

2016 FCPA Year in Review (and a Record-Breaking January 2017)

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The Foreign Corrupt Practices Act (FCPA) continued to be a top enforcement priority for the U.S. Department of Justice (DOJ) and the U.S. Securities and Exchange Commission (SEC) in 2016, with over \$2 billion in corporate fines and 20 individual prosecutions. U.S. enforcement authorities brought enforcement actions against 28 companies last year, in which they continued to advance aggressive enforcement stances. Also in 2016, the DOJ introduced a one-year FCPA Pilot Program designed to encourage self-reporting and cooperation, and several global enforcement actions demonstrated the increasing importance of international anti-corruption cooperation. And 2016 was followed by a record-breaking January 2017, as the Obama Administration drew to a close.

Despite some commentary to the contrary, we believe it would be misguided to conclude that the incoming Trump Administration dramatically alters the importance of FCPA compliance, at least at this stage. First, it is too soon to determine exactly what the Trump Administration's priorities will be. Second, FCPA violations and serious investigations have long life-spans, creating exposure for a greater period than four years. Because the consequences of non-compliance – financial and otherwise – can be enormous, it would be short-sighted to curtail anti-corruption compliance measures significantly.

[Read full summary here.](#)

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