

WEBINAR

Updates and New Developments in Foreign Corrupt Practices Act and Anti-Corruption Enforcement

SEPTEMBER 30, 2020

Speakers: Lori Echavarria, Jay Holtmeier, Kimberly Parker, Erin Sloane and John Walsh





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Agenda

- I. Enforcement Trends
- II. Recently Resolved Matters
- III. Recent Policy Updates
- IV. Legal Developments
- V. International Developments





2020 Midyear FCPA Statistics

2020 FCPA Enforcement Statistics (Year to Date)

| | DOJ | SEC |
|-----------------|-----|-----|
| No. Companies | 4 | 6 |
| No. Individuals | 3 | 1 |

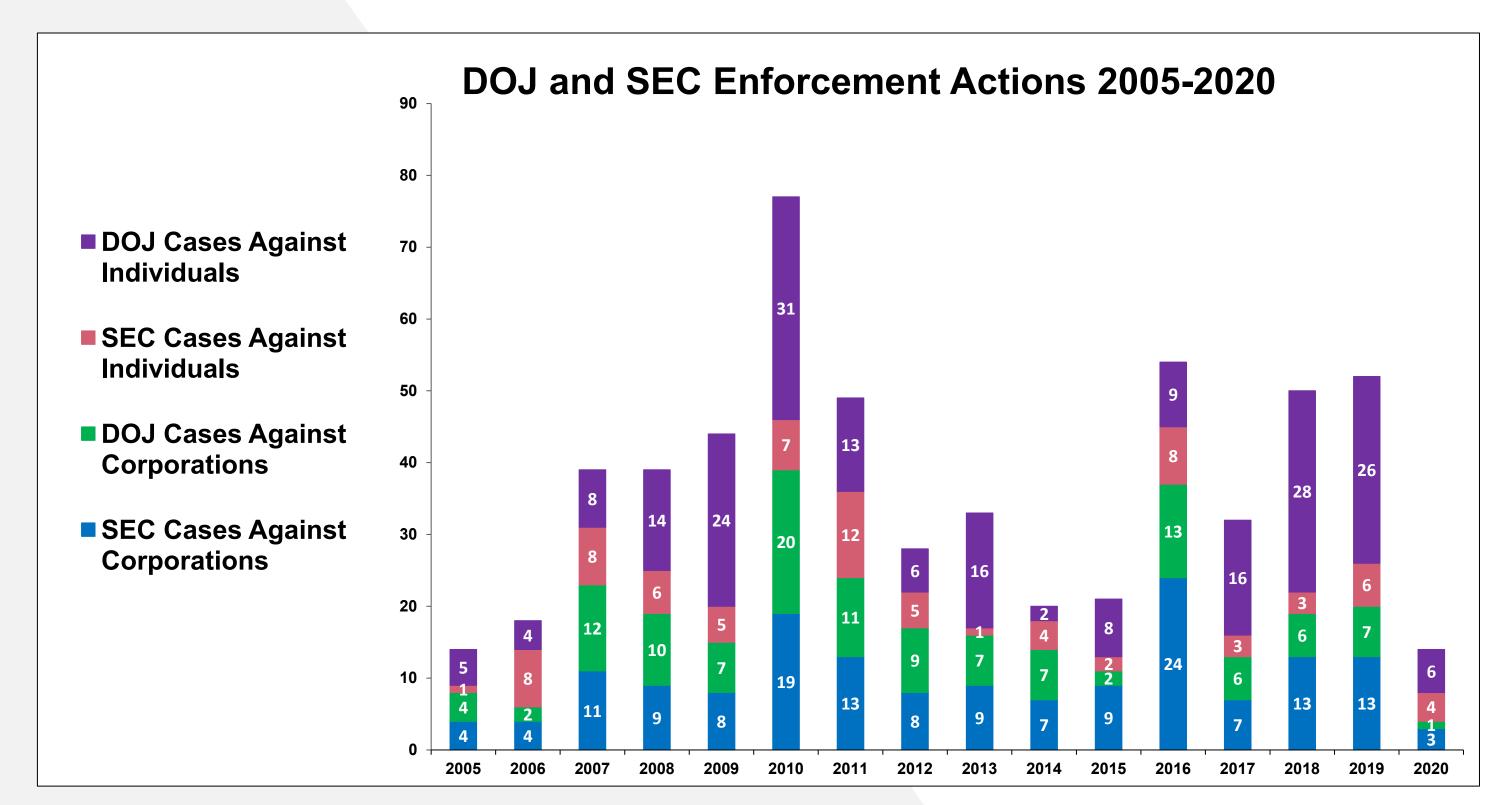
2020 FCPA Announced Case Closure Statistics (Year to Date)

