

**ACC's CLO ThinkTank  
~ 2010 Series ~**

**“Navigating Government Intervention –  
Partnering, Regulated and Beyond”**

**Hosted by:**

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10:00 a.m. – 2:00 p.m.**

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***Participants' Briefing Materials***

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## SUMMARY/OUTLINE OF DISCUSSION TOPICS

### Navigating Government Intervention – Partnering, Regulated and Beyond

The following outline is intended to provide a short overview of some of the issues at the heart of this discussion topic. There may be other issues we've not identified or perspectives on the identified issues that are not adequately represented in the outline: you should feel free to raise these additional thoughts, as you like. *The outline is merely intended as a starting point to help you identify discussion topics and tee up your conversation.*

Below is an overview of topics discussed in more detail in the outline. The outline follows on page 3.

#### OUTLINE OVERVIEW

**A. Organizational Structure-** focus on organizational structure for government affairs, compliance function, role of law department, role of the Board, CLO's role.

**B. Regulatory Proposals & Practices for Monitoring and Responding-** focus on how the organization monitors and responds to regulatory proposals, using internal staff and external resources (e.g., lobbying, etc). Includes issue development and community relations considerations.

**C. Regulatory Developments For Discussions Include:**

- 1. Quebec Bill 17: Contracting By Public Bodies**
- 2. Quebec Bill 60: Consumer Protection in Quebec**
- 3. Privacy and Protection of Personal Information** (new anti-spam legislation and amendments to the criminal code regarding identity theft and fraud)

**D. Disclosures/Public Statements-** organizational structure and practices for making regulatory disclosures and public statements, including roles of all respective corporate functions that need to participate.

**E. Government as Active Participant in the Corporation's Day-to-Day Business-** open discussion on experiences in this emerging area; notion of governance guidelines and standards, enforcement practices that might include corporate monitors, best practices within the company and in working with regulators.

**F. Government Investigations-** practices for responding to government investigations (provincial, federal, agency, those arising beyond Canadian borders, etc.); appropriate practices for conducting internal investigations and other practices, including self-reporting.

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## SUMMARY/OUTLINE OF DISCUSSION TOPICS- More Detail

### Navigating Government Intervention – Partnering, Regulated and Beyond

#### A. ORGANIZATIONAL STRUCTURE

- 1. Law Department & Government Relations/Public Affairs:** What is the organizational relationship between the organization's government relations/public affairs group and the law department? Do these groups report organizationally into the law department or are they separate business or functional groups without any reporting relationship to the law department? What are the pros and cons of having an organizational reporting nexus between the law department and these groups?
- 2. Law Department and Corporate Communications/Public Relations/Investor Relations:** What is your role/role of in-house lawyers in making public statements and in advising on corporate communications and public statements? Does the law department review in advance all public statements or are there thresholds or triggers for legal review?
- 3. Reputational Risk/Disclosure Committees/Public Policy:** Has your organization created executive-level committees for handling policy and strategic issues relating to organizational reputation and public disclosure issues? Who sits on these committees? What is your role as CLO on these committees- are you a committee member or an advisor (or both)? What is the scope of responsibilities/charter for these committees? How often do they 'meet'? Who does the committee report to?
- 4. Corporate Security/Investigations Functions and the Law Department:** Does your organization have a corporate security or corporate investigations group? Is there an organizational reporting nexus to the law department? What are the pros and cons of such a reporting relationship? Are all internal corporate investigations undertaken at the direction of the law department?
- 5. Corporate Compliance Function and the Law Department:** Does your organization have a centralized corporate compliance function? Does the organization have a chief compliance officer (CCO) or chief ethics officer? Are you as CLO also the CCO/CCEO? If not, does the CCO report to you or to a lawyer on your team? What are the pros and cons of the CLO wearing both hats? What are the pros and cons of a reporting nexus between the corporate compliance function and the law department? How does your compliance function interact with or draw from your company's business ethics offices?
- 6. Chief Privacy Officer and the Law Department:** Does your organization have a Chief Privacy Officer (CPO)? Are you the CPO? Does the CPO have an organizational reporting relationship to you? What are the pros and cons? How has the role of the CPO changed during the past 5 years? What are the key functional groups the CPO most closely interacts with?
- 7. Lobbying Activities:** What types of practices does your organization implement in connection with lobbying? Is lobbying performed by internal staff or primarily by external professionals retained by your organization (or through trade associations or others)? Who is on point for handling the organization's lobbying strategy? Have these activities changed in recent years? What is the role of the CLO and/or law department in connection with these activities? What are the key challenges? What types of practices have been most successful? Do you engage in activities the promote the organization's advocacy agenda that do not rise to the level of lobbying but raise many of the same questions? If so, what are they and how are they handled?

