

Lawyers



Aisling O'Shea

Partner

Washington, D.C.

T. +1-202-956-7500

F. +1-202-293-6330

osheaa@sullcrom.com

Aisling O'Shea is a co-head of the Firm's FCPA and Anti-Corruption Group and a member of the Criminal Defense and Investigations Group and the Litigation Group. Her practice focuses on criminal defense, government investigations and the FCPA. She has extensive experience in conducting internal investigations and defending clients in criminal and regulatory matters related to corruption, money laundering, securities fraud and other forms of financial fraud, tax evasion, and criminal antitrust. Ms. O'Shea advises clients on FCPA and anti-corruption issues, including FCPA-related transactional issues and corporate compliance programs and internal controls. She has represented financial institutions, multinational corporations and executives in investigations and enforcement actions by numerous government authorities, including the U.S. Department of Justice, the U.S. Securities and Exchange Commission, the U.S. Commodity Futures Trading Commission, various U.S. Attorney's Offices, various bank regulators, and the UK Financial Conduct Authority.

Ms. O'Shea is a leader in her field and frequently authors articles and speaks at events related to the FCPA, anti-corruption and enforcement trends. She has been recognized by *Global Investigations Review* and *Who's Who Legal* for her work.

Government Service

Ms. O'Shea rejoined the Firm in 2017 after more than five years of service as a trial attorney in the FCPA Unit of the Fraud Section of the U.S. Department of Justice's Criminal Division, where she focused on the investigation and prosecution of corporations and individuals related to FCPA violations, money laundering, securities and healthcare fraud, tax evasion and other complex economic crimes. Over the course of her tenure at the DOJ, Ms. O'Shea worked closely with every major U.S. Attorney's Office and federal law enforcement agency, as well as in coordination with other government agencies, including the U.S. Securities and Exchange Commission, FinCEN and the Office of Foreign Assets Control, and numerous foreign law enforcement and regulatory authorities. She

PRACTICES & CAPABILITIES

Criminal Defense & Investigations

Economic Sanctions and Financial Crime

FCPA & Anti-Corruption

Financial Services Investigations & Litigation

Litigation

EDUCATION

2003, University of Virginia School of Law, J.D.

2000, Georgetown University, B.S.

BAR ADMISSIONS

New York

District of Columbia

LANGUAGES

American Sign Language

also conducted trainings for U.S. and foreign law enforcement authorities related to the FCPA and money laundering.

As a federal prosecutor, Ms. O'Shea led a complex FCPA and money-laundering investigation into corruption at Venezuela's state-owned and controlled oil company and successfully prosecuted more than twenty individuals, including several former Venezuelan officials, in connection with the investigation. The case, which won Homeland Security Investigations' 2016 award for Outstanding Financial Investigation, resulted in the most individual convictions for a single FCPA matter. She also successfully prosecuted two former financial institution executives, and reached a resolution with the financial institution, for conspiracy to commit securities and wire fraud.

Prior to her government service, Ms. O'Shea was an associate at Sullivan & Cromwell where she also focused on complex financial investigations.

Selected Representations

- Bank Hapoalim in a cross-border tax investigation by the Department of Justice, Federal Reserve, and New York Department of Financial Services.
- A major global automotive manufacturer in criminal and regulatory investigations concerning accounting and corruption allegations.
- Barclays in investigations by the Department of Justice, Commodity Futures Trading Commission, Securities and Exchange Commission, and UK Financial Conduct Authority related to the London Interbank Offered Rate (LIBOR).
- Wachovia Bank in a \$110 million deferred prosecution agreement with the Department of Justice, a civil resolution with FinCEN, and a \$50 million civil money penalty with the Office of the Comptroller of the Currency, related to anti-money laundering compliance in Wachovia's correspondent banking business.
- A major international bank in an investigation by the Office of the Comptroller of the Currency into its anti-money laundering controls.
- A major insurance company in investigations by the Department of Justice, the New York Attorney General, the Securities and Exchange Commission, and various state insurance regulators.
- An entertainment management executive in an investigation by the Department of Justice.
- A manufacturing company executive in an investigation by the Department of Justice.
- An e-commerce company in connection with its compliance program and internal controls.
- An insurance executive in investigations by the Department

of Justice and Securities and Exchange Commission, as well as civil litigation, related to reinsurance.

Selected Rankings and Recognitions

- Recognized in *Chambers USA* – Nationwide for FCPA (2020)
- Recognized as one of North America’s Future Leaders in Investigations by *Who’s Who Legal* (2019, 2020)
- Listed in *GIR’s Women in Investigations* survey (2018)

Recent Publications and Press Mentions

- Quoted in “The ACR’s Guide to Mastering Internal Investigation Interviews: Logistics,” *Anti-Corruption Report*, February 5, 2020
- Co-authored “Key Developments in 2019 Anti-Corruption Enforcement,” *Law360*, December 20, 2019
- Co-authored “Practical Implications of the CFTC’s Enforcement Advisory on Foreign Corrupt Practices,” *Anti-Corruption Report*, May 6, 2019
- Quoted in “Updates to the Corporate Enforcement Policy to Address Company Concerns,” *Anti-Corruption Report*, April 3, 2019
- Quoted in “Aruba Telecom Sentencings Demonstrate Continued Panama Papers Repercussions,” *Anti-Corruption Report*, July 11, 2018
- Quoted in “Dun & Bradstreet Settles for \$9 Million with SEC and Receives DOJ Declination for China Subsidiary Misconduct,” *Anti-Corruption Report*, May 2, 2018
- Co-authored “The History of Reach of dd-3 Jurisdiction and Lessons for Companies Investigation Potential Violations,” *Anti-Corruption Report*, April 18, 2018
- Co-authored “FCPA Risks Faced by Financial Institutions,” *Financier World’s Corporate Fraud & Corruption Special Report*, February 2018

Recent Speaking Engagements and Events

- “The Massive, Multi-Country Airbus Settlement,” *Trace International* podcast, February 19, 2020
- “Recent Trends: Foreign Corrupt Practices and the CFTC,” *FIA* webinar, August 22, 2019
- “CFTC Turns to FCPA Enforcement,” *S&C Critical Insights* podcast, April 18, 2019
- “The Foreign Corrupt Practices Act and International Anti-Corruption Developments 2019,” *PLI*, April 16-17, 2019
- “The Foreign Corrupt Practices Act and International Anti-Corruption Developments 2018,” *PLI*, April 24, 2018

- “Revisions to the U.S. Department of Justice’s FCPA Corporate Enforcement Policy and Other Current Trends in FCPA Investigations,” PLI, January 19, 2018
- “Investigations & Enforcement: DOJ’s Codification of Its FCPA Self-Reporting Policy,” S&C Critical Insights podcast, November 29, 2017