

William D. Semins

Partner

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OVERVIEW

William Semins conducts cross-border investigations involving fraud, corruption, and human rights violations. He also advises companies regarding a range of compliance risks from foreign corruption to money laundering and global ethical supply chain management. He has conducted internal corporate investigations, as well as investigations into the conduct of prospective and existing foreign agents and business partners in the United States, Europe, the Middle East, North Africa, Asia, and South America. Overall, William has provided hands-on due diligence and investigative services in more than 40 countries.

In addition to helping clients develop effective multidisciplinary compliance programs to detect and prevent potential problems, he has represented clients in matters before the Department of Justice and the Securities and Exchange Commission.

ACHIEVEMENTS

- 2010 Pennsylvania Rising Star
- 2011 Pennsylvania Rising Star

PROFESSIONAL / CIVIC ACTIVITIES

- Co-Chair, K&L Gates Global Ethical Supply Chain Task Force
- Certified Anti-Money Laundering Specialist, ACAMS

SPEAKING ENGAGEMENTS

- Panelist, “Pressure Testing Your Program: Optimizing Compliance Programs and Strengthening Internal Controls for Resilient Risk Management in 2026,” FCPA & Global Anti-Corruption Houston, Houston, TX 27-28 Jan, 2025

- Co-Presenter, “They Didn't Teach This in Law School: Adventures in Compliance & Cross-Border Investigations,” 12th Annual Fraud & Corruption Awareness Seminar, presented by the Institute of Internal Auditors and the Association of Certified Fraud Examiners, Rivers Casino, Pittsburgh, PA, 20 May 2024
- Moderator/Panelist, “DOJ & SEC: Update on Agencies' Enforcement Posture, Compliance, and Data Analytics,” 12th Annual ACI Anti-Corruption Brazil Conference, Sao Paulo, Brazil, 24 May 2023
- Moderator/Panelist, “Creating a Best-in-Class ESG Compliance Program: Engaging with Stakeholders and Leveraging Cross Functional Teams to Identify Key Risk Factors and Ensure Compliance,” 39th Annual ACI FCPA Conference, Washington, D.C., 30 November 2022
- Panelist, Forced Labour and Child Labour in Supply Chains, K&L Gates and Gowling WLG Webinar with Julie Miville-Dechêne, Senator, Senate of Canada, 19 January 2022
- Panelist, “ESG from a Renewable Developer's Perspective: Due Diligence and Procurement Considerations,” ESG For Renewable Energy Financing, Master Class, presented by INFOCAST Virtual, 2 November 2021
- Panelist, “Voluntary Disclosure: Special Edition - A Debrief on the 37th International Conference on the Foreign corrupt Practices Act, 9 December 2020 (Podcast)
- Panelist, “The New Realities of Third-Party Due Diligence with Limited Resources: The Top Five Newest, Most Effective Strategies for Vetting Your Business Partners, Their Partners and More,” 37th Annual ACI FCPA Conference, Washington, D.C., 3 December 2020
- Presenter, “Strategies for Ethical Supply Chain Risk Management”, Organic & Non-GMO Forum, 10 November 2020
- Moderator/Panelist, “Compliance and Risk Assessment in a Time of Transition: How Industry is Tackling New, Emerging Anti-Corruption Challenges,” 7th Mexico Summit on Anti-Corruption (ACI), October 2020
- Presenter, “Modern Slavery and Human Trafficking in the Supply Chain: Issues Affecting Your Business,” CLE Program, K&L Gates, 20 August 2019
- Presenter, “Politically Destabilized Markets and Regime Changes: Multinational Decision-Makers Offer Perspectives on Making the Newest, Toughest Legal and Compliance Calls”, 10th Annual Forum on Anti-Corruption Compliance in High Risk Markets (ACI), Washington, DC, July 2019
- Presenter, “Compliance & Risk Management Strategy Session: Evolving Your Program to Manage the Convergence of Anti-Corruption, Fraud, AML and Economic Sanctions Risks,” 35th Annual International Conference on the FCPA (ACI), Washington, D.C., 28 November 2018
- Presenter, “M&A and Joint Venture Case Studies: The Latest, Most Overlooked Due Diligence and Post-Acquisition Mistakes to Avoid Moving Forward,” ACI's 34th International Conference on the Foreign Corrupt Practices Act in Washington, D.C., November 2017
- Presenter, “Global Supply Chain Risk: Corporate Exposure for Human Trafficking, Forced Labor and Human Rights Abuses,” K&L Gates Webinar, 24 October 2017
- Presenter, “DOJ/SEC Enforcement Trends 2017,” a PwC event, Pittsburgh, PA, June 2017

