

The Complete Compliance and Ethics Manual

2014

The Complete Compliance and Ethics Manual – 2014 is published and updated by the Society of Corporate Compliance and Ethics, Minneapolis, MN.

Copyright © 2014 by the Society of Corporate Compliance and Ethics, with the exception of the article entitled “‘Carrot and Stick’ Philosophy: The History of the Organizational Sentencing Guidelines and the Emergence of Effective Compliance and Ethics Programs,” which is a work of the United States Government within the meaning of 17 USC sec. 101.

Printed in the United States of America. All rights reserved.

This book or parts thereof may not be reproduced in any form without express written permission of the publisher.

ISBN 978-0-9792210-9-5

This publication is designed to provide accurate, comprehensive and authoritative information on the subject matter covered. However, the publisher does not warrant that information contained herein is complete or accurate. This book is published with the understanding that the publisher is not engaged in rendering legal or other professional services. If legal advice or other expert assistance is required, the services of a competent professional should be sought.

Society of Corporate Compliance and Ethics

6500 Barrie Road, Suite 250

Minneapolis, MN 55435

+1 952 933 4977 or 888 277 4977 | Fax: +1 952 988 0146

www.corporatecompliance.org | helpteam@corporatecompliance.org

The Complete Compliance and Ethics Manual – 2014

Table of Contents

Table of Appendices	x
Editors.....	xiii
Contributors	xiv
Preface.....	xvi
 Chapter 1: Overview of Compliance and Ethics Practice	1.1
Defining Compliance and Ethics	
By David Gebler, JD	1.3
<i>Appendix 1-A: Glossary of Compliance-Related Terms</i>	<i>1.8</i>
The Role of Culture	
By David Gebler, JD	1.13
Compliance and Ethics Programs: The Value Proposition	
By David Gebler, JD	1.17
The Compliance and Ethics Profession: SCCE’s Code of Professional Ethics for Compliance and Ethics Professionals	
By Joseph E. Murphy.....	1.21
<i>Appendix 1-B: Code of Ethics for Compliance and Ethics Professionals.....</i>	<i>1.28</i>
 Chapter 2: Foundational Materials and Program Infrastructure	2.1
“Carrot and Stick” Philosophy: The History of the Organizational Sentencing Guidelines and the Emergence of Effective Compliance and Ethics Programs	
By Ketanji Brown Jackson and Kathleen Cooper Grilli.....	2.3
Revisions to the Federal Sentencing Guidelines for Organizations	
By Rebecca Walker	2.51
Essential Elements of an Effective Ethics and Compliance Program	
By Debbie Troklus, Greg Warner, and Emma Wollschlager Schwartz	2.59
<i>Appendix 2-A: Sample Letter to Vendors.....</i>	<i>2.84</i>
<i>Appendix 2-B: Sample Non-Retaliation/Non-Retribution Policy</i>	<i>2.85</i>
<i>Appendix 2-C: Sample Compliance Officer Job Description</i>	<i>2.87</i>
<i>Appendix 2-D: Sample Audit Review Form.....</i>	<i>2.90</i>
<i>Appendix 2-E: Sample Confidentiality Statement.....</i>	<i>2.91</i>

