



S. Joy Dowdle

Partner, Litigation Department

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S. Joy Dowdle is a partner in the Litigation Department of Paul Hastings and is based in the firm's Houston office. She represents corporations, audit and special committees, and individual officers and directors in internal investigations, as well as investigations by the Department of Justice (DOJ), Securities and Exchange Commission (SEC), and other regulatory agencies. Additionally, Ms. Dowdle represents clients in complex commercial and appellate litigation at the federal and state levels, including shareholder derivative and class-action lawsuits. Ms. Dowdle has particular experience with international anti-corruption law, including the Foreign Corrupt Practices Act (FCPA). She has been involved in advising major corporations in the design, enhancement, and implementation of their compliance programs (including internal controls, policies, and procedures); designing and providing comprehensive compliance training to management, employees, and third parties; advising on and conducting transactional anti-corruption due diligence and integration; and conducting investigations and corporate monitorships in Europe, Asia, Africa, and the Americas. Prior to joining Paul Hastings, Ms. Dowdle served as a law clerk to the Honorable E. Grady Jolly of the United States Court of Appeals for the Fifth Circuit, and practiced law in Houston, Washington, D.C., and London.

Recent Representations

Compliance, Investigations, and Monitorships

- Working with a global rare-disease company in the design, implementation, and assessment of its enhanced global anti-bribery and anti-corruption compliance program, including leading in-market assessments in Asia, Europe, and Latin America
- Serving as company counsel facilitating an independent compliance monitorship arising from a top-10, global FCPA resolution with the Securities and Exchange Commission and Department of Justice
- Designing an enhanced compliance program and conducting a global risk assessment for a medical device company

Houston

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Practice Areas

Energy
Securities Litigation
Securities Enforcement
Oil and Gas
Life Sciences and Healthcare
Litigation
Complex Litigation and
Arbitration
Investigations and White
Collar Defense
Anti-corruption and FCPA

Admissions

Texas Bar
District of Columbia Bar
Mississippi Bar
Tennessee Bar

Education

Mississippi College School of
Law, J.D. 2005
Mississippi College, B.S. 2002

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- Advising a Fortune 100, multi-national pharmaceutical company in the continued enhancement of its global anti-bribery and anti-corruption compliance program, including conducting proactive reviews and advising on government-facing strategy and core program components including monitoring, investigations, and remediation
- Led a global assessment of the anti-bribery and anti-corruption compliance program and related internal controls for a multi-national pharmaceutical company
- Represented a multi-national pharmaceutical company in the anti-bribery and anti-corruption due diligence and integration efforts associated with a multi-billion dollar transaction, including leading in-market assessments in Europe and Asia
- Designed and implemented an anti-corruption compliance program for a U.S.-based global exploration and development company
- Designed and implemented an anti-corruption compliance program for a consortium formed to build and operate a multi-billion-dollar oil and gas pipeline in Latin America
- Participated in the corporate monitorship and close out of the deferred prosecution agreement of a Fortune 100, multi-national pharmaceutical company relating to alleged FCPA violations
- Designed a compliance program and related internal controls for an oil and gas drilling and platform construction company
- Conducted a bribery / corruption investigation in Mexico on behalf of a multi-national telecommunications company
- Conducted a Section 10A investigation on behalf of a multi-national chemical and refining company; resulted in favorable resolution with the auditor
- Represented an up-stream oil and gas company in an FCPA investigation by the DOJ and SEC
- Conducted an internal FCPA investigation on behalf of the special committee of the board of directors of an up-stream oil and gas company
- Conducted an internal investigation on behalf of an up-stream oil and gas company relating to an oilfield death
- Represented the chief financial officer of an office services and equipment company in a stock options backdating investigation by the SEC; resulted in favorable settlement
- Represented the chief executive officer of a retail company in a Regulation Fair Disclosure investigation by the SEC; resulted in favorable pre-suit settlement
- Represented the general counsel of a broker-dealer in an administrative proceeding by the SEC alleging failure to supervise; resulted in dismissal of all claims by the Commission

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- Participated in the corporate monitorship of a Fortune 50, multi-national corporation arising from resolution of FCPA violations

Civil Litigations

- Represented an international offshore and onshore drilling and oil field services company in state and federal shareholder derivative actions related to DOJ and SEC investigations of alleged FCPA violations; resulted in favorable dismissals affirmed by the Fifth Circuit
- Represented an international offshore drilling company in consolidated state and federal shareholder derivative actions related to resolution of DOJ and SEC investigations of alleged FCPA violations; resulted in favorable dismissals
- Represented a pharmaceutical company and several of its directors and senior officers in shareholder derivative and class actions arising from DOJ and SEC investigations of alleged Medicaid fraud; resulted in favorable pre-trial settlement
- Represented an internet service corporation in state and federal consumer class actions brought by subscribers; resulted in favorable dismissals
- Represented a mutual fund company in a shareholder class action alleging misrepresentations in fund prospectus; resulted in a favorable dismissal

