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Areas of Practice

International Regulation &
 Compliance

FCPA/Anti-Corruption

Economic Sanctions

International Trade &
 Investment

Languages

French

Education

University of Michigan Law
 School, J.D., *cum laude*,
 2002; Associate Editor,
Journal of International Law

Princeton University, A.B.,
 Economics, 1997

Bar & Court Admissions

District of Columbia

Michigan

Thomas R. L. Best

Thomas R. Best (Tom) is an associate in the Washington office of Steptoe & Johnson LLP. Mr. Best’s practice focuses on international regulatory enforcement and compliance, mergers and acquisitions, and international trade and investment law. He has had experience practicing both in the United States and the United Kingdom, and has a particular background in the US, UK, and other European Union member state anti-corruption and anti-money laundering regimes, economic sanctions and embargoes, export and anti-terrorism controls, and US anti-boycott regulations.

US Foreign Corrupt Practices Act (FCPA), and International Anti-Corruption Laws, Economic Sanctions, Export and Anti-Terrorism Controls

A significant part of Mr. Best’s practice is focused on representing US and non-US companies in FCPA enforcement actions before the U.S. Department of Justice and Securities and Exchange Commission. He has led FCPA internal investigations in numerous countries throughout West Africa, China, the Middle East, Central Asia, and Latin America in a diverse range of industries, including the offshore oil and gas sector, industrial manufacturing, professional services and telecommunications industries.

Mr. Best advises US and non-US companies developing international regulatory compliance programs. He has particular experience, working in collaboration with colleagues in Steptoe’s London and Brussels offices, in helping companies to design and implement compliance programs addressing the risks associated with the intersection of the FCPA and other nations’ anti-corruption and anti-money laundering laws. These include, in particular, the United Kingdom’s anti-bribery legislation and Proceeds of Crime Act and similar legislation of other European Union member states.

Mr. Best has also led mergers and acquisitions due diligence efforts for major multinational corporations in some of the world’s most challenging jurisdictions, including throughout West Africa (including Nigeria), Central Asia, the Middle East, and Latin America. He has conducted numerous FCPA, sanctions and export control-related audits of third parties, and has guided both US and non-US-based corporations in designing and deploying comprehensive international regulatory compliance policies and procedures to their global workforces.

Mr. Best has particular experience with US anti-terrorism controls, and he counsels private foundations seeking to provide humanitarian and philanthropic assistance to impoverished and war-torn countries in which individuals, groups and entities listed by the US Treasury Office of Foreign Assets Control (OFAC) as “Specially Designated Nationals” are operating.

International Trade

Thomas R. L. Best

Mr. Best's international trade practice is focused on antidumping and countervailing duty investigations and administrative reviews before the US Department of Commerce, International Trade Commission and Court of International Trade. He has experience with a diverse array of products and countries, including numerous different Chinese manufactured goods and Canadian agricultural products.

Select Seminars & Events

Foreign Corrupt Practices Act (FCPA), Federal Publications Seminars, October 24, 2011

Federal Publications Seminars Webcast: "Selected Topics Regarding US and UK Anti-Bribery Enforcement", June 10, 2010

Managing International Regulatory Risks in M&A, November 13, 2008

Selected Publications

Recent Developments Highlight Value of Robust Compliance Programs in Avoiding Prosecution for Employee Conduct, May Signal US Authorities' Response to FCPA Reform Pressures
May 24, 2012

Work on Pending FCPA Guidance Continues as Stakeholder Inputs are Solicited: Issuance Date Still Unknown
May 4, 2012

FCPA Year in Review 2010
March 15, 2011

Resolution of Panalpina and Related Cases Yields Significant Penalties, New Enforcement Theories
November 29, 2010

International Law Advisory - UK Parliament Passes Anti-Bribery Reform Law
April 12, 2010

International Law Advisory - Flurry of FCPA Cases Closes Out 2009; Enforcement Continues Apace in Early 2010
March 16, 2010

International Law Advisory - 2009 UK Anti-Corruption Year in Review
February 22, 2010

Emerging Risk

Thomas R. L. Best

February 9, 2010, *Private Equity Manager Monthly*