

Jamieson A. Smith

EXPERIENCE

OFFICE OF SUSPENSION AND DEBARMENT (OSD)

Washington, DC

The World Bank

Chief Suspension and Debarment Officer

April 2018 – present

Acting Chief Suspension and Debarment Officer

July 2017 – March 2018

Senior Counsel (Sanctions)

April 2011 – March 2018

Legal Consultant

March 2010 – April 2011

- As the World Bank's Chief Suspension and Debarment Officer (SDO), review sanctions cases involving allegations of corruption, fraud, collusion and obstruction in World Bank-financed projects to determine whether to suspend the contracting eligibility of firms and individuals.
- Supervise and mentor OSD staff (three attorneys, three legal interns, one paralegal and one administrative assistant) in connection with this role.
- Represent OSD in World Bank Group-wide working groups and other fora covering sanctions and anti-corruption policy matters, including with counterparts in the Legal Vice Presidency, Sanctions Board Secretariat, Integrity Vice Presidency, Operations Policy and Country Services Vice Presidency, Governance Global Practice, International Finance Corporation and Multilateral Investment Guarantee Agency.
- Supervise the production of OSD's public reports and the collection and presentation of OSD data relating to the sanctions system, including reporting to Senior Management and dissemination to relevant internal and external stakeholders.
- Assist in design, implementation and revision of OSD's policies and protocols relating to case review and processing, internal and external communications, statistical analysis and knowledge retention.
- Supervise research on issues relating to the World Bank's sanctions system, drawing on applicable policies and procedures, legislative history, prior cases and relevant reference points in national and international law.
- Present to internal World Bank and external audiences in training and outreach activities regarding the World Bank's anti-corruption efforts (see a non-exhaustive list of presentations on next page).

CADWALADER WICKERSHAM & TAFT LLP

Washington, DC

Associate

August 2006 – March 2010

- Conducted international internal investigations and due diligence reviews (including on-site investigations in China, Croatia, Italy, Brazil, Indonesia, Egypt and Czechia) related to potential violations of the U.S. Foreign Corrupt Practices Act (FCPA) on behalf of large corporate clients, including coordination and analysis of electronic discovery, conducting interviews and preparation of presentation and submissions to federal agencies.
- Assisted in drafting and implementation of global anti-corruption policies, procedures and training materials across all work streams for a large international pharmaceutical company, including presentations and training workshops.
- Led proactive FCPA reviews of client's operations in Indonesia and France.
- Assessed and mitigated international risk related to internal investigations, including European data protection concerns and potential violation of local anti-corruption laws.
- Represented corporate executives in criminal investigations of potential violations of the FCPA and the Food, Drug and Cosmetic Act.

BAACH ROBINSON & LEWIS PLLC (now Lewis Baach PLLC)

Associate

Washington, DC

November 2002 – July 2005

- Responsible for client preparation, negotiation tactics, factual investigation and sentencing calculations in representation of individuals in white-collar criminal investigations, as well as pre-trial litigation practice in civil insurance, medical malpractice and contracts matters.
- Significant matters included representation of former Executive Vice President of Enron, resulting in plea agreement, entrance into cooperation agreement with Enron Task Force and trial testimony.

VENABLE LLP

Associate

Washington, DC

August 2001 – November 2002

- Performed legal research and drafted submissions involving various document-intensive commercial litigation matters, including motions and appellate briefs.

EDUCATION**UNIVERSITY OF VIRGINIA, Corcoran Dept. of History**

Charlottesville, VA

M.A., Aug. 2006 with concentration in American Legal History

Thesis: "The Men Higher Up" – Individual Corporate Malfeasors and the Federal Criminal Justice System: The United States vs. The American Sugar Refining Company, 1906-1913

DUKE UNIVERSITY SCHOOL OF LAW

Durham, NC

J.D., May 2001, *magna cum laude*Giles-Rich-Stoner Scholar; Staff Editor, *Law & Contemporary Problems***DUKE UNIVERSITY**

Durham, NC

A.B., May 1997, *cum laude*

Berbecker Scholar; Dean's List with Distinction

TEACHING**• GEORGETOWN UNIVERSITY LAW CENTER**

Washington, DC

Adjunct Professor

January 2019 – present

Teach a course on "International Efforts to Combat Corruption."

- Invited Guest Lecturer on international anti-corruption at Georgetown University Law Center (2015, 2017-2018), as well as American University's Washington College of Law (2019, 2022) and Duke University School of Law (2018).

PRESENTATIONS

Addressing Corruption and Other Integrity Risks in Climate Finance, "International Financial Institutions: Protecting Climate Finance Integrity," Moderator (Washington, DC, Dec. 3, 2024)

International Bar Association's Anti-Corruption Committee Annual Conference, "MDB Harmonization in the Global Sanctions System" (Paris, France, June 12, 2024)

2nd Symposium on Supranational Responses to Corruption: Integrity in Climate Finance and Action, Introductory Remarks (London, UK, May 8, 2024)

International Bar Association's Anti-Corruption Committee Annual Conference, "The Latest Hot Topics in Multilateral Development Bank Debarment and Exclusion" (Paris, France, June 13, 2023)

International Bar Association Annual Conference, "Enforcement Trends at Multilateral Banks" (Miami, Florida, Nov. 3, 2022)

Symposium on Supranational Responses to Corruption, Introductory Remarks (Vienna, Austria, Apr. 28, 2022)

