

Red Notice

A monthly update on global investigations and prosecutions

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ANTICORRUPTION DEVELOPMENTS

[Petrobras Settles with U.S. Authorities Over Alleged FCPA Violations](#)

On September 27, 2018, the the U.S. Department of Justice (DOJ) and the Securities and Exchange Commission (SEC) announced they had reached a settlement agreement with Brazil's state-owned energy company, Petroleo Brasileiro SA ("Petrobras") regarding allegations that now-former Petrobras executives participated in a corrupt payment scheme, providing payments to Brazilian officials and then concealing the payments in the company's books and records. Petrobras agreed to pay a total of \$853 million in fines, as part of a non-prosecution agreement with the DOJ, 80 percent of which will be paid into a fund set up in Brazil related to parallel prosecutions of the conduct at issue in that country. SEC and DOJ will split the remaining funds equally. In the settlement agreement, Petrobras took responsibility for violating the books and records provisions of the Foreign Corrupt Practices Act (FCPA), but the agreement does not admit other improper conduct on the part of Petrobras.

Petrobras had previously agreed to pay \$2.9 billion to aggrieved shareholders, as part of a settlement in a class action lawsuit in the Southern District of New York concerning the same alleged conduct, as reported in the [January 2018 edition](#) of Red Notice. The SEC's order notes that the SEC levied a payment of \$933.4 million against Petrobras, but credited that amount to the money already paid as part of the lawsuit settlement.

More information

- [DOJ press release](#)
- [SEC Press Release](#)
- [SEC Order](#)
- [Wall Street Journal](#)
- [BBC](#)
- [Reuters](#)
- [FCPA Blog](#)

Fine for Former CEO of Chilean Mining Company to Settle FCPA Charges

On September 26, 2018, the SEC announced that it had reached an agreement with Patricio Contesse Gonzalez, over allegations of improper payments made to Chilean officials, political candidates and their associates, which Contesse had apparently directed and authorized. Contesse was at the time the CEO of Sociedad Quimica y Minera de Chile S.A. (SQM), a Chilean chemical and mining company. In that capacity, the SEC claims he used a discretionary CEO account to make improper payments of nearly \$15 million, using falsified deals and invoices that Contesse also directed to be recorded falsely in SQM's books and records. Contesse will pay \$125,000 to resolve the charges.

SQM, which is subject to the FCPA because its shares trade on the New York Stock Exchange, had previously settled with both SEC and DOJ in January 2017 over charges related to the same conduct. As reported by [Red Notice](#) at the time, SQM entered into a deferred prosecution agreement and paid a combined fine of \$30.5 million to U.S. authorities.

More information

- [SEC Press Release](#)
- [Administrative Order](#)
- [Wall Street Journal](#)
- [FCPA Blog](#)

ConocoPhillips Officials to Testify in UK Domestic Corruption Trial of Bertling Executives

On September 18, 2018, UK Serious Fraud Office (SFO) prosecutors announced plans to call executives from ConocoPhillips to testify in the trial related to allegations of corrupt payments against individuals connected to F.H. Bertling Ltd ("Bertling"). Four individuals were charged by the SFO in the spring of 2017 with conspiring to make or accept illicit payments in exchange for awarding Bertling contracts related to a North Sea oil exploration project operated by ConocoPhillips. While ConocoPhillips is not facing charges in the case, Georgina Ayres, who was at the time a contracting specialist employed by that company, has been charged with accepting corrupt payments in exchange for preferential treatment for Bertling's contract proposals. Ayres reportedly met with and received payments from Bertling's then-chief commercial officer, who is alleged to have masterminded the scheme. Peter Smith, a director at Bertling is also charged with conspiracy, having approved the payments to Ayres. SFO also alleged that the payments were funneled through fictitious consultancy invoices to a UAE-based company set up by the fourth member of the conspiracy, Robert McNally, who acted as middleman and was at the time an agent of Bertling.

The SFO previously charged Bertling with corrupt activities related to contracts with Angola's state-owned oil company, as reported in the [October 2017 edition](#) of Red Notice.

