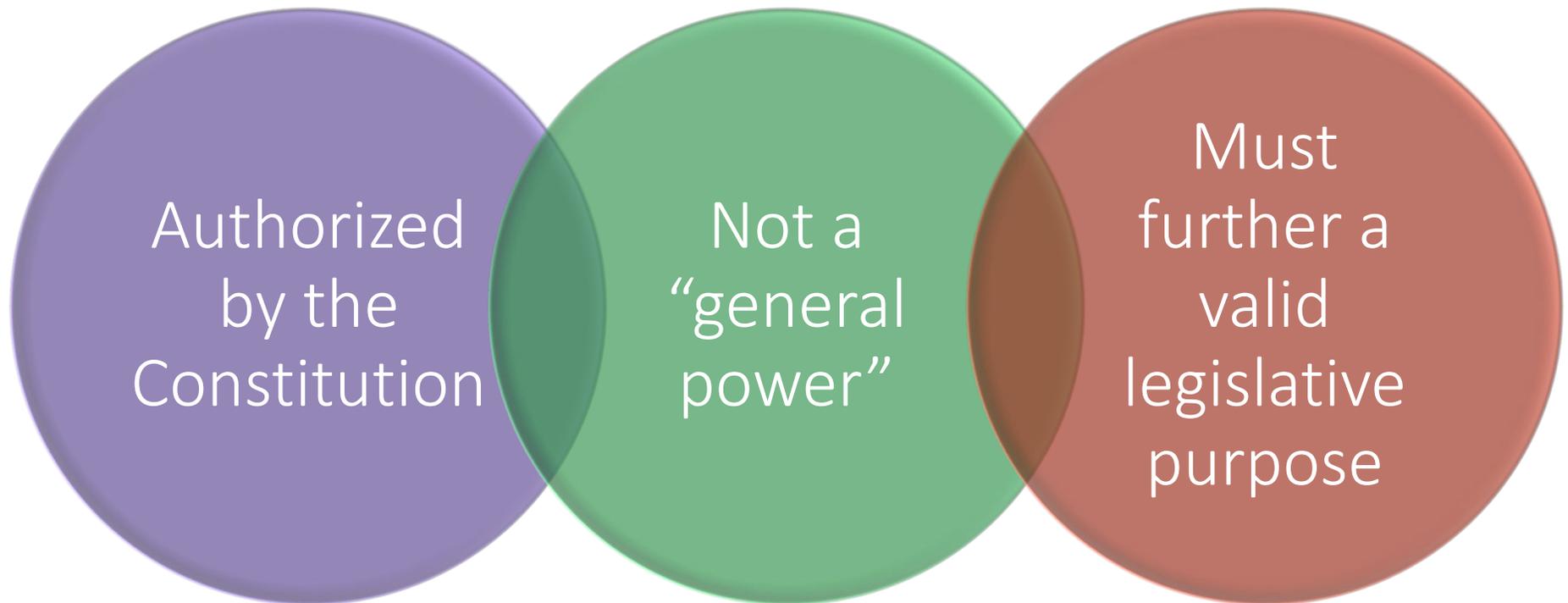


GIBSON DUNN

New Authorities/New Priorities:  
Congressional Investigations in  
the 117<sup>th</sup> Congress

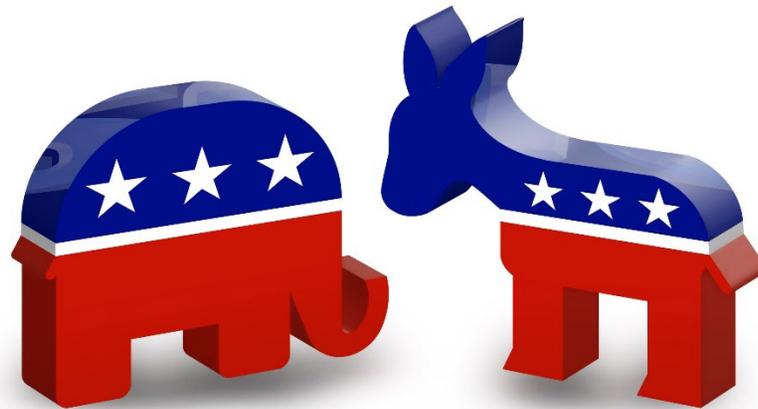
December 8, 2020

# Congressional Investigations Powers



# Purposes of Congressional Investigations

- Expose actual criminal or civil wrongdoing
- Hold a company responsible for its actions
- Advance a policy preference
- Advance legislation
- Bolster a Member's or party's political agenda or position



# Congressional Investigatory Tools

- Requests for information
- Interviews and depositions
- Hearings
- Subpoenas
  - Generally no pre-enforcement review
- Referral to Executive Branch for criminal prosecution
  - Congress may refer, but Executive Branch may proceed regardless of Congress's views.
  - Prosecute false statements to Congress, obstruction, destruction of evidence, etc.



# Subpoena Power

- Document requests usually begin with a letter and are followed by a subpoena, if necessary.
- Every standing committee has the authority to issue subpoenas. This is authorized under both House and Senate rules, but the specific procedures vary by committee.
- Some committees require that some minority members be present for the subpoena vote.
- Subpoenas can be friendly.

Served on me at 11 PM  
10 Oct. 1960, outside of the Congressional  
Hotel,  
Washington  
D.C.  
E.P.

