

CEP Magazine - December 2018 Petrobras FCPA enforcement action shows the international fight against corruption

by Thomas R. Fox

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The Justice Department (DOJ) and Securities and Exchange Commission settled a massive Foreign Corrupt Practices Act (FCPA) enforcement action involving the Brazilian national energy giant Petrobras in September for a stunning \$1.78 billion. The size and scope of Petrobras's corruption were truly amazing. The number of individuals involved at the highest levels of the company was also quite dramatic. Numerous persons inside the company and inside Brazil have gone to jail for their roles in the corruption, as well as vendors, suppliers, and others who were involved in the scandal. It has literally been global in scope. And it is still ongoing.

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