More information

- [SFO Bertling Page](#)
- [Wall Street Journal](#)

U.S. Drops Charges Against Ex-Senegal Official in Chinese Energy Case

On September 15, 2018, the DOJ dropped criminal charges of violating the FCPA against Cheikh Gadio, who was a foreign minister for Senegal from 2002 to 2009. In November 2017, Gadio was arrested on allegations that he accepted a \$400,000 corrupt payment. The government alleged that Gadio engaged in a multi-year scheme with Chi Ping Patrick Ho in order to influence government officials in Chad and Senegal to secure oil contracts for CEFC China Energy, a Chinese oil and gas company. DOJ separately charged Ho with

making corrupt payments to officials in Uganda. It is expected that Gadio will testify against Ho, who is set for trial in November 2018 in the Southern District of New York.

More information

- [New York Times](#)
 - [DOJ Press Release](#)
-

Guilty Pleas for FCPA Violations in Ongoing Venezuela Probe

On September 13, 2018, Juan Carlos Castillo Rincon, the former manager of a Houston-based logistics and freight-forwarding company, pleaded guilty to a conspiracy to violate the FCPA by making improper payments to a then-official of Venezuela's state-owned energy company, PDVSA. Castillo pleaded guilty to making corrupt payments to Jose Orlando Camacho, in exchange for contracts and inside information on the PDVSA bidding process. Camacho's guilty plea was unsealed as part of Castillo's plea, and both have agreed to forfeit the proceeds of their actions associated with the scheme. Red Notice previously covered the PDVSA investigation in the [July 2018 issue](#).

More information

- [DOJ Press Release](#)
 - [Wall Street Journal](#)
-

Guilty Plea for Money Laundering of Corrupt Payments to PetroEcuador

On September 11, 2018, Jose Larrea pleaded guilty to conspiracy to commit money laundering by transferring money from his personal accounts to other U.S. bank accounts to conceal payments from an oil services contractor to Ecuador's state-owned energy company, PetroEcuador. Larrea, a U.S. citizen, based in Miami, Florida, who is a financial advisor, is the fourth individual to plead guilty to money laundering charges associated with the payment scheme. A fifth defendant, Frank Roberto Chatburn Ripalda, has pleaded not guilty to money laundering and FCPA violations. Larrea's plea, however, includes admitting to conspiring with Chatburn to conceal corrupt payments to the PetroEcuador officials.

More information

- [DOJ press release](#)
 - [FCPA Blog](#)
-

SEC Charges Real Estate Broker With FCPA Violations

On September 6, 2018, Judge Edgardo Ramos in the Southern District of New York sentenced Joo Hyun Bahn, a former real estate broker for Colliers International Group, Inc., to six months in prison. Bahn previously pleaded guilty in January 2018 to one count of conspiracy to violate the FCPA in addition to one count of violating the FCPA. In parallel, Bahn agreed to disgorge \$225,000 to the SEC to settle the civil investigation into the FCPA violations. The government alleged that Bahn tried, but failed, to make improper payments to Qatari officials to broker the sale of a high-rise building in Vietnam. DOJ also charged Bahn's father, who is at large, and Malcolm Harris, who was sentenced to 42 months in prison in October 2017 for wire fraud and money laundering. As covered by [Red Notice](#) at the time, Harris allegedly schemed with Bahn to pass along the payments to the Qatari officials, but instead Harris kept the would-be corrupt payment for himself.

More information

- [SEC Press Release](#)
- [DOJ Press Release](#)

- [Bahn Sentencing Memorandum](#)
-

\$25 Million SEC Fine for French Pharmaceutical Company

On September 4, 2018, the SEC announced it had reached a settlement agreement with French pharmaceutical company Sanofi to resolve allegations of corrupt activities by Sanofi subsidiaries in Kazakhstan and the Middle East. Sanofi agreed to pay a fine of \$25 million, without admitting or denying the charges. Sanofi had announced in March that the DOJ had declined to prosecute over allegations relating to corrupt payments, but then noted that the SEC investigation was ongoing, as reported in the [March 2018 edition](#) of *Red Notice*.