<i>Appendix 2-F: Sample Hotline Information Sheet</i>	2.92
<i>Appendix 2-G: Sample Compliance Issue Follow-Up Form</i>	2.93
Structure the Chief Ethics and Compliance Officer and Compliance Function for Success: Five Essential Features of an Effective CECO Position (with Frequently Asked Questions)	
By Donna C. Boehme.....	2.95
Other Governing Directives, Guidelines and Standards	
By Rebecca Walker	2.111
Chapter 3: Strategies for Implementation.....	3.1
Initial Steps for Building a Program	
By Debbie Troklus, Greg Warner, and Emma Wollschlager Schwartz	3.3
<i>Appendix 3-A: Compliance Program Implementation Action Plan</i>	3.16
<i>Appendix 3-B: Compliance Job Descriptions.....</i>	3.22
<i>Appendix 3-C: Compliance Program Risk Inventory.....</i>	3.27
<i>Appendix 3-D: Compliance Risk Matrix</i>	3.31
<i>Appendix 3-E: Sample Compliance Committee Charters.....</i>	3.34
<i>Appendix 3-F: Sample Policies and Procedures.....</i>	3.42
Making a Business Case: Selling Compliance and Ethics to Management	
By Joseph E. Murphy.....	3.77
<i>Appendix 3-G: Benefits of a Compliance Program.....</i>	3.94
Creating a Code of Conduct	
By Vickie L. McCormick	3.95
Communicating Values Across Cultures: Globalizing Your Code of Ethics	
By Lori Tansey Martens.....	3.107
<i>Appendix 3-H: General Checklist for Global Code Implementation.....</i>	3.114
Developing and Implementing Policies for an Effective Program	
By Caroline K. McMichen.....	3.117
<i>Appendix 3-I: Sample Policy Prioritization Matrix.....</i>	3.122
<i>Appendix 3-J: Sample Policy Development Workflow</i>	3.123
<i>Appendix 3-K: Sample Policy Template</i>	3.124
<i>Appendix 3-L: Sample Policy Implementation Master Tracker</i>	3.126
<i>Appendix 3-M: Sample Communication Plan</i>	3.127

**Board Engagement, Training and Reporting:
Strategies for the Chief Ethics and Compliance Officer**

By Donna C. Boehme.....	3.129
<i>Appendix 3-N: Twenty Questions That Boards of Directors Should Ask About Compliance and Ethics</i>	3.143
<i>Appendix 3-O: Web Conference: Not Your Father's Board Training</i>	3.145
<i>Appendix 3-P: Web Conference Q&A: Not Your Father's Board Training</i>	3.150

Due Diligence in Hiring and Promotions: Implementation and Management

By Amii Barnard-Bahn.....	3.155
---------------------------	-------

Effective Ethics and Compliance Training

By Thomas Fox.....	3.161
--------------------	-------

Fraud Prevention: Using Ethics and Compliance Failures as Teaching Tools

By John M. Stoxen	3.167
-------------------------	-------

Auditing and Monitoring

By Sheryl Vacca.....	3.173
<i>Appendix 3-Q: Audit Review Plan Template</i>	3.178

Hotline and Whistleblowing Reporting Mechanisms

By Nan Stout and David Childers	3.179
---------------------------------------	-------

Workplace Investigations

By Meric Craig Bloch	3.185
<i>Appendix 3-R: Witness Instructions</i>	3.193
<i>Appendix 3-S: Interview Memo</i>	3.194
<i>Appendix 3-T: Final Investigations Report</i>	3.195

**Creating an Organizational Investigations Program and Conducting Effective
Workplace Investigations**

By Virginia MacSuibhne	3.197
<i>Appendix 3-U: Checklist for Assessing Investigations Capabilities</i>	3.219
<i>Appendix 3-V: Sample Internal Investigations Policy</i>	3.224
<i>Appendix 3-W: Suggested Upjohn Warning</i>	3.227
<i>Appendix 3-X: Sample Evidence Collection Worksheet</i>	3.228
<i>Appendix 3-Y: Sample Key Allegations Worksheet</i>	3.229
<i>Appendix 3-Z: Key Facts Worksheet</i>	3.230
<i>Appendix 3-AA: Sample Investigation Report Form 1</i>	3.231
<i>Appendix 3-BB: Sample Investigation Report Form 2</i>	3.234
<i>Appendix 3-CC: Sample Policy Against Retaliation</i>	3.236

