

DOJ Clarifies Position on Agency Liability under the FCPA post-Hoskins; New FCPA Chief Named

December 9, 2019 | Client Update

Assistant Attorney General Brian Benczkowski, the head of DOJ's Criminal Division, recently gave a speech in which he clarified that DOJ will not automatically seek to impose agency liability on parent companies for FCPA violations by subsidiaries, joint ventures, and affiliates. Mr. Benczkowski also announced a new permanent chief of the Fraud Section's FCPA Unit, and in response to questions from the audience, he stressed the Criminal Division's desire to reduce protracted negotiations over corporate resolutions.

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.

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