

Webcast: The Patchwork Quilt of Whistleblower Programs

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A growing number of federal, state, and international whistleblower programs create a complex and often overlapping landscape for companies facing potential allegations of misconduct. From programs established to generate enforcement leads for the SEC, CFTC, DOJ, FinCEN, and the IRS, to analogous international whistleblower mechanisms, each program has its own incentives, protections, and reporting mechanisms. These nuances result in significant enforcement risks for businesses across industries, but also opportunities to demonstrate effective compliance controls. This webcast explores the evolving whistleblower framework both in the United States and abroad, recent whistleblower trends, and best practices for managing whistleblower complaints while mitigating legal and reputational exposure.

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PANELISTS: **Greta Williams**, Co-Partner in Charge of Gibson Dunn's Washington, D.C. office, is a nationally recognized employment lawyer and trusted advisor to companies facing high-profile employment litigation, internal investigations, and executive-level employment disputes involving claims of discrimination, harassment, whistleblower retaliation, noncompete violations and trade secret theft. Known for leading sensitive workplace investigations and handling complex cases with discretion and impact, Greta is recognized by *Lawdragon 500*, *Benchmark Litigation*, and *Best Lawyers in America* as one of the leading employment lawyers in the country. **Matt Axelrod**, a nationally recognized white-collar defense lawyer with extensive criminal, national security, and export enforcement experience, serves as co-chair of the firm's Sanctions and Export Enforcement Practice Group. Matt's practice focuses on internal investigations, crisis management, and white collar criminal defense for U.S. and multinational companies. From 2021-2025, Matt served as the Senate-confirmed Assistant Secretary for Export Enforcement at the U.S. Department of Commerce's Bureau of Industry and Security (BIS), where he led a team of over 200 agents, analysts, and compliance specialists responsible for enforcing the country's export controls. Matt also previously spent 14 years at the U.S. Department of Justice. **John D.W. Partridge**, a Co-Chair of Gibson Dunn's FDA and Health Care Practice Group and Chambers-ranked white collar defense and government investigations lawyer, focuses on government and internal investigations, white collar defense, and complex litigation for clients in the life science and health care industries, among others. John has particular experience with the Anti-Kickback Statute, the False Claims Act, the Foreign Corrupt Practices Act, and the Federal Food, Drug, and Cosmetic Act, including defending major corporations in investigations pursued by the U.S. Department of Justice and the U.S. Securities and Exchange Commission. **Katharina Humphrey** is a partner in Gibson Dunn's Munich office. She advises clients in Germany

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and throughout Europe on a wide range of compliance and white collar crime matters. Katharina regularly represents multi-national corporations in connection with cross-border internal corporate investigations and government investigations. She has significant expertise in the areas of anti-bribery compliance – especially regarding the enforcement of German anti-corruption laws and the U.S. Foreign Corrupt Practices Act (FCPA) –, technical compliance, as well as sanctions and anti-money-laundering compliance. She also has many years of experience in advising clients with regard to the implementation and assessment of compliance management systems. **Osman Nawaz** is a litigation partner in the New York office, and a member of the firm's White Collar Defense and Investigations and Securities Enforcement and practice groups. He advises clients on internal and government investigations and enforcement actions, as well as follow-on civil litigation and regulatory and compliance-related issues. Prior to joining Gibson Dunn, Osman concluded a 14-year career with the U.S. Securities & Exchange Commission (SEC). During his time with the SEC, he worked in the agency's New York Office, serving through multiple administrations and in roles ranging from Staff Attorney to Assistant Regional Director, and ultimately serving as a Senior Officer leading a nationwide enforcement group. **Sanford W. Stark** is a partner in Gibson Dunn's Washington D.C. office and the global Chair of the firm's Tax Controversy and Litigation Practice Group. Sanford counsels on a wide range of complex domestic and international tax issues and has served as counsel in a number of the largest tax controversy and litigation matters in recent years. He is consistently named one of the nation's leading Tax Controversy lawyers as recognized in *Chambers USA*, *The Best Lawyers in America*, the *World Tax Experts Guide*, the *Tax Controversy Leaders Guide*, *ITR World Tax*, and other publications. Sanford previously served as a Trial Attorney in the Tax Division of the U.S. Department of Justice, where he received the Tax Division's Outstanding Attorney Award. © 2025 Gibson, Dunn & Crutcher LLP. All rights reserved. For contact and other information, please visit us at www.gibsondunn.com. Attorney Advertising: These materials were prepared for general informational purposes only based on information available at the time of publication and are not intended as, do not constitute, and should not be relied upon as, legal advice or a legal opinion on any specific facts or circumstances. Gibson Dunn (and its affiliates, attorneys, and employees) shall not have any liability in connection with any use of these materials. The sharing of these materials does not establish an attorney-client relationship with the recipient and should not be relied upon as an alternative for advice from qualified counsel. Please note that facts and circumstances may vary, and prior results do not guarantee a similar outcome.

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