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**AREAS OF PRACTICE**

FCPA/Anti-Corruption  
 Anti-Money Laundering  
 International Regulation &  
 Compliance  
 Worldwide Arbitration &  
 Dispute Resolution

**LANGUAGE**

Spanish  
 Portuguese

**EDUCATION**

Georgetown University  
 Law Center, J.D., 2003;  
 Global Law Scholar  
 Brown University, B.A.,  
*magna cum laude*, 1998

**BAR & COURT  
 ADMISSIONS**

District of Columbia  
 New York  
 US Court of International  
 Trade  
 US Federal District Court  
 for the District of Columbia  
 US Federal District Courts  
 in the Southern and Eastern  
 Districts of New York

**Owen Bonheimer**

Owen Bonheimer is an associate in Washington office of Steptoe & Johnson LLP, where he is a member of the International Department. His practice focuses on international regulatory compliance, internal investigations, and controversies.

He is involved in representing corporations and executives on anti-corruption and anti-money-laundering investigations, with experience before the SEC, DoJ, Congress, and the World Bank, and on matters involving parallel foreign probes. He also works with companies in a range of industries to conduct compliance risk assessments, develop effective compliance tools and conduct employee training programs.

In the worldwide arbitration practice, he has appeared in investor-state arbitration proceedings before the International Center for Settlement of Investment Disputes (ICSID). Prior to joining Steptoe, he served as a law clerk with the Overseas Private Investment Corporation (OPIC) and as an intern for a federal judge in the District of Columbia.

Mr. Bonheimer has published articles and spoken at seminars on asset recovery in corruption cases, anti-money laundering "gatekeeper" duties, international procurement fraud, investor-state arbitration, enforcement of foreign arbitral awards, human rights litigation, and transnational legal practice.

In the *pro bono* area, he handles consumer protection matters, as well as human rights cases before US and international tribunals.

Mr. Bonheimer is fluent in Spanish and Portuguese and is familiar with Latin American civil law jurisdictions through legal experience in Brazil and at the Organization of American States.

**PUBLICATIONS**

High-Level Executives Targeted for FCPA Enforcement; Continued Scrutiny of Foreign Subsidiary Operations  
 October 8, 2008

International Law Advisory - New Department of Justice FCPA Opinion Procedure Release Establishes a Limited Safe Harbor Against Successor Liability Based on Significant Undertakings by An Acquirer Regarding Its Post-Closing Conduct  
 July 1, 2008

International Law Advisory - Willbros Group Agrees to Pay \$32.3 Million To Resolve DoJ and SEC FCPA Enforcement Actions  
 May 21, 2008

## Owen Bonheimer

International Law Advisory - Recent Oil-for-Food Program Cases Show the Government's Willingness to Pursue "Improper" Payments Outside the FCPA's Antibribery Provisions, Call Attention to Foreign Enforcement  
March 17, 2008

International Law Advisory - Sight-Seeing Tiger, Hidden Dragon - Lucent Fined for Financing Sight-Seeing Trips for Chinese Officials  
February 1, 2008

International Law Advisory - Fifth Circuit Clarifies the Intent Requirements for a Criminal FCPA Conviction  
November 9, 2007

International Law Advisory - The Kozeny Saga Continues  
October 27, 2007

International Law Advisory - Baker Hughes Agrees to Pay Record \$44.1 Million To Resolve DoJ and SEC FCPA Enforcement Actions  
May 3, 2007

### **PROFESSIONAL AFFILIATIONS**

International Association of Young Lawyers (AIJA) Commercial Fraud Commission, US Law Reporter

Inter-American Bar Association, Working Group on Money Laundering and Corruption, Vice President

AIJA International Arbitration Commission

DC Bar Public International and Criminal Law Committee