

## FCPA Enforcement Trends for Boards and Management to Follow in 2024

### ***GOVERNANCE INTELLIGENCE***

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In [this article](#), John Davis discussed six key Foreign Corrupt Practices Act (FCPA)-related trends that merit attention from senior management and boards in 2024. Amidst the DOJ's and SEC's continued prioritization of FCPA enforcement indicated by recent speeches and cases, Davis highlighted upcoming court decisions that could affect enforcement practices and interpretations of key FCPA provisions, as well as the continuing trend of investigations involving multiple fronts in multiple countries. He also noted likely heightened scrutiny of M&A activities by the agencies and the likely effect of national security considerations on enforcement decisions. Finally, Davis wrote, "[i]n 2024, data analytics may well drive an already evident renewed interest by the agencies in conducting sector and industry sweeps, as has happened recently with FCPA investigations involving, for example, commodities trading firms and the healthcare sector."