

## Overview

Formulating the right response to allegations or evidence of wrongdoing calls for advisors and investigators who recognize the potential pitfalls and have the experience to help companies choose the best path. Dentons' seasoned team of former government officials, investigators and advocates fits that bill precisely. We regularly conduct internal investigations of potential misconduct at the request of corporations, partnerships, boards of directors, independent board committees and audit committees. These investigations cover a wide spectrum of substantive and geographic areas.

At Dentons, we have our eye on results but do not forget about costs. One of the biggest, most costly mistakes made in internal investigations is defining the scope of an inquiry too broadly. Such over-breadth results not only in excessive professional fees, but also substantial additional distraction for executives and critical company personnel. At Dentons, we hone in on and refine the scope and nature of these critical inquiries. Our approach results in efficient, timely and effective results.

## Representative Experience

- **Cross-border anti-corruption investigation:** Represented Fresenius Medical Care AG & Co. KGaA, a global health care/medical device company with operations in more than 150 countries, in connection with parallel SEC and the DOJ investigations into multiple alleged violations of the FCPA in Asia, Africa, Europe, and North and South America. Working with our locally based practitioners, our global team helped the client respond to this cross-border investigation and implement new global anti-corruption policies and procedures. The Dentons team ultimately resolved the US criminal inquiry through a non-prosecution agreement with the DOJ and a regulatory order by the SEC.
- **Global pharmaceutical company:** Conducted multiple internal investigations regarding employees suspected of financial misconduct in Mexico, Colombia, Vietnam and Spain.
- **Global railway company:** Conducted internal investigation regarding employee suspected of engaging in activities that presented a conflict of interest to the company.
- **Professional sports team:** Conducted internal investigation in connection with allegations of sexual misconduct against the coach.
- **School vendor:** Conducted internal investigation for national vendor to public school systems regarding suspicions that its employees were engaged in bribery and procurement fraud.