



CHRISTOPHER R. HALL

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SERVICES

Corporate Governance
Cybersecurity and Privacy
Appellate
Litigation
Commercial Litigation
White Collar and Government
Litigation
Congressional Investigations

INDUSTRIES

Life Sciences
Health Care
Financial Services
Higher Education
Energy
Government Contracts

The defining moment for anyone subject to regulatory scrutiny occurs when the government expresses its intent to prosecute or to bring a civil enforcement action. Government attorneys use the terms "target," "intervention," and "Wells Notice" to communicate these decisions. Christopher Hall draws on his experience as a former federal prosecutor to represent clients who seek to convince the government to decline or reverse these designations and to avoid the stigma, uncertainty, and expense of trial. *Chambers USA* ? a leading directory of attorneys ? ranks Chris in its Band 1 for white collar defense and government investigations. Chris focuses on the life science, health care, financial service, and defense industries, and has deep expertise with the FCA, FCPA, and anti-competition, securities, environmental, trade secret, and public corruption laws. He has responded to hundreds of grand jury subpoenas, search warrants, civil investigative demands, HIPAA subpoenas, depositions, and law enforcement requests for interviews--all with an eye toward convincing the government to take no action.

While Chris admires his former colleagues at the Department of Justice, he is not afraid to go to court when they cannot agree. He obtained a verdict of not guilty after a month-long jury trial on federal felony bank fraud charges brought by the FBI, IRS, and Postal Inspection Service. The judgement of acquittal vindicated his client. Chris is also not afraid to appeal. When a state court judge believed the law permitted the Pennsylvania Attorney General to falsely accuse Chris' client and others in a grand jury report, Chris and his partner Justin Danilewitz (along with 20 other leading criminal defense attorneys) appealed to the State Supreme Court, argued the case on behalf of all appellants, and won - obtaining due process protections for future subjects of state grand jury investigations. The Pennsylvania Association of Criminal Defense Lawyers recognized Chris and Justin for their successful efforts in this matter with the prestigious *Alan Jay Josel Award for Advocacy*.

Chris speaks Spanish fluently, can explain the nuances of federal criminal law in that language, and serves as U.S. counsel to a former president of a country in Central

America.

EXPERIENCE

Pharmaceuticals and Medical Devices

Chris's work for the pharmaceutical and medical device industries requires him to draw on his knowledge of the Food, Drug and Cosmetic Act, the False Claims Act, the Anti-Kickback Statute, the Controlled Substances Act, the Civil Monetary Penalty law, the HHS safe harbor regulations, the First Amendment, and the HHS-OIG's authority to exclude individuals and entities from federally-funded health care programs pursuant to the Social Security Act.

- Persuaded Deputy Attorney General of United States not to bring charges after Chief of Department of Justice Criminal Division and FDA Office of Criminal Investigations approved charges against three clients employed by a medical device manufacturer.
 - Represented board member of global medical device manufacturer in DOJ and HHS-OIG off-label marketing probe, resulting in no charges against or disbarment of client.
 - Collaborated with five national law firms to create "virtual law firm" to represent global 50 medical device manufacturer in DOJ and HHS-OIG investigation of whistleblower/qui tam complaint under False Claims Act. The government declined to intervene and the whistleblower voluntarily dismissed the complaint.
 - Assessed sales and promotional practices of global pharmaceutical company after former employee alleged violations of Food, Drug and Cosmetic Act and Anti-Kickback Statute. Chris then helped the client design a remedial action plan. No federal investigation or whistleblower action under the False Claims Act ensued.
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Financial Services

Chris represents clients in the financial services industry during investigations by the Department of Justice, including the Antitrust Division, the Securities and Exchange Commission, the Federal Deposit Insurance Corporation, and State Attorneys General. He is well versed in: Sarbanes-Oxley; Dodd-Frank; the Securities Act; the Securities Exchange Act; wire, mail and bank fraud statutes; the RICO statute; the federal money laundering statute; and the FDIC statute and regulations governing insured depository institutions.

- Persuaded Antitrust Division of DOJ to decline to prosecute founder and president of financial advisory firm in probe of public finance markets after the FBI and IRS executed a search warrant and DOJ sent a "target" letter. Chris also convinced the SEC not to proceed after the SEC sent a "Wells Notice" by which the SEC staff expressed their intention to recommend a civil injunctive action and an administrative enforcement proceeding pursuant to the Securities Act, the Securities Exchange Act, and Rule 10b-5.
- Convinced the U.S Attorney's Office for the Southern District of New York, the FBI, and the Securities and Exchange Commission to reverse their decisions to charge the client ? a former executive vice president of one of the nation's largest brokerage firms ? with criminal and civil insider trading charges, which could have resulted in imprisonment, a \$500,000 fine, and disgorgement of several hundred thousand dollars. In addition, despite a two-year probe and

issuance of a Wells Notice, the client's name and reputation remained protected from publicity throughout the investigation.

- Convinced DOJ and several State Attorneys General not to proceed against client who had allegedly acted as "robo-signer" of mortgages for one of nation's largest mortgage service companies.
 - Resolved DOJ wire fraud and money laundering investigation of senior executive at large commodities broker with agreement to forfeit proceeds but no criminal or civil enforcement charges.
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Health Care

Chris's work in the health care industry includes proactive counseling on compliance with key regulations facing the industry, including the Stark laws, the Food, Drug and Cosmetic Act, the False Claims Act, the Anti-Kickback Statute, the Civil Monetary Penalty law, the HHS safe harbor regulations, and the HHS-OIG's authority to exclude individuals and entities from federally-funded health care programs.