Independent Investigations Overseen by the Audit Committee: Procedures and Guidance	
By Bradley J. Bondi and Geoffrey E. Gettinger	3.237
Employee Discipline and Compliance	
By Theodore Banks and Gretchen Winter	3.245
Using Incentives in Your Compliance and Ethics Program	
By Joseph E. Murphy.....	3.253
<i>Appendix 3-DD: Evaluation Form</i>	3.281
<i>Appendix 3-EE: Recognition Letter</i>	3.282
<i>Appendix 3-FF: Ideas for Using Incentives in Compliance and Ethics Programs</i>	3.283
Compliance and Ethics Risk Assessments	
By José A. Tabuena	3.285
Ethics and Culture: Strategies for Risk Mitigation	
By Latour “LT” Lafferty	3.311
How to Protect Compliance Risk Assessments from Unwanted Disclosure	
By Russ Berland	3.327
Third-Party Risk Management: Properly Managing Compliance of Outsourced Relationships	
By Steve McGraw.....	3.333
Chapter 4: Measuring Effectiveness	4.1
A Guide to Determining Your Organization’s Compliance and Ethics Effectiveness	
By Emma Wollschlager Schwartz	4.3
Assessing Your Compliance Program: A Practical Approach	
By Kris DiGirolamo and Randy Sparks	4.17
Defining Effectiveness: Anatomy of an Ineffective Compliance and Ethics Program	
By Emma Wollschlager Schwartz	4.25
Methods and Guidelines for Demonstrating Compliance Program Effectiveness	
By Steve McGraw.....	4.35
Chapter 5: Specific Compliance and Ethics Risks	5.1
ANTI-CORRUPTION AND ANTI-BRIBERY	5.3
Anti-Corruption and Anti-Bribery	
By Marjorie Doyle and Diane Lutz	5.5
<i>Appendix 5-A: Anti-Corruption and Anti-Bribery Resources</i>	5.19
<i>Appendix 5-B: Considerations in Initially Planning or Reviewing Your Training Program</i>	5.20

<i>Appendix 5-C: Checklist for Managing Third Party Risk</i>	5.22
<i>Appendix 5-D: Common Red Flags Indicating Heightened Potential for Corruption.....</i>	5.24
The UK Bribery Act 2010	
By Jonathan P. Armstrong.....	5.25
<i>Appendix 5-E: Bribery Act Resources.....</i>	5.34
International Recognition for Compliance and Ethics Programs: The 2010 OECD Good Practice Guidance on Internal Controls, Ethics and Compliance	
By Donna C. Boehme and Joseph E. Murphy	5.35
ANTI-MONEY LAUNDERING	5.41
Anti-Money Laundering Compliance Programs	
By Linda Noonan, Amy Rudnick, and Michael Zeldin.....	5.43
ANTITRUST/COMPETITION LAW	5.67
Federal Antitrust Law Risks	
By Lisa A. Davis and Stefanie Kim.....	5.69
<i>Appendix 5-F: Federal Antitrust Law Key Resources.....</i>	5.83
CONFLICTS OF INTEREST	5.85
Conflicts of Interest	
By Rebecca Walker	5.87
<i>Appendix 5-G: Sample Policy on Conflicts of Interest.....</i>	5.100
Gifts and Entertainment Compliance	
By Rebecca Walker	5.105
GOVERNMENT CONTRACTING AND RELATIONSHIPS.....	5.117
Government Contracts and Relationships Programs: Getting Started and Essential Considerations	
By Eric R. Feldman.....	5.119
Government Contracting and the Federal Acquisition Regulation System	
By J. Andrew Howard	5.125
Compliance Overview: Corporate Involvement in the Federal Public Policy Arena	
By Timothy W. Jenkins and Katherine A. Belinski	5.141
GOVERNMENT ENFORCEMENT ACTIONS AND DISCLOSURES	5.149
Voluntary Disclosure, Mandatory Disclosure, and Government Engagement	
By Jeffrey A. Belkin and Donald G. Brown.....	5.151

