What the Government Expects to Find in an Anti-Corruption Compliance Program

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US-connected companies operating internationally face significant legal risks from the US Foreign Corrupt Practices Act (FCPA) if employees or agents bribe or promise to bribe "foreign officials", especially as the US Securities and Exchange Commission (SEC) and the US Department of Justice (DOJ) reemphasize FCPA enforcement as a continuing priority. In this article published in *DRI: The Voice of the Defense Bar*, Kansas City Litigation and Dispute Resolution partner Brian O'Bleness addresses what the government would expect to find if it reviewed your client's company FCPA compliance program, discusses the hallmarks of an effective compliance program and examines case studies of recent enforcement actions.

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