

Anne Elkins Murray

Partner

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Anne is a Partner in Winston's White Collar & Government Investigations practice. She brings more than two decades of experience helping clients navigate high-stakes white collar matters involving fraud and corruption. She guides companies, boards, and individuals through complex enforcement matters and internal investigations. Clients also trust Anne to help them proactively address enforcement and compliance risks by enhancing their corporate compliance programs and internal controls.

Anne conducts investigations on behalf of clients facing allegations of bribery, corruption, accounting fraud, earnings management, improper revenue recognition, embezzlement, and other misconduct. She regularly represents companies and individuals facing scrutiny from federal agencies, including the U.S. Department of Justice (DOJ) and the U.S. Securities and Exchange Commission (SEC). Her practice spans a wide range of industries, including healthcare and life sciences, aerospace, technology, extractives, retail, hospitality, and food and beverage.

With on-the-ground experience in more than 17 countries, Anne has an extensive track record handling cross-border matters spanning a range of fraud, ethics, bribery, and corruption issues. Chambers consistently recognizes Anne for her Foreign Corrupt Practices Act (FCPA) expertise.

Anne also maintains an active corporate compliance practice. She has been a member of DOJ and SEC-appointed independent monitor teams. Anne has also guided a client through a three-year government monitorship. She works with companies at every stage of growth to build, enhance, and assess corporate compliance and ethics programs. She takes a practical, risk-based approach to designing compliance policies and procedures that can be effectively operationalized. As part of her compliance practice, Anne conducts risk assessments and compliance reviews, advises on pre-acquisition anti-corruption diligence, and helps clients integrate newly acquired entities into their compliance programs.

Key Matters

Some of the experience represented below may have been handled at a previous firm.

INVESTIGATIONS

- Represented a special committee of the board in an investigation into embezzlement by a company's senior executives
- Conducted an internal investigation into allegations of earnings management by senior leaders of a publicly traded company

- Defended a multinational corporation in a five-year corruption and bribery investigation by the DOJ and SEC that spanned South America, Europe, Asia, and Australia, and obtained government declination letters
- Conducted an internal investigation into potential accounting fraud issues at a multinational corporation on behalf of its board of directors
- Conducted an internal investigation into ethics issues and product substitution at manufacturing plant
- Conducted an internal investigation into fraud and corruption issues by a third-party distributor to a multinational corporation
- Represented several individuals in industry-wide FCPA investigations related to the oil services and pharmaceutical sectors
- Conducted an internal investigation into a healthcare company's operations in China
- Conducted an internal investigation into corruption allegations related to a U.S. public official

MONITORSHIPS

- Represented a multinational company throughout a three-year DOJ- and SEC-imposed FCPA monitorship
- Served on DOJ and SEC-appointed FCPA monitor team

COMPLIANCE PROGRAM DEVELOPMENT, RISK ASSESSMENTS, & M&A DILIGENCE

- Developed an anticorruption compliance program for a life sciences company
- Performed a global anticorruption risk assessment for a hospitality and tourism corporation with worldwide operations
- Developed criteria and conducted a risk assessment for an oil exploration company in the Middle East
- Conducted global risk assessment for financial services organization
- Conducted assessment and tested compliance program for manufacturing company

Recognitions

- Chambers Global, FCPA: USA, 2022-2026
 - Chambers USA, FCPA, 2022-2025
 - Global Investigations Review, Women in Investigations, 2025
 - Global Investigations Review's GIR 100, Recommended, 2024
 - Super Lawyers, Washington, D.C., Rising Star, 2014-2019
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Credentials

EDUCATION

Anne earned her J.D. from the American University Washington College of Law in 2005. She received her B.A., *cum laude*, from Middlebury College in 2001.

ADMISSIONS

- District of Columbia
- Massachusetts

Related Insights & News

PRESS RELEASE

Winston Expands White Collar & Government Investigations Practice with Partners Anne Murray and Guy Singer

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