

Washington DC's FCPA Bar: Crowell & Moring

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Few firms can claim to have advised on FCPA matters for as long as Crowell & Moring. The firm was involved in the Lockheed bribery scandal that gave rise to the FCPA, and began advising clients on anti-corruption matters shortly after the law's enactment in 1977. During that time, partner Alan Gourley, who has spent his entire career at Crowell, worked with aerospace and defence companies on anti-corruption compliance as a part of his government contracts practice.

Since then, the anti-corruption practice has grown to include prominent FCPA lawyers in the firm's Washington, Los Angeles and New York offices.

In DC, Steve Byers, a white-collar lawyer who has been with the firm for over 20 years, began by partnering with Gourley on FCPA matters in response to the needs of corporate clients. In January 2006, Tom Hanusik joined the firm, adding government experience to the white-collar team. Hanusik began his career in the SEC's division of enforcement before joining the Justice Department, where he served as one of the original prosecutors on the Enron Task Force. Upon his departure from public service, Hanusik served as an assistant chief in the criminal division's fraud section – alongside now-Shearman & Sterling partner Philip Urofsky – and as senior counsel for the section's securities fraud unit.

The firm conducted an internal investigation for US luxury clothing company Ralph Lauren into foreign bribery allegations in Argentina. The findings of the firm's investigation were self-disclosed to the DOJ and SEC, and with Crowell's help, the company was able to secure dual non-prosecution agreements (NPAs) from both agencies, including the first NPA provided by the SEC in an FCPA matter.

The firm was involved in a case against Magyar Telekom, a Hungarian telecommunications company and its parent Deutsche Telekom, a German telecommunications company, which in 2011 paid a combined US\$63.9 million to resolve criminal FCPA charges. The firm has also had success securing declinations for corporate clients, including for a Fortune 100 software distributor and for an aviation company.

Crowell's practice is inclusive of individuals as well as corporate clients. The firm has acted for executives in connection with FCPA investigations into French engineering company Alstom, General Cable, and Houston-based oil and gas drilling services provider Parker Drilling.