Panel on Demystifying Anti-Corruption Enforcement for Journalists, “Anti-Corruption in Multilateral Organizations” (virtual, May 4, 2021)

International Bar Association Annual Conference, “Leveraging Synergies: A Data Eco-System of Anti-Corruption Exclusion Mechanisms” (virtual, Dec. 5, 2020)

World Bank’s 5th Debarment Colloquium, Introductory Remarks (virtual, Sept. & Oct. 2020)

American Conference Institute’s 36th International Conference on the Foreign Corrupt Practices Act, “World Bank Interview: What Triggers Debarment and Other Key Enforcement Decisions” (Washington, DC, Dec. 5, 2019)

International Bar Association Annual Conference, “Criminal Law Section Mock Trial on Foreign Bribery” (Seoul, South Korea, Sept. 23, 2019)

African Development Bank Sanctions Seminar, “Sanctions Regimes of the Multilateral Development Banks: Experience, Lessons Learned and the Way Forward” (Abidjan, Côte d’Ivoire, May 16, 2019)

4th International Corruption Hunters Alliance Meeting, “Anti-Corruption Sanctions and Enforcement Across Jurisdictions” (Copenhagen, Denmark, Oct. 26, 2018)

36th International Symposium on Economic Crime, “A Comparison of Multilateral Development Banks’ Debarment Regimes” (Cambridge, UK, Sept. 5, 2018)

C5’s 12th Advanced Conference on Anti-Corruption, “The Latest in Multilateral Development Banks’ Anti- Corruption Enforcement Actions: Investigations, New Prohibited Practices and Expectations on Compliance” (London, UK, June 27, 2018)

OECD Global Anti-Corruption & Integrity Forum, “Integrity in Public Procurement” (Paris, France, Mar. 27, 2018)

World Bank’s 2017 Anti-Corruption Day, “Insight from Adjudicative Bodies on Governance and Service Delivery” (Washington, DC, Dec. 11, 2017)

American Conference Institute’s 34th International Conference on the Foreign Corrupt Practices Act, “World Bank and IADB Enforcement: A Close Look at the Investigative Process and Enforcement Trends” (Washington, DC, Nov. 29, 2017)

World Bank’s 4th Colloquium on Suspension and Debarment, “Moving Forward: Suspension and Debarment in the Development Context” (Washington, DC, Sept. 14, 2017)

34th International Symposium on Economic Crime, “The Fight Against Corruption: Sanctions Regimes of Multilateral Development Banks” (Cambridge, UK, Sept. 8, 2016)

International Legal Institute’s International Procurement Seminar, “The World Bank’s Sanctions System and Anti-Corruption Efforts” (Washington, DC, Sept. 13, 2012, Mar. 14, 2013, and Nov. 15, 2016)

American Bar Association’s Section on International Law, “The Rising Influence of Multilateral Development Banks in the Fight Against Corruption” (Washington, DC, July 2, 2015)

American Conference Institute’s Anti-Corruption Boot Camp: Miami, “How Multilateral Development Banks are Enforcing Anti-Corruption Measures in Latin America: Penalties, Sanctions & Debarment” (Miami, Florida, Oct. 16, 2014)

C5’s Forum on Anti-Corruption: Italy Edition, “The World Bank Speaks About Sanctions and Debarment Regimes for Corrupt Practices in Funded Projects” (Milan, Italy, Nov. 13, 2013)

American Bar Association’s National Institute on the Foreign Corrupt Practices Act, “What You Need to Know About the World Bank’s Anti-Corruption Program” (Washington, DC, Sept. 19, 2013)

American Conference Institute’s 3rd Latin America Conference on Anti-Corruption, “Multilateral Development Banks – How to Stay on Their Good Sides by Understanding Enforcement Priorities, Penalties and Coordination of Investigations” (São Paulo, Brazil, June 25, 2013)

American Conference Institute’s Singapore Summit on Anti-Corruption Compliance and Risk Management, “How Multilateral Development Banks are Enforcing Anti-Corruption Measures and Coordinating Investigations” (Singapore, Dec. 5, 2012)

C5’s Forum on Anti-Corruption: Sub-Saharan African Edition, “Multilateral Cooperation and Anti-Corruption Enforcement in Sub-Saharan Africa” (Cape Town, South Africa, Sept. 21, 2011)

Ethical Corporation’s European Anti-Corruption Summit, “Enforcement, Sanctions and Settlement: How is Your Business Affected?” (London, UK, Nov. 2, 2010)

PUBLICATIONS

“In Search of a Tailored Approach to Anti-Corruption Sanctions in the International Development Context: Financial Remedies by the Multilateral Development Banks” (with A. Manea), in *The Transnationalization of Anti-Corruption Law* (R. Bismuth, J. Dunin-Wasowicz, and P. Nichols, eds.) (Routledge 2021)

INTERVIEWS

“The World Bank: Jamieson Smith,” *Unspoken Giants* podcast (Oct. 27, 2021) (*available at* <https://www.rpc.co.uk/perspectives/unspoken-giants/>)

“Exclusive Interview with Jamieson Smith, Chief Suspension and Debarment Officer (SDO) of the World Bank,” *Leaders League* (Oct. 23, 2019) (*available at* <https://www.leadersleague.com/en/news/exclusive-interview-with-jamieson-smith-chief-suspension-and-debarment-officer-the-sdo-of-the-world-bank>)

BAR ADMISSIONS

Maryland, District of Columbia