

Critical FCPA and Export Compliance Issues for the Health Care Industry

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FCPA prosecutions are now a top enforcement priority for the Department of Justice (DOJ) and the Securities and Exchange Commission (SEC). In the first twenty years after the enactment of the FCPA, the government prosecuted 17 companies. Between 1998 and 2008, more than 50 companies were prosecuted. Enforcement activity has increased even more over the past few years. According to a senior Justice Department official, approximately 110 FCPA investigations are currently open.