

CFTC Is Latest Entrant to Anti-Corruption Enforcement

March 11, 2019 | Client Update

On March 6, 2019, CFTC Director of Enforcement James McDonald said the agency is pursuing foreign corrupt practices that constitute violations of the Commodities Exchange Act, with some investigations already underway. The agency also moved to encourage voluntary disclosures, with a new policy of generally not seeking civil monetary penalties for CFTC non-registrants who demonstrate full cooperation and appropriate remediation. Our client memo examines the implications for companies of the CFTC's entry into an already crowded enforcement space, including the CFTC's commitment not to pile onto existing investigations by the DOJ and SEC.

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.

Martine M. Beamon

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

Angela T. Burgess

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

James W. Haldin

+1 212 450 4059
james.haldin@davispolk.com

Neil H. MacBride

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

Tatiana R. Martins

+1 212 450 4085
tatiana.martins@davispolk.com

Denis J. McInerney

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

Paul J. Nathanson

+1 202 962 7055
+1 212 450 3133
paul.nathanson@davispolk.com

Neal Potischman

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

Linda Chatman Thomsen

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

This communication, which we believe may be of interest to our clients and friends of the firm, is for general information only. It is not a full analysis of the matters presented and should not be relied upon as legal advice. This may be considered attorney advertising in some jurisdictions. Please refer to the firm's privacy notice for further details.

Related materials

[Read the full update](#)