

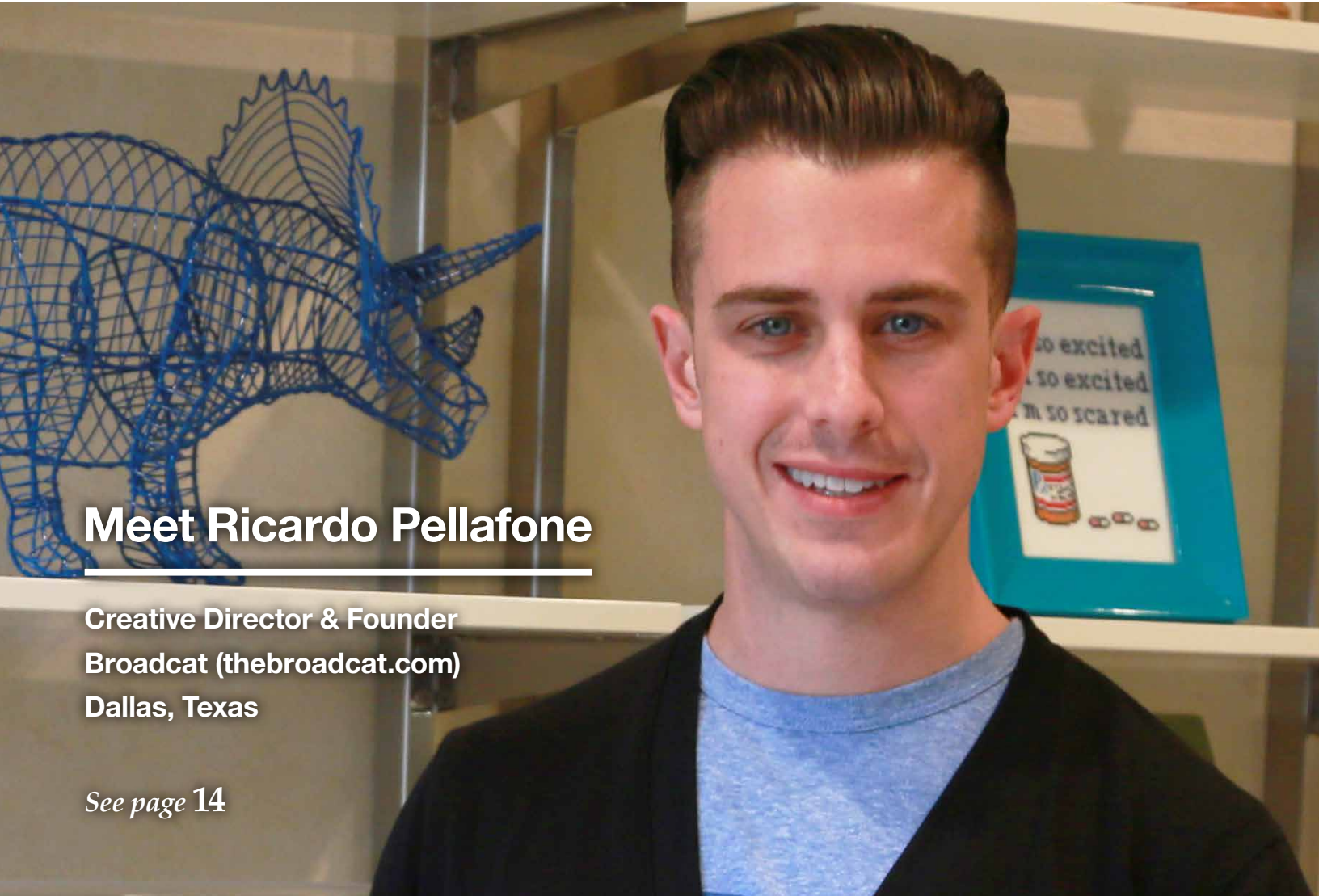
# Compliance & Ethics Professional

March  
2016



A PUBLICATION OF THE SOCIETY OF CORPORATE COMPLIANCE AND ETHICS

[www.corporatecompliance.org](http://www.corporatecompliance.org)



## Meet Ricardo Pellafone

Creative Director & Founder  
Broadcat ([thebroadcast.com](http://thebroadcast.com))  
Dallas, Texas

See page 14

25

A need for ethics & compliance professionals to understand ethical theory

Chad Kleist

31

Measuring ethics

Fares Tabba

35

How to make your compliance management system sustainable

Bill Dee

39

Saying no effectively

Kristy Grant-Hart



## Ricardo Pellafone, JD

Creative Director & Founder  
Broadcast ([thebroadcast.com](http://thebroadcast.com))  
Dallas, Texas

an interview by Stephanie Gallagher, Esq.