More information

- [SEC Press Release](#)
 - [Reuters](#)
 - [Law360](#)
-

Enesco Announces SEC and DOJ Declinations

On September 4, 2018, UK offshore drilling company Enesco plc (Enesco) announced via a SEC filing that U.S. enforcement authorities had ended their investigations of the company without any charges. Enesco had voluntarily disclosed to the SEC and DOJ in 2015 that a drilling services contract it acquired, originally entered into between Enesco's now-subsidiary Pride International and Brazilian state-owned oil and gas company Petrobras, contained "irregularities" to the SEC and DOJ in 2015.

More information

- [Enesco Form 8-K](#)
 - [Wall Street Journal](#)
 - [FCPA Blog](#)
-

Anticorruption Spotlight: SEC Issues Whistleblower Determinations

On September 24, 2018, the SEC announced that it was issuing a whistleblower award of close to \$4 million to an overseas whistleblower. By law, the SEC does not disclose information that may directly or indirectly reveal the identity of a whistleblower.

Further, on September 14, 2018, the SEC awarded over \$1.5 million to another whistleblower despite finding that the whistleblower was culpable for the underlying misconduct. The SEC's order highlighted that the award was "severely reduced" because the whistleblower "unreasonably delayed" providing the information to the SEC for more than a year, during which time the individual financially benefited from the delay. Notwithstanding the award determination in this case, the SEC stated that "[w]histleblowers with similar conduct should expect to receive a severely reduced award—indeed, even one as low as the minimum statutory threshold—in future cases."

On September 6, 2018, the SEC announced two whistleblower awards of \$15 million and \$39 million, respectively. The \$39 million award represents the second-largest whistleblower award in the SEC's history. Cumulatively, these determinations bring the total number of whistleblower awards to 59 since the SEC first began the practice in 2012. Awards totaling more than \$326 million have been paid for whistleblower information.

Whistleblower awards—provided for under the Dodd-Frank Act—can range from 10 percent to 30 percent of the money collected when monetary sanctions from a successful enforcement exceed \$1 million. Notices of Covered Actions—enforcement actions with sanctions greater than \$1 million—are posted on the SEC's website, and claims must be submitted within 90 days of such posting.

More information

- [SEC Press Release and Order – September 6](#)
- [SEC Press Release and Order – September 14](#)
- [SEC Press Release and Order – September 24](#)

EXPORTS, SANCTIONS AND CUSTOMS ENFORCEMENTS

Defense Contractor Charged with Conspiracy to Defraud DOD and Violate AECA

On September 6, 2018, the Department of Justice (DOJ) announced the indictment of Ferdi Murat Gul, a Turkish citizen, in connection with a scheme to fraudulently acquire Department of Defense (DOD) manufacturing contracts and a conspiracy to export military technical drawings to Turkey without the required licenses. Gul is currently believed to be at large in Turkey.

According to the indictment, Gul is the principal owner, CEO, and general manager of two U.S. companies: Bright Machinery Manufacturing Group Inc. (BMM), a defense contractor in Paterson, New Jersey, and FMG Machinery Group (FMG), a purported manufacturing company in Paterson and Long Island City, New York. Gul also has an ownership interest in a Turkish manufacturing company, HFMG Insaat (HFMG).

The indictment alleges that, from 2010 to 2015, BMM fraudulently obtained hundreds of DOD contracts, valued at approximately \$7 million, through false representations that the items would be manufactured in the United States. The items, including torpedo parts, bomb ejector racks, firearms, and mine clearance systems, were instead manufactured by HFMG in Turkey and fraudulently supplied to DOD. To manufacture the items in Turkey, Gul routinely and unlawfully exported drawings and technical data, some of which were subject to U.S. export control laws.