UNITED STATES OF AMERICA  
Congress of the United States

To Dr. Limas Fausling  
Congressional Hotel  
Washington, D. C.

Meeting:  
Pursuant to lawful authority, YOU ARE HEREBY COMMANDED to appear  
before the Internal Security Subcommittee of the  
Committee on the Judiciary  
of the Senate of the United States, on Tuesday, October 11, 1960,  
at 10:30 o'clock a. m., at their committee room 323C New Senate  
Office Bldg., Washington, D. C., then and there  
to testify what you may know relative to the subject matters under consid-  
eration by said committee.  
You are hereby commanded to bring with you all signatures or purported  
signatures to the petition presented by you to the Secretary General of the  
United Nations on January 15, 1958, together with all letters of transmittal  
by which, or in connection with which, such signatures were transported to you  
or received by you. Pursuant to Senate Resolution 366 approved by the 81st  
Congress—2d, as amended and extended and Senate Res. 242 agreed to Feb. 9, 1960.  
With respect to Communist participation in, or support of, propaganda campaign  
against nuclear testing, and other Communist or Communist-front activity with  
respect to which you may have knowledge.

Retreat fail not, as you will answer your default under the pains and pen-  
alties in such cases made and provided.

To JOSEPH C. DUKE, Sergeant at Arms of the Senate of the United States  
and/or F. W. Schroeder, William Williams, Internal Security Subcommittee, of  
the United States Senate.

Given under my hand, by order of the committee, this  
10th day of October, in the year of our  
Lord one thousand nine hundred and sixty

THOMAS J. DUKK  
Vice-Chairman, Committee on the Judiciary  
and Internal Security Subcommittee.

# Congressional Contempt

- Although Congress does not frequently resort to its contempt power to enforce subpoenas, it generally has three sources of contempt authority.

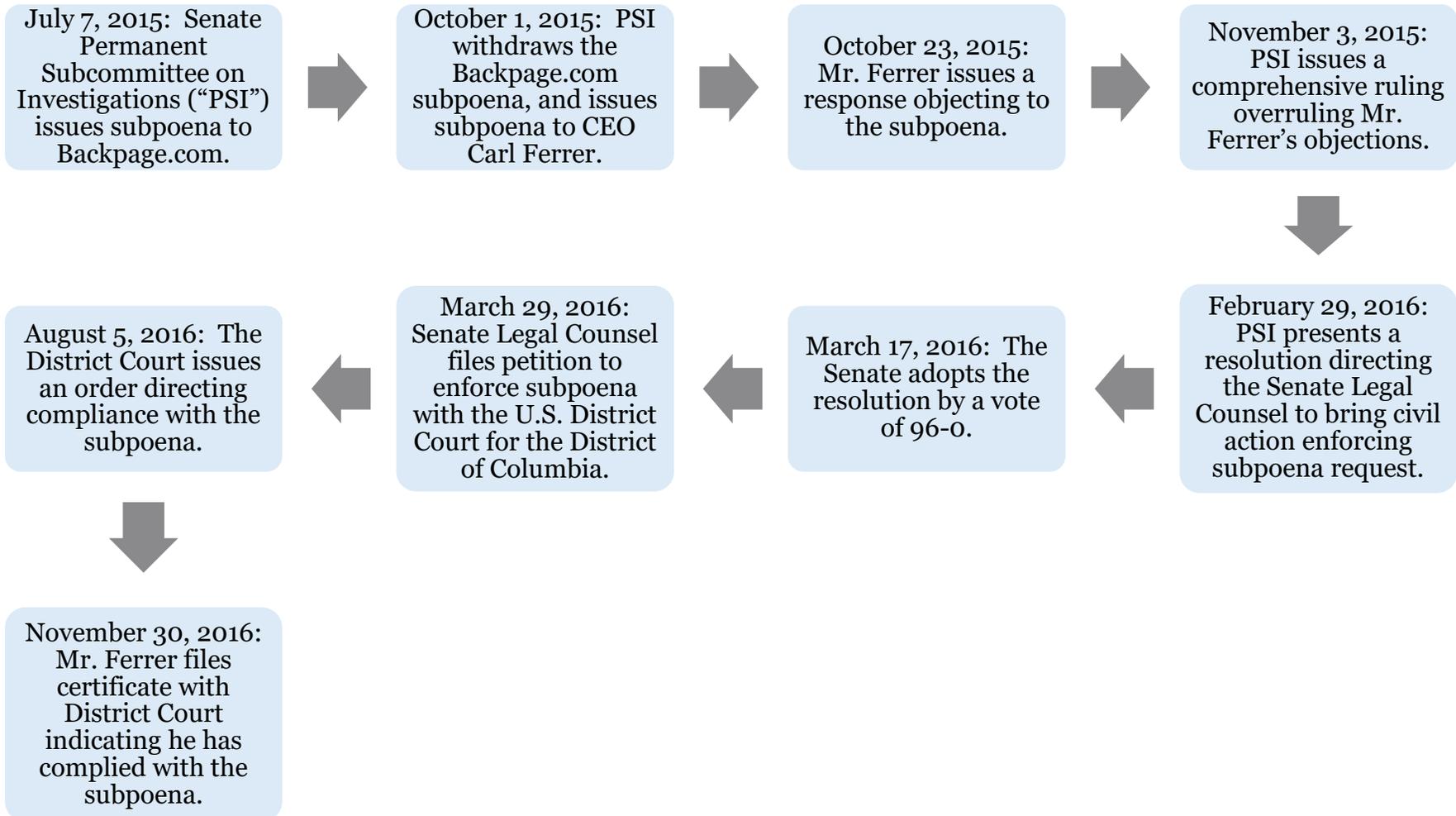
**Inherent**  
(both House  
and Senate)