Corporate Probation: The Use of Independent Monitors to Improve Compliance and Prevent Fraud	
By Vincent L. DiCianni and Eric R. Feldman	5.171
False Claims Act Risks	
By Peter B. Hutt II	5.185
<i>Appendix 5-H: False Claims Act Key Resources</i>	5.195
LABOR/EMPLOYMENT	5.197
Wage and Hour Compliance Under the FLSA and Other Federal and State Laws	
By Virginia MacSuibhne	5.199
<i>Appendix 5-I: Sample Policy: Work Schedule</i>	5.217
<i>Appendix 5-J: Sample Policy: Compensation and Hours Worked</i>	5.218
<i>Appendix 5-K: Sample Meal and Rest Period Acknowledgement</i>	5.220
<i>Appendix 5-L: Sample On-Duty Meal Period Acknowledgement</i>	5.221
<i>Appendix 5-M: Sample Independent Contractor Policy</i>	5.222
MERGERS AND ACQUISITIONS	5.223
Compliance Issues in M&A: Performing Diligence on the Target's Ethics and Compliance Program	
By Michael M. Mannix and David S. Black.....	5.225
PRIVACY AND DATA PROTECTION	5.235
Privacy Issues in Organizations	
By Amanda Mayhew and Barbara Lawler.....	5.237
<i>Appendix 5-N: Creating Privacy Policies and Procedures</i>	5.249
<i>Appendix 5-O: Sample Privacy Impact Assessment</i>	5.254
<i>Appendix 5-P: Privacy References/Links to Key Resources and Guidelines</i>	5.255
Cyber Compliance: What Every CEO, CRO and CLO Needs to Know about Cyber Compliance and Cyber Vigilance	
By David Childers.....	5.257
<i>Appendix 5-Q: Selected Cyber-Awareness Resources</i>	5.268
RECORDS MANAGEMENT AND RETENTION.....	5.269
Records Management: You Live and Die by the Records!	
By Donato A. Giordano	5.271
<i>Appendix 5-R: Records Management: Further Information</i>	5.286
<i>Appendix 5-S: Primary and Secondary Records: Life Cycle</i>	5.287

Creating an Effective Records and Information Management Program	
By Virginia MacSuibhne	5.289
<i>Appendix 5-T: Sample Records and Information Management Policy</i>	5.298
<i>Appendix 5-U: Sample Retention Schedule Excerpt</i>	5.302
<i>Appendix 5-V: Sample Litigation Hold Notice</i>	5.304
<i>Appendix 5-W: Sample RIM Decision Tree Tool</i>	5.306
SOCIAL MEDIA	5.307
Social Media Compliance	
By Eric Newman	5.309
<i>Appendix 5-X: Sample Policy: Corporate Social Media Policy</i>	5.315
<i>Appendix 5-Y: Sample Policy: Guidelines for Social Media Participation</i>	5.316
SUPPLY CHAIN	5.317
Increasing Regulation of the Multi-National Supply Chain	
By Gwendolyn Hassan	5.319
Complying with the SEC's New Conflict Minerals Rule: An Overview for Compliance Professionals	
By Michael R. Littenberg, Farzad F. Damania and Cecilia Wang	5.331
TRADE COMPLIANCE	5.341
International Trade and Business: U.S. Export Controls	
By Josephine Aiello LeBeau and Joshua Holzer	5.343
<i>Appendix 5-Z: Sample Export Management Compliance Policies and Procedures</i>	5.358
<i>Appendix 5-AA: International Trade References and Links to Key Resources</i>	5.359

Table of Appendices

Chapter 1: Overview of Compliance and Ethics Practice

Appendix 1-A: Glossary of Compliance-Related Terms	1.8
Appendix 1-B: Code of Ethics for Compliance and Ethics Professionals.....	1.28

Chapter 2: Foundational Materials and Program Infrastructure

Appendix 2-A: Sample Letter to Vendors.....	2.84
Appendix 2-B: Sample Non-Retaliation/Non-Retribution Policy	2.85
Appendix 2-C: Sample Compliance Officer Job Description	2.87
Appendix 2-D: Sample Audit Review Form.....	2.90
Appendix 2-E: Sample Confidentiality Statement.....	2.91
Appendix 2-F: Sample Hotline Information Sheet	2.92
Appendix 2-G: Sample Compliance Issue Follow-Up Form	2.93

Chapter 3: Strategies for Implementation

Appendix 3-A: Compliance Program Implementation Action Plan.....	3.16
Appendix 3-B: Compliance Job Descriptions.....	3.22
Appendix 3-C: Compliance Program Risk Inventory.....	3.27
Appendix 3-D: Compliance Risk Matrix	3.31
Appendix 3-E: Sample Compliance Committee Charters.....	3.34
Appendix 3-F: Sample Policies and Procedures	3.42
Appendix 3-G: Benefits of a Compliance Program	3.94
Appendix 3-H: General Checklist for Global Code Implementation.....	3.114
Appendix 3-I: Sample Policy Prioritization Matrix.....	3.122
Appendix 3-J: Sample Policy Development Workflow	3.123
Appendix 3-K: Sample Policy Template	3.124
Appendix 3-L: Sample Policy Implementation Master Tracker	3.126
Appendix 3-M: Sample Communication Plan	3.127
Appendix 3-N: Twenty Questions That Boards of Directors Should Ask About Compliance and Ethics	3.143
Appendix 3-O: Web Conference: Not Your Father's Board Training	3.145
Appendix 3-P: Web Conference Q&A: Not Your Father's Board Training.....	3.150

