

Not Your Everyday Investigation: Key Issues to Consider When Conducting Internal Investigations Into the Potential Violation Of U.S. Export Controls and Sanctions Laws

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In this article, Timothy O'Toole discusses key issues to consider when conducting internal investigations into potential violations of U.S. export controls and sanctions laws. "When done correctly, the decision to conduct an internal investigation into potential violations of U.S. law can have significant benefits for a company. These include allowing the company to make an informed decision about how to proceed, and assisting the company's current and future compliance with U.S. law, by identifying what went wrong, stopping it and making sure to prevent similar problems down the road," O'Toole said. "In the event of an enforcement proceeding, moreover, conducting a timely, thorough, credible investigation will also help convince U.S. regulators that the company is serious about compliance with U.S. law."