

White Collar Update: DOJ Announces One-Year FCPA Self-Reporting Pilot Program

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On April 5, 2016, the U.S. Department of Justice (“DOJ”) launched a new one-year pilot program encouraging voluntary self-disclosure of misconduct related to the Foreign Corrupt Practices Act (“FCPA”). Companies meeting certain cooperation, remediation, and disgorgement requirements will now be eligible for a fine reduction of up to 50% below the bottom of the Sentencing Guidelines range, resolution without a monitor, and consideration of a declination. The pilot program complements the Yates Memo and recent amendments to the U.S. Attorneys’ Manual (“USAM”), reflecting further efforts by DOJ to incentivize cooperation and to clarify requirements for obtaining maximum credit.

If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

Greg D. Andres

+1 212 450 4724
greg.andres@davispolk.com

Martine M. Beamon

+1 212 450 4262
martine.beamon@davispolk.com

Angela T. Burgess

+1 212 450 4885
angela.burgess@davispolk.com

Neil H. MacBride

+1 202 962 7035
neil.macbride@davispolk.com

Denis J. McInerney

+1 212 450 4477
denis.mcinerney@davispolk.com

Neal Potischman

+1 650 752 2021
neal.potischman@davispolk.com

Linda Chatman Thomsen

+1 202 962 7125
linda.thomsen@davispolk.com

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