**Criminal**  
(both House  
and Senate)

**Civil**  
(Senate, and  
if authorized  
by resolution,  
House)

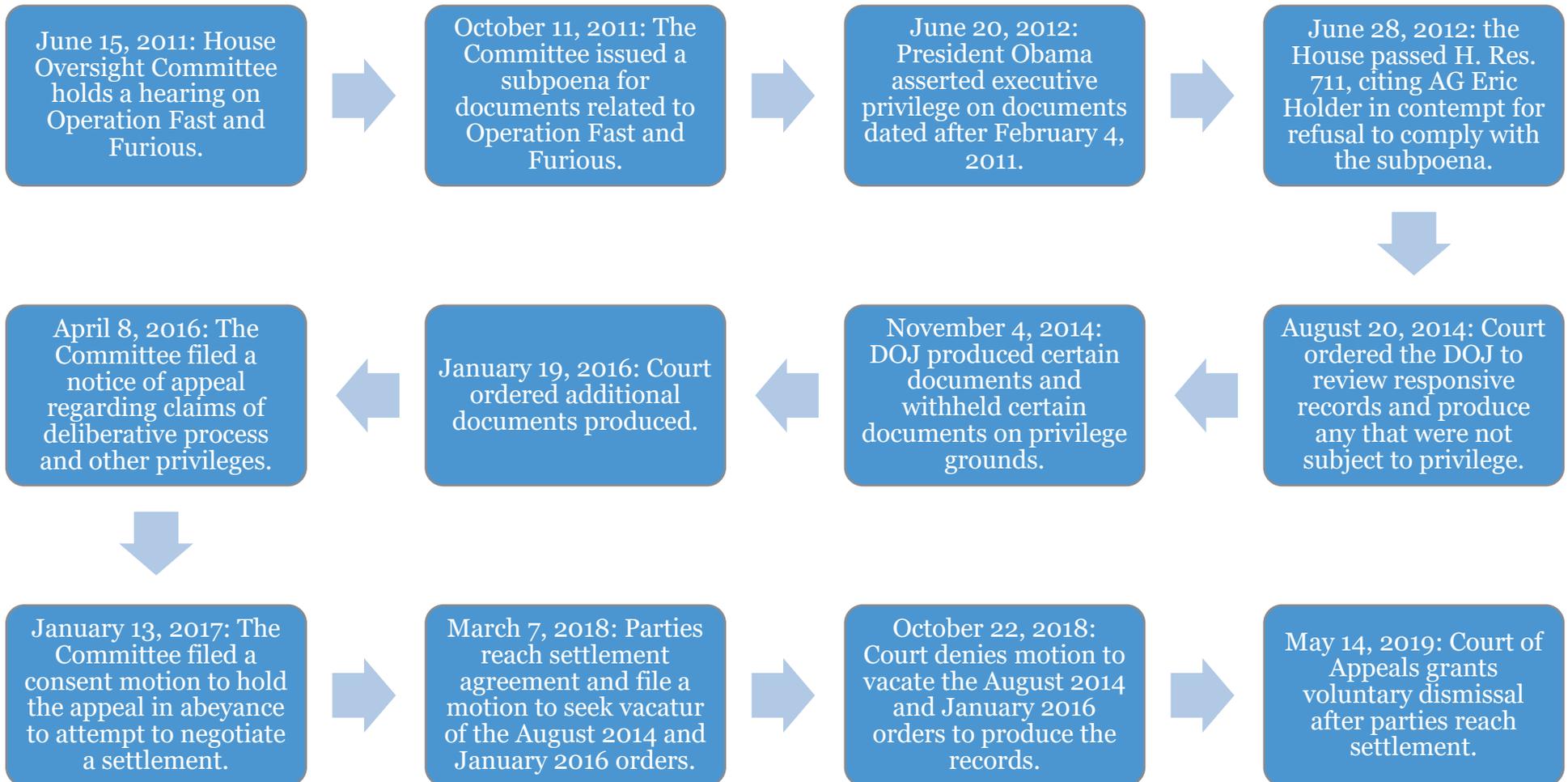


# Backpage.com Subpoena Timeline



The entire process took approximately **17 months**.

# Fast and Furious Subpoena Timeline



# Congressional Investigation Defenses

Committee  
Jurisdiction  
(Legislative  
Purpose)

First  
Amendment

Fourth  
Amendment

Fifth  
Amendment

Attorney-  
Client  
Privilege &  
Attorney  
Work  
Product

# Committee Jurisdiction

- Investigation must relate to a legislative purpose.
  - But courts interpret “legislative purpose” broadly.
- Questions must be pertinent to subject matter of inquiry.
- The subject matter of an inquiry must be within the scope of jurisdiction clearly delegated to the committee by Congress.



## *Trump v. Mazars* (SCOTUS)

- In April 2019, three different House committees issued subpoenas for the President's financial records.
- In the majority opinion, writing for a 7-justice majority, Chief Justice John Roberts acknowledged that Congress has the power to obtain information so that it can craft legislation effectively, but held that congressional subpoenas are valid only if they serve a "valid legislative purpose" and are not intended for law enforcement purposes.
- The Court took a hard look at "valid legislative purpose" and suggested that attorney-client privilege applies to congressional investigations.