- Presenter, “How to Build a Relationship without Committing a Crime: Analyzing Political Contributions, Sponsorship and Donations, Gifts, Entertainment and Hospitality Pitfalls,” ACI's 6th Global Forum on Anti-Corruption Compliance in High Risk Markets in Washington, D.C., July 2015
- Presenter, “Middle East Case Study: Iraq, UAE and Saudi Arabia -- How Increased Liability and Evolving Regulatory Changes are Impacting Culture and Anti-Corruption Compliance Business in the Region,” ACI's 3rd Global Anti-Corruption Regulatory and Enforcement Update in Washington, D.C., July 2015
- Presenter, “Russia – State of Enforcement and New Economic Sanctions Restrictions and How They Impact the Anti-Corruption Landscape in Russia,” ACI's 3rd Global Anti-Corruption Regulatory and Enforcement Update in Washington, D.C., July 2015
- Presenter, “Uncovering Red Flags – How to Identify Weak Internal Financial Controls in Your Russian Operations,” at ACI's 7th Annual Russia and CIS Summit on Anti-Corruption in Moscow, Russia, March 2015
- Presenter, “Russia's Amended Anti-Bribery Law: Extended Statute of Limitations, Greater Penalties and More,” Strafford Publication Webinar, November 2014
- Moderator, “Cracking Foreign Markets: How to Avoid Traps While Hunting for Opportunity,” Wisconsin Early Stage Symposium, Madison, WI, November 2014
- Presenter, “Policies in Action: Tales from the Front Lines of Anti-Corruption Compliance,” Madison International Trade Association, Madison, WI, November 2014
- Presenter, “Emerging Trends in Anti-Corruption Compliance,” Moscow Business Leaders Roundtable, K&L Gates event, Moscow Russia, September 2014
- Presenter, “US & EU Export Controls and the Impact of Sanctions,” Moscow Business Leaders Roundtable, K&L Gates event, Moscow, Russia, September 2014
- Presenter, “Doing Business in India,” K&L Gates Webinar, May 2014
- Presenter, “Update on the UK Bribery Act and Enforcement Environment in the UK and Russia,” American Leaders Conference: Anti-Corruption Compliance in Practice, Washington, DC, April 2014
- Presenter, “FCPA and the Newly Amended Anti-Bribery Law in Russia: Compliance Strategies for Expanded Enforcement of Corruption Laws,” Strafford Publication webinar, September 2013
- Presenter, “Russia Joins the OECD Anti-bribery Convention: What will this mean for doing business in Russia?” K&L Gates Webinar, May 2012
- Presenter, “FCPA and Anti-Corruption in Russia: Compliance Strategies Following New OECD Relationship, Recent Enforcement Actions and Other Developments,” Strafford Publication Webinar, August 2012
- Presenter, “FCPA and Anti-Corruption in Russia and the Commonwealth of Independent States: Compliance Strategies for the Region's Unique Cultural and Governmental Intricacies,” Strafford Publications Webinar, May 2011

EDUCATION

- J.D., University of Virginia School of Law, 2002
- A.B., Princeton University, 1993 *(cum laude)*

ADMISSIONS

- Bar of Pennsylvania
- United States District Court for the Western District of Pennsylvania

