

## **Bruce Zagaris' Anti-Corruption and Transparency Practice**

Mr. Zagaris has regularly prepared due diligence documents for businesses on anti-corruption, both policy documents and model agreements for agents and consultants. He has also advised on and prepared business ethics and anti-corruption guidance for entities. The work has included Brazil, Canada, Chile, Hungary, Iraq, Israel, Mexico, Nigeria, and Russia.

Mr. Zagaris has advised on specific transactions. For instance, a multinational was about to visit Hungary and meet with government officials of an agency with which it had a contract. Mr. Zagaris advised on the propriety of bringing a very small gift.

Mr. Zagaris has also advised on whistleblowing cases involving anti-corruption and implications of a settlement of a problematic transaction involving a multilateral development bank.

In 2004, Mr. Zagaris advised a US media company which was undergoing a Sarbanes-Oxley investigation concerning payments to agents offshore in the aftermath of the Orange Revolution in Ukraine.

In the mid-2000s, Mr. Zagaris conducted an internal investigation for a U.S. oil company concerning payments in Mexico and advised the board on how to handle the matter.

In 2013, Mr. Zagaris advised a non-profit client on its due diligence provisions with respect to work in Israel and the PRC and then revised their model contracts for their worldwide operations.

In 2013, Mr. Zagaris consulted and provided an expert affidavit in a Canadian lawsuit arising out of World Bank sanctions for procurement corruption.

Mr. Zagaris advised on an extradition request from the U.S. to a European country arising out of an FCPA prosecution and on the resolution of a case between the U.S. and a Latin American country involving a Politically Exposed Person (PEP).

Mr. Zagaris has worked on a number of international criminal cases concerning Brazil. The issues have concerned international evidence gathering and extradition involving Brazilian officials.

Mr. Zagaris has advised a firm involved in several different industry groups, such as hotels/apartments, air charters, et al, in anti-money laundering issues surrounding investments by apparent Politically Exposed Persons. The advice included developing a compliance program.

Mr. Zagaris has written law review articles on anti-corruption. For instance, his article,

*The Emergence of an International Enforcement Regime on Transnational Corruption in the Americas* (with Shaila Lakhani Ohri), was published in 30 *LAW & POLICY IN INT'L BUSIN.* (Georgetown Univ. Law School) 53-93 (1999). A chapter in his book on International White Collar Crime is on anti-corruption and his chapter on the World Bank Group contains lengthy discussions of the World Bank Group's anti-corruption efforts.. In Feb. 2013, his chapter "Transnational Corruption in Brazil: The Relevance of the U.S. Experience with the Foreign Corrupt Practices" Act was published in *THEMES IN ANTI-CORRUPTION AND COMPLIANCE* ([www.elsevier.com](http://www.elsevier.com)).

On May 1, 2012, Mr. Zagaris' podcast on the Wal-Mart corruption investigation in Mexico appeared in the newsletter of the Association of Financial Crime Specialists <http://acfcs.org/financial-crime-expert-zagaris-uses-wal-mart-case-to-guide-companies-on-operating-in-corruption-infested-countries>.

In October 2012, Mr. Zagaris trained prosecutors in Bahrain and the United Arab Emirates on prosecuting money laundering and asset recovery related to corruption cases.

In July 2013, Mr. Zagaris trained Supreme Court justices in Cairo, Egypt on prosecuting money laundering and asset recovery related to corruption cases.

In late 2012, for American Bar Association Rule of Law Institute (ROLI), Mr. Zagaris prepared a training module for teachers of corruption-related anti-money laundering and asset recovery.

In October 2013, Mr. Zagaris prepared a report for a non-governmental organization on International Asset Forfeiture: Recovering the Proceeds from Illegal Elephant Poaching.

In 2014, Mr. Zagaris co-authored a report for U4, a Norwegian think-tank on foreign bribery settlements, "Impact of foreign bribery legislation on developing countries and the role of donor agencies" : <http://www.u4.no/publications/impact-of-foreign-bribery-legislation-on-developing-countries-and-the-role-of-donor-agencies/#sthash.mgopDaQx.dpuf>

In 2015, Mr. Zagaris led the work on an SEC investigation of PDVSA (Venezuelan state oil company). The work required helping respond to requests from the SEC and FINMA, the Swiss regulator.

In 2016, Mr. Zagaris appeared on a panel at the George Washington Univ. Brazil Initiative on the effect of the Odebrecht corruption settlement on pending criminal and civil cases in the Western Hemisphere.

In 2013-15, Mr. Zagaris revised the anti-corruption and ethics procedures for a multinational enterprise and conducted training on anti-corruption and related matters.

In 2010-15, Mr. Zagaris advised and prepared anti-corruption due diligence procedures for several small enterprises doing international work.

In September 2016, Mr. Zagaris gave a 90-minute talk in Portuguese on international financial crimes, especially corruption and tax, at the Federal Univ. of Rio de Janeiro.

In January 2018, Mr. Zagaris conducted a two-day module on corruption-based money laundering at the World Bank for professionals at the International Anti-Corruption Academy. He is supervising the master's thesis for some of the students.