## *Committee on the Judiciary v. McGahn* (D.C. Circuit)

- As part of its impeachment investigation into alleged misconduct by President Trump and his advisors, the House Judiciary Committee issued a subpoena to Don McGahn to appear at a hearing to testify and produce requested documents. McGahn refused to appear, and the committee filed suit to enforce its subpoena.
- The district court ruled that the committee had standing and a cause of action to enforce its subpoena, and rejected McGahn's claim of absolute immunity.
- On appeal, the *en banc* D.C. Circuit held that the House Judiciary Committee has standing to seek judicial enforcement of its subpoenas.

# Constitutional Defenses

- **First Amendment.** Balance the interest in privacy against the need for disclosure (has never succeeded in court).
- **Fourth Amendment.** Reasonableness varies depending upon the “nature, purposes, and scope of the inquiry.”
  - Overly broad demands for documents that lack congruence and proportionality to the scope of the investigation may violate protection against search and seizure, but some cases challenge this argument.
- **Fifth Amendment.** Individuals can invoke right against self-incrimination. Corporations cannot.
  - Generally applies only to testimony, although in certain circumstances the privilege applies to the act of producing documents (when the documents amount to “Testimonial Communications”).
  - Congress can compel testimony by granting transactional immunity or use and derivative use immunity.
  - Choose your words carefully, so as not to waive the privilege.
    - In 2013, Lois Lerner invoked the privilege before the House Committee on Oversight and Reform, but also stated that she had done nothing wrong.
    - Chairman Darrell Issa claimed her statement waived the privilege, and Congress referred the matter to the U.S. Attorney for the District of Columbia for criminal contempt charges when Lerner refused to testify.

# Attorney-Client Privilege

- Elements of Attorney-Client Privilege: (1) communication, (2) made in confidence, (3) to an attorney, (4) by or to a client, (5) for purposes of seeking or obtaining legal advice.
- Both the House and Senate have taken the position that they are not required to recognize privilege.
- Committees often require that claims of privilege be logged per normal procedures applicable to civil litigation.



# Work Product Doctrine

- The Doctrine protects documents prepared in anticipation of litigation.
- The protection is waived if disclosure substantially increases the opportunity for potential adversaries to obtain the information.
- It is not clear whether the privilege applies to congressional investigations, but there is substantial authority that they are not “adversarial proceedings.”



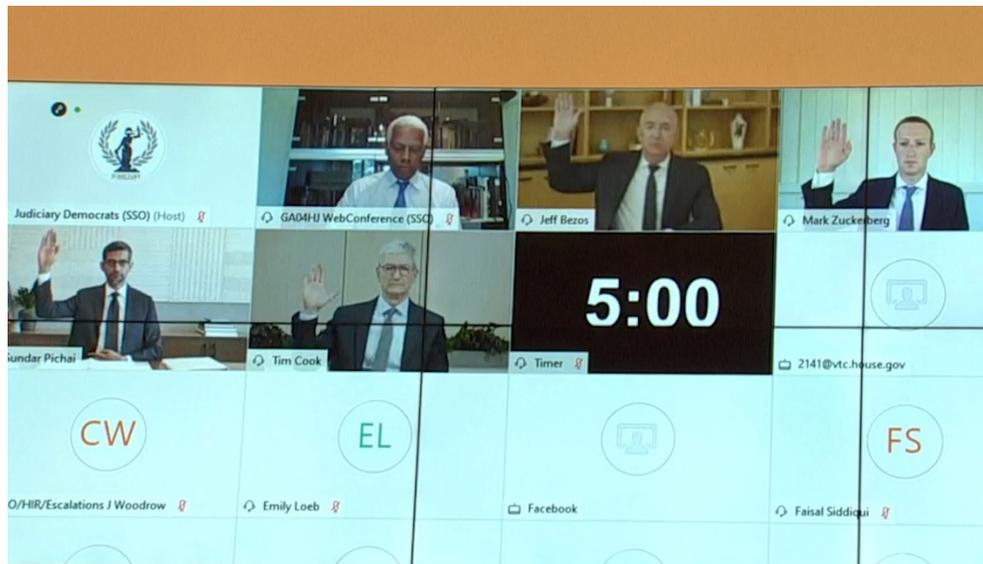
# Impact of COVID-19 Protocols on Investigations

- **Investigations**

- Remain primarily document-oriented
- Fewer depositions and transcribed interviews

- **Hearings**

- Virtual, rather than in person
- More difficult to engage in questioning



# LAY OF THE LAND IN THE 117TH CONGRESS (SENATE)

## Homeland Security & Gov. Affairs



Rob Portman (R-OH) Gary Peters (D-MI)

## Health, Education, Labor & Pensions



Richard Burr (R-NC) Patty Murray (D-WA)

## Armed Services



Jim Inhofe (R-OK) Jack Reed (D-RI)

## Commerce, Science & Transportation



Roger Wicker (R-MS) Maria Cantwell (D-WA)

## Judiciary



Charles Grassley (R-IA) Dick Durbin (D-IL)

## Finance



Mike Crapo (R-ID) Ron Wyden (D-OR)

## Banking, Housing & Urban Affairs



Pat Toomey (R-PA) Sherrod Brown (D-OH)

