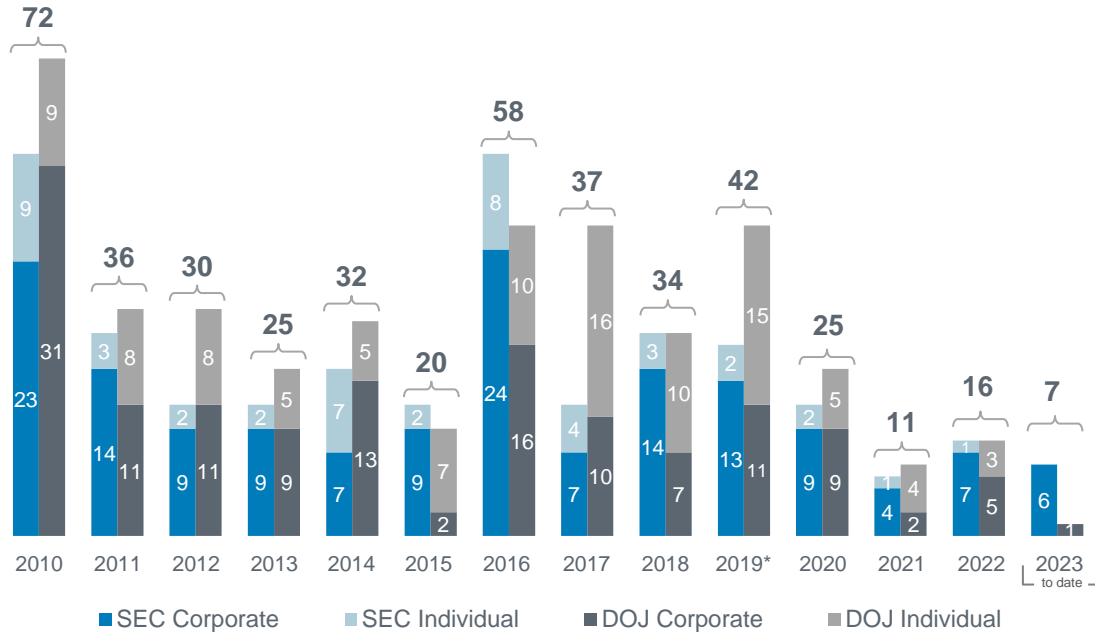


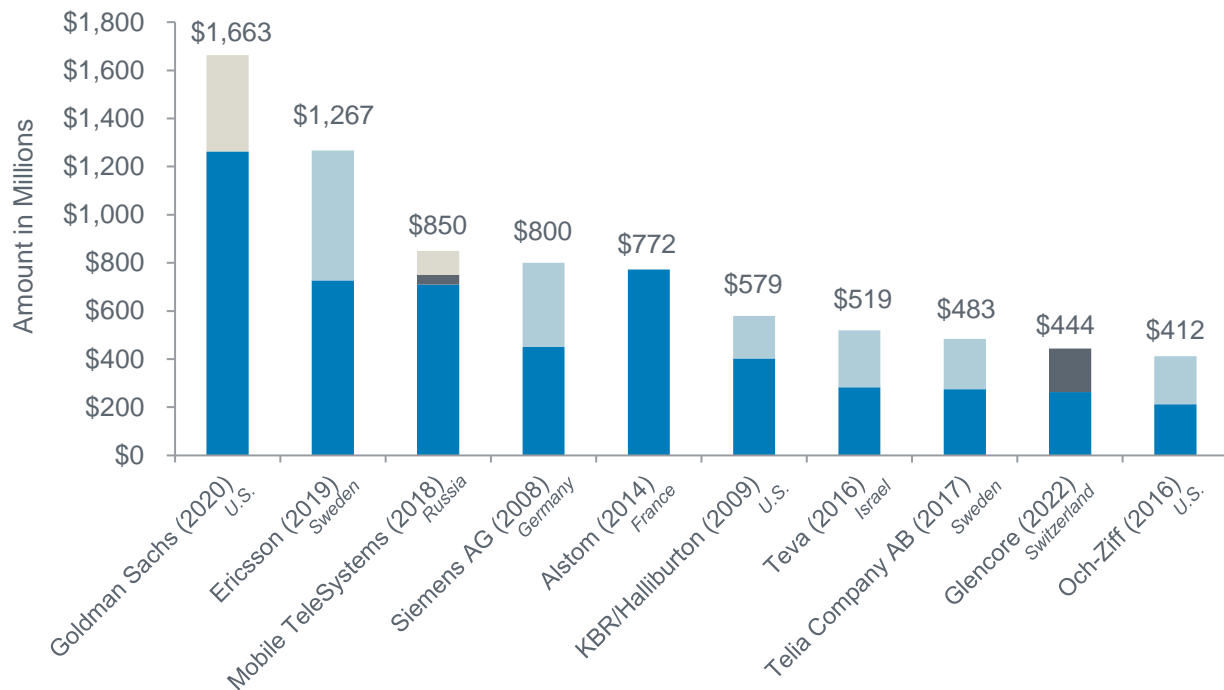
# Resolved Enforcement Actions By Year from 2010



**Note:** Updated through August 15, 2023. These statistics count each distinct resolution with a company and its affiliates as separate enforcement actions. They also include certain FCPA-related settlements and SEC default judgments, but do not include “declinations with disgorgements.”

