

Tackling the Hardest Issues in Internal Investigations

Stephen King, legal senior director & chief compliance investigator, PepsiCo

Andrew Gaillard, assistant general counsel, U.S. compliance investigations, Pfizer

James Finnerty, SVP, associate deputy global anti-money laundering officer - United States, TD Bank

Moderator: Bruce Carton, featured columnist, Compliance Week

Building Blocks

- ❑ Tracking and monitoring of regulatory and law enforcement contacts: An early warning tool
- ❑ Document retention
- ❑ Investigation teams: Identification and Training
- ❑ Private investigators: Use and control
- ❑ Triage and escalation: Review, notice, and updates

The Role of the Investigator

- Be Intelligent
- Be Independent
- Be Intrepid
- Be Inquisitive

The Investigation Output

- What is produced?
- When is it produced?
- Who is it provided to?
- Who decides punishment/corrective action?
- What about follow-up communications?

Investigation Scenarios

- ❑ Investigating the C-Suite Executive
- ❑ Too Many Cooks – Internal Partners
- ❑ Too Many Cooks – External Partners
- ❑ Pressure to Race to the Finish
- ❑ Overseas Investigations