**8. Board's Role:** How does the Board view its role in public policy/government affairs? Do any of the organization's officer-level executives/functional leaders have an organizational reporting relationship to the Board (or a committee of the Board)? Does your Board have a public policy committee and what are the key focus areas for this committee? If the Board doesn't have a public policy committee, which committee(s) would be most likely to be engaged in public policy/government relations issues? Who is on point to brief the Board on issues in these areas? Who provides legal guidance to the Board on crisis management, organizational reputation issues, and/or strategic public policy initiatives—you as CLO, other in-house lawyers, or independent outside counsel? Are there 'filters' or policies outlining the types of matters that need to be brought to the attention of the Board (and corresponding time frames)?

## **B. REGULATORY PROPOSALS AND PRACTICES FOR MONITORING AND RESPONDING**

**1. Who is on point for monitoring government policy/regulatory proposals?** What organizational group is on point for monitoring government proposals (or does the organization rely on outside entities such as law firms or bar/industry associations or others to monitor information on proposals)? At what point does the group on point for monitoring proposals involve the law department when something arises that may affect the company? What types of best practices have you implemented or heard of with regard to monitoring/early detection of upcoming proposals? Once identified as an issue of interest to the company, what happens next and who leads such efforts?

**2. Response strategy- organization or others as primary?** How often does the organization conduct its own advocacy efforts in response to government policy/regulatory proposals? When the organization conducts its own efforts, what is the law department's role? For what types of matters would the organization most typically handle its own advocacy? For what types of matters would the organization most likely work with another organization to formulate and communicate a response?

**3. Input from Executive Management and the Board:** What types of proposals and response strategies might require input or authorization from executive management and/or the Board? How is that process managed? What kind of role does the board take in shaping response strategy?

**4. Regulatory shift:** Do you perceive a trend toward increased government intervention/oversight/involvement in setting corporate direction or mandating corporate responses/policies vis a vis employees, stakeholders, customers, the public? Are there certain types of practices or industries or other groupings of issues that have received more attention in recent years? What are your concerns in this regard and how if at all can you voice them?

**5. Community Relations:** What function is on point for setting the organization's community relations strategy in connection with responses to regulatory or legislative proposals? What is the role of the law department? What practices have been most successful in sharing the organization's position (e.g., designating a spokesperson within the company and getting the message out first, newspaper op-ed ads, working through trade associations, combination, other, etc.)? For which types of matters might you as CLO be the lead spokesperson for the organization? In that role, what types of practices have been most helpful to you?

**6. Reputational Risk: Policy and organizational structure:** Does your organization have a reputational risk policy? Is there a committee or multi-disciplinary team on point for evaluating reputational risks? Who are the key players? What role does the Board play in assessing and responding to matters involving reputational risk? What filters do you use to determine when to escalate matters involving reputational risk? What is your role as CLO in assessing and advising on reputational risk? What types of practices has your organization implemented (or have you seen others implement) in this area that you would consider to be leading or best practices?

**7. Impacts on Potential Litigation and External Investigations:** What types of processes does your law department implement regarding publicizing to the media information that may relate to potential litigation or government investigations? Where are the greatest challenges? Who makes the

final determination on the scope and timing of information release (CLO, CEO, Head of Public Affairs, other?)?

