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Areas of Practice

- FCPA/Anti-Corruption
- Anti-Money Laundering
- International Regulation & Compliance
- Securities Litigation & Enforcement
- Worldwide Arbitration & Dispute Resolution
- Business and Human Rights

Languages

- Spanish
- Portuguese

Education

Georgetown University
 Law Center, LL.M., with
 Distinction in Securities and
 Financial Regulation, 2011;
 Dean's List; *Thomas
 Bradbury Chetwood, S.J.
 Prize*

Georgetown University
 Law Center, J.D., 2003;
 Global Law Scholar

Brown University, B.A.,
magna cum laude, 1998

Bar & Court Admissions

- District of Columbia
- New York

Owen Bonheimer

Owen Bonheimer is an associate in Washington office of Steptoe & Johnson LLP, where he is a member of the International Department. His practice focuses on international regulatory compliance under the securities laws, internal investigations, and controversies.

He is involved in representing corporations and executives on anti-corruption and anti-money-laundering investigations, with experience before the SEC, DoJ, Congress, and the World Bank, and on matters involving parallel foreign probes. He also works with companies in a range of industries to conduct compliance risk assessments, develop effective compliance tools and conduct employee training programs.

With the advent of the Dodd-Frank Act, he has helped extractive industry members to fashion strategy and comments on new disclosure regulations proposed by the SEC relating to international operations. Mr. Bonheimer also has experience working with financial industry professionals to analyze the potential impact of these and other new SEC disclosure regulations.

In the worldwide arbitration practice, he has appeared for the claimant in successful investor-state arbitration proceedings before the International Center for Settlement of Investment Disputes (ICSID). Prior to joining Steptoe, he served as a law clerk with the Overseas Private Investment Corporation (OPIC) and as an intern for a federal judge in the District of Columbia.

Mr. Bonheimer has published articles and spoken at seminars on anti-corruption laws, asset recovery in corruption cases, anti-money laundering "gatekeeper" duties, international procurement fraud, investor-state arbitration, enforcement of foreign arbitral awards, human rights litigation, and transnational legal practice.

In the *pro bono* area, he handles consumer protection matters, as well as human rights cases before US and international tribunals.

Mr. Bonheimer is fluent in Spanish and Portuguese and is familiar with Latin American civil law jurisdictions through legal experience in Brazil and at the Organization of American States.

Select Seminars & Events

Corporate Criminal Liability, Bribery & Corruption: Roadmap to Get Rid of Problems Seminar, 2011 AIJA Conference, November 17, 2011

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

US Federal District Court
for the District of Columbia

US Federal District Courts
in the Southern and Eastern
Districts of New York

Owen Bonheimer

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

Anti-Corruption Year in Review 2011
March 6, 2012

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

FCPA Self-Reporting and the Effects of the Dodd-Frank Whistleblower Provisions: A New Calculus
May 5, 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

FCPA Year in Review 2010
March 15, 2011

The Widening FCPA Dragnet
November 29, 2010, *Journal of Securities Operations & Custody*

Professional Affiliations

International Association of Young Lawyers (AIJA) Commercial Fraud Commission, Vice President

Inter-American Bar Association, Working Group on Money Laundering and Corruption, Vice President