

United States: FCPA Overview and Trends

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[In this article](#), James Tillen and Ann Sultan discuss trends in Foreign Corrupt Practices Act (FCPA) enforcement actions in 2015. "Marking the lowest mid-year total in a decade, U.S. enforcement authorities have brought eight resolved FCPA enforcement actions to date this year," the authors said. "It appears that the enforcement numbers overall may be down in part because of a rise in the number of declinations -- or decisions not to pursue enforcement -- particularly by the [Department of Justice]." Tillen and Sultan describe a number of high-profile actions from the past year, noting that with respect to resolved enforcement actions, mergers and acquisitions and the provision of gifts, travel and entertainment continue to be prominent.