More information

- [DOJ press release](#)

FTC Settles Three “Made in USA” Claims; Signals Enhanced Enforcement Going Forward

On September 12, 2018, the Federal Trade Commission (FTC) announced a final consent order and two proposed consent orders with U.S. retailers of mattresses, hockey pucks, and recreation equipment alleged to have falsely labeled and marketed their products as “Made in USA.” The first of the two proposed orders involved a group of New York companies conducting business under the name Patriot Puck, who through various online outlets claimed that all or virtually all of its hockey pucks were made in the United States. The FTC alleged that, on the contrary, Patriot Puck’s merchandise was “wholly imported from China,” identifying more than 400,000 pucks imported since January 2016. The second consent agreement involved California-based companies Sandpiper of California, Inc. (“Sandpiper”) and PiperGear USA, Inc. (“PiperGear”), alleged by the FTC to have claimed in advertising materials, labels and online outlets that its merchandise (e.g., backpacks and travel bags) was virtually all made in the U.S. The FTC alleged that, instead, more than 95 percent of Sandpiper’s products were imported as finished goods, and roughly 80 percent of PiperGear’s products were imported as finished goods or contained significant imported components. The companies are alleged to have, in some cases, hidden the products’ true origin markings and inserted other false U.S.-origin labeling. Finally, the FTC issued a final consent order with Nectar Brand LLC, alleged to have falsely claimed that its mattresses were “Designed and Assembled in the USA” when they were in fact wholly imported from China.

Under the terms of each order, two of which are open to public comment through October 12, 2018: (1) the companies are prohibited from making “unqualified” U.S.-origin claims, i.e., without demonstrating the products qualify under the “Made in USA” standard; (2) any “qualified” Made-in-USA claim must include a “clear and conspicuous disclosure” of foreign parts, ingredients, or processing; and (3) the companies are prohibited from making

“untrue, misleading, or unsubstantiated” country-of-origin claims in marking materials. The companies must also engage in “recordkeeping and reporting” to assist the FTC in monitoring compliance. Violation of the orders carries a potential civil penalty of more than \$40,000 per violation.

The Commission issued the proposed and final consent orders each by a vote of 4-1. In a concurring statement, Commissioner Slaughter and Chairman Simons defended the “no-money, no-fault” settlements, noting that similarly scoped orders have been “largely successful” in both remediation and deterrence. Echoing concerns by dissenting Commissioner Rohit Chopra, however, Commissioners Slaughter and Simons acknowledged that the FTC can “further maximize its enforcement reach, in all areas, through strategic use of additional remedies,” including among others “monetary relief or notice to consumers.” In addition, they explained that the FTC has already begun a “broad review” of its use of available remedies to enforce its authorities.

More information

- [FTC press release](#)
 - [Patriot Puck FTC Complaint](#)
 - [Sandpiper and PiperGear Complaint](#)
 - [Nectar Brand LLC FTC \(Case Page\)](#)
 - [Concurring Statement of Commissioner Rebecca Kelly Slaughter](#)
 - [Dissenting Statement of Commissioner Rohit Chopra](#)
-

Epsilon Settles Alleged Violations of ITSR for \$1.5 Million

On September 13, 2018, the Treasury Department’s Office of Foreign Assets Control (OFAC) announced its settlement with Epsilon Electronics, Inc. (“Epsilon”) of alleged violations of the Iranian Transactions and Sanctions Regulations (ITSR). According to OFAC’s announcement, Epsilon agreed to \$1,500,000 to settle allegations that it sold certain goods to Asra International LLC, a Dubai-based company Epsilon knew or had reason to know distributed most of its products to Iran. The settlement follows years of litigation challenging a \$4.07 million penalty ultimately set aside by the D.C. Circuit in 2017 in an order remanding the case to OFAC for further consideration.

In its September 13 announcement, OFAC considered the following to be aggregating factors: (1) the alleged violations reflected a systematic pattern of conduct; (2) the goods were valued at \$2,823,000; and (3) Epsilon had no compliance program at the time of the alleged violations. OFAC considered the following to be mitigating factors: (1) Epsilon had not received a Penalty Notice or Finding of Violation in the preceding five years; (2) Epsilon is a small business; and (3) Epsilon provided some cooperation to OFAC, including entering into an agreement to toll the statute of limitations for one year.

