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David Caldwell is Counsel in Simpson Thacher's New York office, where he is a member of the Firm's Government and Internal Investigations Practice. He advises companies, private equity sponsors, and boards of directors on investigations and a range of regulatory compliance matters, including anti-corruption, economic sanctions and anti-money laundering counseling and transactional due diligence.

David has assisted both U.S. and foreign clients with government and internal investigations relating to alleged improper conduct and violations of internal accounting controls across Latin America, as well as in Asia and the Middle East. He also has experience preparing executives and employees for testimony before U.S. enforcement authorities. He routinely advises companies on their internal controls and compliance policies and procedures, including remediation efforts following internal reviews and resolutions with U.S. regulators.

David's representative experience while at Simpson Thacher includes:

- An Asian telecommunications company in successfully resolving an SEC investigation regarding allegations of FCPA violations;
- The board of a U.S. multinational travel management company in a confidential internal investigation;
- A South American energy company in an internal investigation into accounting irregularities;
- A South American forestry company in FCPA and anti-corruption compliance counseling;
- A major South American mining consortium in connection with the design and implementation of an enhanced anti-corruption compliance program;
- A U.S. multinational wellness company in a global review of its compliance policies and procedures;
- A global security services provider in strengthening its anti-corruption policies and procedures and implementing third-party

Practice Focus:

- Litigation
- Corporate Governance
- Government and Internal Investigations
- International Regulatory and Compliance
- Asset Management Litigation

Industries:

- Financial Services
- Technology
- Telecommunications
- Consumer Products
- Business and Professional Services
- Real Estate
- Metals and Mining

- due diligence program;
- A South American-based airline in updating its anti-corruption policy and third-party due diligence protocol;
- Prominent private equity firms and their portfolio companies in DOJ, SEC, and other government investigations concerning a range of issues;
- Private equity firms, portfolio companies, and global multinational corporations in anti-corruption and economic sanctions due diligence and risk mitigation on real estate and M&A transactions and strategic investments; and
- Private equity firms in anti-money laundering counseling with respect to investor onboarding and in designing, evaluating, and auditing anti-money laundering compliance programs.

He received his B.A. from Columbia University in 2006, and his J.D. from Harvard Law School in 2011, where he was Executive Editor of the *Harvard Law Review*.