## Aging



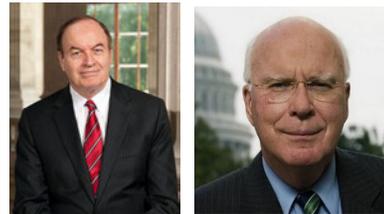
Tim Scott (R-SC) Bob Casey (D-PA)

## Agriculture



John Boozman (R-AR) Debbie Stabenow (D-MI)

## Appropriations



Richard Shelby (R-AL) Patrick Leahy (D-VT)

## Budget



Lindsay Graham (R-SC) Bernie Sanders (I-VT)

## Foreign Affairs



James Risch (R-ID) Bob Menendez (D-NJ)

# LAY OF THE LAND IN THE 117TH CONGRESS (HOUSE)

## Labor & Education



Bobby Scott (D-VA) Virginia Foxx (R-NC)

## Transportation



Peter DeFazio (D-OR) Sam Graves (R-MO)

## Appropriations



Rosa DeLauro (D-CT) Kay Granger (R-TX)

## Energy & Commerce



Frank Pallone (D-NJ) Cathy McMorris Rodgers (R-WA)

## Financial Services



Maxine Waters (D-CA) Patrick McHenry (R-NC)

## Oversight & Government Reform



Carolyn Maloney (D-NY) James Comer (R-KY)

## Homeland Security



Bennie Thompson (D-MS) Mike Rogers (R-AL)

## Judiciary



Jerrold Nadler (D-NY) Jim Jordan (R-OH)

## Ways & Means



Richard Neal (D-MA) Kevin Brady (R-TX)

## Science, Space & Technology



Eddie Bernice Johnson (D-TX) Frank Lucas (R-OK)

# Potential Committee Inquiries & Investigations

- **House Select Subcommittee on the Coronavirus Crisis**
  - Pandemic Response and Use of CARES Act Funds
    - Vaccine development
    - COVID treatments
    - Medical devices
    - PPE shipments
  - Use of CARES Act Funds
    - Whether CARES Act funds are used as Congress intended
    - Focus on private equity companies who benefitted from PPP funds



Rep. James Clyburn (D-SC),  
Chair

## Private Equity's Backdoor Path to PPP Cash Revealed in Data Dump

### More than half of emergency small-business funds went to larger businesses, new data shows

The Trump administration has emphasized PPP loans to small firms, but most of the \$522 billion went to about 600 larger companies and chains

# Potential Committee Inquiries & Investigations

- **House Oversight & Government Reform Committee**

- Prescription drug prices
- Government contract issues
- Health care access issues
- Consumer protections
- Census and voting reforms

**Oversight Committee to Hold Hearing Examining Risks to Accurate and Complete Census Count**

Dec 2, 2020 | Press Release

- **House Financial Services Committee**

- Regulatory compliance
- Consumer protections
- Eviction protections
- Oversight of the Paycheck Protection Program
- Small and minority business access to capital
- Industry interaction with Trump Administration



# Potential Committee Inquiries & Investigations

- **House Judiciary Committee**

- Competition issues, particularly regarding Big Tech
- Content moderation policies at social media companies
  - [Section 230 of the Communications Decency Act](#)
- Immigration enforcement
- Racial justice and civil rights
- Election process and voter irregularities
- Cybersecurity

TECH

## House Panel Says Big Tech Wields Monopoly Power

Democratic-led report concludes after 16-month probe that Amazon, Facebook, Google and Apple stifle competition

- **House Energy & Commerce Committee**

- Drug pricing and health care access
- ACA and health insurance plans
- Surprise medical billing
- Consumer protections
- Climate change and the oil/gas industry

## **PALLONE, WALDEN, ALEXANDER, MURRAY EXPAND BIPARTISAN SURPRISE BILLING INVESTIGATION INTO PHYSICIAN STAFFING COMPANIES, TOP INSURERS**

### **ENERGY & COMMERCE COMMITTEE RELEASES REPORT DETAILING TRUMP ADMINISTRATION ENVIRONMENTAL ROLLBACKS**

Oct 28, 2020 | Press Release

# Potential Committee Inquiries & Investigations

- **Senate Judiciary Committee**

- Mail-in voting and voter fraud
- FBI Russia investigation
- Hunter Biden

**After Biden win, GOP eyes investigations into the 2020 election**

- **Senate Homeland Security Committee**

- Social media companies and political speech
- Opioids
- Cybersecurity
- Securing the supply chain
- Coronavirus oversight and pandemic response

- **Senate Finance Committee**

- Drug pricing
- COVID-19 response

**Does Section 230's Sweeping Immunity Enable Big Tech Bad Behavior?**

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October 28, 2020

253 Russell Senate Office Building

# Work Plan for Effectively Managing a Congressional Investigation



# Risk Assessment

Develop key facts with respect to areas of congressional interest

- Health and Safety
- Consumer Protection
- Competition

Targeted email searches and document analysis

- Leverage previous collections
- Identify “hot” documents
- Identify helpful documents