| | DOJ | SEC |
|---------------|-----|-----|
| No. Companies | 6* | 3 |

^{*}One case declined under the DOJ FCPA Corporate Enforcement Policy

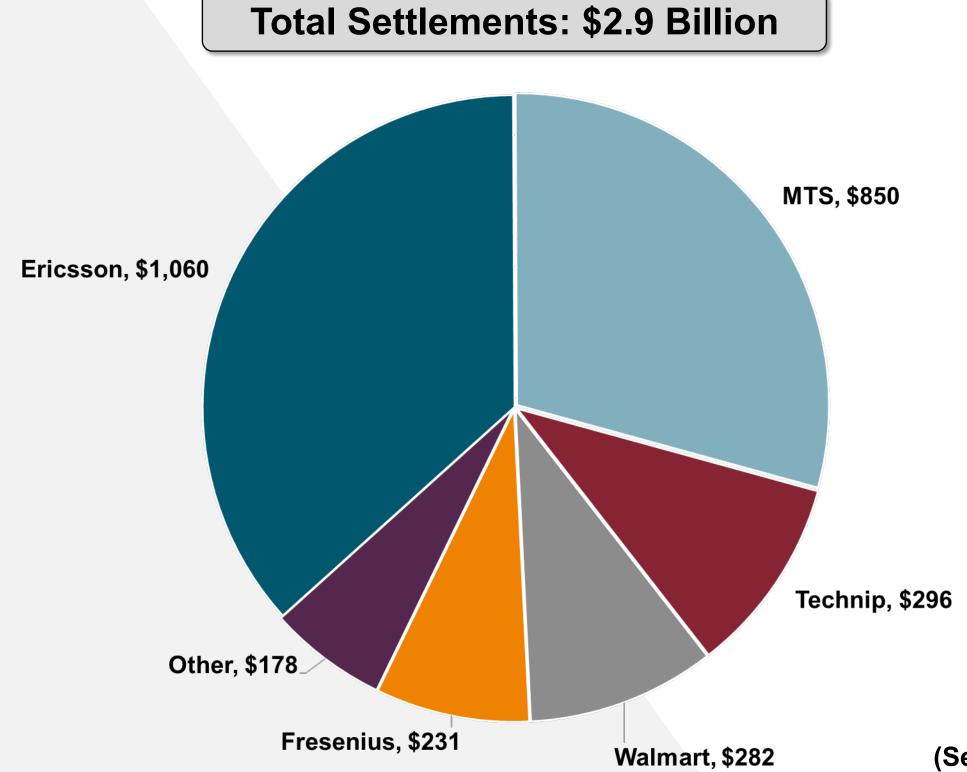


Continued Sustained Enforcement Activity





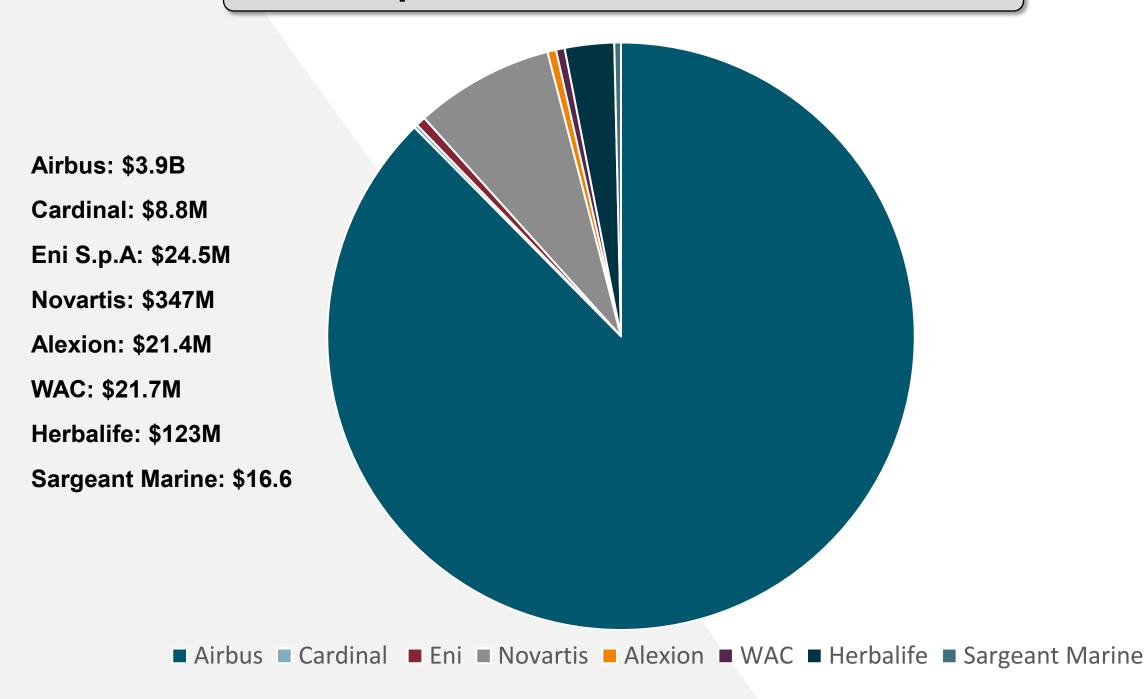
2019 Corporate Settlements





2020 Corporate Settlements (to-date)

Total Corporate Settlements: \$4.53 Billion





Anti-Corruption Enforcement Trends

- ✓ Prioritization of large monetary settlements
- ✓ Settlements reflect continued focus on high-risk industries (energy, pharma/healthcare, defense)
- ✓ Reliance on FCPA's accounting provisions to reach settlements
- ✓ Continued focus on risks related to third parties
- ✓ International law enforcement cooperation
- ✓ Continued focus on individuals
- ✓ Rewards for companies that voluntarily self-disclose, fully cooperate, and appropriately remediate
- Ever increasing expectations of corporate compliance programs, including updated DOJ/SEC guidance



Impact of the COVID-19 Pandemic

- ✓ Impact on timing and pace of investigations and resolutions
- ✓ Impact on availability of foreign evidence
- ✓ Focus on potential corruption schemes related to the pandemic –
 e.g., healthcare, government programs
- ✓ Challenges of maintaining effective compliance programs, strong compliance culture, and monitoring behavior during the pandemic



DOJ and SEC Enforcement Priorities

- COVID has not appeared to slow pace of enforcement actions since March:
 - Novartis/Alcon
 - Eni SpA
 - Alexion Pharmaceuticals
 - World Acceptance Corporation
 - Herbalife
 - Sargeant Marine
- Many other big cases in publicly reported pipeline
- In July 14 virtual FCPA conference, DOJ Criminal Division Chief stated that he expects to see
 a number of FCPA settlements this year: "2020 has obviously been challenging in a number of