Appendix 3-Q: Audit Review Plan Template.....	3.178
Appendix 3-R: Witness Instructions	3.193
Appendix 3-S: Interview Memo.....	3.194
Appendix 3-T: Final Investigations Report	3.195
Appendix 3-U: Checklist for Assessing Investigations Capabilities.....	3.219
Appendix 3-V: Sample Internal Investigations Policy	3.224
Appendix 3-W: Suggested Upjohn Warning.....	3.227
Appendix 3-X: Sample Evidence Collection Worksheet	3.228
Appendix 3-Y: Sample Key Allegations Worksheet	3.229
Appendix 3-Z: Key Facts Worksheet.....	3.230
Appendix 3-AA: Sample Investigation Report Form 1	3.231
Appendix 3-BB: Sample Investigation Report Form 2	3.234
Appendix 3-CC: Sample Policy Against Retaliation	3.236
Appendix 3-DD: Evaluation Form	3.281
Appendix 3-EE: Recognition Letter	3.282
Appendix 3-FF: Ideas for Using Incentives in Compliance and Ethics Programs	3.283

Chapter 5: Specific Compliance and Ethics Risks

Appendix 5-A: Anti-Corruption and Anti-Bribery Resources	5.19
Appendix 5-B: Considerations in Initially Planning or Reviewing Your Training Program.....	5.20
Appendix 5-C: Checklist for Managing Third Party Risk.....	5.22
Appendix 5-D: Common Red Flags Indicating Heightened Potential for Corruption	5.24
Appendix 5-E: Bribery Act Resources	5.34
Appendix 5-F: Federal Antitrust Law Key Resources.....	5.83
Appendix 5-G: Sample Policy on Conflicts of Interest.....	5.100
Appendix 5-H: False Claims Act Key Resources.....	5.195
Appendix 5-I: Sample Policy: Work Schedule	5.217
Appendix 5-J: Sample Policy: Compensation and Hours Worked	5.218
Appendix 5-K: Sample Meal and Rest Period Acknowledgement.....	5.220
Appendix 5-L: Sample On-Duty Meal Period Acknowledgement	5.221
Appendix 5-M: Sample Independent Contractor Policy.....	5.222
Appendix 5-N: Creating Privacy Policies and Procedures	5.249
Appendix 5-O: Sample Privacy Impact Assessment.....	5.254
Appendix 5-P: Privacy References/Links to Key Resources and Guidelines	5.255

Appendix 5-Q: Selected Cyber-Awareness Resources.....	5.268
Appendix 5-R: Records Management: Further Information.....	5.286
Appendix 5-S: Primary and Secondary Records: Life Cycle	5.287
Appendix 5-T: Sample Records and Information Management Policy.....	5.298
Appendix 5-U: Sample Retention Schedule Excerpt.....	5.302
Appendix 5-V: Sample Litigation Hold Notice	5.304
Appendix 5-W: Sample RIM Decision Tree Tool	5.306
Appendix 5-X: Sample Policy: Corporate Social Media Policy	5.315
Appendix 5-Y: Sample Policy: Guidelines for Social Media Participation	5.316
Appendix 5-Z: Sample Export Management Compliance Policies and Procedures.....	5.358
Appendix 5-AA: International Trade References and Links to Key Resources.....	5.359