Accolades and Recognitions

- Recognized as a Texas Rising Star, 2013-2018
- Listed in Texas Monthly's selection of Top Attorneys—Texas' Outstanding Young Lawyers, 2013–2018

Speaking Engagements and Publications

- Panelist, "More Insights into the Monitorship Process Behind the Curtain," ACI's 13th Annual Houston Forum on the Foreign Corrupt Practices Act, January 2019
- Panelist, "Assessing the Value of ISO 37001 for Your Business – Whether, When and How to Seek and Maintain Certification," ACI's 12th Annual Houston Forum on the Foreign Corrupt Practices Act, January 2018
- Presenter, "A Journey to the Dark Side of International Business – Leveraging Front Line Experience to Protect Your Organization and Embed Compliance and Ethics," Society of Corporate Compliance and Ethics, Regional Compliance & Ethics Conference, Dallas, Texas, November 2017
- Faculty, "The Foreign Corrupt Practice Act (and World-Wide Anti-Corruption Enforcement)," Seton Hall Law School, U.S. Healthcare Compliance Certification Program, June 2017
- Panelist, "A Practical Debate on the Value of ISO 37001 and Other Compliance Certifications: Weighing the Pros and Cons in the Life Sciences Context," ACI's

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11th Annual Forum on FCPA & Anti-Corruption for the Life Sciences Industry, June 2017

- Panelist, “Sponsorship and Congresses: 5 Big Mistakes to Avoid,” ACI’s 11th Annual Forum on FCPA & Anti-Corruption for the Life Sciences Industry, June 2017
- Presenter, “DOJ Compliance Program Evaluation Guidance: What is it and What does it mean?,” North Texas Ethics & Compliance Council, May 2017
- Author together with Samuel W. Cooper, Christie A. Mathis & Betsey A. Boutelle, Going, Going, Gone: First Law of the Trump Administration Repeals Regulations Implementing Section 1504 Reporting Requirements for Payments to Governments by Oil, Gas, and Mining Companies, February 2017
- Panelist, “The Transformative Impact of the SEC’s Whistleblower Program: How and Why Companies Need to Brace Themselves for an Increased Number of Reports and Awards to Protect Their Investors,” ACI’s 11th Annual Houston Forum on the Foreign Corrupt Practices Act, January 2017
- Author with Gary F. Giampetruzzi & Katherine K. Solomon, Teva Pharmaceuticals Announces a Reserve of \$520M in View of What Stands to Be the Fourth Largest FCPA Resolution to Date, November 2016
- Panelist, “4th Oil and Gas Anti-Corruption Compliance Exchange,” Houston, Texas, October 2016
- Author with Gary F. Giampetruzzi & Katherine K. Solomon, They Keep Coming: The SEC Enters a \$5.5M Settlement with AstraZeneca PLC Resolving FCPA Allegations, September 2016
- Author with Samuel W. Cooper & Spencer D. Bruck, Take Two—The SEC Adopts Section 1504 Reporting Requirements for Payments to Governments by Oil, Gas, and Mining Companies, July 2016
- Faculty, “ACI’s Third Party Due Diligence and Monitoring Seminar,” Chicago, IL, June, 2016
- Author with Gary F. Giampetruzzi & Emmanuel Gastard, Seal the Deal: Four Steps to Effective FCPA Acquisition Due Diligence & Integration, May 2016
- Author with Gary F. Giampetruzzi & Jena A. Sold, It’s Back—True to the Promise of Continued Scrutiny of Life Sciences, the SEC Enters a \$25M FCPA Resolution with Novartis, April 2016
- Author with Gary F. Giampetruzzi & Christopher F. Allen, Your Joint Venture In Fact Can Be Your Problem: Bristol Meyers Squibb Pays \$14M to Resolve FCPA Allegations, October 2015
- Author with Samuel W. Cooper, Proactive Thinking About International White Collar Investigations: How to Mitigate Risks and Manage Key Issues, International White Collar Enforcement, 2015 Edition
- Author with Gary F. Giampetruzzi & Lucy B. Jennings, Inside Out: The SEC

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Awards \$1 Million Plus to Yet Another Compliance Professional Turned Whistleblower, May 2015

