

Representative Legal Matters

Jonathan D. Nelms

- Oversees team in North America, Western Europe and the former Soviet Union in charge of reviewing all high-risk transactions (M&A, JVs, long-term commercial arrangements, government-facing service providers and other vendors) for a European client under FCPA-related deferred prosecution agreement.
- Conducted for a major US medical devices manufacturer subject to a deferred prosecution agreement with the US Department of Justice, two internal investigations in Russia and Ukraine concerning (i) irregular sales practices and interactions with healthcare professionals at a recently acquired business unit and (ii) problematic importations of products involving potentially improper payments via a consultant.
- Advised the same US medical devices manufacturer on the legal risks (particularly anti-corruption and anti-money laundering) associated with selling to customers in Ukraine, Kazakhstan, Uzbekistan and Belarus via offshore affiliates of those customers.
- Conducted an internal review for a Swiss agricultural manufacturer (a US issuer) concerning importations into Russia pursuant to a US Securities and Exchange Commission request and a whistleblower letter.
- Advised multinational pharmaceutical manufacturers on the development of partner-selection and other commercial policies intended to comply with Russian competition law, the FCPA and other anti-corruption law.
- Conducted anti-corruption and anti-money laundering investigations into the operations in Russia, Kazakhstan, Azerbaijan and Dubai of a Swiss freight-forwarder and representing the company before the US Department of Justice and SEC.
- Advised on the development and implementation of comprehensive compliance policies and protocols for a major Russian industrial manufacturer seeking partial acquisition by a Western company subject to the FCPA.
- Led an internal investigation into distribution practices on sales into Russia by the Swedish subsidiary of a major US pump manufacturer and preparing the US company for reporting to the SEC.
- Developed and implemented business partner review and selection process for resellers for a US-listed manufacturer of industrial equipment.
- Prepared a comprehensive anti-corruption manual and related protocols (M&A, joint ventures, retention of agents and distributors) for a US oil services company.



- Led compliance due diligence in various M&A transactions for a US oil services company and a leading US media company.