**C. DEVELOPMENTS FOR DISCUSSION- IN SPECIFIC**

**1. Contracting by Public Bodies (Québec's Bill 17)**

- **Organizational Structure for Organizations Contracting with Public Bodies:** Does your organization have a centralized function on point for handling contracts with public bodies? What role does the law department play? Has your organization identified all of the types of contracts it enters into with public bodies? What process did you use?
- **Tendering Process/Amendments:** What types of practices does your organization implement in connection with the rules set out in Québec's Bill 17 regarding: selection of contractors, public tendered thresholds and/or contracts by mutual agreement, contract amendments? Are there best practices you've seen in this area? For CLOs of quasi-governmental bodies: what types of best practices have you seen? What are the key challenges and ways to address them?
- **Key Impacts/Changes:** What are your thoughts on key challenges and best practices in connection with these requirements?

**2. Consumer Protection (Québec's Bill 60)**

- **Process for Addressing Complaints:** What is the process for handling complaints made directly to your organization or via the Office de la protection du consommateur (OPC), and what rules do you apply when responding to a complaint and dealing with the OPC's agents who act as mediators?
- **Practices Relating to Potential Injunctions or Class Action Suits:** What types of practices has your organization implemented to address potential needs to respond quickly to consumer association calls for injunctive relief or potential class action suits alleging prohibited practices under CPA? What lessons should general counsel be thinking about while watching Toyota's legal department respond to their current product recall crises, or looking at the experience of companies like WalMart and their employee class-action concerns.
- **New processes/practices:** How do you address contracts that are national in scope with regard to prohibited stipulations, stipulations which do not apply in Quebec and 'contracts involving sequential performance for a service provided at a distance'?
- **Next Phase- Looking Ahead and Practices:** If you are a financial institution or retailer, how are you preparing for the next phase of amendments to Québec Consumer Protection Act on credit contracts, which is due for spring or fall 2010?

**3. Privacy and Protection of Personal Information (Bill C-27 and Amendments to Canada's Criminal Code- sections 402.1 and 402.2)**

- **New federal anti-spam legislation (not yet in force), Bill C-27**  
*-Practices:* Does your organization use e-mail for marketing or publicity purposes and/or to communicate with customers or prospects?

**-Privacy Policy/Practices:** What key provisions do you include in your organization's privacy policy to address consent to use personal information and/or send emails? In what types of situations might consent be implied? What types of practices/process changes might your organization implement to comply with Bill C-27 and manage any inquiry or investigation by the CRTC? How does your organization manage the CRTC's 'Do-not-call' list?

**-Challenges & Best Practices:** What are the key challenges presented by Bill C-27? What types of practices would best address these challenges? What should companies be thinking about that's "next," consistent with what companies have been thinking about with the advent of the European Union's data privacy initiatives?

**-Response to Inquiries/Investigations:** What organizational function is on point to respond to inquiries or investigation by Canada's Privacy Commissioner or Québec's Commission d'accès à l'information? What is the role of the law department? What types of practices have you implemented in connection with responding to these types of inquiries/investigations?

▪ **Amendments to the Criminal Code Regarding Identity Theft & Identity Fraud**

**-Amendment:** Canada's Criminal Code (Sections 402.1 and 402.2) has been amended to create new offences related to identity theft and identity fraud. Section 402.2(2) states that "everyone commits an offence who transmits, makes available, distributes, sells or offers for sale another person's identity information, or has it in their possession for any of those purposes, knowing that or being reckless as to whether the information will be used to commit an indictable offence that includes fraud, deceit or falsehood as an element of the offence."

**-Organizational Structure:** What organizational function(s) are on point to address identity theft/fraud issues? What is the role of the law department? What are the respective roles of Corporate Security and IT? If your organization has a centralized function for consumer-related contracts, what role(s) does that function play and how does it coordinate with corporate security and IT?

**-Practices:** What types of practices does your organization implement to manage the prevention of identity fraud, identity theft or breach of security? What types of practices have been most effective? What security measures does your organization take regarding: retention and destruction of personal information, protection of personal information agreements with third parties to whom you communicate personal information? What security measures are put into place when your organization transfers personal data in another province or another country? What security measures are taken by your organization to ensure that your customers' or employees' personal information will not be made available to unauthorized third parties?