\*These figures reflect the acquittal of Lawrence Hoskins on FCPA charges and the overturned convictions of Roger Richard Boncy and Joseph Baptiste.

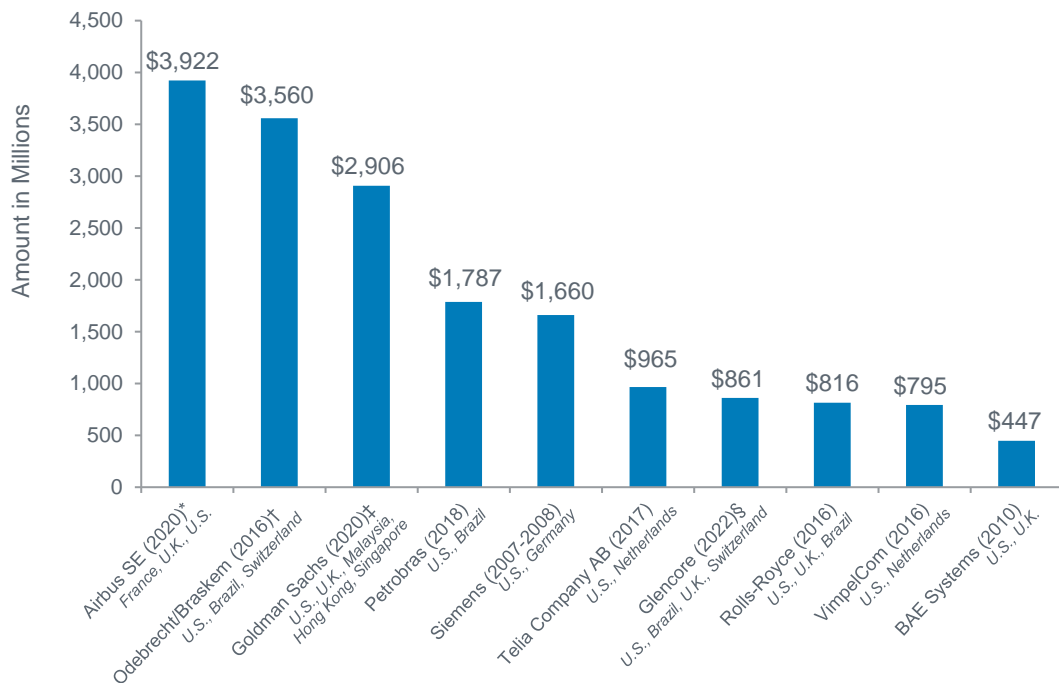
# Top 10 Largest Corporate FCPA Settlements (Combined Penalties, Disgorgements, and Interest)



**Note:** Updated through May 16, 2023. The amounts listed above reflect only settlement agreements with the DOJ and SEC related to the FCPA and do not include parallel or coordinated settlements with foreign enforcement authorities. Where a matter involved more than one action brought by U.S. authorities against a particular company and its subsidiaries and affiliates, those actions are “combined” and counted as one. Calculations of total FCPA penalties are based on amounts paid to the United States after any offsets or credits, including credits for amounts paid to foreign jurisdictions. Accordingly, our Top 10 Largest Corporate FCPA Settlements chart may differ from those compiled by other sources that use different calculation methods or data sets.”

- Civil Penalty
- Forfeiture
- Disgorgement and Prejudgment Interest
- Criminal Fine

# Ten Largest Internationally Coordinated Resolutions Involving the FCPA



**Note:** Updated through January 19, 2023. These statistics count the 10 largest FCPA-related resolutions in which U.S. authorities, in resolving a matter, coordinated with a foreign authority's enforcement action. Coordinating authorities appear in *italics*.

\* The U.S. settlement amount of \$532.2 million includes a \$237.7 million penalty for ITAR-related conduct and \$294.5 million for FCPA-related conduct.

† The Odebrecht/Braskem amount reflects the reduced amount following the inability-to-pay analysis by the DOJ that lowered the total from approximately \$5.56 billion to \$3.56 billion.

‡ The U.S. settlement amount of \$1,663,088,000 includes \$400 million civil penalty to SEC and credits against previously paid amounts and other enforcement authorities but does not include \$154 million to be paid to the United States Federal Reserve or \$150 million to be paid to New York's Department of Financial Services.

§ Glencore's amount will increase pending announcement of penalties for related U.K. and Swiss matters.