



Brockton B. Bosson

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Brock Bosson is a member of Cahill Gordon & Reindel LLP's Corporate Governance & Investigations and Litigation practice groups. He serves as co-chair of the Firm's Pro Bono Committee.

Brock 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. He regularly represents clients before government agencies in criminal and regulatory investigations and enforcement actions relating to the Foreign Corrupt Practices Act, 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 40 countries and across a range of industries, including financial services, retail, oil & gas, life sciences, consumer goods, real estate, automotive, and aviation. Brock was named as a finalist for the inaugural *Excellence in Compliance: Anti-Corruption* award by *Compliance Week* magazine and is recommended as a corporate investigations and white-collar criminal defense lawyer by *The Legal 500*. 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.

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, and infrastructure industries in connection with M&A activities in Africa, Asia, and South America.
- Conducted on-the-ground assessments of anticorruption compliance programs in over a dozen countries.

Corporate Social Responsibility and Responsible Sourcing

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- 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

Tulane University, B.A.

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

Practices

Corporate Governance & Investigations

Securities Litigation & White Collar Defense

Crisis Advisory

Cyber & Information Security

Corporate Social Responsibility and Supply Chain Compliance

Clerkships/Government Service

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

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

Admission

New York