**D. DISCLOSURES/PUBLIC STATEMENTS**

**1. Disclosure Process and Practices for Financial Filings**

- **Organizational Structure- Disclosure Committee:** Does your organization have a Disclosure Committee? Who sits on the committee? Are line business leaders members of the committee? What are the key role(s) of the committee? Does the committee have a role in reviewing and/or signing off on financial information filings, securities filings, earnings

releases? Does the committee regularly report to the Board on financial compliance? How often does the committee meet? Are meetings in person or via phone?

- **Role of the CLO:** Are you as CLO a working member of the committee or do you participate as a legal advisor? What are the pros and cons of having the CLO participate as a committee member?
- **Finance; Auditors (internal and external):** What roles do finance and internal audit play in the financial disclosure process? What is the role of the law department in supporting these groups? What role, if any, do external auditors play in the financial disclosure process?
- **Disclosure Process:** How does your organization's disclosure process work? Are certifications (and/or sub-certifications) part of the overall disclosure process? Do you as CLO provide certifications (written or verbal)?
- **Role of the Board:** What role (if any) does the Board play? What reports are made/how often to the Board in connection with financial disclosures? Is this changing in recent years? What advisor(s) (if any) does the Board seek to engage in connection with this process? What role do you as CLO play in connection with the Board's engagement of any outside advisors?
- **Challenges and Best Practices:** What are some of the key challenges in connection with the financial disclosure process? What are some leading or best practices your organization implements (or you've seen others implement)?

## 2. Disclosure Process on Non-Financial Regulatory Matters/ Self-reporting

- **Organizational Structure:** Does your organization have a committee or other function on point to provide input on disclosures of non-financial regulatory matters (such as self-reporting of regulatory irregularities or noncompliance, etc.)? Who is on point for deciding corporate strategy for non-financial regulatory disclosures? Who is involved in the overall decision process? What role does Internal Audit play? What role does the organization's Compliance function play?
- **Role of the CLO:** What is the role of the CLO/law department? What types of factors do you consider in determining whether to engage outside resources and deciding timing on disclosure?
- **Role of the Board:** Does your organization have guidelines or criteria for when certain types of non-financial regulatory matters need to be brought to the Board? What types of factors do you consider? Who is generally on point to bring these matters to the Board? What types of matters would be brought to the full Board and what types of matters might go to a committee of the Board? Does the Board have a say in whether and when a matter is disclosed or is reporting to the Board for informational purposes?
- **Reportable Matters:** What is the process for determining reportable matters? What are the key criteria/drivers considered in making a decision to self-report to a regulatory agency? Who is involved in the ultimate decision-process? What is your role as CLO? What is the role of the Board? Who takes the lead in initiating reporting? Do you request the opportunity to report in person, via phone, other? What are some of the key considerations in determining whether an investigation of an allegation is 'ripe' to self-report? What are some of the pitfalls/best practices in self-reporting strategies?

- **Contexts/Experiences:** What types of contexts have you had to consider in determining whether to make regulatory disclosures? What have been some of the most difficult experiences? What have been some of the most successful experiences?
- **Successful Practices:** What practices have you implemented to successfully evaluate whether and when to make such disclosures? What best practices have you implemented (or seen or heard of) in this area? What feedback have you received from governmental or quasi-governmental bodies on the types of practices that are most successful and guidelines they would like to see in place?

