

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.

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