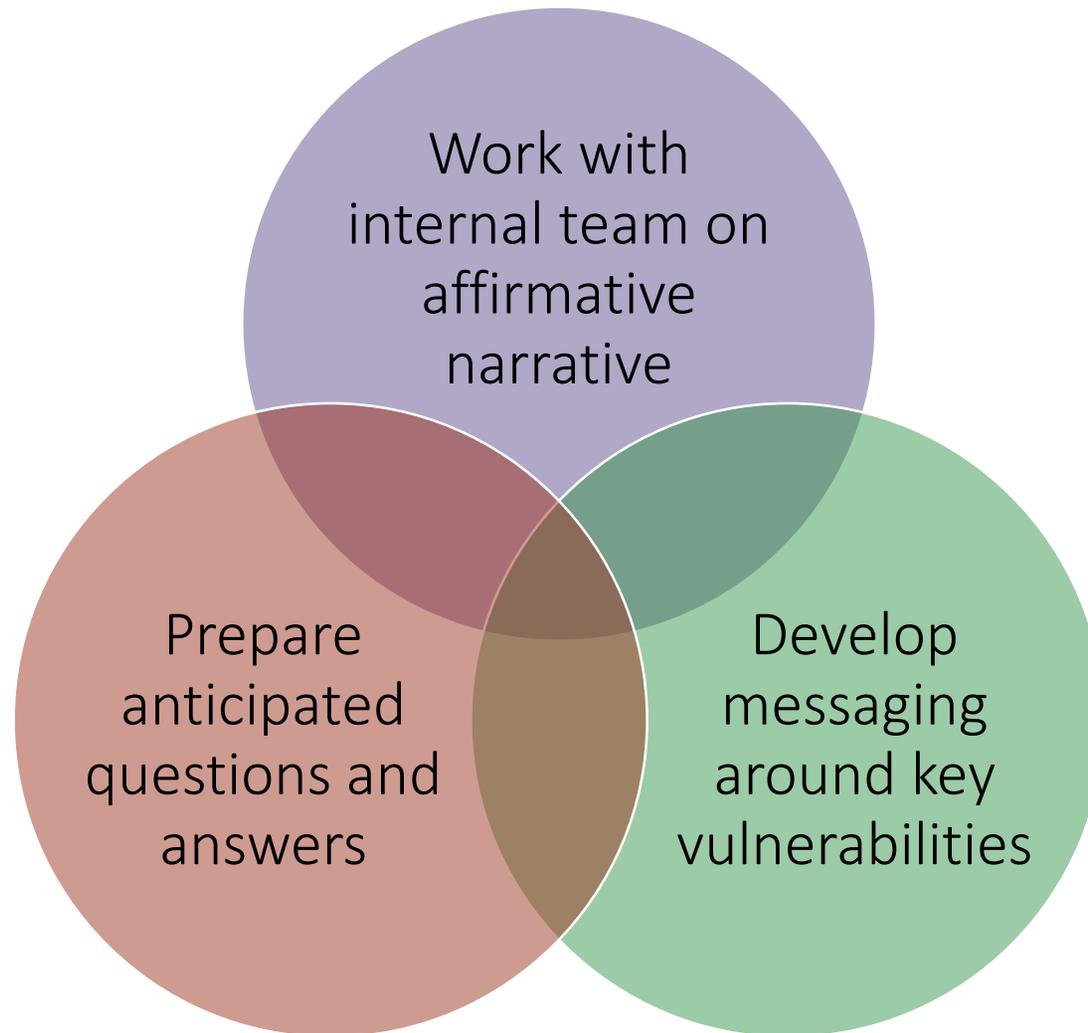
Interviews with key personnel

- Leverage information from previous interviews
- Identify key vulnerabilities
- Assess potential witnesses

Intelligence gathering on Capitol Hill

- Coordinate with government relations team
- Anticipate future investigations and legislative initiatives

# Narrative Development



# Witness Preparation

Identify key witnesses

Design and conduct targeted issue sessions

Instruction on best practices for hearing testimony, depositions, and staff interviews

In-mode Q&A with immediate feedback

Conduct mock hearings

Use demonstratives to show good and bad witness testimony

# Training

## Internal/external communications protocols

- Approval processes
- Distribution lists
- Designated speakers

## Maintain attorney-client and work product privilege

- Do not share materials provided by or to lawyers
- Do not delete captions that reflect work product or privilege, or forward or copy the text of these documents
- Do not discuss privileged information with anyone outside of your organization

## Email “hygiene”

- Do not use work email for personal communications, or personal email for work communications
- Do not suggest a topic is better discussed over phone or in person

# Team Organization

Organize and  
structure response  
team

Define roles

Structure  
coordination  
between internal and  
external stakeholders

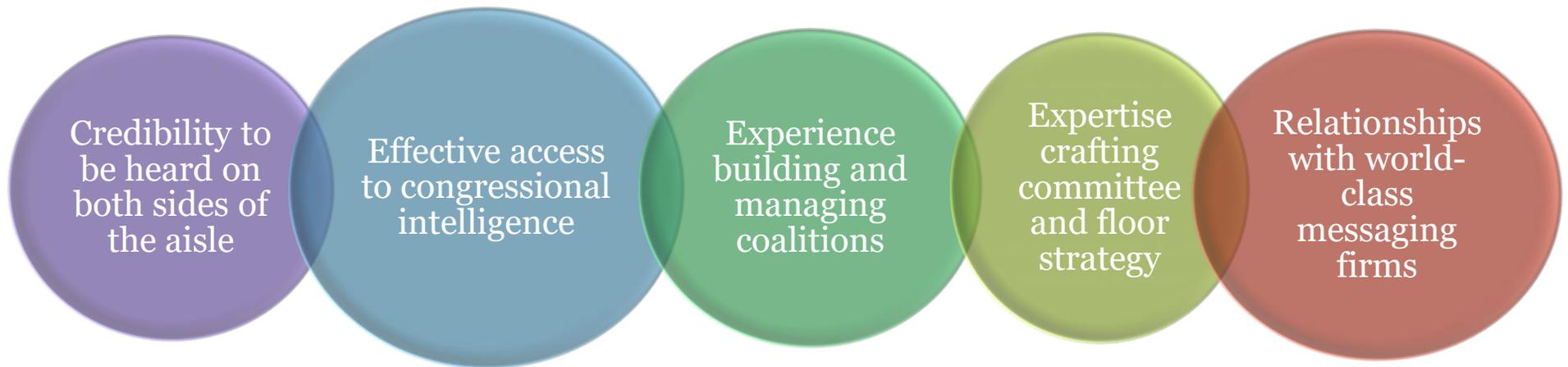
Ensure consultants  
are brought under  
the attorney-client  
privilege