THOUGHT LEADERSHIP *POWERED BY HUB*

- June 2026, ESG and the Sustainable Economy Handbook
- 30 January 2026, Dyson Forced Labour Case Proceeds to Trial: Key Lessons on Compliance in Global Supply Chains
- 12 June 2025, The FCPA is Back—What Companies Need to Know About DOJ's New America-First Enforcement Priorities
- 12 February 2025, President Trump Orders FCPA Freeze; DOJ Announces Major Policy Realignment De-Emphasizing Corporate Investigations and Enforcement
- 24 June 2021, White House Chooses Exclusion of Silica-Based Products Produced Using Forced Labor, Impacting Solar PVs
- 15 January 2021, More Tools for AML Enforcement and More to Come: Key Considerations from the 2020 Anti-Money Laundering Act and the Corporate Transparency Act
- 9 December 2020, Voluntary Disclosure: Special Edition - A Debrief on the 37th International Conference on the Foreign Corrupt Practices Act
- 14 October 2020, Five New Products from China Added to Forced Labor List
- 8 June 2020, DOJ Emphasizes Data-Driven Approach to Monitoring and Importance of Culture in Latest Adjustments to Corporate Compliance Program Guidance
- 4 June 2020, COVID-19: Mitigating Remote Working Risks - Messaging and Chat Apps
- 22 May 2020, COVID-19: Senior Officials Comment on the Current State of Enforcement, Expectations, and Context Considerations During the COVID-19 Pandemic
- 22 May 2020, COVID-19: Enforcement Trends in Latin America and Corporate Risk Mitigation in the Next Global Hotspot

- 16 May 2019, DOJ Revises Corporate Compliance Guidance Calling Attention to Three Areas Where Most Companies Fall Short: Risk Assessments, Compliance Culture, and Continuous Compliance Program Improvement
- 7 December 2017, Takeaways from the 34th International Conference on the Foreign Corrupt Practices Act

OTHER PUBLICATIONS

- Quoted, “FirstEnergy: Best Practices for Preserving Privilege in Internal Investigations,” *Anti-Corruption Report,* 17 December 2025
- Quoted, “FirstEnergy: Reaffirming Upjohn's Approach to Privilege in Internal Investigations,” *Anti-Corruption Report*, 3 December 2025
- Author, “Holding the Line: Evolving ABAC Practices in a Changing World,” Anti-Corruption Report, July 16, 2025
- Co-Author, "Something's Gotta Give: Navigating Auditor Inquiries in Investigations," *Anti-Corruption Report* (2-part series), 21 December 2022 and 4 January 2023; reprinted in *Cybersecurity Law Report*, *Private Equity Law Report*, *Hedge Fund Law Report*
- Co-Author, “Using Risk Assessments and Contract Clauses to Manage Modern Slavery Supply-Chain Risk,” *Anti-Corruption Report,* 30 March 2022
- Co-Author, “Risk Assessments During Pandemic: The Standard Is Still the Standard,” *Anti-Corruption Report,* 15 September 2021
- Co-Author, “ESG and the Sustainable Economy Handbook,” 13 September 2021
- Co-Author, “White House Chooses Exclusion of Silica-Based Products Produced Using Forced Labor, Impacting Solar PVs”, *K&L Gates Updates*, 24 June 2021; reprinted, *National Law Review, Volume XI, Number 175*
- "Doing More With Less: Tools for Managing Third Party Risk With Scarce Resources," *Anti-Corruption Report*, 28 April 2021; reprinted in *Cyber Security Report*; reprinted in the *Hedge Fund Law Report*
- Co-Author, “More Tools for AML Enforcement and More to Come: Key Considerations from the 2020 Anti-money Laundering Act and the Corporate Transparency Act”, 15 January 2021
- Co-Author, “The Compliance Risks Facing Companies that Use Chat Apps,” *Law360*, 16 June 2020
- Co-Author, “Pandemic Elevates Cos.' Compliance Risks in Latin America,” *Law360,* 27 May 2020
- Co-Author, “The Growing Importance of Fully Integrated Compliance Programs,
- ”The Review of Securities & Commodities Regulation, Vol. 52, No. 9, 8 May 2019
- "Managing Global Corruption Risk in an Era When Everyone Has (or Should Have) a Compliance Program," *Association of Corporate Counsel - South Carolina Chapter Newsletter*, 22 June 2017

