Through decades of experience, Steptoe has earned a national reputation as a go-to firm for boards, audit committees, special committees, companies, and other institutions in need of outside counsel to handle government investigations, sensitive internal investigations, and compliance reviews.

Our team includes former officials from a wide range of law enforcement and regulatory agencies, including the Department of Justice, the Securities and Exchange Commission, FBI, DHS, Treasury Department, IRS, FTC, FERC, and the New York County District Attorney’s Office.

We conduct independent investigations for boards of directors and trustees and board committees and internal investigations for public and privately-held companies. We also represent public and private companies in proceedings before the DOJ, the SEC, state government entities, congressional committees, and other US or foreign agencies and regulators. Steptoe lawyers provide crisis management advice relating to every facet of the modern financial crisis, and work with our clients to help them avoid or limit exposure before federal and state government agencies, in related litigation, and in the press. In addition, in connection with an investigation, our lawyers design and implement remedial and preventive measures, enhance compliance programs and controls, and provide business and governance counseling and guidance.

We have offices around the world that extend our reach for global investigations and allow us to manage data privacy issues when conducting investigations that require us to collect and review documents overseas and interview witnesses in foreign countries.

Our judgment and deep law enforcement and government experience gives us unique credibility and effectiveness in dealing with law enforcement and other government agencies, along with the ability to scope investigations properly and economically for our clients. At Steptoe, we don’t do “run away” investigations, and we are sensitive to the disruptions and collateral consequences that such investigations may cause. Our team excels in conducting complex, multijurisdictional investigations while maintaining our focus on the key issues under review.

We are recognized by leading legal directories and publications – including Chambers USA, The Legal 500, Benchmark Litigation, and Law360 – for our preeminence in corporate criminal defense and investigations. We have also been recognized by the National Law Journal as the Washington Legal Department of the Year in White-Collar Crime.

Noteworthy
- Legal 500 US, Corporate Investigations and White-Collar Criminal Defense: Advice to Corporates and Individuals (2020)
- Chambers Global, FCPA, US (2020)
- Chambers USA, FCPA, Nationwide (2014-2020)
- Chambers USA, Corporate Crime & Investigations, Nationwide (2015-2020)
Representative Matters

- Steptoe conducted an investigation on behalf of the Special Litigation Committee of the board of directors of a public biopharmaceutical company involving allegations of financial misstatements, channel stuffing, violations of the Anti-Kickback Statute, retaliation, and other healthcare related issues.
- Steptoe conducted an internal investigation on behalf of the operator of a major airport into the operations of the airport's transit system.
- Steptoe conducted an independent investigation on behalf of the Board of Pilot Flying J, the largest travel center and diesel fuel provider in the United States, in connection with a criminal investigation by the Department of Justice into allegations that the company defrauded some of its trucking company customers.
- Steptoe led a high-profile investigation of allegations of public corruption and pay-to-play practices at CalPERS, the largest state pension public fund in the United States, which resulted in more than $200 million in related fee reductions for the fund as well as other governance and financial safeguards and related changes to California state law. The investigation was completed amidst related investigations and actions by state and federal prosecutors and securities regulators and intense media scrutiny.
- Steptoe represented a publicly-traded offshore drilling contractor in connection with a DOJ and SEC investigation of potential FCPA violations in multiple foreign operations, prompted by a Dodd-Frank whistleblower who formerly held a control position in the company. Based on Steptoe's multi-jurisdictional internal investigation, both agencies terminated their investigations without enforcement action, and in doing so praised the thoroughness of the Steptoe investigation and the company's compliance program, on which Steptoe also advised.
- Steptoe conducted an internal investigation for Tidewater Inc., a leading oil field services company, and represented the company before the DOJ and the SEC in an FCPA investigation of payments to government officials in multiple countries in sub-Saharan Africa and Southeast and Central Asia. Steptoe was able to reach a resolution with the government that avoided charges against the company, and has provided ongoing compliance advice to Tidewater on its anti-corruption program and specific transactional and operational issues.
- Steptoe conducted an internal investigation on behalf of one of the largest energy companies in the United States into allegations that the company had provided misleading information to the Federal Energy Regulatory Commission (FERC).
- Steptoe conducted an internal investigation for a government contractor relating to alleged gratuities provided to government officials. We assisted the client in making a disclosure to the agency's IGs and in responding to the IG's investigation of the matter, which included employee interviews. Steptoe also worked with the client to develop additional compliance policies, procedures and employee training programs relating to this issue.
- Steptoe represents one of the nation's leading financial institutions in connection with ongoing civil, criminal, and congressional investigations centered on AML/Bank Secrecy Act (BSA) compliance. This representation has embraced both systemic issues of devising and implementing practices and policies to meet with go-forward regulatory approval, and disclosure and enforcement issues in connection with legacy systems and particular historical transactions. In addition, we have assisted in a broad range of internal investigatory work. Our work has brought Steptoe lawyers in close contact and coordination with the full community of regulatory, congressional, and criminal authorities.
- Steptoe represented Japan Airlines in a criminal antitrust investigation before the Antitrust Division of the DOJ. In addition, we represented the company in a European Commission investigation into international passenger services between Europe and Japan, and defended them in the airfreight cartel investigation before the European Commission and the Swiss Competition Authority.
- Steptoe partners served as special counsel to the Board of the Bank One Funds, whose investment adviser was named in the New York Attorney General’s first mutual fund market-timing complaint.
- Steptoe partners served as special counsel to the Board of the AmSouth Funds, whose adviser was "Adviser A" in the SEC’s landmark action against BYSYS Fund Services and others for mutual fund marketing kickbacks.
- Steptoe lawyers defended one of the country's principal defense contractors in serial government criminal, administrative and civil investigations growing out of a qui tam complaint about the provision of countermeasures used on the B-1 Bomber and F-15 Fighter. Once unsealed, the relator's claims were dismissed, but other issues arising from the government investigation led the government to intervene to pursue other claims. Ultimately, three grand juries failed to return indictments against the company or any individuals, the administrative investigation was abandoned, and the civil claims were settled favorably.
News & Publications