More information

- [OFAC Settlement Announcement](#)
- [Law360](#)
- [Red Notice - June 2017](#)

EXPORTS, SANCTIONS AND CUSTOMS DEVELOPMENTS

Client Alert: The Export Control Reform Act and Possible New Controls on Emerging and Foundational Technologies

The Export Control Reform Act of 2018 (ECRA) became law on August 13, 2018, as part of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (NDAA). ECRA provides the permanent statutory authority for the Export Administration Regulations (EAR), which is administered by the Department of Commerce’s Bureau of Industry and Security (BIS). The new law codifies long-standing BIS policies and does not require changes to the EAR, such as to its country-specific licensing requirements.

However, as part of the larger effort to reform the authorities governing the review of foreign investment in the United States, the law effectively requires BIS to lead an interagency process to identify and add to the EAR certain controls on “emerging” and “foundational” technologies that are “essential to the national security of the United States.”

Although the types of emerging and foundational technologies to be identified are not yet publicly known, anyone involved in emerging and foundational technology areas, such as artificial intelligence, driverless vehicle technology, advanced computing, additive manufacturing or microelectronics, should begin preparing comments on possible new controls in line with the standards in the new law. BIS will likely soon publish a notice seeking such comments, and the formal comment period will likely be short relative to the complexity and the significance of the issue. The submission of thoughtful and well-supported industry comments will be absolutely critical to the creation of properly scoped and clearly described controls that are consistent with the statutory standards.

More information

- [Akin Gump Client Alert](#) on the Export Control Reform Act
-

Client Alert: Trump Administration Sanctions Chinese Entity and Its Director in First Imposition of Secondary Sanctions Under Section 231 of CAATSA

On September 20, 2018, the Trump administration imposed sanctions on a Chinese entity, the General Armaments Department, and its director Li Shangfu for engaging in “significant transactions” with Rosoboronexport, a Russian defense company named on the State Department’s List of Specified Persons (LSP). While the State Department emphasized in a press release that the “secondary” sanctions, authorized by Section 231 of the Countering America’s Adversaries Through Sanctions Act (CAATSA), targeted the Russian supplier, rather than the Chinese acquirer, the actions taken emphasize the extraterritorial scope of U.S. sanctions and their potential impact on non-U.S. companies and individuals. Non-U.S. persons engaging in activities, particularly with Russia, that are subject to U.S. secondary sanctions should take note of the administration’s actions and assess the secondary sanctions risk associated with their activity.

More information

- [Akin Gump Client Alert](#)
 - [State Department press release](#)
-

President Trump Signs Executive Order Providing for Sanctions in the Event of Foreign Interference in U.S. Elections

On September 12, 2018, President Donald Trump signed Executive Order 13848, entitled “Imposing Certain Sanctions in the Event of Foreign Interference in a United States Election.” The Order allows for the imposition of a broad range of sanctions against any entity that attempts to interfere with U.S. elections. Potential restrictions include, among others, the blocking of property, restrictions on access to financial institutions and “any other measures authorized by law.”

The Order also establishes an interagency process for determining whether election interference has occurred, including assessments by the Director of National Intelligence, the Attorney General and the Secretary of Homeland Security. Once a determination of election interference is made, the Order provides for the designation by the Department of the Treasury of foreign persons who engage in election interference and other broader measures to target the states behind those efforts.

More information

- [Executive Order 13848](#)

OFAC Extends Ukraine-Related General Licenses

On September 21, 2018, OFAC announced that it extended the expiration date of certain General Licenses (GLs) related to GAZ Group, EN+ Group PLC and United Company RUSAL PLC (RUSAL).

According to new GL 13D, certain transactions with GAZ Group are authorized through October 22, 2018, and certain transactions with EN+ Group and RUSAL are authorized through November 11, 2018. OFAC made the corresponding updates to GL 14, covering RUSAL, and GL 16, covering EN+ Group. OFAC accordingly issued revised GL 14A and GL 16A.