# Top Mistakes

- **Facts:** failure to identify and verify
- **Corporate message:** unclear or undetailed
- **Internal communications:** understanding the risks and settling on a strategy
- **Context:** failure to adapt to type of investigation
- **Care and concern:** inadequate attention
- **Legal:** preserving privilege and assessing collateral consequences
- **Knowing the rules:** vary by committee
- **Big picture:** anticipating what might come next



# The Gibson Dunn Advantage



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- Most participants should anticipate receiving their certificate of attendance via email approximately four weeks following the webcast.
- Virginia Bar Association members should anticipate receiving their certificate of attendance six weeks following the webcast.
- Please direct all questions regarding MCLE to [CLE@gibsondunn.com](mailto:CLE@gibsondunn.com).

# Gibson Dunn Webcasts

## *Upcoming Webcasts*

- [Dec. 10, 2020 | International Anti-Money Laundering and Sanctions Enforcement](#)

## *Recorded Webcasts (CLE credit available)*

- [What's Next? The Legislative and Policy Landscape After the 2020 Election](#)
- [SEC Enforcement Focus on COVID-19 Issues and Key Areas of Risk](#)
- [Corporate Compliance and Sentencing Guidelines](#)
- [Managing Internal Audit](#)
- [Spoofing What it is, where it's going](#)
- [Trends in Government Investigations into Foreign Influence in the Private Sector: A discussion of FARA and related provisions](#)
- [Negotiating Closure of Government Investigations: NPAs, DPAs, and Beyond](#)

# Michael Bopp

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Michael Bopp is a partner in the Washington, D.C. office, Chair of the firm’s Congressional Investigations Subgroup, Chair of the firm’s Public Policy Practice Group, and a member of the Firm’s White Collar Defense and Investigations, Crisis Management, and Financial Institutions Practice Groups. Mr. Bopp’s practice focuses on congressional, internal corporate, and other government investigations, public policy and regulatory consulting in a variety of fields, and managing and responding to major crises involving multiple government agencies and branches. BTI Consulting named Mr. Bopp to its 2018 BTI Client Service All-Stars list, recognizing the “lawyers who truly stand out as delivering the absolute best client service” as determined by a poll of corporate counsel.

During more than a decade on Capitol Hill, Mr. Bopp led or played a key role in major investigations in both the Senate and House of Representatives, including four special investigations. In these capacities, he developed the strategy and set the agenda, and managed the discovery efforts for numerous investigations and orchestrated more than 100 committee hearings. Since joining Gibson Dunn in 2008, Mr. Bopp has defended clients in dozens of Congressional and other investigations and has prepared numerous CEOs and other top executives for committee hearings, depositions, and interviews. He also brings his more than two decades of investigations experience to bear on internal investigations on important matters for a variety of clients.

Representative engagements include:

- Counsel for pharmaceutical manufacturer in House Oversight and Government Reform investigation of drug pricing and efforts to extend patents;
- Counsel for health insurance company, multiple government contractors, and a nonprofit entity in House and Senate investigations relating to the Affordable Care Act;
- Counsel for Big 4 accounting firm in an investigation by the Senate Permanent Subcommittee on Investigations into alleged offshore tax evasion. This investigation culminated in a hearing at which our client successfully defended its actions resulting in no follow-up by the Subcommittee and avoiding negative press coverage and reputational damage;
- Counsel for private equity firm in Senate Aging Committee investigation of drug pricing;
- Counsel for automaker in connection with potential congressional and executive branch investigations relating to emissions controls.

Mr. Bopp currently chairs the ABA’s Committee on Legislative Process and Congressional Investigations. His contacts are extensive and strong in both Republican and Democratic circles. Mr. Bopp received his law degree *cum laude* from Harvard Law School where he was Articles Editor on the *Journal of Law and Public Policy*. He graduated *magna cum laude*, with honors, in public policy from Brown University.

# Thomas Hungar

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Thomas G. Hungar is a partner in the Washington, D.C., office of Gibson, Dunn & Crutcher LLP. His practice focuses on appellate litigation, and he assists clients with congressional investigations and complex trial court litigation matters as well. He has presented oral argument before the Supreme Court of the United States in 26 cases, including some of the Court's most important patent, antitrust, securities, and environmental law decisions, and he has also appeared before numerous lower federal and state courts.

