



THE TOP FCPA PRACTITIONERS

F JOSEPH WARIN

GIBSON, DUNN & CRUTCHER LLP

Warin is a towering figure on the foreign bribery scene, known by most as “the dean of the FCPA bar” for his almost unmatched expertise and his presence on the biggest cases.

Warin tops the list of having worked on the most foreign bribery resolutions. He has also secured the most publicly known examples of FCPA declinations issued by the Justice Department, having advised on at least six public declinations since 2010.

One of his biggest FCPA cases was for Brazilian state oil company Petrobras, a highly significant international settlement stemming from the country’s Operation Car Wash investigation. Petrobras faced a major corporate crisis back in 2014 but has now put the matter behind it.

There is a consensus among lawyers at rival firms that Warin is especially effective in front of the boardroom and in high-stakes settlement negotiations; his presence on an FCPA deal has the utmost weight. “He is the person you want on that phone call with the government”, said one practitioner.

Warin, who’s based in Washington, DC, can also call upon a stellar team of well-respected lawyers including Richard Grime and Patrick Stokes. Stokes, the former head of the FCPA Unit, is also widely considered to be one of the top lawyers in the foreign bribery bar. Stokes represented Herbalife Nutrition on its 2020 FCPA settlement.