- Co-author, “FCPA and Other Anti-Corruption Concerns Facing Companies Doing Business in Argentina and Brazil,” Latin American Law and Business Report, Vol. 20, No. 11, November 2012, Reprinted for Practical Intellectual Corporate Finance Strategies, Vol. 38, No. 22, December 2012
- Co-author, “FCPA: Enforcement Growing Globally,” Global Government Solutions 2010 - The Year Ahead, K&L Gates Publication
- Co-author, “A New Method for Regulatory Antitrust Analysis? Verizon Communications Inc. v. Trinko,” Richmond Journal of Law & Technology, October 2005
- Co-author, “The New FTC Disgorgement and Restitution Policy Statement: 'Exceptional' Remedies Could Lead to Exceptional Penalties,” Antitrust & Trade Regulation Update

NEWS & EVENTS

- 29 September 2025, K&L Gates' White Collar Team Shortlisted for *Global Investigations Review* Awards
- 19 January 2022, Forced Labour and Child Labour in Supply Chains, Hosted by Gowling
- 2-3 November 2021, ESG for Renewable Energy Financing, hosted by Infocast Master Class
- 13 September 2021, K&L Gates Releases ESG and the Sustainable Economy Handbook

AREAS OF FOCUS

- White Collar Defense and Investigations
- Anti-Bribery and Anti-Corruption
- Commercial Disputes

INDUSTRIES

- Corporate Sustainability
- Critical Minerals
- Energy

EMERGING ISSUES

- ESG - Sustainability and Responsible Business

REPRESENTATIVE EXPERIENCE

- Represented a provider of mission-critical program administration solutions for government-funded healthcare programs in connection with inquiries from the US Attorney's Office and the South Carolina Attorney General's Office regarding performance and invoicing by the client on a state procurement contract.
- Assisted an international manufacturer of electrical supplies in conducting a global compliance risk assessment involving operations or sales in more than 50 countries, including preparation of heat map, risk register, and priority roadmap.
- Assisted a leading Singapore-based global marine and offshore engineering group in conducting a multijurisdictional, internal investigation into corruption allegations arising out of Brazil's high-profile Operation Lava Jato investigation; negotiated resolutions with various regulators and prosecutors.
- Acted for a logistics company in relation to a suspected employee bribery issue.
- Conducted a full compliance program assessment, including preliminary risk assessment, policy gap analysis, and evaluation of policies, programs, and training across international operations, with a phased implementation roadmap, for a global solar energy company.
- Performed a compliance program risk assessment of global operations of a technology manufacturer with operations or sales in 30+ countries. The scope included policy gap analysis, 200 stakeholder interviews, preparation of heat map, risk register, and priority roadmap.
- Advised a global nuclear fuel supply company regarding ethical supply-chain risk-management initiatives and the Anti-Modern Slavery Policy for a UK subsidiary.
- Provided export control and sanctions compliance advice to a US-based apparel design and sales company, particularly with regard to supply-chain sourcing and dealings with parties in China subject to expanded US sanctions restrictions and complex questions arising under Russia primary sanctions.
- Completed a compliance risk program assessment of policies and procedures for a global US defense contractor, including third-party due diligence procedures, with a focus on harmonizing US and non-US policies and procedures. The risk assessment included a full review and gap analysis of US/non-US policies.
- Investigated the Indian operations of an international healthcare provider in response to whistleblower complaints alleging real estate-related foreign bribery and kickbacks.
- Conducted an internal investigation involving alleged bribery and corruption in South and Central America on behalf of a medical device manufacturer.
- Conducted due diligence regarding the business ethics and integrity of numerous global agents and distributors on behalf of a manufacturer of security equipment.
- Conducted a compliance audit of Mexican operations of a publicly traded security equipment manufacturer.