# Meet Ricardo Pellafone

**Ricardo Pellafone** ([ricardo@thebroadcast.com](mailto:ricardo@thebroadcast.com)) was interviewed in December of 2015 by **Stephanie Gallagher** ([stephanie.gallagher@corporatecompliance.org](mailto:stephanie.gallagher@corporatecompliance.org)), Social Media Manager at SCCE.

**SG:** Thank you, Ricardo, for your willingness to share your expertise with us. Can you tell us a little bit about your background in Compliance?

**RP:** I'm a recovering lawyer, so I started off on the investigations side of things. Early on, that was as outside counsel, and then as the in-house compliance investigations leader for a

couple of big companies in Abu Dhabi and California.

After I got in-house, though, I started taking on broader compliance program duties—especially in training and communications. It was a way for me to take what I was learning from investigations and combine it with my pre-law-school background in psychology and art. And then that training and communications remit just snowballed, and now I do it full time at Broadcast.

**SG:** You established and led the Internal Investigations function at Mubadala

Development Co. in Abu Dhabi. What was that like?

**RP:** That was great. We had a ton of support from the business leaders to set up something meaningful, which of course makes any compliance job infinitely easier. Mubadala is involved in industries all over the world—everything from aerospace and oil to healthcare and mining—so it let me establish a broad base of compliance experience really quickly, too.

And if you're thinking of Compliance as a long-term career, take an expat assignment. I know a lot of us in Compliance are road warriors, but living overseas gives you a totally different perspective. Our work gets more international every year, so being able to see beyond an American lens is only going to get more critical, too.

(Also, if you ever get to Abu Dhabi, go to Ferrari World. It totally rules.)

**SG:** Given your legal and compliance background, what do you wish you had known about the Compliance field when you started?

**RP:** I wish I'd known that Compliance is 10% knowing stuff and 90% leadership. I'd learned the "knowing stuff" part from being an outside lawyer, but when I got in-house, I realized how little that helped. Anyone can read DOJ settlements; compliance leaders get people to change their behavior.

Fortunately, my first in-house Compliance job was with two ex-General Electric people—Kurt Drake and Angie Hanson, who are now

the CCO and a senior compliance leader at General Cable—and so I got up the learning curve on leadership skills very quickly, thanks to them.

**SG:** You recently founded Broadcast, a startup that makes graphic content for legal and compliance training. What inspired you to do this?

**RP:** I was trying to solve a problem I had when I was in-house. I wanted training materials that made things very easy for our employees. I felt like there were a lot of solutions that looked great, but they didn't actually make understanding the concepts any easier. That's a design problem.

I always go back to trips I've taken to Seoul; I know basically no Korean, but everything in the city is so well-designed that you can go anywhere and do almost anything, just based on icons and pictures. I wanted our employees to have the same experience: to be able to look at our materials and know what to do without having to learn the "language" of regulations. And once I realized that a lot of other companies were having the same problem, I set up Broadcast to do just that.

**SG:** Where did the name "Broadcast" come from?

**RP:** I wanted the name to reflect what we're trying to accomplish in making these concepts both accessible and interesting, so it's a riff on the word "broadcast"—I wanted it to be evocative of communication without being

**I wish I'd known that Compliance is 10% knowing stuff and 90% leadership. I'd learned the "knowing stuff" part from being an outside lawyer, but when I got in-house, I realized how little that helped.**

overly literal. It's proven to be a pretty good conversation starter at events.

**SG:** What is your favorite part of your job as Founder and Creative Director of Broadcat?

**RP:** I like getting people excited about ethics, and I love meeting people who are trying to do the same thing at their companies. I mean, look how excited people get about celebrity gossip—it's just fluff, but it's packaged in an interesting and digestible way by people who are passionate about it, and that makes it contagious.

