

**Alert | White Collar Defense & Special Investigations**



**March 2021**

## **FCPA Year in Review 2020**

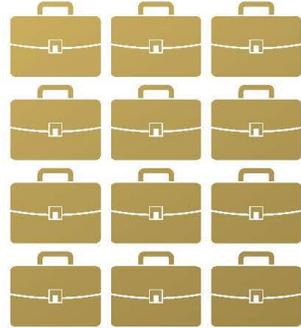
2020 was another record-setting year in U.S. Foreign Corrupt Practices Act (FCPA) enforcement. In 2019, corporate FCPA enforcement set an all-time high with over \$2.65 billion in fines and penalties. Additionally, that year, the U.S. Department of Justice (DOJ) and the U.S. Securities and Exchange Commission (SEC) imposed the two largest FCPA corporate penalties, including the first billion-dollar settlement in FCPA history. In 2020, corporate FCPA enforcement eclipsed the 2019 record with \$2.78 billion in total fines and penalties and set the record for the largest single FCPA penalty, which was a \$1.6 billion settlement. 2020 also saw an increase in multi-jurisdictional cases, with foreign governments receiving over \$5 billion in global anti-corruption settlements related to FCPA cases.

In addition, the government charged 36 individuals for FCPA and FCPA-related conduct, representing one of the highest numbers of individual prosecutions ever pursued in a year. The last three years have seen record individual enforcement related to FCPA matters. This development matches DOJ's rhetoric that it will continue to strongly pursue individual prosecutions.

Following is a snapshot of 2020 FCPA enforcement:

# FCPA 2020 YEAR IN NUMBERS

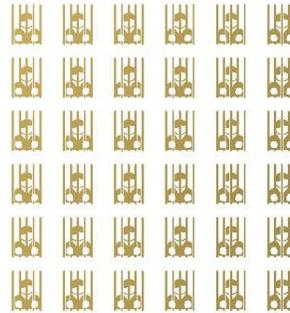
## ENFORCEMENT CASES AND SETTLEMENT AMOUNTS



**12 Cases**  
AND  
**\$2.78B**

in Settlement Amounts  
(Total Global Penalties Related to  
FCPA Cases Almost \$8B)

## ANNOUNCED FCPA AND FCPA-RELATED ACTIONS AGAINST INDIVIDUALS



**36 Individuals**

Charged or Indicted in 2020

## INDUSTRIES MOST AFFECTED



Oil & Gas

Healthcare/  
Pharmaceutical

Financial Services

Aerospace/Defense

Engineering/  
Construction

Consumer Goods

Agribusiness

## WHERE IMPROPER CONDUCT OCCURRED



*Ranked by Number of Cases*

- |                  |                             |
|------------------|-----------------------------|
| <b>Brazil</b>    | <b>Indonesia</b>            |
| <b>China</b>     | <b>Malaysia</b>             |
| <b>Venezuela</b> | <b>Panama</b>               |
| <b>Ecuador</b>   | <b>Poland</b>               |
| <b>Mexico</b>    | <b>Russia</b>               |
| <b>Algeria</b>   | <b>South Korea</b>          |
| <b>Colombia</b>  | <b>Turkey</b>               |
| <b>Ghana</b>     | <b>Uganda</b>               |
| <b>Greece</b>    | <b>United Arab Emirates</b> |
| <b>India</b>     | <b>Vietnam</b>              |

Greenberg Traurig is a service mark and trade name of Greenberg Traurig, LLP and Greenberg Traurig, PA. ©2021 Greenberg Traurig, LLP Attorneys at Law. All rights reserved. The enclosed materials have been prepared for general informational purposes only and are not intended as legal advice. The infographics presented are reflective of published industry-wide FCPA actions and information. 34841

**About Greenberg Traurig's White Collar Defense & Special Investigations**

**Practice:** Greenberg Traurig's [White Collar Defense & Special Investigations Practice](#) protects companies and individuals under government scrutiny. GT's creative defense lawyers in the US, Europe, Latin America, and Asia Pacific are at the forefront of white-collar defense, with wide-ranging experience in structuring internal investigations, developing guidelines, implementing compliance programs, and addressing issues of voluntary disclosure. Their representations involve alleged securities and commodities fraud, Foreign Corrupt Practices Act (FCPA) violations, health care/pharmaceutical fraud, environmental crimes, money laundering, financial services fraud, public corruption/campaign finance, tax corruption, defense contracting, and bankruptcy fraud. In addition, the majority of GT's litigation shareholders and counsel have first-chair trial experience.

**Author**

This GT Alert was prepared by:

- [Cuneyt A. Akay](#) | +1 303.572.6576 | [akayc@gtlaw.com](mailto:akayc@gtlaw.com)

