



**Ivan Komaritsky**

**Attorney**

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Ivan Komaritsky is an attorney in DLA's New York office with over 12 years experience with international corporate, regulatory compliance, and internal investigations matters. He advises clients with respect to the Foreign Corrupt Practices Act (FCPA), anti-money laundering (AML), and US economic sanctions and embargoes (OFAC regulations). Ivan guides clients on developing and implementing multinational compliance programs and policies to address risks of corruption, fraud, embezzlement, and violation of OFAC/sanctions legislation. Ivan has conducted numerous internal investigations and FCPA corporate audits in Russia, Eastern Europe (Romania, Czech Republic, Georgia, Azerbaijan), Middle East (Turkey, UAE, Iraq), Central Asia (Kazakhstan, Mongolia) and South East Asia (Philippines, Indonesia). Additionally, Ivan carries out third party due diligence in cross-border and M&A transactions minimizing FCPA risks and ensuring appropriate controls are established and executed by clients.

- Litigation, Arbitration and Investigations

Ivan performs the full cycle of investigation activities including developing work plans, document reviews, drafting outlines, conducting interviews, presenting remediation steps to business leadership teams. Ivan manages document review projects including liaising with vendors, training the review teams, performing searches and quality checks. Ivan has served clients in prominent international public companies focused in the pharmaceutical, digital technology, financial services, and energy fields. He has a law degree from Moscow State University and a Master of Laws degree from Columbia University School of Law. He is admitted to practice law in Russia, New York and Connecticut.

## REPRESENTATIVE INVESTIGATION MATTERS

- Represented a global healthcare company in SEC investigation of potential FCPA violations in connection with government tender in Iraq
- Represented multinational pharmaceutical corporation in DOJ investigation of potential FCPA violations in connection with the government tender for vaccine in Russia

- Investigated alleged improper payments and the use of unauthorized subcontractors by a US aircraft parts manufacturing company in South-East Asia
- Investigated alleged kickbacks by American multinational computer technology corporation to government distributors in Russia
- Advised Indonesian branch of a US pharmaceutical company on a fraud investigation triggered by employees who misappropriated the client's discount cards in Indonesia
- Investigated a multinational technology company's operations in India in relation to government bribery allegations
- Investigated alleged kickbacks by a Russian media vendor of a multinational pharmaceutical company
- Investigated allegations of discount abuse by a government distributor of a multinational pharmaceutical company in Romania
- Investigated allegations of embezzlement by event management vendor of a multinational pharmaceutical company in Czech Republic
- Investigated allegations of misappropriation of marketing budget by the country manager of a global healthcare company in Mongolia
- Investigated alleged misuse of product samples and forgery of internal corporate documents by employees of a multinational pharmaceutical company in Philippines
- Conducted FCPA investigation for a premier biopharmaceutical company of alleged improper payments to senior government official in Ministry of Health of Russia in exchange for increased purchases of client's products

## REPRESENTATIVE REGULATORY COMPLIANCE MATTERS

- Performed global anti-corruption risk and compliance audits and assessments for a multinational pharmaceutical company in Kazakhstan
- Provided FCPA/anti-corruption training to employees, officers, and audit committee members of a multinational pharmaceutical company in Kazakhstan
- Counseled on FCPA/anti-money laundering due diligence protocols applicable to a U.S. insurance company establishing a bank in Moscow
- Investigated allegations of potential off-label promotion of products by consultants of pharmaceutical company in Philippines and South Korea.

## REPRESENTATIVE CORPORATE MATTERS

- Conducted corporate/anti-corruption due diligence for a multinational pharmaceutical company on various supply and distribution arrangements with counterparties in Russia and Kazakhstan
- Performed due diligence in M&A transactions, equity offerings and project finance, including construction of LNG plant for Kazakh oil and gas exploration group

## REPRESENTATIVE SANCTIONS MATTERS

- Performed due diligence of supply arrangements with distributors and direct customers of US welding manufacturer in Russia to assess trade compliance rules as well as compliance with OFAC/sanctions legislation

## CREDENTIALS

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### Admissions

- Connecticut
- New York

### Education

- LL.M., Columbia University School of Law 2007
- J.D., Moscow State University 2005

## NEWS

## **DLA Piper advises Parsec in its US\$320 million sale to Unity**

12 August 2021

DLA Piper is representing Parsec in its sale to Unity (NYSE: U) for US\$320 million.

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## **DLA Piper advises Solis LLC and Parasol Renewable Energy LLC in sale of Clēnera with an enterprise value of US\$433 million**

1 July 2021

DLA Piper represented Solis LLC and Parasol Renewable Energy LLC in the sale of renewable energy company Clēnera to Enlight Renewable Energy LTD.

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