



U.S. Department of Justice

Criminal Division

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*Fraud Section  
1400 New York Avenue, NW  
Washington, D.C. 20005*

June 6, 2016

Josh Levy, Esq.  
Ryan Rohlfesen, Esq.  
Ropes & Gray LLP  
Prudential Tower 800 Boylston Street  
Boston, MA 02199-3600

**Re: Akamai Technologies, Inc.**

Dear Mr. Rohlfesen:

I write regarding the investigation by the Department of Justice, Criminal Division, Fraud Section into your client Akamai Technologies, Inc. ("Akamai" or the "Company") concerning possible violations of the Foreign Corrupt Practices Act, 15 U.S.C. § 78dd-1, *et seq.* Based upon the information known to the Department at this time, we have closed our inquiry into this matter. Consistent with the FCPA Pilot Program, we have reached this conclusion despite the bribery by an employee of the Company's subsidiary in China and one of that subsidiary's channel partners, based on a number of factors, including but not limited to Akamai's prompt voluntary self-disclosure of the misconduct, the thorough investigation and fulsome cooperation by the Company (including by identifying all individuals involved in or responsible for the misconduct and by providing all facts relating to that misconduct to the Department) and its agreement to continue to cooperate in any ongoing investigations of individuals, the steps that the Company has taken to enhance its compliance program and its internal accounting controls, the Company's full remediation (including promptly suspending at the start of the investigation the individual involved in the China misconduct who then resigned shortly thereafter, terminating the relationship with the channel partner involved in the misconduct, and disciplining five other employees who should have prevented other violations of the Company's policies), and the fact that Akamai will be disgorging to the SEC the full amount of disgorgement as determined by the SEC. If additional information or evidence should be made available to us in the future, we may reopen our inquiry.

Sincerely,

A handwritten signature in black ink, appearing to read "DKahn", written over a horizontal line.

Daniel Kahn  
Deputy Chief