### 3. Public Statements/Media Relations

- **Media Relations:** What are the most typical challenges you/law department faces in connection with providing information to the media? What types of processes have you implemented to help ensure accuracy of information provided? How does the law department work with the organization's public affairs/media function to navigate issues such as scope and timing of information release? What types of processes does your law department implement regarding publicizing to the media information that may relate to potential litigation or government investigations? Where are the greatest challenges? Who makes the final determination on the scope and timing of information release (CLO, CEO, Head of Public Affairs, other)?
- **Role of the Law Department/ CLO:** What role does the law department play in media relations? Does the law department review all press releases before they're made? Only some? Are lawyers external media spokespersons for the organization? In what circumstances would you as CLO expect to be the spokesperson? Does outside counsel have a role in media relations strategies?
- **Proactive Approach:** Do you implement practices to use the media in a positive way to impact your organization's reputation? How is the law department involved in these types of strategic initiatives? Have you seen/implemented best practices in this area? Have you considered or implemented media training for senior execs?
- **Process; Scope of Release:** What types of processes have you implemented to help ensure accuracy of information provided? Who makes the final determination on the scope and timing of information release (CLO, CEO, Head of Public Affairs, other)? Do you have guidelines that require legal review/sign-off prior to any press-releases? Are they blanket guidelines for all press releases or are they specific to certain types of matters?
- **Technology- blogs, social media, chatrooms & beyond:** Does your organization use blogs, chatrooms, social media, the internet to send important corporate messages? Do you monitor these communications channels for messages posted by others about the organization? Do you encourage or discourage or otherwise regulate employee participation in such media? Do you or the law department have a social media presence? Does the organization? What are the pros and cons?

## E. GOVERNMENT AND QUASI-REGULATORY BODIES AS ACTIVE PARTICIPANT IN THE CORPORATION'S DAY-TO-DAY BUSINESS

**1. Experiences- Open Discussion:** What types of experiences have you had in connection with the government or quasi-regulatory involvement in your organization's day-to-day operations? Are there certain areas (corporate governance, shareholder rights, consumer protection, etc.) where they are more active?

2. **Monitors:** Has your organization had the experience of working with a corporate monitor?
3. **Challenges:** What are the key challenges in this area? How has your organization successfully addressed them? What do you see as emerging challenges in this area? How can these best be addressed?
4. **Leading or Best Practices:** What types of practices has your organization implemented to successfully work with the government and quasi-regulatory bodies in these circumstances? What are the best practices you've implemented or heard of?

## F. RESPONDING TO GOVERNMENT AND QUASI-GOVERNMENTAL INVESTIGATIONS

1. **Process for Determining Action:** How are government and quasi-governmental inquiries filtered and investigated? Who makes decisions on strategy for addressing these concerns and internal investigations? What is the decision process for initiating an internal investigation? Who generally manages investigations within the company? Does the company have documented procedures for investigating alleged ethical concerns and/or violations? Is there a designated team or function on point to generally conduct preliminary internal investigations?
2. **Role of CLO; Law Department:** What is the role of the CLO/law department in connection with responding to governmental investigations? What is the role of the CLO/law department in connection with conducting internal investigations? Does the law department generally lead these investigations or otherwise play a coordinating or supporting role? Would the law department's role change if the investigation is undertaken in response to a government inquiry versus as follow-up to an internal reported concern regarding a potential allegation of wrongdoing? Is privilege a consideration? What is the role of lawyers (in-house) on the investigative team? What criteria are considered in determining whether to bring in outside investigators/outside counsel to help conduct or lead an investigation? How do you deal with legally mandated disclosures or voluntary disclosures? What role does the CLO play in communicating investigation outcomes to the Board and/or managing risk? Or in communicating investigation results to the government or others outside the company?
3. **Board's Role:** What types of practices are in place in connection with the Board's oversight role in connection with investigations?
4. **Internal Investigations- Documents and Reports:** What are the organization's practices in connection with preparing reports of internal investigations? If reports are prepared, are they prepared with an understanding that the results and/or a written report will likely be provided to the government? Are reports provided or underlying facts discussed? How does this impact the scope and approach for conducting the investigation and who should conduct it? What factors are considered in determining whether to prepare a written report? Is privilege an issue? Are there two internal investigations (one that might be provided to the government and a second for which privilege may be claimed)?
5. **Investigating Body- Practice Distinctions:** Does the government agency conducting the investigation impact the process undertaken to respond to the investigation? What are some of the key considerations for responding to investigations conducted at the agency, provincial and federal levels (how might experiences and organizational practices vary)?
6. **Multiple Cross-Border Investigations; Coordination:** What are some of the key steps/additional factors to consider when multiple agencies are involved? How does your role as CLO/law department's role change? How do you manage multiple, multi-jurisdictional or cross-border investigations and the corresponding expectations of different regulators and law enforcement agencies?
7. **Public disclosure:** When does the existence of an investigation trigger a disclosure obligation or a strategic decision to disclose to a regulatory agency/law enforcement? What standards have your law department and organization implemented to evaluate when disclosure is appropriate? What are the key

challenges in making these determinations? What role do you play as CLO? Is your company's Board involved?