More information

- [OFAC press release](#)
- [Red Notice - May 2018](#)

OFAC Issues New Ukraine/Russia FAQs on Permitted “Maintenance” Activities Under General Licenses 14, 15 and 16

On September 14, 2018, OFAC published new Frequently Asked Questions (FAQs) 625 and 626 regarding GL 14, GL 15 and GL 16 under the Ukraine/Russia sanctions program. The FAQs provide guidance on the term “maintenance” as used in GLs.

According to the FAQs, authorized actions necessary for the maintenance of operations or contracts provided for under the GLs generally include transactions and activities ordinarily incident to performing under a contract that existed prior to the imposition of sanctions as well as all transactions and activities ordinarily incident to obtaining goods or services from or providing goods or services to a blocked entity listed in the GLs consistent with past practices. The FAQs clarify that such activities could include issuing or accepting purchase orders and making or receiving shipments, but stockpiling of inventory is not permitted unless the transaction history reflects that stockpiling is consistent with past practice.

More information

- [OFAC press release](#)
- [New OFAC FAQs](#)

GLOBAL INVESTIGATIONS RESOURCES

- [9th Circuit Makes Mandatory Escobar's Implied False Certification Test, but Fails to Faithfully Follow Escobar's Directives](#)
- [The Export Control Reform Act and Possible New Controls on Emerging and Foundational Technologies](#)
- [Concurrent Delay – Is the English Court of Appeal's Clarification Conclusive?](#)
- [Developments in Cryptocurrency in 2018](#)
- [New CFIUS Law: Key Issues Affecting the Energy Sector](#)

WRITING AND SPEAKING ENGAGEMENTS

On October 3, 2018, Akin Gump will host an Energy Infrastructure CLE program titled: Impact of Trade Policy, Midterm Elections and Oil Prices in Akin Gump's Houston offices. Presenters include: [Chris LaFollette](#), [Steve Davis](#), [Christian Davis](#), [Gabe Procaccini](#), [Steve Baldini](#), [Marty Brimmage](#) and [Justin Williams](#).

On October 4, 2018, [Peter Altman](#) will be a panelist discussing “CCO Liability: How to Protect Yourself,” at ACA Compliance Group's Fall 2018 conference in Scottsdale,

Arizona.

On October 10-12, 2018, [David Vondle](#) will speak on the topic of "Innovation and Patent Systems: Global Review", [Stephen Kho](#) will speak on the topic of "Trade Agreements and IP: Tools and Techniques" and [Robert Huffman](#) will provide opening and closing remarks at the Innovation and IP Leadership conference in Ottawa, Canada.

On October 11, 2018, [Robert Huffman](#) will be a panelist on "The Materiality Requirement in False Claims Act Cases After Escobar," at the ABA Public Contract Law Section Procurement Fraud Committee meeting in Washington, DC.

On October 15, 2018, [Wynn Segall](#) will present on Sanctions and Export Controls at International Law Institute's "Regulatory Challenges for Chinese Investment in the United States" in New York City.

On October 17, 2018, [Christian Davis](#) will present on a webinar "Impact of FIRRMA on Private Equity Funds: Expanded CFIUS Review of Foreign Investments, New Filing Requirements: Structuring Investments to Minimize CFIUS Risk," hosted by Strafford.

On October 25, 2018, [David Applebaum](#) will be moderating the panel "Market Manipulation: A New Era in FERC Enforcement—Lessons Learned from Recent Cases."

On October 30, 2018, [Tatman Savio](#) will serve as a co-chair of the 4th Asia Summit on Economic Sanctions conference in Singapore.

If you would like to invite Akin Gump lawyers to speak at your company or to your group about anticorruption law, compliance, cybersecurity, enforcement and policy or other international investigation and compliance topics, please contact Jaime Sheldon at +1 212.407.3026 or [email](#).

[More information](#) for lawyers in the global investigations and compliance practice.

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