

Evaluating FCPA Pilot Program: Lessons and Expectations

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Kimberly A. Parker, Jay Holtmeier and Erin G.H. Sloane provided insights on the Department of Justice's Foreign Corrupt Practices Act pilot program in a recent article published as part of *Law360's* Expert Analysis series. The article assesses the program's goals, notable settlements and future.

So far, the one-year-old pilot program has been an effective means to encourage self-disclosure, cooperation, and remediation in exchange for leniency at sentencing, the authors write. Companies that self-report violations, fully cooperate with authorities and engage in timely remediation can significantly reduce their penalties, including fine reductions of up to 50 percent, avoiding monitorships, or even receiving declinations of prosecution. And despite the recent administration change, "it appears that the pilot program's principles are likely to continue to guide the DOJ in its approach to corporate resolutions, and we expect the department to offer further guidance as it makes certain components permanent fixtures of its anti-bribery enforcement regime," the authors note. [Read the full article](#)

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