Contents of Data CD

- The Complete Compliance and Ethics Manual (full text)
- Sarbanes-Oxley Act of 2002
- Federal Sentencing Guidelines: Overview of the U.S. Sentencing Commission and the Federal Sentencing Guidelines
- Federal Sentencing Guidelines: Chapter 8 — Sentencing of Organizations
- Federal Sentencing Guidelines: Reason for Amendment 673
- Federal Sentencing Guidelines: Report of the Ad Hoc Advisory Group
- The Basics of Compliance from the Viewpoint of the Federal Sentencing Guidelines
- SEC Listed Companies Standards
- Speech by SEC Staff: The Vital Role of Effective Comprehensive Compliance Controls
- NYSE Corporate Governance Rules
- Federal Reserve Board Remarks: Enterprise-Wide Compliance Programs
- Other Compliance Standards
- Possible Privileges of Protections for Compliance Programs
- Foreign Corrupt Practices Act Anti-Bribery and Books & Records Provisions
- A Resource Guide to the U.S. Foreign Corrupt Practices Act
- Selection and Use of Monitors in Deferred Prosecution Agreement and Non-Prosecution Agreements with Corporations (the “Morford Memorandum”)
- Additional Guidance on the Use of Monitors in Deferred Prosecution Agreements and Non-Prosecution Agreements with Corporations (the “Grindler Memorandum”)

Editors

Theodore L. Banks, JD

Partner
Scharf Banks Marmor LLC
Chicago, IL

David Childers, CIPP

Chief Executive Officer
Compli
Portland, OR

C. Lee Essrig, Esq., CCEP

Chief Ethics and Compliance Officer
Lenovo
Morrisville, NC

Lisa Kuca

Senior Compliance Officer, Eastern Division
First American Title Insurance Company
Washington, DC

Greg Triguba, JD, CCEP

Principal
Compliance Integrity Solutions, LLC
Highlands Ranch, CO

Rebecca Walker, JD

Partner
Kaplan & Walker LLP
Santa Monica, CA

Contributors

Josephine Aiello-LeBeau

Partner
Wilson Sonsini Goodrich & Rosati
Washington, D.C.

**Jonathan P. Armstrong,
LL.B FCIM**

Partner
Duane Morris, LLP
London, England

Theodore L. Banks, JD

Partner
Scharf Banks Marmor LLC
Chicago, IL

**Amii Barnard-Bahn, JD,
CCEP, CHC, CCEP-I**
Chief Compliance & Ethics Officer
McKesson U.S. Pharmaceutical
San Francisco, CA

Katherine A. Belinski, JD

Associate
Nossaman, LLP
Washington, D.C.

Jeffrey A. Belkin, Esq.

Partner
Alston & Bird, LLP
Atlanta, GA

Russ Berland

Of Counsel
Stinson Morrison Hecker LLP
Kansas City, MO

David S. Black, JD

Partner
Holland & Knight, LLP
McLean, VA

Merik Craig Bloch, Esq., CFE
Vice President, Compliance
and Corporate Investigations
Adecco Group North America
Parsippany, NJ

Donna C. Boehme

Principal
Compliance Strategists LLC
New Providence, NJ

Bradley J. Bondi

Partner
Cadwalader, Wickersham & Taft
Washington, D.C.

Donald G. Brown, Esq.

Associate
Alston & Bird, LLP
Atlanta, GA

David Childers, CIPP

CEO
Compli
Portland, OR

Farzad F. Damania

Special Counsel
Schulte Roth & Zabel LLP
New York, NY

Lisa A. Davis, JD

Special Counsel
Wilson Sonsini Goodrich & Rosati
Palo Alto, CA

Vincent L DiCianni, Esq.

President
Affiliated Monitors, Inc.
Boston, MA

**Kris DiGirolamo, BBA,
MBA, CPA, CIA, CFSA**
Compliance and Privacy Director
Enterprise Business
Conduct Office
Allstate Insurance Company
Northbrook, IL

Marjorie Doyle, JD, CCEP-F

Managing Director
Aegis Compliance &
Ethics Center, LLP
Chicago, IL

Eric R. Feldman, CFE, CIG

President
Core Integrity Group
Redondo Beach, CA

Thomas Fox

Principal
Tomfoxlaw.com
Houston, TX

David Gebler, JD

President
Skout Group, LLC
Sharon, MA

Geoffrey E. Gettinger

Associate
Cadwalader, Wickersham & Taft
Washington, D.C.

