



## Brockton B. Bosson

PARTNER

[bbosson@cahill.com](mailto:bbosson@cahill.com)

212.701.3136 Phone

Cahill Gordon & Reindel LLP

32 Old Slip

New York, NY 10005

**Brock Bosson, Chair of Cahill's Corporate Governance & Compliance Advisory practice group, is an advisor to global companies and their officers, directors, and board committees, focusing on internal investigations, compliance counseling, white-collar defense, and securities litigation.**

Brock regularly represents clients before government agencies in criminal and regulatory investigations and enforcement actions relating to the Foreign Corrupt Practices Act (FCPA), cryptocurrency regulation, securities fraud, financial integrity, trade sanctions, anti-money laundering, and corporate social responsibility matters. He also has extensive experience conducting internal investigations and assisting both multinational companies and governmental agencies in assessing and enhancing their regulatory compliance programs. He frequently conducts anti-corruption compliance due diligence for companies engaging in mergers & acquisitions in jurisdictions with high corruption risk, and he advises clients in designing and implementing post-acquisition compliance integration plans. Brock's investigations and work in compliance counseling have covered issues in over 50 countries and across a range of industries, including digital assets, financial services, retail, oil & gas, life sciences, consumer goods, real estate, automotive, and aviation. He currently represents and advises various digital asset trading exchanges, DeFi wallet providers, investment platforms, and other cryptocurrency projects in enforcement actions and regulatory compliance matters.

**"Brock is a commercial and very knowledgeable attorney. He has a superb understanding of business needs and appreciation of competing factors." – *Chambers USA***

Brock is ranked by *Chambers USA* and *Chambers Global* on its list of "Up and Coming" FCPA practitioners, with clients describing him as "a fantastic lawyer," noting he "is easy to work with" and "very practical and understands the local cultural environment." In 2021, Brock was recognized by *Law360* as a Rising Star in the area of corporate compliance – one of five attorneys in the country under 40 to receive that recognition. Brock has been recognized by *Benchmark Litigation* in the 40 & Under Hot List and as a Future Star, has been named as a finalist for the inaugural *Excellence in Compliance: Anti-Corruption* award by *Compliance Week* magazine and has been recommended as a corporate investigations, white-collar criminal defense, and corporate governance lawyer by *The Legal 500*. Brock also has written on compliance-related issues in *Practical Law*, *The Deal*, the *New York Law Journal*, the anti-money laundering edition of *International Comparative Legal Guides (ICLG)*, and *Corporate Secretary*. He is a Term Member of the Council on Foreign Relations.

Before joining Cahill, Brock investigated and prosecuted a range of criminal matters while serving as a Special Assistant U.S. Attorney and military prosecutor in the U.S. Army. He also served as a legal advisor for combat operations and contingency planning, and he was frequently the U.S. government's primary representative, negotiator, or compliance inspector on matters of international law at events throughout the Middle East.

In 2014, Brock founded Cahill's Veterans' New Business Initiative, through which he and many other Cahill attorneys provide pro bono representation and advice to military veterans who are in the early stages of starting small businesses. In 2021, Brock was recognized by *Crain's New York Business* as a Notable Veteran Executive, celebrated as a remarkable leader in New York City who has brought the best of his military experience and training to his work. Brock currently serves as co-chair of the firm's Pro Bono Committee.

---

## SELECTED MATTERS

### Foreign Corrupt Practices Act

- Represented the Audit Committee of Walmart in connection with the Company's enhancements to its global compliance program and concerning an extensive investigation by the DOJ and SEC into allegations of corruption.
- Conducted an internal investigation on behalf of an oil services company into alleged corrupt payments in Brazil.
- Conducted anticorruption pre-acquisition due diligence and post-acquisition compliance integration on behalf of a range of companies in the consumer goods, pharmaceutical, life sciences, renewables, and infrastructure industries in connection with M&A activities in Africa, Asia, and South America. Brock has advised on anticorruption risk and compliance in connection with some of the largest renewable infrastructure projects in South America.

### Digital Assets and Emerging Technology

- Advising an AI-related cryptocurrency project in connection with an investigation by the SEC.
- Assisting a large cryptocurrency exchange with a range of government enforcement matters and litigation inquiries.
- Representing a cryptocurrency investment platform in responding to SEC information requests.
- Advising a digital asset wallet provider on compliance with OFAC regulations and other trade sanctions programs.
- Advising a cryptocurrency exchange on various litigation strategies in connection with an SEC enforcement action.
- Advising a cryptocurrency exchange on sensitive cross-border enforcement involving foreign regulators.

### Corporate Social Responsibility and Responsible Sourcing

- Designed charitable giving procedures that govern donations made by a publicly traded company in over 20 countries.
- Represented several leading retailers and retail brands in connection with supply chain integrity matters and enhancement of responsible sourcing processes.

### Cybersecurity

- Conducted cybersecurity pre-acquisition due diligence in connection with the expansion of a multinational infrastructure company.

### Other Compliance Advisory Work

- Counsel to the independent, DOJ-appointed Monitor of Toyota Motor Corporation throughout a three-year monitorship focusing on safety and the accuracy of Toyota's public statements.

### Anti-Money Laundering and Trade Sanctions

- Represented a global bank in an investigation by the U.S. Senate Permanent Subcommittee on Investigations relating to alleged violations of anti-money laundering laws and OFAC sanctions.
- Advised a multinational bank in connection with potential exposure to U.S. AML laws arising from a bribery scandal in Asia.
- Represented an individual in successfully recovering money seized by U.S. Customs and Border Protection as a result of alleged violations of U.S. cash import laws.

### Securities, Accounting, and Consumer Fraud

- Represented a senior executive of a global financial institution in connection with an investigation by the SEC into alleged consumer fraud in the marketing of investment products.

- 
- Advising the Audit Committee of a large insurance company in an internal investigation concerning accounting irregularities.

---

## Education

University of Tennessee, J.D., *magna cum laude*; *Order of the Coif*; *Managing Editor, Tennessee Law Review*

Tulane University, B.A.

---

## Practices

Anticorruption & FCPA

Antitrust & Trade Regulation

Cybersecurity & Data Privacy

Environmental, Social and Governance (ESG)

Corporate Governance & Compliance Advisory

Digital Assets and Emerging Technology

Securities Litigation, Regulation & Enforcement

White Collar Defense & Investigations

International Trade & Investments

---

## Clerkships/Government Service

Captain, U.S. Army Judge Advocate General's Corps

Special Assistant U.S. Attorney, Western District of Louisiana

---

## Admission

New York