- Conducted several internal investigations involving potential corruption issues in Saudi Arabia and United Arab Emirates on behalf of a global oilfield services and equipment provider and security equipment manufacturer.
- Performed anti-corruption compliance due diligence for a provider of products and services for the energy industry in connection with a US$10 billion multinational merger involving more than 700 global resellers, agents, and distributors.
- Conducted a compliance audit of Asian operations of a publicly traded US transportation and logistics company.
- Prepared compliance policies and procedures for a US airline company.
- Completed a compliance risk assessment of operations at the Philippines subsidiary of a US publicly traded technology manufacturer. The scope included environmental compliance, conflicts of interest, ABAC, procurement procedures, labor union relations, and EHS issues.
- Represented a global manufacturer in five separate cross-border investigations involving alleged misconduct at subsidiaries in China, Malaysia, and Australia. Issues included fraud, corruption, and conflicts of interest/self-dealing. The matters involved forensic collections of computers and phones from employees in Malaysia and China and multiple rounds of interviews in both countries. The Australia investigation was in response to a government raid on a subsidiary's office and subsequent detention and questioning of the managing director of the subsidiary.
- Conducted an internal investigation regarding alleged IP theft by the China-based subsidiary of a global software company.
- Provided modern slavery due diligence, contract negotiation, and policy advice to a multinational coffee business.
- Drafted human rights policies and procedures, including a supplier code of conduct, for a global leader in the development and management of high-integrity, high-impact programs for climate, sustainable development, and environmental projects.
- Assisted a global beauty company with supply chain mapping.
- Performed a modern slavery risk assessment for an international horticulture company.
- Negotiated remediation of allegations of forced labor in APAC facilities on behalf of a manufacturer of safety workwear.
- Developed tailored AML programs, including KYC, EDD, and source of funds due diligence, for a global leader in the development and management of high-integrity, high-impact programs for climate, sustainable development, and environmental projects.
- Assisted a bank holding company with day-to-day Bank Secrecy Act (BSA), USA Patriot Act, and applicable UK laws and regulations relating to AML compliance and monitoring.

- Performed a compliance assessment involving multiple workstreams/disciplines on behalf of a global media and communications company with subsidiaries in more than a dozen countries, including the European Union, United Kingdom, Australia, and China. The scope involved preparation of heat map, risk register, and priority roadmap.
- Completed a compliance assessment of operations in China, Brazil, and Mexico, which included engaging and supervising a forensic accounting team, on behalf of a global industrial product manufacturer. Deliverables included a risk register and priority roadmap.
- Performed targeted compliance risk assessments on behalf of a cosmetics company with operations in China, Russia, and Mexico.
- Completed a compliance risk assessment relating to manufacturing operations in Malaysia, including a focus on third-party involvement in obtaining licenses, permits, and tax incentives.
- Engaged as EMEA regional compliance counsel by a global electronics manufacturing company. Activities include monitoring and testing of compliance program effectiveness; establishing key compliance metrics; counseling with respect to development and implementation of compliance policies and procedures; triage of compliance red flags and reported concerns; developing a compliance communication plan, including regular conferences with senior leadership across the region to ensure alignment of principles and commitment to building a compliance culture; conducting due diligence regarding high-risk third parties, including open-source review, interviews, and contract negotiations; and advising regarding EU regulations relating to procurement and supply chain compliance.
- Conducted post-acquisition anti-corruption compliance due diligence and risk assessment of a newly acquired Brazil subsidiary on behalf of an engineering and technology conglomerate, including forensic review of the accounting books and records, policy review, and onsite interviews with key personnel in Brazil.
- Conducted a cross-border investigation in response to a whistleblower complaint for a global chemical manufacturer. The matter involved more than a dozen interviews in Germany, the United States, Italy, Switzerland, and the Netherlands.