 different ways, but we have been able to move forward with a number of key prosecutions and
 resolve a number of cases in 2020, including the Novartis case. I expect to see more of those
 in the coming months additional FCPA resolutions despite the pandemic, so that obviously
 remains a priority."
- SEC FCPA Unit Chief shared a similar message: "We're not hitting the pause button on our investigations."



Corporate Resolutions

2020 Midyear Resolution Tracker

| Company | Date | Enforcement Authority | Resolution* | Alleged FCPA Violation | Industry | Geography |
|-------------------------------------|-----------------------|--------------------------|--|--|---------------------|---|
| Airbus SE | Jan. 28, 2020 | DOJ | \$3.9B (DPA) | Anti-Bribery | Aerospace | China |
| Cardinal Health, Inc. | Feb. 28, 2020 | SEC | \$8.8M (cease & desist order) | Books & Records Internal Controls | Healthcare | China |
| Eni S.p.A. | April 17, 2020 | SEC | \$24.5M (cease & desist order) | Books & Records Internal Controls | Oil & Gas | Algeria |
| Novartis AG / Alcon Pte Ltd. | June 25, 2020 | DOJ & SEC | DOJ: \$233.9M (DPA) SEC: \$112.8M (cease & desist order) | Anti-Bribery Books & Records Internal Controls | Healthcare | China, Greece, South Korea, Vietnam |
| Alexion Pharmaceuticals, Inc. | July 2, 2020 | SEC | \$21.4M (cease & desist order) | Books & Records Internal Controls | Healthcare | Turkey, Russia, Brazil, Colombia |
| World Acceptance Corporation | August 6, 2020 | SEC | \$21.7M (cease & desist) | Anti-Bribery Books & Records Internal Controls | Consumer Finance | Mexico |
| Herbalife | August 28, 2020 | DOJ & SEC | DOJ: \$55.7M (DPA) SEC: \$67.3M (cease & desist) | Books & Records Internal Controls | Nutrition | China |
| Sargeant Marine, Inc. | September 22, 2020 | DOJ | \$16.6M (guilty plea) | Anti-Bribery | Construction | Brazil, Ecuador, Venezuela |