In corporate Compliance, we have material that actually matters and actually impacts peoples' lives. And so I love being able to work with people to package and message what we do in a way that helps make it just as interesting and digestible.

**SG:** What do you think is the most important factor in building an ethical culture?

**RP:** You have to communicate relentlessly. Culture is just a series of relationships at scale, so the same stuff that works in personal relationships applies here, too. If you want a healthy marriage, for example, you can't just assume that your spouse knows that you love them. You have to actually say it to them and take actions that show it regularly.

It's the same thing with company culture; if you want an ethical culture, people at all levels need to have conversations and take actions to demonstrate the company's commitment to ethics on a regular basis.

**SG:** How can compliance professionals positively impact corporate culture?

**RP:** It's a long game, so start by making your value more apparent to your business teams so that they'll actually want to listen to you. This means making every interaction as easy and painless as possible, which

demonstrates that you respect how strapped for time and bandwidth your employees are.

Most people get this right on in-person interactions, but it applies to your forms, policies, newsletters, and training, too—because that's the only way most employees will ever interact with you. You have to make it easier for people to ask permission than seek forgiveness, and having those paper interactions be simple, accessible, and tailored in a way that shows you understand your business is a key way to drive that.

**SG:** What do you believe is most important for someone new to the field to know about Compliance?

**RP:** It's not a back-office job. No one needs compliance people who are exclusively subject-matter nerds—that's why we have outside lawyers. Instead, we need compliance people that are subject-matter experts *and* able to connect with employees in a practical, warm, human way. Because, at the end of the day, your subject-matter expertise is only useful if people will actually listen to you.

And while some of that is personality-driven, most of it can be learned. I used to be very introverted, but just like the FCPA or HIPAA can be learned, so can things like public speaking, persuasive writing, and visual presentation. So, as you're learning about program structure and your key risk areas, make sure you're consistently working on improving your communication and presentation skills, too.

**SG:** You are an active blogger on The Compliance & Ethics Blog. What got you into it?

**RP:** I sent one of our very first pieces to Adam Turteltaub through Twitter, and he encouraged me to reach out to the blog to see if they'd be interested in running our work. Stephanie, you were super supportive

and started putting our pieces out there, and then the world just exploded for us. I really can't recommend blogging on the SCCE's site enough; we've grown as fast as we have because of the exposure we got through the SCCE.

**SG:** What advice would you give other compliance professionals about getting involved in blogging/social media, both personally and from a professional perspective?

**RP:** If you're an in-house practitioner and wary of social media because of your role—and I'm sympathetic to that, because that was me, too—start by experimenting with your company's Intranet and newsletter. It's a safe way to try things out to establish your voice and get feedback. See what works and what doesn't, and ask for a ton of feedback from people. All of that will help you define your niche, and you'll find that most people are incredibly encouraging.

**SG:** Your blog posts typically focus on making compliance obligations easy to understand and accessible to everyone. How do you approach breaking down these concepts for your audience?

**RP:** There are four basic steps to what we do. First, you have to totally own the material, because you can't simplify something until you've mastered it. That applies to both the abstract concepts and also the potential use cases; how will people actually use this information at a company? If it won't be useful to a practitioner, we leave it out.

**If you're an in-house practitioner and wary of social media because of your role—and I'm sympathetic to that, because that was me, too—start by experimenting with your company's Intranet and newsletter.**

Second, we sort it into the smallest possible number of subjects or categories. That helps speed up the brain's ability to process and retain the information.

Third, we figure out the most efficient way for someone to process the individual pieces of data; most of the time, that means a graphic, but not always, because the graphics are just a means to achieve fast comprehension. Our goal is to make things understandable, not just add pictures for the sake of adding pictures.

Finally, we organize all of the text and graphics into a visual narrative. We

know we're done when we have something that folks can process in less than a minute and get what they need to know. We keep iterating through that process until we reach that goal.

**SG:** Can you tell us a few things about yourself that people would be surprised to know?

**RP:** Normally, people are surprised that I'm a lawyer, and I take that as a huge compliment—because no one ever says, "You sound and look like a lawyer" and means it in a good way, you know?

That also may be because I have a bunch of visible tattoos and can look younger than my age (I'm 35, so I'm at the old end of the Millennial generation). But whatever, I'll take the win.

**SG:** Thank you, Ricardo, for sharing your extensive background and valuable experience with us. \*