

SETON HALL | LAW

Healthcare Compliance
Certificate Program



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Alexander is a Director with KPMG's Forensic Function in UAE. Alexander is a Chartered Accountant with 15 years of experience in Forensic Accounting. Alexander specializes in pharmaceutical and healthcare sector.

Alexander has led over 75 Anti-bribery and Corruption (AB&C) investigations and pro active reviews for 5 of the top 10 Pharmaceutical company's business operations in UAE, Saudi Arabia, India, Kuwait, Turkey, Egypt, Bahrain, Qatar, Yemen, Nigeria, Kenya, Lebanon, Uganda and Iraq. Investigated matters involving ABAC laws (FCPA & UK Bribery Act), US SEC/DOJ initiated matters, non-compliance with regional MOH regulations and pharmaceutical industry codes.

Specialization

- Investigations and AB&C reviews

Education and certifications

- Chartered Accountant, Institute of Chartered Accountants of India
- Bachelor of Commerce, University of Mumbai, India
- CISA, Information and Systems Audit and Control Association, US
- Middle East Healthcare Compliance Certification, Seton Law College, NJ, US

Relevant Experience:

- Led a US DOJ initiated investigation for an international pharmaceutical company for allegations of improper engagement with a senior surgeon by providing implants (including FOCs) through out of the channel sales, and other value transfers of Free For Service (FFS) and grants.
- Led an investigation in Saudi Arabia over allegations that the local distributor of an international pharmaceutical company had made out of channel sales in order to exploit discounts and increase margins. This investigation uncovered counterfeiting of trade packaging of governmental tender stock for diversion into the retail market.
- Led an investigation for a UAE based electronics distributor for allegations concerning breach of Arab League sanctions. Investigation identified ancillary products sold by the distributor which were manufactured in a country sanctioned by the Arab League.

- Led an investigation in Turkey for an international pharmaceutical company over wide-ranging corruption allegations including improper value transfers to HCPs through Clinical Trial projects and improper payments to a KOL to secure GAMP certification for a local manufacturing site in Turkey. The investigation procedures to-date uncovered evidence to support the allegations.
- Led an investigation in Saudi Arabia over allegations that an international pharmaceutical had made sales to a distributor in Saudi Arabia without market demand (channel stuffing). The investigation identified channel stuffing of products of US 15M, which subsequently expired at the distributor's warehouse. The company had to compensate the distributor for expired stock of the said amount.
- Led a multi jurisdictional investigation for an international pharmaceutical company's operations in Nigeria, Kenya and Uganda for wide range of allegations including channel stuffing, bribery payments to customs officials, manipulation of marketing budgets and conflict of interest of a senior management staff.
- Led an engagement for compliance review of an European pharmaceutical company's operations in Egypt under the instructions of an independent monitor appointed by the US SEC. Identified certain process violations in the arrangements with KOLs for scientific speaker fees.
- Led a compliance audit of a Kuwaiti distributor for an international pharmaceutical company. Identified number of improper sponsorships and other benefits provided by the distributor to KOLs and HCPs from government and private hospitals which included round trip flight tickets for family members of HCPs. These sponsorships were not only noncompliant with the international ABAC regulations but also with the Gulf Code of Pharmaceutical Promotional Practices in the GCC.
- Led an investigation in Saudi Arabia for an international pharmaceutical company over allegations that price control regulations were manipulated. Identified evidence to verify the allegations in form of FOCs and rebates were provided to customers which were not compliant with the SFDA.
- Led an investigation for operations of an international pharmaceutical company in Yemen into wide-ranging corruption allegations including improper HCP events, conflict of interest and hiring a lobbyist for securing a government tender. The investigation uncovered evidence to verify the allegations.