

# Export Controls and Sanctions Representative Experience

FTI Consulting's Export Controls and Sanctions practice is comprised of professionals with in-depth experience in some of the most complex areas of compliance, from both industry and government perspectives. Our team helps U.S. and non-U.S. companies comply with global export controls and sanctions laws, providing services such as due diligence, advanced data analytics for risk models, practical policies and procedures, and tailored training programs.

FTI has deep experience conducting and responding to multi-jurisdictional investigations, including parallel investigations by multiple regulatory and enforcement agencies. We regularly support both in-house and outside counsel under attorney-client privilege protections.

Our work is informed by more-than 100 years of collective investigations experience, providing a keen sense of what government agencies expect from export controls and sanctions compliance programs.

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## INVESTIGATIONS / VOLUNTARY DISCLOSURES / VOLUNTARY SELF DISCLOSURES

Collectively, the members of our team have investigated hundreds of potential export controls and sanctions violations in dozens of jurisdictions around the world. Our careers include extensive experience not only in preparing disclosures, but also reviewing them from a government enforcement perspective. Our team has worked directly with the U.S. Departments of Justice, Treasury, Commerce, Defense, and State, as well as regulators in EMEA and Asia Pacific countries, and the United Nations.

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## CHINESE TELECOMMUNICATIONS PROVIDER

FTI Consulting was engaged by counsel to assist the company with settlement of its violations of U.S. export controls and sanctions laws. During the investigation, FTI facilitated an extensive unstructured data collection, review and production, and developed and implemented innovative forensic and structured data analysis methodologies to apply the complex requirements of U.S. law to the company's historic customer, manufacturing and shipping data held in a number of disparate systems. FTI's extensive efforts to recreate bills of material from throughout the statute of limitations period required methodologies to map operational processes to corresponding data, and both qualitative and quantitative analytical models applied to the disparate data sets to retrospectively calculate de minimis levels. The data analytics were accepted by the U.S. Government as the company reached settlement and started the monitorship process. FTI continues to assist the company with its on-going obligations to the U.S. Government and its monitor by gathering information for investigative and voluntary disclosure purposes and proactively working with the company and its other advisors to resolve issues.



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## U.S.-BASED FILTRATION COMPANY

A U.S.-based filtration company required an export controls compliance system for items controlled under Export Administration Regulations (EAR) and International Traffic in Arms Regulations (ITAR), as well as classified projects subject to the National Industrial Security Program Operating Manual (NISPOM). Our team members created end-to-end detailed process maps to identify all potential risk and controls points, then developed tailored control solutions for the company's unique processes and risk profile. In addition to export compliance, the process maps were used with continuous improvement methodologies to streamline operations, resulting in millions of dollars in savings.

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## EU-BASED LOGISTICS COMPANY

Our team works closely with other FTI practices to provide clients with the right solutions. To identify inappropriate payments by an EU-based logistics company involving OFAC-sanctioned countries, FTI Consulting's global Data & Analytics team was brought in for a multi-year operations investigation involving 85 countries and more than 25 disparate ERP systems. FTI deployed data and analytics specialists from the Americas, EMEA and Asia Pacific regions to collect and analyze information from global, regional and country-level information systems. FTI worked closely with external counsel and the client to minimize cost and disruption. FTI hosted collected information in U.S. and EMEA data centers, performing reviews in-country where required by local data protection laws.

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## GLOBAL INDUSTRIAL MACHINERY MANUFACTURER

Our team members previously helped create, launch and maintain the global export controls and sanctions compliance program for a global Fortune 100 company across more than 100 jurisdictions. The complexity of the company's matrix organization structure along with its vast global network of dealers and repair centers required a program that was more complex than those of its peers. Our team worked closely with the client's new compliance organization to tailor the program to the culture, including Six Sigma principles, and general internal controls structure of the company to ensure broad and swift adoption by all stakeholders.

### Matthew Bell

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Matt Bell is a Senior Managing Director and the Global Leader of the Export Controls & Sanctions practice in the Forensic & Litigation Consulting segment at FTI Consulting, and he is based in Houston. He has built best-in-class compliance programs under intense government scrutiny and has extensive experience working with the U.S. Departments of Justice, Commerce, and Treasury as part of government investigations, record-setting civil and criminal settlements, and government-mandated audits and monitorships. Prior to FTI Consulting, Mr. Bell held senior legal and compliance positions in major multi-national companies in the telecommunications and energy industries.