- Author with Gary F. Giampetruzzi & Jennifer A. Ebling, Not Finished With You Yet—The U.S. Government Extends its Deferred Prosecution Agreement with Biomet, Inc. Again Underscoring the FCPA Risk in Life Science, March 2015
- Author with Gary F. Giampetruzzi & Lucy B. Jennings, SEC Sends a \$30 Million-Plus Warning to Companies: Beware of Foreign Whistleblower, September 2014
- Panelist, “Dodd-Frank sections 1502 (Conflict Minerals) & 1504 (Government Payment Reporting): Where things stand and What oilfield services companies are doing to prepare,” Institute for Energy Law, Oilfield Services Practice Committee Meeting, October 2013
- Author with Samuel W. Cooper & Christie A. Mathis, Preparing for Shareholder Lawsuits When Dealing with Foreign Corrupt Practices Act Investigations, August 2013
- Author with Samuel W. Cooper, Federal Court Vacates the SECs Section 1504 Reporting Requirements for Payments to Government by Oil, Gas, and Mining Companies, July 2013
- Panelist, “Corporate Boards: Perspectives on Risk and Compliance Issues,” Ernst & Young Risk & Compliance Seminar, May 2013
- Author, Long-Anticipated Guidance on the Foreign Corrupt Practices Act Released by the Department of Justice and Securities and Exchange Commission, November 2012
- Panelist, “Managing Risk in A Global Economy,” Women’s Global Leadership Conference in Energy & Technology, October 2012
- Author, Superman and the Selective Waiver Doctrine: The Potential Impact of Waiving Privilege in Government Investigations in Light of Parallel Litigation, July 2012
- Author, SEC Approves Final Dodd-Frank Whistleblower Rules, May 2011

Education

- Mississippi College School of Law, J.D. (summa cum laude, Editor-in-Chief—Mississippi College Law Review, Member—Moot Court Board)
- Mississippi College, B.S. (summa cum laude, with highest honors, Student Body Vice President)

Insights

April 17, 2019

Part II of II—Not a U.S.-Fits-All-Proposition: Four Key Considerations When

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Building the Compliance Framework to Go Global with Patient Support

April 11, 2019

Part I of II—Not a U.S.-Fits-All-Proposition: Four Key Considerations When Building the Compliance Framework to Go Global with Patient Support

October 09, 2017

Does Your Research Compliance Need a Refresh? China's Highest Court Sends a Warning to Life Sciences Companies

February 15, 2017

Going, Going, Gone: First Law of the Trump Administration Repeals Regulations Implementing Section 1504 Reporting Requirements for Payments to Governments by Oil, Gas, and Mining Companies

November 17, 2016

Teva Pharmaceuticals Announces a Reserve of \$520M in View of What Stands to Be the Fourth Largest FCPA Resolution to Date

September 12, 2016

They Keep Coming: The SEC Enters a \$5.5M Settlement with AstraZeneca PLC Resolving FCPA Allegations

July 05, 2016

Take Two—The SEC Adopts Section 1504 Reporting Requirements for Payments to Governments by Oil, Gas, and Mining Companies

June 09, 2016

Ever Active and Perhaps Not So New—The SEC Awards Three Dodd-Frank Whistleblowers

May 04, 2016

Seal the Deal: Four Steps to Effective FCPA Acquisition Due Diligence & Integration

April 06, 2016

It's Back—True to the Promise of Continued Scrutiny of Life Sciences, the SEC Enters a \$25M FCPA Resolution with Novartis

October 12, 2015

Your Joint Venture In Fact Can Be Your Problem: Bristol Meyers Squibb Pays

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\$14M to Resolve FCPA Allegations

May 07, 2015

Proactive Thinking About International White Collar Investigations: How to Mitigate Risks and Manage Key Issues - Thomson Reuters/Aspatore

May 06, 2015

Inside Out: The SEC Awards \$1 Million Plus to Yet Another Compliance Professional Turned Whistleblower

March 26, 2015

Not Finished With You Yet—The U.S. Government Extends its Deferred Prosecution Agreement With Biomet, Inc., Again Underscoring the FCPA Risks in Life Sciences

September 30, 2014

SEC Sends a \$30 Million-Plus Warning to Companies: Beware of the Foreign Whistleblower

August 30, 2013

Preparing for Shareholder Lawsuits When Dealing with Foreign Corrupt Practices Act Investigations

July 08, 2013

Federal Court Vacates the SECs Section 1504 Reporting Requirements for Payments to Governments by Oil, Gas, and Mining Companies