**8. Enforcement; Deferred Prosecution/Non-Prosecution Agreements:** What are some of the strategies you've implemented or heard of in connection with successfully resolving enforcement actions? What are the most important provisions to include in any settlement/DPA/NPA? What are some of the most problematic provisions? What are the key steps to take in the early phases of the self-reporting/strategic resolution discussions? What types of remedial initiatives have regulators been most responsive to? What factors do you think the government considers most in determining whether to enter into a DPA or NPA? Additional ideas on challenges/success factors/leading practices in this area?

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## REFERENCES

**What follows is a sampling of various resources related to some of the topics raised in this piece, including resources from our session sponsor, Ogilvy Renault. For additional ACC resources, please search ACC's online resources at <http://www.acc.com/search.cfm>.**

### LAW DEPARTMENT STRUCTURE/ROLE OF CLO RELATING TO GOVERNMENT AFFAIRS

Going Global: The Pro-Business Global Lawyer: Combining Legal and Government Relations Responsibilities, ACC Docket, October 2008

<http://www.acc.com/legalresources/resource.cfm?show=64035>

Lawyers as Gatekeepers: Part 2, ACC Docket, December 2008

<http://www.acc.com/legalresources/resource.cfm?show=211735>

The Transformative Power of Principled Leadership, ACC Docket, December 2008

<http://www.acc.com/legalresources/resource.cfm?show=211981>

Lawyers as Gatekeepers: Part 1, ACC Docket, November 2008

<http://www.acc.com/legalresources/resource.cfm?show=86737>

Corporate Compliance Strategies Must Address the Growing Influence of State Attorneys General The "New" Regulators: Why, ACC Docket, September 2008

<http://www.acc.com/legalresources/resource.cfm?show=243715>

Strategic Risk Management: Should Corporate Counsel Lead the Charge, ACC Docket, November 2008

<http://www.acc.com/legalresources/resource.cfm?show=86548>

Top Ten Things Your Board Needs to Know About Effective Compliance & Ethics Programs, ACC Quick Reference, August 2006

<http://www.acc.com/legalresources/resource.cfm?show=115885>

The Acid Test for Your Compliance Program, ACC Docket article, April 2006

<http://www.acc.com/legalresources/resource.cfm?show=14693>

The CLO's Role in Government Relations and External Affairs, ACC's CLO ThinkTank Executive Report, December 2006

<http://www.acc.com/legalresources/resource.cfm?show=20063>

## **PRIVACY & DATA PROTECTION**

Performing a Privacy Risk Assessment, ACC Docket, November 2009  
<http://www.acc.com/legalresources/resource.cfm?show=721374>

The Nuts and Bolts of the EU Safe Harbor, ACC Docket, November 2009  
<http://www.acc.com/legalresources/resource.cfm?show=721536>

Protecting Data in a Business Failure, ACC Docket article, September 2009  
<http://www.acc.com/legalresources/resource.cfm?show=516410>

Trust, but Verify: The Reality of Data Protection in an Information-Driven World, ACC Docket article, May 2008  
<http://www.acc.com/legalresources/resource.cfm?show=14335>

Defining Data Security Measures that Protect Your Company and Customers, ACC Docket Article, December 2007  
<http://www.acc.com/legalresources/resource.cfm?show=14419>

Privacy and Data Protection, ACC Leading Practice Profile, January 2006  
<http://www.acc.com/legalresources/resource.cfm?show=16798>

Complying with Data Security Breach Laws, ACC Quick Reference, August 2006  
<http://www.acc.com/legalresources/resource.cfm?show=16620>

