. SEC*: Whither Disgorgement in FCPA Cases
July 13, 2017

2017 FCPA Mid-Year Review
June 29, 2017

AIIB New Prohibited Practices Policy
May 12, 2017

2016 FCPA Year in Review
February 16, 2017

DOJ Export Controls and Economic Sanctions Enforcement Guidance Likely to Impact Government Contractors, Parallels FCPA Pilot Program
December 19, 2016, *Thomson Reuters Briefing Papers*

World Bank's Integrity Vice Presidency Releases Annual Integrity Update
November 1, 2016

DOJ Sanctions and Export Controls Guidance Focuses on Companies, Parallels FCPA Pilot Program
October 26, 2016

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Canadian Supreme Court Upholds World Bank Immunities in *World Bank Group v. Wallace*, Encouraging a Continued Flow of Referrals to National Prosecutors
May 3, 2016

Professional Affiliations

Presidential appointee, Panel of Conciliators, International Centre for the Settlement of Investment Disputes, 2016

Board of Directors, Coalition for Integrity (formerly Transparency International - USA)

President, American Society of International Law, 2016

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

Advisory Board, Global Anti-Corruption, American Conference Institute

International Bar Association

Inter-American Bar Association, 1998-2008

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

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

American Bar Association