

Independent Monitorships

Practices and Industries

PRIMARY CONTACTS

Kathryn Katie Muldoon Griffin

+1 703.883.1667

Haynes Boone offers in-depth experience in monitorship appointments around the globe for national and international organizations of companies operating in engineering, infrastructure and construction, oil and gas, renewable energy, information technology, and transportation. Drawing upon our substantial talent for guiding clients through internal investigations, enforcement matters, and government inquiries, as well as our attorneys' prior legal service as government regulators and federal prosecutors, we are well-suited to serve in the role of independent monitor.

Our team assists in building compliance programs for business operations, contracts, and other processes as needed working in close partnership with clients. We establish government contracting compliance programs and internal controls, policies, and procedures; provide employee counseling and training; and perform annual compliance program reviews. Members of our team have been appointed to serve in oversight roles regarding corporate compliance under Administrative Compliance, Deferred Prosecution, and similar agreements with federal agencies.

Independent Monitorships Representative Matters

- Independent monitor by appointment of the U.S. Department of Justice of Technology Integration Group with a mandate to monitor the company's development of an ethics and compliance program, including, but not limited to, pricing and other contractual obligations in government contracting. The three-year monitorship included site visits and witness interviews at 12 locations in the U.S. and Canada.
- Independent monitor by appointment of the International Bank for Reconstruction and Development and International Development Association (World Bank) of SNC-Lavalin, Inc. with a mandate to monitor the company's development of an ethics and compliance program consistent with the World Bank's Integrity Guidelines, including but not limited to anti-corruption compliance. Scope of the ten-year monitorship, shortened to eight years after satisfying the terms of the independent monitor agreement, included the company's operations across the globe in South America, the Middle East, Southeast Asia, East Asia, Europe, Africa, and North America.
- Independent monitor by appointment of the Department of the Army with a mandate to supervise ITT Corporation's performance under an Administrative Compliance Agreement in October 2007. Other attorneys in the firm, as part of the ITT Independent Monitor team, have addressed compliance areas, training, investigations, and employee communications.
- Independent monitor by appointments of the U.S. Department of Homeland Security and the U.S. Department of Justice, supervising various corporate entities.