

GAYLE E. LITTLETON, Partner

Gayle E. Littleton conducts corporate internal investigations and represents companies engaged in civil litigation and companies and individuals in criminal proceedings. Ms. Littleton's work focuses on anti-corruption (FCPA), fraud, whistleblower complaints, #MeToo allegations, and regulatory compliance matters.

A former assistant US attorney (AUSA), Ms. Littleton brings a wealth of experience investigating and litigating criminal matters, as well as civil actions brought pursuant to the False Claims Act and the Financial Institutions Reform, Recovery and Enforcement Act. She is a seasoned courtroom lawyer and has tried 18 federal cases throughout the country. Ms. Littleton also has briefed and argued numerous appeals before the US Court of Appeals for the Seventh Circuit.

Ms. Littleton served as a federal prosecutor for 12 years, working in both the Chicago office of the US Attorney's Office for the Northern District of Illinois and in the Northern District of Florida. In the US Attorney's Office in Chicago, Ms. Littleton served on the prosecution team that investigated and prosecuted former Illinois Governor George Ryan's chief of staff. As an AUSA in Florida, Ms. Littleton investigated and prosecuted high-level white collar cases and served as senior litigation counsel to the US attorney, where she advised the US attorney on charging decisions.

Ms. Littleton has served as an adjunct professor at Loyola University (Illinois) and has taught at the Department of Justice training center.

While not an exhaustive list, Ms. Littleton's recent representative matters include:

- Led multinational FCPA internal investigation in Central Asia and Eastern Europe for international oil field services company, and represented that company in parallel DOJ/SEC investigations. The matter involved international investigations team and government presentations, and was resolved without charges or corporate resolution.
- Engaged by large publicly traded company to conduct #MeToo investigation, counseled company on employment and public relations issues, and resolved matter without litigation. The matter involved domestic and international corporate offices, and cross-border legal issues.
- Conducted investigation for the board of a large insurer related to whistleblower allegations made by an employee, counseled company on employment issues and regulator contact, and resolved the matter without litigation.
- Led investigatory teams for the monitor of Credit Suisse AG following the bank's \$715 million settlement with the New York Department of Financial Services, part of a broader \$2.6 billion settlement with DOJ and federal regulators.



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PRACTICE GROUPS

Investigations, Compliance and Defense
Litigation
Monitorship Practice

EDUCATION

Cornell Law School, J.D., 1999; *magna cum laude*; Order of the Coif; Note Editor, *Cornell Journal of Law & Public Policy*

Stetson University, B.A., 1994

ADMISSIONS

Florida, 2012

Illinois, 2016

New York, 2002

JUDICIAL CLERKSHIP

Hon. Joseph L. Tauro, U.S. District Court,
District of Massachusetts 2000 - 2001
(Clerkship)

Hon. Gerald W. Heaney, U.S. Court of
Appeals, Eighth Circuit 1999 - 2000
(Clerkship)

- Engaged by a hedge fund to represent it and employees in SEC enforcement investigation related to alternate lending positions.
- Conducted multinational corruption investigation for an international healthcare company related to alleged impropriety in Eastern Europe. The matter involved international investigations team, and cross-border legal issues.
- Led civil regulatory compliance investigation for a multinational healthcare company related to international product ingredients.
- Represented real estate developers in a DOJ affirmative civil FCA and FIRREA investigation and resolved the matter pre-litigation.
- Represented current and former individual employees in:
 - FCPA investigations in the oil and gas industry; and
 - Investigations related to alleged bank-fraud/BSA violations.

Awards

- FBI Director's Certificate
Prosecution of *US v. Dubose, et al.*, 2014
Prosecution of *US v. Abbas*, 2007
- Girl Scouts, Women of Distinction Award, 2014
- *Chambers USA*
Litigation: White Collar Crime and Government Investigations (IL) - 2019

Teaching

- Loyola University, Adjunct professor, "American Judicial Process," 2008
- US Department of Justice National Advocacy Center
Instructor, "Roving Wiretaps Under Title III," 2006
Instructor, "Appellate-Paralegal Seminar," 2007

Publications

- Co-Author, *Update to Anti-Corruption Enforcement 2018-2019: A Guide to the FCPA and the UK Bribery Act*, June 2019
- Co-Author, Client Alert: DOJ Releases Guidelines on Awarding Cooperation Credit in False Claims Act Matters, May 16, 2019
- Co-Author, *DOJ Releases Guidelines on Awarding Cooperation Credit in False Claims Act Matters*, May 7, 2019
- Client Alert: Co-Author, Operation Car Wash Rolls into the History Books with One of the Largest Global FCPA Resolutions, October 11, 2018
- French Pharmaceutical Company Sanofi Agrees to Pay More Than \$25 Million for FCPA Violations, September 17, 2018
- Co-Author, *Business Guide to Anti-Corruption Laws 2018 Mid-Year Update*, Jenner & Block, July 19, 2018
- Client Alert: Co-Author, Lessons Learned from Société Générale and Legg Mason FCPA Resolution, June 12, 2018

- Co-Author, Panasonic and Subsidiary Panasonic Avionics Corporation Pay Over \$280 Million in Penalties and Disgorgement to Resolve Foreign Corrupt Practices Act and Accounting Fraud Violations, May 14, 2018
- “Navigating Cryptocurrency Regulation: Common Sense in an Uncommon Industry,” *FinTech Weekly*, January 16, 2018
- Client Alert: DOJ Formalizes FCPA Enforcement Policy, November 30, 2017
- Co-Author, Client Alert: Swedish Telecommunications Company Telia Agrees to Pay Almost \$1 Billion for FCPA Violations, September 26, 2017
- Co-Author, “Clearing Up Franchise Distribution Agreements at 6th Circ.,” *Law360*, August 7, 2017
- Client Alert: “Supreme Court Interprets Bank Fraud Statute as Prohibiting Schemes Which Only Intend Financial Loss to Non-Bank Parties”, December 20, 2016
- Client Alert: “DOJ Issues Guidance Regarding Enhanced FCPA Enforcement and Credit for Voluntary Disclosure, Cooperation, and Remediation”, April 7, 2016
- Co-Author, *Offender Reentry, Part VI Introduction: What Works? Assessment of Reentry Initiatives*, 2014
- Member, Committee to Draft Commentary to the Criminal Procedure Code for Kosovo. Work included writing the commentary to numerous Code provisions, 2005-2006
- Co-Author, *Business Torts in Massachusetts, Chapter 2: Fraud and Negligent Misrepresentation*, 2002

Speaking Engagements

- “Managing International Litigation and Enforcement Risk,” Jenner & Block, May 16, 2018
- Panelist, Alumnae Law Coalition of Cornell Career Panel, January 18, 2018
- Consumer Products-based Chief Compliance Officer Roundtable, April 08, 2016