Timothy D. Belevetz

Partner

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Tim Belevetz is the co-chair of Ice Miller's White Collar Defense & Investigations Group. A former federal prosecutor and U.S. Securities and Exchange Commission attorney, he focuses his practice on white collar criminal defense, internal investigations, SEC enforcement, and corporate compliance. He represents companies and individuals in high-stakes government investigations and enforcement actions, including matters involving the Foreign Corrupt Practices Act (FCPA) and other potential corporate misconduct, and in congressional investigations. Tim also provides compliance counseling designed to help prevent the need for such investigations.

Tim was previously a partner in the Washington, D.C. office of an international law firm.

Tim brings a prosecutor's perspective to his cases and identifies the issues government counsel and investigators will focus on. During his 12 years at the U.S. Department of Justice, Tim served both in the U.S. Attorney's Office for the Eastern District of Virginia and at the Tax Division, where he prosecuted a wide array of white collar offenses against both individuals and entities. During his eight years at the U.S. Attorney's Office, where he most recently served as chief of the Financial Crimes & Public Corruption Unit, he prosecuted and investigated a range of complex financial crimes. As a trial attorney in the Tax Division's Criminal Enforcement Section, Tim led the prosecution of federal tax offenses. He has extensive trial experience, having served as counsel in numerous federal trials involving securities and corporate fraud, tax offenses, health care fraud, fraudulent investment schemes, money laundering, bank fraud, identity theft, procurement fraud, and arson, among others. In addition, he has prosecuted other white-collar matters such as FCPA violations, theft of trade secrets and campaign finance offenses.

Tim also has extensive securities litigation experience. Prior to his tenure at the Justice Department, he spent two years at a leading national law firm defending civil securities fraud actions and representing clients in SEC enforcement matters. Before that, he served for five years at the SEC's Division of Enforcement, where he investigated and prosecuted federal securities law violations, including complex financial fraud, insider trading, accounting violations, unregistered securities offerings, and broker-dealer violations.

Services & Industries

- White Collar Defense & Investigations
- Securities Litigation & Regulation
- Litigation
- False Claims Act & Qui Tam Litigation
- Trade Enforcement & Compliance

Tim is a highly sought-after media commentator on issues related to white collar crime and related legal proceedings. He also serves as an adjunct professor at William & Mary Law School, where he teaches a course on Federal White Collar Crime.

Many of Tim's most successful engagements have not led to public charges and accordingly remain confidential.

Education

- Amherst College (B.A., *cum laude*, 1989)
  - Political Science and French
- William & Mary Law School (J.D., 1993)
- Georgetown University Law Center (LL.M., 1995)
  - Securities Regulation

Admissions

- District of Columbia
- Virginia
- United States District Court - District of Columbia
- United States District Court - Eastern District of Virginia
- United States District Court - Western District of Virginia
- United States District Court - Western District of Michigan
- United States Court of Appeals - Fourth Circuit
- United States Court of Appeals - Sixth Circuit

Professional Affiliations

- Edward Bennett Williams Inn of Court
- Association of Securities and Exchange Commission Alumni

Awards & Honors

- Washington, D.C. *Super Lawyers,* 2015-2016, 2018, 2020-2024
- Outstanding Attorney Award, U.S. Department of Justice, Tax Division, 2004
- *The Best Lawyers in America®*, Criminal Defense: White-Collar, 2023-2026

Recognition for Outstanding Contributions to Law Enforcement:

- Internal Revenue Service – Criminal Investigation
- Bureau of Alcohol, Tobacco, Firearms and Explosives
- Central Intelligence Agency, Office of the Inspector General
- Virginia Office of the Attorney General, Medicaid Fraud Control Unit
- Insurance Fraud Bureau of Massachusetts

