

The Foreign Corrupt Practices Act: 2013 Year-in-Review

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Vigorous enforcement of the Foreign Corrupt Practices Act (FCPA) continued unabated in 2013. There was almost a 20% increase in FCPA enforcement actions against companies and individuals in 2013 over the prior year. Those numbers are buoyed somewhat by an increase in actions brought against individuals. The number of enforcement actions brought against corporations in 2013 was actually down from 2012. Yet, although the quantity of corporate enforcement actions may have diminished slightly, there was a marked improvement in the “quality” of FCPA actions. Major settlements with Total, S.A. (\$398.2 million) and Weatherford International Ltd. (Weatherford) (\$152.6 million) headlined a year in which the average FCPA settlement hovered around \$80 million. According to Charles Duross, former Department of Justice (DOJ) FCPA Unit Chief, this trend will continue, as the DOJ expects to bring “very significant, top 10 quality cases” in 2014. In fact, in the first few days of the new year, the Government announced a \$384 million FCPA settlement with Alcoa—the fifth largest FCPA settlement of all time. [Click here to read the full article.](#)

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Authors

Ralph J. Caccia
Partner
202.719.7242
rcaccia@wiley.law

Laura El-Sabaawi
Partner
202.719.7042
lel-sabaawi@wiley.law

Brandon J. Moss
Partner
202.719.7554
bmoss@wiley.law

Practice Areas

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