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## Anti-Corruption Enforcement Developments: 2011 Year-in-Review and 2012 Preview

2012-01-18

The year 2011 proved to be another busy year for enforcement of the Foreign Corrupt Practices Act ("FCPA"), as well as anti-corruption efforts globally. US authorities continued their vigorous enforcement efforts and the overall enforcement trends persisted, although the number of cases initiated declined. In addition to the continued focus on prosecuting individuals, a major portion of the cases continue to involve third-party intermediaries, and substantial financial penalties continue to be imposed. The most notable development of 2011 is the record level of trials and related litigation that have generated judicial decisions and guidance on key issues relating to the FCPA, including the definition of "foreign official," the knowledge requirement under the FCPA, and the jurisdictional scope of the Travel Act. Given that key decisions issued in 2011 are the subject of appeals and that significant trial activity is expected to continue in 2012, further judicial guidance is likely forthcoming. There were also significant international developments, in the United Kingdom, with the UK Bribery Act coming into force, and globally as other countries made significant efforts in the enforcement and legislative spheres. In Anti-Corruption Enforcement Developments: 2011 Year-in-Review and 2012 Preview, WilmerHale Partners Roger M. Witten, Kimberly A. Parker, Jay Holtmeier, and Tim Matthews and Counsel Saniya O'Brien analyze 2011's anti-

corruption enforcement developments and discuss anti-corruption enforcement trends expected in 2012.

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