Key Matters

Reported and Representative Cases

- Represented National Institutes of Health (NIH) official in House Select Subcommittee investigation
- Obtained dismissal of False Claims Act case against government contractor in the Eastern District of Virginia
- Represented former White House deputy press secretary in January 6th House Select Committee investigation
- Represented board of publicly-traded biotech company in connection with its investigation of, and response to, shareholder demands
- Defended real estate developer in a criminal tax prosecution
- Defended at trial the CEO of a tactical products company indicted for submitting false claims, wire fraud, and conspiracy in the Eastern District of Virginia
- Provided Foreign Corrupt Practices Act (FCPA) compliance counseling to a Danish energy company
- Defended an attorney in a criminal money laundering prosecution
- Defended the president of an aviation maintenance and repair company in a criminal FCPA case
- Represented a Midwest-based composite materials company in a criminal antitrust investigation in which the DOJ declined to bring charges
- Represented the former chief accounting officer of a publicly-traded pharmaceutical company in an SEC investigation into potential internal controls violations in which the staff declined to bring an enforcement action
- Performed an assessment of the anti-corruption compliance program of U.S. based, multinational company in connection with an M&A transaction
- Represented a self-employed investor in an insider trading investigation in which the SEC declined to bring an enforcement action
- Conducted an internal investigation into potential revenue recognition issues at a publicly traded technology company
- Filed a Wells submission on behalf of a securities attorney under investigation pursuant to Rule 102(e) for failing to appropriately represent his client in an SEC investigation. After consideration of the Wells submission, the Commission declined to authorize charges.
- Represented the president of a government contractor in a procurement fraud and false statements investigation in which the Justice Department declined to prosecute
- Defended a creditor in a proceeding brought by the debtor’s equity committee in U.S. Bankruptcy Court alleging civil Racketeer Influenced and Corrupt Organizations Act (RICO) violations
- Provided FCPA compliance counseling to a multinational infrastructure engineering and construction company
- Led an internal investigation related to potential FCPA violations by the Latin American affiliate of a U.S. software company
- Conducted an internal investigation into potential FCPA offenses as part of the due diligence relating to the sale of a multinational corporation’s Latin American subsidiary
- Conducted an internal investigation into potential FCPA risk exposure relating to an international defense procurement bid
- Led the defense of a large government contractor in a qui tam action alleging False Claims Act violations in which the complaint was dismissed
- Represented a technology company owner in a clawback action brought by a receiver appointed in an SEC enforcement case
- Regularly assists veterans and their survivors with Department of Veterans Affairs disability claims on a pro bono basis

Selected Experience

U.S. Department of Justice Experience

- Prosecuted four defendants in a 16-week jury trial involving allegations of securities fraud, accounting fraud, wire fraud and obstruction of justice.
- Obtained a conviction against the former chairman and CEO of a publicly traded company in a trial involving securities fraud allegations. *United States v. Johnson*, 553 F. Supp. 2d 582 (E.D.Va. 2008), *aff'd*, 387 Fed.Appx. 402 (4th Cir. 2010).
- Tried numerous criminal cases to jury verdicts, including obtaining convictions of individuals charged with health care fraud, tax evasion, money laundering, bank fraud, and aggravated identity theft.
- Briefed and won an argument in the Fourth Circuit Court of Appeals challenging the constitutionality of a federal statute prohibiting the production of false identification documents. *United States. v. Jaensch*, 665 F.3d 83 (4th Cir. 2011).
- Led a grand jury investigation that produced charges against a major South Korean corporation and five of its executives for conspiracy to steal trade secrets from a U.S. Fortune 100 company.

U.S. Securities and Exchange Commission Enforcement and Securities Litigation Experience

- Obtained a preliminary injunction freezing the principal investment and profits of securities transactions in an insider trading case with overseas traders. *SEC v. Heden*, 51 F. Supp. 2d 296 (S.D.N.Y. 1999).
- Obtained dismissal of an investor class action alleging securities fraud by a publicly traded real estate investment trust and its officers and directors. *In re Humphrey Hospitality Trust, Inc. Securities Litigation*, 219 F. Supp. 2d 675 (D. Md. 2002).

