

Law Firm Policy: Extortion Demands and Payments

To: All Partners, Associates, and Staff

From: Management Committee / Office of General Counsel

Effective Date: [Insert Date]

1. Purpose

This policy outlines the firm's position regarding extortionate demands, including ransomware, cyber-extortion, and physical threats. The firm is committed to legal compliance, ethical integrity, and the protection of client data.

2. General Prohibition

The firm maintains a general policy against paying extortion demands. Payment of such demands can encourage further criminal activity, fund illegal organizations, and does not guarantee the recovery of data or the cessation of threats.

3. Reporting Requirements

Any employee who receives an extortion demand or identifies a potential threat must immediately:

- Cease all communication with the extorting party.
- Notify the IT Department and the General Counsel's office.
- Refrain from clicking links or downloading attachments associated with the demand.
- Document the time, date, and nature of the communication.

4. Response Protocol

Upon receiving a report, the firm will:

- Activate the Incident Response Team.
- Conduct a risk assessment to determine the scope of the compromise.
- Consult with external cybersecurity experts and legal counsel.
- Notify law enforcement (e.g., FBI/local authorities) as required by law.

5. Exceptions and Authorization

Any deviation from the non-payment policy requires written authorization from the Managing Partner and the Management Committee. Payments will only be considered under extreme circumstances where there is a direct threat to life or safety, or where legally permissible and deemed the only viable path to protecting client interests.

6. Legal and Regulatory Compliance

The firm will strictly adhere to all applicable laws, including Office of Foreign Assets Control (OFAC) regulations regarding payments to sanctioned entities. Any proposed payment must undergo a thorough legal review to ensure it does not violate anti-money laundering or counter-terrorism financing laws.

Acknowledgment: By continuing your employment or association with the firm, you acknowledge that you have read and understand this policy.