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Meet Rebecca Walker: The progression of compliance

Rebecca Walker is Partner at Kaplan & Walker LLP in Santa Monica, California, USA

Rebecca Walker (rwalker@kaplanwalker.com) was interviewed by Adam Turteltaub (adam.turteltaub@corporatecompliance.org), Chief Engagement & Strategy Officer at SCCE & HCCA.

AT: You've worked in compliance for a long time now, more than two decades. What led you into the field when it was still relatively new?

RW: You are correct, Adam, that I got my start in compliance during the 1990s, when both the compliance profession and I were still quite young. At the time, I was a white-collar criminal defense lawyer in New York. I was exposed to compliance in my work representing companies that were being investigated by federal prosecutors, and from the beginning, I fell in love with the positive, proactive nature of compliance. It was a wonderful contrast to the devastation that you are faced with when dealing with a criminal investigation.

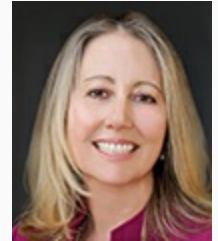
I began practicing compliance law at Skadden Arps, which was perhaps the only large law firm that had a compliance program practice group during the 1990s. I feel very fortunate to have been able to transition from criminal defense into a wonderfully rich career in our noble profession early on. About 15 years ago, I formed a partnership with my friend and compliance lawyer extraordinaire Jeff Kaplan, and we have been happily practicing compliance law together since.

I love the work that I do, in particular when I am able to dig deep and witness the positive impact that compliance can have in an organization. I also cherish the connections and friendships that I have made over the years. (That includes you, Adam, and so many others at the fabulous SCCE!) Compliance tends to attract good people who are happy to share with and support each other. I love that about our profession.

AT: In that early era, compliance tended to have a significant legal focus, which isn't surprising since so many of the early programs came out of serious criminal investigations. What do you think helped evolve the view to a more all-encompassing one that goes beyond legal?

RW: I think that the primary reason we were able to expand the focus of programs beyond a criminal—and even beyond a legal—focus is that compliance programs work. It took a little while (although not too long, really) for the compliance profession to gain the traction that it needed to be able to prove itself. But we got there, and the success of compliance programs at preventing and detecting misconduct has, in my view, been the primary reason for its expansion.

Other factors also contributed, of course. The development of the field of behavioral ethics helps us understand why compliance programs work and how they can be more effective. The Department of Justice and other regulators have also increased their focus on compliance. And the increased use of data analytics in programs allows us to prove the value of our programs with numbers, which enhances their credibility.



Rebecca Walker



Adam
Turteltaub

There's an indisputable internal logic to compliance. If we create systems with an authentic intention to prevent and detect misconduct, then we will in fact prevent and detect misconduct. Of course! But in those early days, there were plenty of skeptics who questioned the value of compliance, and while we have come a long way, there are still some skeptics out there.

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