Airbus SE



- Airbus SE is a France-based aerospace company
- In January 2020, Airbus agreed to pay approximately \$4 billion in combined penalties

 the largest resolution in FCPA history to authorities in United States, France, and
 United Kingdom
- The DOJ imposed a \$2.09 billion penalty for FCPA offenses, setting a record for largest FCPA penalty ever
- Government alleged, between 2008 and 2015, members of the company's Strategy and Marketing Organization ("SMO") used consultants to pay bribes to government officials and executives at state-owned airlines to boost orders and obtain more favorable regulatory environment
- SMO concealed the bribes through fraudulent contracts, fake invoices, and false activity reports
- Government also alleged violations of International Traffic in Arms Regulations ("ITAR") for failing to report commissions or fees to third party defense service providers



Cardinal Health



- Cardinal Health is an American multinational healthcare company
- In February 2020, Cardinal agreed to pay \$8.8 million to resolve SEC allegations of FCPA books and records and internal accounting controls violations
- Government alleged, between 2010 and 2016, Cardinal's former Chinese subsidiary improperly directed marketing funds to Chinese HCPs and state-owned retail companies
- Employees disguised the improper payments including cash, luxury goods, and travel – by characterizing the transactions as marketing or "production fees"
- Cardinal agreed to pay (i) \$5.4 million in disgorgement; (ii) \$916,887 in prejudgment interest; and (iii) a civil penalty of \$2.5 million
- SEC acknowledged the company's voluntary self-disclosure, cooperation with the SEC's investigation, and remedial actions
- Cardinal announced that DOJ declined to take action



Eni S.p.A.



- Eni S.p.A. is an Italian oil and gas company
- Government alleged, between 2007 and 2010, a minority subsidiary of Eni (Saipem) entered into four sham contracts to obtain government oil contracts in Algeria
- Saipem paid approximately €198 million to intermediary, which directed a portion to Algerian officials to secure state-owned oil contracts
- Saipem classified improper payments as "brokerage fees" in its books and records (which were then consolidated into the Eni's books)
- Former Saipem executive who orchestrated the scheme was later hired as Eni CFO, where he continued to facilitate Saipem's improper payments
- SEC alleged that Eni failed to exercise "good faith" to cause Saipem to maintain sufficient internal controls
- Eni agreed to pay \$24.5 million, including \$19.75 million in disgorgement and \$4.75 million in pre-judgment interest



Novartis



- In June 2020, Novartis and two subsidiaries (one current and one former) resolved FCPA investigations with the DOJ and the SEC for a combined \$347 million
- First parallel SEC / DOJ FCPA resolution of 2020
- Novartis Greek subsidiary (Novartis Hellas) and former subsidiary (Alcon Pte) agreed to pay over \$233 million in FCPA criminal penalties
- Novartis Hellas was accused of bribing employees of state-owned and statecontrolled hospitals and clinics in Greece and falsely recording the payments, while Alcon was accused of falsely recording improper payments in Vietnam
- Separately, Novartis settled with the SEC for over \$112 million to resolve FCPA books and records and internal controls violations spanning 2012 to 2016 at subsidiaries in South Korea, Vietnam, Greece, and China



Alexion Pharmaceuticals



- Alexion is a pharmaceutical company based in Connecticut
- In July 2020, Alexion agreed to pay \$21.4 million to resolve SEC charges that the company bribed foreign officials in Turkey and Russia
- Government alleged improper payments to government officials and doctors at stateconnected hospitals in Turkey and Russia to promote use of its blood-disease drug, Soliris
- Government also alleged, from 2013 to 2015, Alexion failed to maintain accurate books and records at subsidiaries in Brazil and Colombia
- SEC charged violations of FCPA's books and records and internal controls provisions (no anti-bribery charges)
- Alexion agreed to pay a \$3.5 million penalty, \$14.2 million in disgorgement and \$3.8 million in prejudgment interest
- SEC considered Alexion's cooperation, remedial acts, and steps to strengthen compliance program



