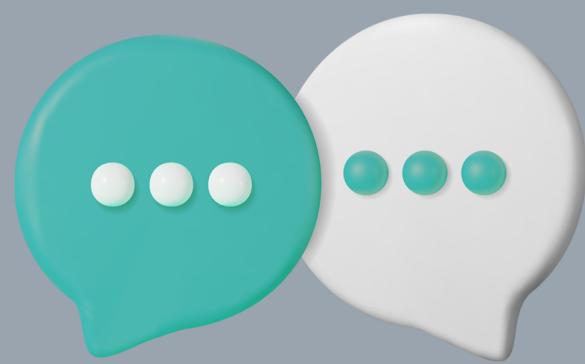




ACC InConversation: James Turoff of The Hershey Company

Interviews and Profiles



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James Turoff

Senior Vice President, General Counsel, and Corporate Secretary

The Hershey Company

James Turoff, Senior Vice President, General Counsel, and Secretary at The Hershey Company, has built a career that blends strategic legal leadership, adaptive management, and a keen eye for technological change.

In a wide-ranging conversation with ACC President & CEO Veta T. Richardson, he shared insights on cultivating relationships, embracing AI, and navigating the ever-expanding mandate of today's chief legal officer.

Start with relationships

For Turoff, relationships are strategy, not just etiquette. He schedules purposeful cadences with executive peers, even those outside his immediate orbit. With a CTO based largely in Seattle, for example, he blocks a monthly one-on-one and makes time for lunch whenever the CTO is in town to strengthen rapport before challenges arise.

The same approach guides his work with Hershey's board. With many new directors joining since May, Turoff has invested 90-minute to two-hour onboarding meetings with each director to share who he is, how the company operates, and the biggest enterprise challenges — not just legal issues — so that when the inevitable problems surface, "they're not starting from scratch."

"Similar to onboarding a new CEO, you've got to rebuild those relationships. They don't have the baseline of 10 years of trust and having seen you," he shared.

Turoff embraces the role of judgment filter for the CEO, deciding what truly warrants escalation: Making his boss look good often comes down to identifying the key nuggets the board needs while protecting the CEO's time. "Being able to be that filter for the CEO and have enough judgment to say, what do I bring to the CEO, what do I not? That's something that you have to develop over time, but it adds tremendous value."

But rather than simply defending management decisions, he invites directors into problem-solving conversations. This collaborative posture turns oversight into partnership.

[Building your leadership toolkit? See ACC's Essential Toolkit for New General Counsel, including the checklist on Developing Leadership and Business Skills.](#)

A legal team built for today's challenges

Hershey's legal department reflects the breadth and complexity of the modern in-house function. Turoff oversees a team of about 75 people, including roughly 20 attorneys, 10 paralegals, and a wide range of professionals whose work extends far beyond traditional lawyering. Ethics and compliance, government relations, sustainability, privacy, AI, and even physical security all report through him.

He delights in the diversity of issues his team tackles — each day brings “a new puzzle and a new challenge for which there’s rarely a rulebook.” The rapid pace of change, driven by technology, geopolitics, and shifting regulations, demands constant adaptation.

Even the office culture stands out. Hershey is “a very, very special place,” Turoff said, where snacks are everywhere and newcomers often joke about gaining the “Freshman 15” in their first year.

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Leading with adaptability

Turoff’s leadership style did not emerge overnight. Early mentors encouraged him to evolve beyond a natural “command and control” approach and become an adaptive leader, capable of matching direction to the needs of different people and situations. At first, he swung too far toward consensus, which left his team unclear on priorities, teaching him the importance of balancing clear direction with empowerment.

“Adaptive leadership doesn’t mean abandoning your (natural) leadership approach, or abandoning setting clear directions. It’s finding the balance of setting clear direction, and then empowering the team to understand where they need to be,” Turoff said.

If we’re problem solvers, part of our role is to go in to search for the problems.

James Turoff

A pivotal career moment came when he did not get the GC role on his first try. Instead of discouragement, he embraced development, attending ACC’s Executive Leadership Institute (ELI) at the suggestion of the incoming GC.

“It was incredible, again, having people in your corner, and people who want you to succeed is so important,” Turoff said. “But then getting open to these types of opportunities, and [ELI] was such a great way to get a ‘trial by fire’ in front of a board, because you have actual directors who are there asking you questions, helping and coaching and guiding.”

He advises aspiring GCs to say yes to stretch opportunities, even those outside their comfort zone. Early in his Hershey tenure, he accepted an assignment in China despite having “never been to Asia,” an experience that built credibility and relationships that paid dividends years later when the GC role opened again.

[Learn more about ACC’s Executive Leadership Institute](#)

Compliance and regulatory insights

Turoff shared a pragmatic model for structuring compliance and regulatory functions. At Hershey, ethics and compliance report through legal but with a degree of independence: The Chief Compliance Officer makes final calls and meets directly with the audit committee. Food regulatory matters, however, sit outside legal with a dedicated lawyer, reflecting the need for specialized expertise.

Rather than focusing on reporting lines, Turoff stressed the importance of defining decision rights and cross-functional roles, so teams know who owns which calls.

Global regulatory change remains a constant challenge. He described the difficulty of tracking an increasingly fragmented landscape — particularly the growing divergence between state and federal rules in the US — and the need for a cross-functional team to separate “signal from noise” until AI tools can automate more of the work.

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James Turoff

Moving AI from hype to habit

Turoff sees AI as transformative as the internet, predicting it will reshape both legal work and business strategy. His mantra: “AI is not going to come and take your job, but someone who knows how to use AI is going to come and take your job — so that person should be you.”

[Explore the ACC AI Center of Excellence for In-house Counsel](#)

He recommends starting small to overcome the “blank canvas” fear. At Hershey, his team launched a weekly “in-case-you-missed-it” email generated with AI to compile key updates and links, saving time and reducing inbox clutter. They also created a technology committee of super-users and skeptics to identify simple pilot projects and share use cases.

To drive adoption, he combines carrots and sticks: set AI use-case goals (quarterly for advanced teams, annually for others) while showcasing wins that free lawyers from repetitive tasks.

“You want to win the hearts and minds of people if you can. So, selling them on the benefits of, ‘Hey, you know that question that you’ve had to answer 12 times?’” Turoff shared as an example. “Well, imagine if that was agentic AI answering that, because your answer doesn’t change. ... How much of your time would you free up? But more importantly, how much of your mental energy and your frustration would that free up?”

Policies and training guardrails are essential, as “the business is already using AI whether you know it or not.”

[Download ACC's AI Toolkit for In-house Lawyers](#)

Secure the CEO reporting line

Finally, Turoff is unequivocal: [**The CLO should report directly to the CEO**](#). “If you don’t, have a serious conversation with your CEO,” he advised, citing both privilege considerations and the strategic need for unfiltered communication.

That access must be earned. His method is to identify the most significant problems early — from food regulation to tariffs to cocoa pricing — rather than waiting for issues to reach legal.

“If we’re problem solvers, part of our role is to go in to search for the problems,” Turoff said. Legal adds maximum value when it operates as an enterprise problem solver, connecting dots across risk, operations, and strategy.

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