

# President's Biden – Anti-corruption Memo

*“Memorandum on Establishing the Fight Against Corruption as a Core United States National Security Interest” – June 3, 2021*

1. 200 days deadline
2. Increase Coordination among US agencies including DOJ, Treasury (OFAC), State, Defense and Homeland Security Departments
3. Accountability
4. Transnational Cooperation
5. Best practices and enforcement mechanisms to facilitate foreign assistance and security cooperation

# FBI Miami-Based Corruption Squad

---

1. Created in August 2019 – International Corruption Squad (aka ICS)
2. Coordination with Fraud Section and Money Laundering Asset Forfeiture Section of the U.S. Department of Justice (DOJ)
3. Focus on Latin America
4. Staffed by senior FBI agents, forensic accountants and prosecutors and investigators who are experienced chasing white-collar criminals and public corruption

# 2020 Trends in Enforcement

- Corporate enforcement
  - Big penalties
  - Multi-jurisdictional cases
  - Repeat offenders – beware!
  - Other U.S. agency settlements
- Individual enforcement
  - Continued emphasis on holding individuals accountable
  - More FCPA-related offenses (money laundering and wire fraud)
- DOJ and SEC guidance
  - Signal a continued focus on FCPA and the importance of ongoing and risk-based compliance



## INDUSTRIES MOST AFFECTED



Oil & Gas



Healthcare/  
Pharmaceutical



Financial Services



Aerospace/Defense



Engineering/  
Construction



Consumer Goods



Agribusiness



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

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

# Applicable Laws – Mexico (and other)

