



A Decade of FCPA Enforcement Lessons for Corporate Counsel

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Today's Presenters

U.S. & International Experience

Enhancing relevance for multinational organizational challenges



Erik C. Liroy

Partner – Global
Disputes & Investigations
Forvis Mazars U.S.



Linda Schut

Senior Manager –
Forensic & Investigation
Services
Forvis Mazars
Netherlands



Darya Oglezneva

Director – Forensic &
Investigation Services
Forvis Mazars Group

Today's Roadmap

Decade of Enforcement Review

We'll review 10 years of FCPA enforcement with a data-driven focus on corporate compliance trends.

Educational & Practical Focus

This session will emphasize practical lessons within an educational overview of real-world corporate legal challenges.

Questions Are Encouraged!

Please submit any questions or comments through the Q&A module.



Session Overview & Objectives

Session Focus & Data

Based on analysis of 99 FCPA enforcement actions from 2015 to 2025, focusing on real enforcement outcomes.

Key Enforcement Themes

Discussion covers DOJ assessment, cooperation impact, remediation, and factors influencing enforcement resolutions.

Practical Guidance for Professionals

Helping legal and compliance teams understand commonly discussed considerations around investigation timing, internal response, and disclosure.

Influence of Yates Memorandum

Highlights the lasting impact of the Yates Memorandum on accountability and corporate cooperation in enforcement.



Key Themes

Internal Investigations

Timely, credible, and independent internal investigations can influence enforcement outcomes favorably.

Remediation

Enhancing compliance programs, accountability, and controls are critical remediation actions often valued by authorities.

Cooperation

Transparent document production and facilitating witness access are factors frequently referenced in enforcement resolutions.

Disclosure Decisions

Well-reasoned disclosure decisions may affect penalty calculations and enforcement resolution structures.



Contact

Forvis Mazars

Erik Lioy

Partner – Global Disputes & Investigations
erik.lioy@us.forvismazars.com

Linda Schut

Senior Manager – Forensic & Investigation Services
linda.schut@forvismazars.com

Darya Oglezneva

Director – Forensic & Investigation Services
darya.oglezneva@mazars.co.uk



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