Published In

- "What US-French Securities Oversight Efforts Mean for Cos.," *Law360*, May 20, 2021
- "U.S.-U.K. Antifraud Guidance in Transatlantic Foreign Bribery Investigations," Bloomberg Law, December 2019
- "DOJ's Citgo Case Highlights Reach, And Limits, of FCPA," *Law360*, June 19, 2019
- Co-Authored Cuban Chapter, *From Baksheesh to Bribery: Understanding the Global Fight Against Corruption and Graft*, 2019
- "Corporate Compliance Answer Book, Foreign Corrupt Practices Act," *Practising Law Institute*, 2019 Edition
- "Federal Court: DOJ Free to Pursue Alternate Theories for FCPA Jurisdiction," *The FCPA Blog*, July 24, 2018
- "Corporate Compliance Answer Book, Foreign Corrupt Practices Act Chapter," *Practising Law Institute*, 2018 Edition
- "Cybersecurity Breaches: Avoiding Pitfalls," *RSCA Publications Vol. 50 No.17*, October 11, 2017
- "Corporate Compliance Answer Book, Foreign Corrupt Practices Act Chapter," *Practising Law Institute*, 2017 Edition
- "Corporate Compliance Answer Book, Foreign Corrupt Practices Act Chapter," *Practising Law Institute*, 2016 Edition
- "A Warning on Doing Business in Cuba," *CNBC*, July 30, 2015
- "Major Changes Coming To Sentencing Guidelines For Fraud," *Law360*, April 21, 2015
- "DOJ Criminal Division Renews Efforts to Investigate Whistleblower Allegations," *Financial Fraud Law Report*, February 2015
- "2015 May Be 'Year Of The Individual' At DOJ," *Law360*, December 17, 2014
- "Much More Pressure On Banks Under DOJ Operation Choke Point," *Law360*, June 24, 2014

Thought Leadership

May 27, 2026
SEC Transforms Settlements by Allowing Defendants to Make Their Case to the Public

August 29, 2025
A New Era of Trade Enforcement: DOJ Expands Criminal and Civil Focus on Tariff Fraud

June 27, 2025
Anti-DEI Enforcement Takes Shape: DOJ and States Apply New Vision of Civil Rights

May 23, 2025
The DOJ's Evolving Policies: White-Collar Enforcement Under President Trump

May 2, 2025
As the Department of Justice Affirms and Advances Its Cyber-Fraud Initiative, Government Contractors Should Take Steps to Ensure Cybersecurity Compliance

February 12, 2025
DOJ Issues Memo Focused on Corporate and Educational DEIA Policies

April 12, 2024
SEC Obtains Judgment Against Executive for "Shadow Trading"

May 16, 2023
Supreme Court Narrows Mail and Wire Fraud Liability

January 20, 2023
DOJ Revises Corporate Enforcement Policy

May 25, 2022
SEC's Use of Administrative Proceedings Ruled Unconstitutional by Court of Appeals

December 17, 2021
SEC Proposed Amendments to Rule 10b5-1 Insider Trading Plans Aim to Enhance Safe Harbor

June 7, 2021
Biden Administration Moves to Strengthen Measures to Combat International Corruption and Illicit Financing

May 14, 2021
Groundbreaking DOJ Non-Prosecution Agreement Over Global Software Company's Iran Sanctions & Export Controls Violations

February 11, 2021
SEC Readies to Expand Enforcement Investigations

July 10, 2020
DOJ and SEC Update FCPA Resource Guide for First Time Since 2012

June 23, 2020
U.S. Supreme Court Preserves SEC's Disgorgement Power—With Limits

May 21, 2020
DOJ, SEC & FBI Host Virtual Town Hall on Foreign Bribery and Health Care Fraud Enforcement