World Acceptance Corporation



- World Acceptance Corporation ("WAC") is consumer loan company based in South Carolina
- In August 2020, WAC agreed to pay \$21.7 million to resolve SEC charges that the company bribed government and union officials in Mexico
- Government alleged, between 2010 and 2017, a subsidiary of WAC in Mexico paid
 \$4.1 million in bribes, directly or through intermediaries, to retain business
- SEC charged WAC with violations of FCPA's anti-bribery, books and records, and internal controls provisions
- WAC agreed to disgorge \$17.8 million plus prejudgment interest of \$1.9 million, and civil penalties of \$2 million
- Shortly after announcing the resolution, WAC published a DOJ declination letter related to the same activity; DOJ declined to bring an enforcement action pursuant to its Corporate Enforcement Policy
- The DOJ cited the company's self-disclosure, proactive cooperation, and remediation



Herbalife Nutrition Ltd.



- Herbalife is a US-based global nutrition company
- In August 2020, Herbalife agreed to pay \$123 million to resolve DOJ and SEC charges that the company provided improper payments to government officials in China
- Government alleged, between 2007 and 2016, Herbalife and wholly-owned subsidiaries conspired to provide corrupt payments and to falsify its books and records
- Government charged Herbalife with violating the FCPA's books and records and internal controls provisions
- Herbalife agreed to pay \$55.7 million criminal penalty to the DOJ and approximately \$67 million to SEC (\$58.7 million disgorgement plus \$8.6 million in prejudgment interest)



Sargeant Marine, Inc.



- Sargeant Marine is a Florida-based asphalt company
- In September 2020, Sargeant Marine agreed to pay \$16.6 million to resolve DOJ charges that it violated the FCPA's anti-bribery provisions
- Government alleged, between 2010 and 2018, the company paid millions of dollars in bribes to foreign officials in Brazil, Venezuela, and Ecuador to obtain contracts to purchase or sell asphalt to the countries' state-owned and state-controlled oil companies
- To execute the scheme and conceal the bribe payments, Sargeant Marine entered into fake consulting agreements with bribe intermediaries in each country
- According to the DOJ, bribes in Brazil helped Sargeant Marine win Petrobras contracts worth \$185 million
- In conjunction with the resolution, the DOJ announced guilty pleas by six individuals involved in the bribery scheme

Individual Enforcement Actions



Martinelli Brothers

- On July 6, the DOJ unsealed charges against Luis Martinelli Linares and Ricardo Martinelli Linares, brothers and sons of Panama's former president, for alleged role in Odebrecht bribery scheme
- Government alleged that brothers served as intermediaries for \$28 million in bribes paid by Odebrecht (Brazilian construction conglomerate) for the benefit of their father, former Panamanian president Ricardo Martinelli
- Odebrecht pleaded guilty in 2016 to making bribery payments worth hundreds of millions of dollars

Asante Berko

- On April 13, the SEC filed a civil complaint against Asante Berko, a former Goldman Sachs banker
 in the UK, for alleged violations of the antibribery provisions of the FCPA
- SEC alleges that Berko orchestrated a scheme in which Ghananian government officials received bribes in exchange for helping secure an energy contract for a Goldman client, a Turkish energy company
- In announcing the complaint, SEC said "The firm's compliance personnel took appropriate steps to prevent the firm from participating in the transaction and it is not being charged."
- DOJ did not bring charges



Reza Moenaf, Eko Sulianto, and Junji Kusunoki

- On February 18, the DOJ announced charges against two former executives of an Alstom S.A. subsidiary and a former executive of Marubeni Corporation in long-running investigation into bribery in Indonesia
- The DOJ alleges that Reza Moenaf, Eko Sulianto, and Junji Kusunoki retained "consultants" to pay bribes to win a lucrative Taharan power plant contract in Indonesia
- Alstom pleaded guilty in December 2014 to bribing officials in Indonesia, Saudi Arabia,
 Egypt, and the Bahamas; Alstom paid \$772 million in criminal penalties to settle the charges

Larry Puckett

- On April 13, Larry Puckett, a former Alstom sales manager in the United States, was sentenced via videoconference to two years of supervised release
- Puckett agreed in 2013 to plead guilty to conspiring with Lawrence Hoskins, a former Alstom executive, to bribe Indonesian government officials in connection with the Taharan power plant



