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Kenneth A. Polite Jr.
(kp polite@sidley.com) is a Partner and Global Co-Leader of White Collar Defense and Investigations at Sidley Austin LLP in Washington, DC, USA.



Adam Turteltaub
(adam.turteltaub@corporatecompliance.org) is the Chief Engagement & Strategy Officer at SCCE & HCCA, based in Eden Prairie, Minnesota, USA.

Meet Kenneth A. Polite Jr.: Diversification is the future of compliance

By Kenneth A. Polite Jr. and Adam Turteltaub

AT: Thank you for taking the time to sit down and share your thoughts with us. You are, famously, the only chief compliance officer (CCO) to ever head the Criminal Division at the U.S. Department of Justice (DOJ). Before we get to that, though, I want to ask: what led you to compliance? Before joining Entergy as CCO, your career had been a mix of serving as a prosecutor and working in private practice. Many with similar backgrounds become in-house counsel, but few dive into compliance. What intrigued you about the opportunity?

KP: I was fortunate to inherit the compliance function from a strong CCO (indeed, the company's first). The platform provided me with an opportunity to learn about the company and its personnel quickly, given its connectivity to all parts of the enterprise. In addition, I viewed the compliance function as closely tied to an important part of my work as the U.S. attorney, that is, investigating and remediating wrongdoing. But it also connected well to my general belief in prevention as an effective tool, whether the objective was addressing public safety or building an ethical corporate culture.

AT: You got a bit of a taste of compliance in the U.S. attorney's office in New Orleans, where you came in as the new U.S. attorney and had to clean up an existing scandal involving inappropriate online postings about cases. Did that factor in?

KP: Becoming the U.S. attorney on the heels of that scandal was instructive in so many ways. Certainly, the experience highlighted how leadership and culture are critical to the success or failure of an organization's compliance function.

AT: What surprised you about the role of CCO once you took it on?

KP: What surprised me most about the role was how "corporate" it was—that is, operating almost exclusively from headquarters. We immediately began utilizing our incredible staff to get out into the field, visiting our various operations and connecting with the personnel we were serving.

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