**Greenberg Traurig's U.S.-Based White Collar Defense & Special Investigations Practice:**

- [Cuneyt A. Akay](#) | +1 303.572.6576 | [akayc@gtlaw.com](mailto:akayc@gtlaw.com)
- [David G. Barger](#) | +1 703.749.1307 | [bargerd@gtlaw.com](mailto:bargerd@gtlaw.com)
- [Matthew J. Cannon](#) | +1 312.456.1066 | [cannonm@gtlaw.com](mailto:cannonm@gtlaw.com)
- [Abigail A. Clapp](#) | +1 312.476.5072 | [clappa@gtlaw.com](mailto:clappa@gtlaw.com)
- [Tyler D. Coombe](#) | +1 303.572.6558 | [coombet@gtlaw.com](mailto:coombet@gtlaw.com)
- [Jared E. Dwyer](#) | +1 305.579.0564 | [dwyerje@gtlaw.com](mailto:dwyerje@gtlaw.com)
- [Daniel P. Filor](#) | +1 212.801.6758 | [filord@gtlaw.com](mailto:filord@gtlaw.com)
- [Kyle R. Freeny](#) | +1 202.331.3118 | [freenyk@gtlaw.com](mailto:freenyk@gtlaw.com)
- [John F. Gibbons](#) | +1 312.476.5017 | [gibbonsj@gtlaw.com](mailto:gibbonsj@gtlaw.com)
- [Sandra D. Gonzalez](#) | +1 512.320.7234 | [gonzalezsd@gtlaw.com](mailto:gonzalezsd@gtlaw.com)
- [Benjamin G. Greenberg](#) | +1 305.579.0850 | [greenbergb@gtlaw.com](mailto:greenbergb@gtlaw.com)
- [Gregory W. Kehoe](#) | +1 813.318.5732 | [kehoeg@gtlaw.com](mailto:kehoeg@gtlaw.com)
- [David Klaudt](#) | +1 214.665.3616 | [klaudtd@gtlaw.com](mailto:klaudtd@gtlaw.com)
- [Michael X. Marinelli](#) † | +1 512.320.7236 | [marinellimx@gtlaw.com](mailto:marinellimx@gtlaw.com)
- [Pamela J. Marple](#) | +1 202.331.3174 | [marplep@gtlaw.com](mailto:marplep@gtlaw.com)
- [Carolyn Fitzhugh McNiven](#) | +1 415.655.1270 | [mcnivenc@gtlaw.com](mailto:mcnivenc@gtlaw.com)
- [Scott Mendeloff](#) | +1 312.456.1083 | [mendeloffs@gtlaw.com](mailto:mendeloffs@gtlaw.com)
- [David I. Miller](#) | +1 212.801.9205 | [David.Miller@gtlaw.com](mailto:David.Miller@gtlaw.com)
- [Nathan J. Muyskens](#) | +1 202.331.3164 | [muyskensn@gtlaw.com](mailto:muyskensn@gtlaw.com)
- [Jessica Natali](#) | +1 215.988.7824 | [natalij@gtlaw.com](mailto:natalij@gtlaw.com)

- **A. John Pappalardo** | +1 617.310.6072 | [pappalardoj@gtlaw.com](mailto:pappalardoj@gtlaw.com)
- **Todd A. Pickles** | +1 916.868.0628 | [picklest@gtlaw.com](mailto:picklest@gtlaw.com)
- **Mathew S. Rosengart** | +1 310.586.3889 | [rosengartm@gtlaw.com](mailto:rosengartm@gtlaw.com)
- **Michael R. Sklaire** | +1 703.749.1308 | [sklairem@gtlaw.com](mailto:sklairem@gtlaw.com)
- **John Voorhees** | +1 303.685.7465 | [voorheesj@gtlaw.com](mailto:voorheesj@gtlaw.com)
- **David B. Weinstein** | +1 813.318.5701 | [weinsteind@gtlaw.com](mailto:weinsteind@gtlaw.com)

‡ Admitted in the District of Columbia. Not admitted in Texas.

Albany. Amsterdam. Atlanta. Austin. Boston. Chicago. Dallas. Delaware. Denver. Fort Lauderdale. Germany. † Houston. Las Vegas. London.\* Los Angeles. Mexico City.+ Miami. Milan.» Minneapolis. New Jersey. New York. Northern Virginia. Orange County. Orlando. Philadelphia. Phoenix. Sacramento. Salt Lake City. San Francisco. Seoul.∞ Shanghai. Silicon Valley. Tallahassee. Tampa. Tel Aviv.^ Tokyo.\* Warsaw.- Washington, D.C.. West Palm Beach. Westchester County.

*This Greenberg Traurig Alert is issued for informational purposes only and is not intended to be construed or used as general legal advice nor as a solicitation of any type. Please contact the author(s) or your Greenberg Traurig contact if you have questions regarding the currency of this information. The hiring of a lawyer is an important decision. Before you decide, ask for written information about the lawyer's legal qualifications and experience. Greenberg Traurig is a service mark and trade name of Greenberg Traurig, LLP and Greenberg Traurig, P.A. †Greenberg Traurig's Berlin office is operated by Greenberg Traurig Germany, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. \*Operates as a separate UK registered legal entity. +Greenberg Traurig's Mexico City office is operated by Greenberg Traurig, S.C., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. »Greenberg Traurig's Milan office is operated by Greenberg Traurig Santa Maria, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ∞Operates as Greenberg Traurig LLP Foreign Legal Consultant Office. ^Greenberg Traurig's Tel Aviv office is a branch of Greenberg Traurig, P.A., Florida, USA. ‡Greenberg Traurig's Tokyo Office is operated by GT Tokyo Horitsu Jimusho and Greenberg Traurig Gaikokuhojimbengoshi Jimusho, affiliates of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ~Greenberg Traurig's Warsaw office is operated by Greenberg Traurig Grzesiak sp.k., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. Certain partners in Greenberg Traurig Grzesiak sp.k. are also shareholders in Greenberg Traurig, P.A. Images in this advertisement do not depict Greenberg Traurig attorneys, clients, staff or facilities. No aspect of this advertisement has been approved by the Supreme Court of New Jersey. ©2021 Greenberg Traurig, LLP. All rights reserved.*