Eberhard Reichert & Andres Truppel

- On April 17, Eberhard Reichert, a former Siemens executive, was sentenced via teleconference to time served for bribing officials in Argentina
- Government alleged Reichert conspired to pay \$100 million in bribes to Argentine officials in exchange for \$1 billion contract to create national identity cards
- Reichert pleaded guilty in March 2018
- Andres Truppel, a former CFO of Siemens Argentina and Reichert's co-defendant, was sentenced in March 2020 to time served for related FCPA violations
- Truppel pleaded guilty in September 2015 to one count of conspiring to violate the FCPA's anti-bribery, internal controls, and books and records provisions, and to commit wire fraud
- Truppel was credited with cooperating with U.S. prosecutors (in part why his sentencing was delayed)
- In 2008, Siemens settled FCPA charges in the US and anti-corruption charges in Germany and elsewhere relating to, among other things, the Argentine conduct, paying approximately \$1.6 billion in total penalties



Additional PDVSA Charges

- The DOJ continues its ongoing investigation into bidding panels of Venezuelan state-owned oil company Petróleos de Venezuela, S.A. ("PDVSA")
- In February, Tulio Anibal Farias-Perez pleaded guilty to FCPA conspiracy in connection with gifts and payments to PDVSA representatives
- In March, the DOJ unsealed charges against 2 former PDVSA officials and filed new charges against two Venezuelan business men

Donville Inniss

- On January 16, Donville Inniss, the former Barbados Minister of Industry, was convicted by a federal jury of one count of conspiracy to commit money laundering and two counts of money laundering
- According to the indictment, between 2015 and 2016, Inniss accepted approximately \$36,000 in bribes from executives of the Insurance Corporation of Barbados Limited (ICBL)
- In exchange, Inniss used his official position to steer approximately \$686,000 worth of renewed insurance contracts to ICBL



Individuals charged in Sargeant Marine scheme

- In conjunction with the September 2020 Sargeant Marine resolution, the DOJ announced the unsealing of guilty pleas by six individuals involved in the bribery scheme:
 - Sargeant: Senior executive of Sargeant; conspiracy to violate the FCPA and to commit money laundering
 - Meneses: Sargeant trader; conspiracy to violate the FCPA
 - Finocchi: Sargeant trader; conspiracy to defraud the United States
 - Andrade: Consultant/bribe intermediary in Brazil; conspiracy to violate the FCPA
 - Diaz: Consultant/bribe intermediary in Venezuela; two counts of conspiracy to violate the FCPA
 - Troyano: Former PDVSA official who received bribes in Venezuela; conspiracy to commit money laundering

Javier Aguilar

- On September 22, a federal grand jury indicted Aguilar of conspiracy to violate the FCPA and to commit money laundering
- Aguilar is an oil trader at a U.S. subsidiary of a multinational oil and distributor and trading company
- Aguilar allegedly paid \$870,000 in bribes to Ecuadoran officials to secure a \$300 million fuel-oil contract with the state-owned enterprise, Petroecuador
- He allegedly used sham consulting agreements with intermediaries and offshore shell companies

Case Closures

2020 Midyear Case Closure Tracker

| SEC | | DOJ | | |
|---------------------------------|----------------|---------------------------------|----------------|--|
| Company | Date | Company | Date | |
| United Technologies Corporation | Feb. 6, 2020 | Uber Technologies, Inc. | Jan. 6, 2020 | |
| USANA Health Sciences, Inc. | June 29, 2020 | United Technologies Corporation | Feb. 6, 2020 | |
| KBR, Inc. | August 6, 2020 | CHS, Inc. | April 8, 2020 | |
| | | USANA Health Sciences, Inc. | June 29, 2020 | |
| | | KBR, Inc. | August 6, 2020 | |
| | | World Acceptance Corporation* | August 6, 2020 | |

^{*}Declined under the DOJ's Corporate Enforcement Policy





DOJ Creates New Privilege Unit (May 2020)

- ✓ New Special Matters Unit
- ✓ Led by Jerrob Duffy (former Asst. US Attorney in Miami & DOJ Fraud Section prosecutor)
- Collaboration with FCPA, Market Integrity and Major Frauds, and Health Care Fraud Units
- ✓ Evolution of the filter team created in 2019 to oversee negotiations with defense counsel over privilege issues
- ✓ Prevent prosecutor exposure to protected information