Mr. Hungar served as General Counsel to the U.S. House of Representatives from July 2016 until January 2019, when he rejoined the firm. As General Counsel, he provided legal advice and litigation representation on a non-partisan basis to the House and its leadership, members, officers, and staff, and he worked closely with numerous House committees in connection with their oversight and investigative activities. Previously, he served as a Deputy Solicitor General of the United States. In that position, he supervised business-related appellate litigation for the federal government, with particular emphasis on patent, antitrust, securities, and environmental appellate cases, and he also oversaw appellate litigation in banking, bankruptcy, tax, government contracts, communications, copyright, labor, trademark, and international trade matters. In private practice, Mr. Hungar's appellate experience has encompassed those areas as well as class actions, constitutional law, employment law, product liability, administrative procedure, insurance coverage and bad faith, and general commercial litigation. He has handled scores of business-related appeals in the Supreme Court and lower appellate courts, and has briefed and argued many high-profile matters.

Mr. Hungar is a Fellow of the American Academy of Appellate Lawyers and is a frequent lecturer in his areas of expertise. While at the Department of Justice, he served as Appellate Counsel to the Intellectual Property Task Force Executive Staff, and he was awarded the John Marshall Award for Outstanding Legal Achievement, the Department's highest award presented to attorneys for contributions and excellence in legal performance, in recognition of his handling of patent-law matters before the Supreme Court.

Mr. Hungar served as an Assistant to the Solicitor General of the United States from 1992-1994. In that position he presented oral argument before the Court and handled numerous other appellate matters for the government. He also served as a law clerk to Justice Anthony M. Kennedy of the Supreme Court and to Circuit Judge Alex Kozinski of the United States Court of Appeals for the Ninth Circuit. He received his law degree from Yale Law School in 1987, where he was a Senior Editor of the *Yale Law & Policy Review*. He received his bachelor of science degree *magna cum laude* in mathematics/computer science and economics from Willamette University in 1984.

# Roscoe Jones, Jr.

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Roscoe Jones, Jr., is a counsel in the Washington, D.C. office of Gibson, Dunn & Crutcher. He is a member of the firm's Public Policy, Congressional Investigations, Crisis Management, and White Collar Defense and Investigations Practice Groups. His practice focuses on advising clients on various public policy matters and helping clients navigate congressional, executive branch, and internal investigations.

Prior to joining Gibson Dunn, Mr. Jones served for almost a decade in high-level roles on Capitol Hill, most recently as Chief of Staff to Representative Abigail Spanberger, as Legislative Director to Senator Dianne Feinstein, as Senior Counsel to Senator Cory Booker, and as Counsel, and later Senior Counsel, on the Senate Judiciary Committee for then-Chairman Patrick Leahy.

Mr. Jones served in several roles at the U.S. Department of Justice. He was an Assistant United States Attorney in the Criminal Division of the Western District of Washington (Seattle), Special Assistant U.S. Attorney in the District of Columbia, and an attorney in the Appellate Section of the Civil Rights Division of the Justice Department. He served as Special Counsel to then-Assistant Attorney General Tom Perez, where he helped oversee the Civil Rights Division's legislative initiatives and directed the Division's response to congressional investigations.

Mr. Jones graduated with high honors from Stanford University and the University of Virginia School of Law, where he was Editor-in-Chief of the *Virginia Journal of Social Policy & Law* and co-founder of the Law School's Center for Race and Law. He clerked for Judge Carl E. Stewart on the U.S. Court of Appeals for the Fifth Circuit and Judge Alexander Williams, Jr., on the U.S. District Court for the District of Maryland. Early in his career, he served as the Francis D. Murnaghan, Jr., Appellate Advocacy Fellow at the Public Justice Center. He has been published in the *Harvard Law & Policy Review*.

Mr. Jones is an adjunct lecturer at the University of Michigan Law School and Yale Law School. He previously taught at the Harvard Kennedy School.

He is admitted to the Bars of Maryland and District of Columbia.

# Megan Kiernan

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Megan B. Kiernan is an associate in the Washington, D.C. office of Gibson, Dunn & Crutcher. She practices in the firm’s Litigation Department and is a member of its Litigation, Appellate and Constitutional Law, White Collar Defense, Congressional Investigations, and Crisis Management Practice Groups.

Ms. Kiernan represents clients in investigations as well as in civil and criminal litigation. Her investigations practice includes enforcement actions, internal investigations, and House and Senate inquiries. Additionally, Ms. Kiernan has significant litigation experience and has briefed cases before federal district and appellate courts and represented clients in proceedings before administrative agencies. She has helped secure significant victories for clients, including a favorable verdict in a jury trial and a reversal of convictions in a criminal appeal. Ms. Kiernan also advises clients on crisis management. She has played key roles in responding to inquiries in high-profile matters involving significant media and political scrutiny—using her investigations and litigation experience to help clients navigate potential liability.

Before joining the firm, Ms. Kiernan clerked for the Honorable Karen Nelson Moore of the United States Court of Appeals for the Sixth Circuit and the Honorable Joan Humphrey Lefkow of the United States District Court for the Northern District of Illinois. She received her law degree, *magna cum laude* and Order of the Coif, from Northwestern University Law School. She was a Senior Articles Editor for the *Journal of Criminal Law and Criminology*, and argued a criminal appeal before the Court of Appeals for the Seventh Circuit through the law school’s Federal Appellate Clinic. Prior to attending law school, she received her undergraduate degree from the University of Pennsylvania, *summa cum laude*.

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