

**UT LAW**

**GOVERNMENT  
ENFORCEMENT  
INSTITUTE**

**2022**

**FCPA:  
A LOOK AT THE  
PAST YEAR**

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Starting off at 40,000 feet:

A look at 2022 so far in  
FCPA enforcement

How busy—*or NOT*  
in terms of Resolutions  
has 2022 been?

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# HAS THE ADMINISTRATION CAUSED US TO LOOK FOR A SURGE—OR AT LEAST AN INCREASE?

- December 2021, the Biden administration announced a sweeping new anti-corruption strategy.
- “United States Strategy on Countering Corruption” (the SCC)
- It followed... President Biden’s declaration in a June 3, 2021 memorandum...”...corruption enforcement is a “core United States national security interest.”
- Department of Justice (DOJ) announcements made throughout the fall to “surge resources” for corporate enforcement, revise its corporate criminal enforcement policies, and adopt a new stance on corporate recidivism.

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## Is 2022 Up or Down?

Not Many Big cases (So far)...What does that mean?

**Factors?**

**Covid 19?**

**Transition lag?**

**Other Factors?**

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# 3 Landmark (or noteworthy) Resolutions

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# GLENCORE

FCPA/CONSPIRACY  
MARKET MANIPILATION

Over \$1Billion in fines

Primary takeaways?

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Title search: FCPA: Key Updates and Strategic Responses

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