DOJ Updates Guidance for Evaluating Corporate Compliance Programs (June 1, 2020)

- ✓ Consideration of each company's circumstances
- ✓ Focus on compliance program resources and independence
- ✓ Focus on data analytics
- ✓ Need for regular review and enhancement ("lessons learned")
- ✓ Emphasizes that effective third-party management does not stop at onboarding, but must continue through the life-span of the relationship



Release of Second Edition of FCPA Resource Guide (July 3, 2020)

- ✓ Joint guidance from the DOJ and the SEC
- ✓ Refreshes and updates the first edition (November 2012) in three ways:
 - Incorporates significant policies that have been released by the DOJ since the first edition
 - DOJ Corporate Enforcement Policy ("CEP") [does not bind the SEC]
 - DOJ's Evaluation of Corporate Compliance Programs
 - Guidance on the selection and imposition of a compliance monitor or independent consultant
 - "No-Piling-On" policy
 - Omits Yates Memo in consideration factors
 - 2) Supplements interpretation of key elements of the statute with recent corporate resolutions (e.g., hiring cases)



Release of Second Edition of FCPA Resource Guide (July 3, 2020)

- 3) Incorporates court decisions in Kokesh, Hoskins, Esquenazi
 - Kokesh: Limits SEC's ability to seek disgorgement for conduct that occurred more than five years before the SEC brought action
 - Esquenazi: Provides a non-exhaustive list of factors for evaluating "instrumentality" – Guide updates the factors accordingly
 - Hoskins: Provides that foreign national may be liable for FCPA anti-bribery violation even without presence in United States if defendant is an agent of an issuer or domestic concern; emphasizes Government's view of Hoskins' potentially limited reach



DOJ Issues FCPA Advisory Opinion (August 14, 2020)

- ✓ First release since November 2014
- ✓ Question: Would fees paid by a U.S.-based investment advisor to a foreign government-linked investment bank unit trigger FCPA enforcement action?
- ✓ DOJ response: No enforcement action
 - Investment advisor received "specific, legitimate services" compensation was reasonable for the value
 - Payments were going to the bank affiliate, not any individual
 - Payment arrangements "transparent"
 - Company received assurances from the bank unit that the payment would be used only for its business operations
- > Total time from submission to opinion was approximately 9 months



SEC Adopts Whistleblower Reforms (September 23, 2020)

- ✓ SEC amended rules governing its whistleblower awards program
- ✓ Commissioners voted 3-2 to approve the amendments. Highlights:
 - SEC has discretion to determine the award can change an amount simply for being too high or too low
 - Whistleblowers will only be protected if they report violations in writing to the SEC before they are retaliated against
 - Presumption of a statutory maximum award percentage at 30% for awards that are estimated to be \$5 million or less streamlines the award evaluation process
 - Note: 75% of awards under the program have been \$5 million or less
 - Whistleblowers may receive awards based on DPAs and NPAs entered into by the DOJ or a settlement agreement by the SEC outside of a judicial or administrative proceeding





United States v. Hoskins (February 2020)

- ✓ D. Conn. set aside jury verdict and acquitted Hoskins of FCPA-related counts, finding no agency relationship between Hoskins and Alstom's U.S. subsidiary
 - ✓ DOJ's evidence insufficient to show that the U.S. subsidiary had the ability to control Hoskins's actions
- ✓ Nonetheless, Hoskins convicted of money laundering and sentenced to 15 months in prison and a \$30,000 fine
 - ✓ CT was an appropriate venue because the money transfers were all part of a single, continuing transaction, and the U.S. subsidiary was based in CT
 - ✓ Court rejects Hoskins' argument that he had to know that his U.S. bank accounts would be used
- ✓ DOJ and Hoskins both appealed portions of the decision to the 2nd Circuit



United States v. Mark Lambert (February 2020)

- ✓ Mark Lambert, former president of a U.S. transportation company, was found guilty of four counts of violating the FCPA, two counts of wire fraud, and one count of conspiracy
- ✓ Lambert filed a motion for judgment of acquittal on two wire fraud convictions
 - ✓ He argued that the government failed to prove material misrepresentations or omissions that caused injury to the Russian state-owned entity, the alleged victim
- ✓ D. Maryland denied Lambert's motion, finding sufficient evidence that Lambert concealed bribes from the entity
- ✓ The Court also held that gov't not required to prove financial injury, since Lambert intended to deprive the entity of money