CLIENT ALERTS
A Busy Month for DOJ on No-Poach/Wage-Fixing Enforcement Front
December 23, 2020
By: Patrick F. Linehan, Damon J. Kalt, Rachel B. Peck, Daniel Aldrich

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Law360
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December 4, 2020
By: Patrick F. Linehan, Zoe Osborne, Nicholas P. Silverman, Alexandrea Rahill

PRESS RELEASES
Former FINRA Associate Director Erica Gerson Returns to Steptoe
December 1, 2020

PUBLICATIONS
Insider Trading on Government Information
New York Law Journal
December 1, 2020
By: Michael Campion Miller, Michelle L. Levin, Bruce C. Bishop, David B. Hirsch
Events

WEBINARS

Investigations & Enforcement Webinar Series
Quarterly Investigations Update
October 27, 2020
Speakers: James D. Barnette, Christopher R. Conte, Paul R. Hurst, Patrick F. Linehan, Lucinda A. Low, Michael Campion Miller, Brittany Prelogar, Wendy Wysong

WEBINARS
Navigating the Road Ahead: Congressional and DOJ Investigations into Waste and Abuse Related to COVID-19 Relief Funds
September 14, 2020

WEBINARS
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Midyear Update
July 16, 2020
Speakers: James D. Barnette, Christopher R. Conte, Paul R. Hurst, Patrick F. Linehan, Lucinda A. Low, Michael Campion Miller, Brittany Prelogar, Wendy Wysong

ON DEMAND
Borrower Beware: Risks Associated with Accessing COVID-19 Relief Funds
April 14, 2020
Speakers: Matthew B. Kulkin, Michael Campion Miller, Leah M. Quadrino, Ashwin J. Ram, Jeremy B. Glen, Caitlin Conroy, Jason Meade

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FCPA Year in Review
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By: Alexandra Baj, Ali Burney, Brian Egan, Eric C. Emerson, Edward J. Krauland, Michelle L. Levin, Patrick F. Linehan, Meredith Rathbone, Wendy Wysong, Elizabeth (Liz) Laskey LaRocca, Hena Schommer, Nicholas Turner, Dana J. Delott, Anthony Pan, Zachary Simmons, Martin Willner, Jacob Nelson (International Trade Assistant)

INTERNATIONAL LAW ADVISORY
Top Ten Changes to the DOJ/SEC FCPA Resource Guide
July 20, 2020
By: Lucinda A. Low, Brittany Prelogar, Christopher R. Conte, John P. Rupp, Brigida Benitez, Wendy Wysong, Ali Burney, Jefferson Klocke, Yasmin Almeida, Anthony Pan, Wan Yi Ho

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June 4, 2020
By: Lucinda A. Low, Brittany Prelogar, Patrick F. Linehan, Yasmin Almeida

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Considerations for Conducting Internal Investigations Remotely
March 30, 2020
By: Patrick F. Linehan, Zoe Osborne, Brittany Prelogar, Katherine M. Dubyak, Jefferson Klocke

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March 24, 2020
By: Zoe Osborne, Jack R. Hayes, Nicholas Turner

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The Asia Pacific Top Ten FCPA Enforcement Actions of 2019
February 3, 2020
By: Wendy Wysong, Richard J. Battaglia, Susan Munro, Ali Burney, Hena Schommer, Nicholas Turner, Anthony Pan
INTERNATIONAL LAW ADVISORY

FCPA/Anti-Corruption Developments: 2019 Year in Review
January 21, 2020
By: Lucinda A. Low, Brittany Prelogar, Brigida Benitez, Wendy Wysong, Zoe Osborne, Steven J. Barber, Alexandra Melia, Susan Munro, Richard J. Battaglia, Ali Burney, Fernando Q. Merino, Rachel B. Peck, Nicholas Turner, Hena Schommer, Alexandra Baj, Jessica Piquet Megaw, Elizabeth Arkel, Jefferson Klocke, Yasmin Almeida, Yas Froemel, Veronica Ganzitti, Chris Han, Jessica D. Maneval, Lia Metreveli, Anthony Pan, Alexandria Rahill, Troy Shephard, A. Cherie Tremaine, Stefan Tsakanaklis, Meihui (Mary) Xiao, Lin Yang, Bo Yue

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DOJ Adds Incentives for Disclosure in Updated Export Control and Sanctions Enforcement Policy
January 13, 2020
By: Wendy Wysong, Ali Burney, Hena Schommer, Nicholas Turner

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