Data Protection - A Practical Guide to Personal Data Transfer Laws in Asia/Pacific Region, Canada, Europe, and the U.S., ACC InfoPak, August 2006  
<http://www.acc.com/legalresources/resource.cfm?show=19659>

## **GOVERNMENT INTERVENTION & INVESTIGATIONS (AND LAW DEPARTMENT'S ROLE)**

The Government Investigator is Knocking: Now What?, ACC Sample Forms & Policy by Evan Slavitt and Bridget Rohde, May 2009  
<http://www.acc.com/legalresources/resource.cfm?show=265476>

Crisis Management in Litigation and Investigations: Parallel Proceedings, Competing Stakeholders, and Multiple Venues, ACC InfoPak, August 2008  
<http://www.acc.com/legalresources/resource.cfm?show=77428>

Conducting Corporate Investigations: The Use of Lawful and Ethical Strategies, article by John Lewis and Joy Davis, October 2009  
<http://www.acc.com/legalresources/resource.cfm?show=750825>

Responding to Governmental Investigations, ACC InfoPak, August 2008  
<http://www.acc.com/legalresources/resource.cfm?show=77637>

The Use of External Investigators to Aid in Corporate Investigations, ACC Leading Practice Profile, January 2007  
<http://www.acc.com/legalresources/resource.cfm?show=16794>

Responsive Measures for Government Investigations, ACC Whitepaper, September 2005  
<http://www.acc.com/legalresources/resource.cfm?show=16040>

Grand Jury Investigations: A Guide for In-house Counsel, ACC Docket article, August 2003  
<http://www.acc.com/legalresources/resource.cfm?show=17084>

Corporate Counsel Caught in the Crosshairs (Bibliography of Resources)  
<http://www.acc.com/legalresources/resource.cfm?show=19997>

**FEATURED OGILVY RENAULT RESOURCES ON SPECIFIC REGULATORY DEVELOPMENT DISCUSSION TOPICS**

Quebec introduces Bill 17, An Act respecting contracting by public bodies, Ogilvy Renault, June 2006  
[www.acc.com/community/clo/upload/Ogilvy-Summary-bill-17-contracting.pdf](http://www.acc.com/community/clo/upload/Ogilvy-Summary-bill-17-contracting.pdf)

Federal Anti-spam Offensive: An Analysis of the Proposed Electronic Commerce Protection Act (Bill C-27), Ogilvy Renault, October 2009  
[www.acc.com/community/clo/upload/Ogilvy-Pub-Federal-Anti-spam-Offensive.pdf](http://www.acc.com/community/clo/upload/Ogilvy-Pub-Federal-Anti-spam-Offensive.pdf)

Multinational Corporations and Patchwork Privacy Laws: The Facebook Dilemma, Ogilvy Renault, August 2009  
[www.acc.com/community/clo/upload/Ogilvy-Pub-Multinational-Corps-and-Privacy.pdf](http://www.acc.com/community/clo/upload/Ogilvy-Pub-Multinational-Corps-and-Privacy.pdf)

Privacy Laws and Regulations Around the Globe: The Impact on Doing Business Internationally, Ogilvy Renault, Fall 2009  
[www.acc.com/community/clo/upload/Privacy-Laws-and-Regulations-Around-the-Globe.pdf](http://www.acc.com/community/clo/upload/Privacy-Laws-and-Regulations-Around-the-Globe.pdf)

Privacy and Technology Law Developments: 2009 Year in Review, Ogilvy Renault, February 2010  
[www.acc.com/community/clo/upload/Ogilvy-2009\\_Year\\_in\\_Review\\_PrivacyandTechnologyLawDev.pdf](http://www.acc.com/community/clo/upload/Ogilvy-2009_Year_in_Review_PrivacyandTechnologyLawDev.pdf)

Bill 60: Changes to Quebec's Consumer Protection Act Stand to Have a Major Impact, Ogilvy Renault, July 2009  
[www.acc.com/community/clo/upload/Ogilvy-pub-re-Bill-60-changes.pdf](http://www.acc.com/community/clo/upload/Ogilvy-pub-re-Bill-60-changes.pdf)