May 9, 2020
Borrower Beware

March 13, 2020
Be Wary of Coronavirus Scams

Speaking Engagements

- "Managing & Negotiating Civil Investigative Demands," Government Investigations & Civil Litigation Institute Annual Meeting, Albuquerque, NM, November 13, 2025
- “2025 & Beyond: GC Playbook for Hot Issues in Trump 2.0 – Trade, Tariffs, Civil Rights, and the Enforcement Agenda,” In-House Connect Seminar, Washington, D.C., September 10, 2025
- "The Foreign Extortion Prevention Act," Government Investigations & Civil Litigation Institute Annual Meeting, Fort Lauderdale, FL, November 21, 2024
- "Ethical Issues in Pool Counsel Engagements," Government Investigations & Civil Litigation Institute Annual Meeting, Palm Springs, CA, November 16, 2023
- "FCPA in Big Tech: Lessons Learned for Other Industries," Government Investigations & Civil Litigation Institute Annual Meeting, Miami, FL, November 9, 2022
- "2022 Local Government Workshop: Inside Out—Cyber Threats Facing Local Governments and Municipalities," Ice Miller Webinar, August 23, 2022
- "2021 Local Government Workshop: Defending Municipalities and Public Officials in SEC and DOJ Enforcement Actions Related to Municipal Bond Offerings and Pension Fund Management," Ice Miller Webinar, July 22, 2021
- "Road to Recovery: COVID-19's Impact on Civil Litigation and Government Enforcement," Ice Miller Webinar, June 9, 2021
- "The Year in Review: Significant Anti-Corruption Prosecutions, Policy Updates and Case Law Developments," Intelligent Compliance & Regulations Management - Virtual Symposium 2020, November 12, 2020
- "Managing Compliance Risks in a Remote Workplace: Health Care Fraud," Ice Miller Webinar, May 5, 2020
- "Managing Compliance Risks in a Remote Workplace: Corporate Fraud and Internal Controls," Ice Miller Webinar, April 16, 2020
- "The Grey Zone: Representing Clients Operating in Grey Areas of the Law," 2019 BlockChainge D.C. Conference, Washington, D.C., January 15, 2019
- "Would You Like Fraud With That? Examining Pharmacy Enforcement," ABA Washington Health Law Summit, Washington, D.C., December 11, 2018
- "Managing Cybersecurity Risks," Financial Services Technology 2018 – Avoidance of Risks Conference, Practicing Law Institute, New York, NY, April 30, 2018
- "General Overview of the Foreign Corrupt Practices Act," International Chamber of Commerce Mexico, Mexico City, April 23, 2018
- "Receivers and Compliance Monitors: What Are the Best Approaches Toward Having an Effective Compliance Program?," ABA National Institute on Securities Fraud, Salt Lake City, UT, January 11, 2018
- "Financial Services IT - Request for Proposal (RFP) Preparation," Financial Services Technology 2017 – Avoidance of Risks Conference, Practicing Law Institute, New York, NY, May 13, 2017
- "FCPA and Corruption in Colombia: Challenges and Future," Bogotá, Colombia, October 19, 2016
- "Foreign Corrupt Practices Act and Compliance," Mexico City, Mexico, September 27, 2016

- "Global Risk and Investigations," Financial Services Technology 2016 – Avoidance of Risks Conference, Practicing Law Institute, New York, NY, May 17, 2016
- "Creating an Anti-Fraud Culture in Your Organization," Global Compliance & Risk Management Conference, Global Outsourcing Association of Lawyers, Washington, D.C., November 13, 2014
- "Risks of Parallel Prosecutions," American Health Lawyers Association Annual Conference, New Orleans, LA, February 6, 2014
- "Making an Effective Sentencing Argument," Edward Bennett Williams American Inn of Court, Washington, D.C., October 17, 2013
- "Use of Financial Records in Fraud Investigations," Financial Crimes Seminar, Davao, Philippines, June 27, 2013
- "Organized Fraud Rings: Law Enforcement and Prosecutorial Response," Federal/Mid-Atlantic Insurance Fraud Summit, National Insurance Crime Bureau, Arlington, VA, October 11, 2011
- "Sentencing Considerations for Prosecutors," U.S. Sentencing Commission Annual Seminar, New Orleans, LA, June 19, 2009