Joseph Baptiste and Roger Richard Boncy (March 2020)

- ✓ In June 2019, jury found retired U.S. Army colonel Joseph Baptiste and former Haitian Ambassador-at-Large Roger Richard Boncy guilty of conspiracy to violate the FCPA and Travel Act
 - ✓ Baptiste and Boncy allegedly solicited bribes from undercover FBI agents in a \$84 million port development project in Haiti
- ✓ In March 2020, D. Mass. granted a new trial for both, citing ineffective "overall performance" of Baptiste's trial attorney
 - ✓ E.g., the attorney did not subpoena any witnesses for Baptiste and pursued an entrapment defense even after being told that the defense was unavailable
 - ✓ The Court held that Boncy was also prejudiced because his attorney had to "play an outsized role at trial rather than pursue his preferred defense strategy"
- ✓ DOJ has appealed the order to the 1st Circuit



Liu v. SEC (June 2020)

- ✓ Charles Liu and Xin Wang were ordered to disgorge close to \$27 million in profits and pay \$8.2 million in penalties for allegedly misappropriating funds intended for a cancer treatment center
 - ✓ The district court had refused to permit the deduction of even legitimate business expenses from the disgorgement amount, and the Ninth Circuit affirmed
- ✓ The Supreme Court upheld the SEC's power to obtain disgorgement in civil actions, but with important limitations:
 - (1) Disgorgement amount must be returned to victims/investors for their benefit;
 - (2) Joint-and-several liability may be inconsistent with equitable principles; and
 - (3) Disgorgement award must deduct legitimate business expenses and cannot exceed the defendant's gains





Enforcement Actions Against Government Officials

- China Former President of Interpol and Chinese Vice Minister of Public Security, Meng Hongwei, sentenced to more than 13 years in prison for accepting bribes (January 2020)
- Israel Prime Minister Benjamin Netanyahu indicted in court on corruption charges (January 2020)
- Spain Emeritus King Juan Carlos I investigated for alleged kickback payments to build a high-speed rail link to Mecca (June 2020)
- Malaysia Former Prime Minister Najib Razak convicted of money laundering, abuse of power and other charges for transferring money from sovereign wealth fund to his personal accounts (July 2020)



Enforcement Actions Against Government Officials (Cont.)

- Japan Former Defense Minister overseeing casino policy arrested on suspicion of taking bribes and allegedly offering witnesses money to falsely testify in court (August 2020)
- Mexico Investigation launched against former President Nieto for allegedly taking millions in bribes and bribing MPs (August 2020)
 - Emilio Lozoya, former CEO of PEMEX and a key witness for Nieto probe, extradited from Spain to Mexico to face charges (July 2020)
 - Pres. Lopez Obrador's brother implicated in an illegal campaign contributions scheme (August 2020)



Enforcement Actions Relating to Payment of Bribes

- France, UK Airbus pays £820 million to the UK Treasury and £1.7 billion to France to settle corruption charges, in addition to settlement with the DOJ (January 2020)
- China Former Vice President of Baidu being investigated for corruption after Baidu's internal investigation found evidence and turned him over to the police (April 2020)
- Portugal CEO of power utility company EDP-Energias de Portugal judicially suspended from the company as part of corruption investigation (July 2020)
- UK Two former managers of a Monaco-based oil and gas company, Unaoil, were found guilty of conspiracy to make corrupt payments in the Iraqi oil industry (July 2020)



International Policy Developments

Brazil

- New regulations from the Brazilian Central Bank will go into effect in October 2020, prohibiting money laundering, terrorist financing, proliferation of weapons of mass destruction, suspicious transaction reporting
- Highlights:
 - Obliges companies to carry out specific and documented risk assessment for AML/CFT, taking into account the regulated entities' types of operations (products and services), distribution technologies, and different counterparts (customers, employees, partners, and service providers)
 - Enlarges the list of politically exposed persons (PEPs) to comprise second-degree relatives and commercial relationships (close collaborator)

Mexico

- Prosecution Bureau Specialized in the Combat of Corruption submitted first written Annual Report to the Senate (March 2020)
 - Announced plans to issue guidelines for evaluation of corporate compliance programs
 - May modify several laws related to combatting corruption to strengthen prosecutorial authority



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