- Obtained "declination" from U.S. Attorney of both criminal and civil fraud charges against health care practice alleged to have created fatal risk of infection by misusing medical devices during surgical procedures. Chris conducted an emergency internal assessment, counseled the practice on remedial and disciplinary steps, and helped the client self-disclose to the State Medical Licensing Board. The State Medical Licensing Board - like the Department of Justice - took no action.
 - Assessed effectiveness of compliance program and policies of nationally recognized health system.
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Government and Defense Contracts

Chris's experience on behalf of companies who contract with the government includes allegations of criminal and civil fraud, FAR and set-aside violations, sexual misconduct and the Contracts Dispute Act.

- Obtained declination by U.S. Attorney of all criminal and civil fraud charges against government contractor after FBI executed search warrant.
 - Convinced DOJ Inspector General to reverse order suspending government contractor's federal grant award and to replace that sanction with three-year, self-monitored compliance program.
 - Conducted internal investigation on behalf of Audit Committee of Board of Directors of publicly-traded defense contractor to assess allegations by Navy that client had submitted false claims for payment.
 - Represented senior official in large government agency funded by HUD during federal investigation of sexual and other misconduct by agency's Executive Director. The U.S. Attorney took no action. Chris also obtained dismissal of two civil class actions filed against his client.
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Environmental Enforcement, FCPA, FCA, and the Economic Espionage Act - Regulatory Schemes Spanning Industries

Some criminal and civil enforcement statutes - like the Foreign Corrupt Practices Act,

the False Claims Act, and the Clean Air and Water Acts, and the Economic Espionage Act - span multiple industries. Chris' experience with these and other regulatory enforcement schemes permits him to operate across numerous sectors of the economy.

- Convinced US DOJ Tax Division, ?Main Justice? Environmental Crimes Section, and U.S. Attorney to decline to bring charges of criminal violations of EPA regulations governing renewable fuel tax credits. Then convinced EPA civil regulatory authorities not to pursue an administrative enforcement action.
 - Convinced U.S. Attorney to reverse decision to prosecute chemical manufacturer after tragic environmental disaster. The Department of Justice had approved an indictment on behalf of the EPA that would have charged the client with criminal violations of the Clean Air Act.
 - Persuaded U.S. Attorney not to charge CEO of global pharmaceutical company with trade secret theft in wake of complaint lodged by competitor.
 - Counsels domestic manufacturer with extensive international sales channel on FCPA compliance.
 - Represented employee who performs internal audit function for international, publicly-traded company in joint FCPA investigation by the DOJ and SEC. The government took no action against Chris' client.
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Past federal prosecution work

Chris's past work as an Assistant U.S. Attorney allows him to help clients understand the tactics and strategies behind government investigations and prosecutions. As a federal prosecutor, he won jury verdicts in more than 30 federal felony criminal prosecutions and handled cases involving a diverse array of matters, including the Clean Water Act, the Computer Fraud and Abuse Act, and mail and wire fraud.

- Pursued first environmental justice prosecution in Eastern District of Pennsylvania, which resulted in jury conviction of demolition contractor on felony Clean Air Act charges and felony guilty plea by international conglomerate by which it agreed to fund \$1 million cleanup of under-served neighborhood in Philadelphia.
 - Brought first predatory lending charges to trial in Eastern District of Pennsylvania, resulting in mail and wire fraud convictions.
 - Obtained conviction of former, disgruntled employee under Computer Fraud and Abuse Act for compromising company's firewalls and exposing proprietary information and confidential personal data to internet hackers.
 - Traveled to South America for Department of Justice to help Bolivian government draft money laundering legislation.
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Public corruption

- Obtained sentence of probation for high-level state public official charged with receiving stream of bribes to influence purchasing decisions.
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HONORS

Awarded the *Alan Jay Josel Award for Advocacy* by the Pennsylvania Association of Criminal Defense Lawyers for advocating for constitutional rights in a statewide

investigative grand jury, 2019

Named one of "America's Leading Lawyers in White Collar Crime & Government Investigations" by *Chambers USA*, 2013 to present

Named to *The Best Lawyers in America* list, Criminal Defense, White Collar 2015 to present

Named to the *Pennsylvania Super Lawyers* List for Criminal Defense: White Collar, 2007 to present

Director's Award for Outstanding Performance, U.S. Department of Justice

Prosecutor of the Year Award, International Association of Financial Crimes Investigators

AV Peer Review Rated, Martindale-Hubbell

MEMBERSHIPS AND AFFILIATIONS

Current Board Member and Past Chair, Federal Criminal Law Committee for the Eastern District of Pennsylvania

Co-Chair, ABA Qui Tam Committee, Criminal Justice Section's White Collar Crime Committee

Vice Chair, White Collar Crime Committee, National Association of Criminal Defense Lawyers

Past Co-Chair, ABA Criminal Law Section, Sub-Committee for White Collar Crime, Mid-Atlantic Region

Board Member, Philadelphia Diversity Law Group

Chair, Breakthrough Bike Challenge

Member, Abramson Cancer Center Director's Leadership Council

EDUCATION

J.D., Georgetown University Law Center, 1985

- Editor, *The American Criminal Law Review*

B.A., Amherst College, 1981, *cum laude*

BAR ADMISSION

New Jersey

New York

Pennsylvania

FIRM INVOLVEMENT

White Collar and Government Litigation, Chair

Board Member and Liaison to Philadelphia Diversity Law Group

CLERKSHIPS

Honorable James S. Holden, U.S. District Court for the District of Vermont