Donato A. Giordano

New York, NY

Kathleen Cooper Grilli, Esq.

Deputy General Counsel
United States Sentencing
Commission
Washington, D.C.

Gwendolyn Hassan, JD

Managing Attorney
Compliance Fiat Industrial, CNH
Oak Park, IL

Joshua Holzer, JD

of Counsel
Wilson Sonsini Goodrich & Rosati
Washington, D.C.

J. Andrew Howard, JD

Partner
Alston & Bird, LLP
Los Angeles, CA

Peter B. Hutt II, JD

Partner
Akin Gump Strauss
Hauer & Feld, LLP
Washington, D.C.

Ketanji Brown Jackson, Esq.

Vice Chair
United States Sentencing
Commission
Washington, D.C.

Timothy W. Jenkins, JD

Partner
Nossaman, LLP
Washington, D.C.

Stephanie Kim, JD
Special Counsel
Wilson Sonsini Goodrich & Rosati
Washington, D.C.

Latour LT Lafferty, JD, CCEP, CHC
Practice Leader, White Collar Crime, Government Investigations, Corporate Compliance and Ethics Practice
Fowler White Boggs, PA
Tampa, FL

Barbara Lawler, CIPP, CHP
Chief Privacy Officer, Legal & Compliance Org.
Intuit Inc.
Mountain View, CA

Michael R. Littenberg
Partner
Schulte Roth & Zabel LLP
New York, NY

Diana Lutz
Managing Director and Chief Ethics and Compliance Officer
The Steele Foundation
New York, NY

Virginia MacSuihbne
Director of Ethics & Compliance
Roche Molecular Systems, Inc.
Pleasanton, CA

Caroline K. McMichen, CCEP, CIA
Chief Ethics and Compliance Officer
Molson Coors Brewing Company
Denver, CO

Michael M. Mannix, JD
Partner
Holland & Knight LLP
McLean, VA

Lori Tansey Martens
CEO
International Business Ethics Institute
Washington, DC

Amanda Mayhew, CIPP, CCEP
Global Privacy Counsel & Sr. Consultant
EthicsPoint, Inc.
Portland, OR

Steve McGraw
President of Governance, Risk and Compliance
SAI Global
Alpharetta, GA

Joseph E. Murphy, JD, CCEP
Director of Public Policy
Society of Corporate Compliance and Ethics
Haddonfield, NJ

Eric Newman, Esq., CCEP
Social Media Manager
Society of Corporate Compliance and Ethics
Minneapolis, MN

Linda Noonan, JD
Of Counsel
Gibson Dunn and Crutcher, LLP
Washington, D.C.

Amy Rudnick, JD
Partner
Gibson Dunn and Crutcher, LLP
Washington, D.C.

Emma Wollschlager Schwartz, MPH
President
Wollschlager Consulting, LLC
El Paso, TX

Randy Sparks
Regulatory Compliance Senior Manager
Enterprise Business Conduct Office
Allstate Insurance Co.
Northbrook, IL

Nan Stout
Vice President of Business Ethics
Staples, Inc.
Framingham, MA

John M. Stoxen
Director of Business Content and Compliance
3M Company
St. Paul, MN

José A. Tabuena
Senior Vice President of Governance and Compliance
PhyServe Physician Services, Inc.
Dallas, TX

Debbie Troklus, CHC-F, CCEP-F, CHRC, CHPC
Managing Director
Aegis Compliance & Ethics Center, LLP
Chicago, IL

Sheryl Vacca, CCEP-F, CCEP-I, CHC-F, CHPC, CHRC
SVP and Chief Compliance & Audit Officer
University of California
Oakland, CA

Rebecca Walker, JD
Partner
Kaplan & Walker LLP
Santa Monica, CA

Cecilia Wang
Associate
Schulte Roth & Zabel LLP
New York, NY

Greg Warner, CHC
Director for Compliance
Mayo Clinic
Rochester, MN

Gretchen Winter
Executive Director, Center for Professional Responsibility in Business and Society
University of Illinois

Michael Zeldin
Principal
Deloitte Financial Advisory Services, LLP
Washington, D.C.