



Foreign Corrupt Practices Act and Anti-Corruption

Companies facing high-stakes government and internal investigations involving allegations of bribery and corruption, as well as those seeking anti-corruption risk assessments, M&A guidance, and ad hoc counseling, rely on WilmerHale. Our team, which has been named an “FCPA Powerhouse” and “Practice Group of the Year” by *Law360* and *Global Investigations Review*, has been involved in some of the most notable public and non-public cases and key developments related to FCPA and anti-corruption issues, and regularly counsels dozens of companies on anti-corruption compliance.

PRACTICE AT A GLANCE

- We represent companies and individuals in US Department of Justice (DOJ), US Securities and Exchange Commission (SEC) and UK Serious Fraud Office investigations; perform internal investigations on the ground in Asia, Africa, the Middle East, Eastern Europe, Latin America and elsewhere; conduct risk assessments and benchmarking; advise on strategic transactions; develop and enhance compliance programs; offer ongoing and real-time counseling; and draft and conduct anti-corruption training.
- Our US team features the former Chief of the DOJ’s FCPA Unit, as well as numerous partners with decades of FCPA experience and strong connections with enforcement attorneys at the DOJ, SEC and other agencies. Outside the United States, clients benefit from the extensive knowledge of our experienced anti-corruption lawyers based in the UK and Germany.
- Our FCPA work spans a multitude of industries, including financial and professional services; technology; pharmaceuticals, medical devices and healthcare; energy, oil and gas, and natural resources; media; defense and aerospace; manufacturing; and consumer goods.
- Our team, which has been practicing in this area since the enactment of the FCPA, is tied with one other firm for advising on the most FCPA public settlements since late 2008—the turning point for foreign bribery enforcement. In 2022, we handled the largest FCPA resolution brought during the Biden Administration. And, in 2016 alone, we handled five DOJ and/or SEC settlements, along with a publicly announced DOJ/SEC declination. The firm has also obtained numerous non-public declinations for clients who were under investigation by enforcement authorities.

A DEEP BENCH

100+

lawyers across the firm involved in investigations

A BROAD REACH

105+

countries in which the firm has conducted investigations work



Practice leaders Kimberly Parker, Jay Holtmeier, Erin Sloane and Chris Cestaro author the leading treatise in the field, **Complying with the Foreign Corrupt Practices Act**.

EXPERIENCE

- Represented **Glencore** in its May 2022 \$1.186 billion global resolution of bribery and market manipulation charges—the largest FCPA settlement under the Biden Administration. In November 2022, advised on the UK Serious Fraud Office’s bribery case in Africa, resulting in its largest-ever financial penalty. Coordinated favorable outcomes with authorities in Brazil, Switzerland, the Netherlands, DR Congo, and Nigeria. In March 2025, secured early termination of two DOJ compliance monitorships tied to the original plea agreements from May 2022.
- Successfully represented technology giant **Oracle** in a major SEC inquiry involving potential violations of the FCPA in Turkey and other countries, securing a favorable resolution for Oracle after the company settled charges with the SEC.
- Advised **WPP** in a \$19.2 million FCPA resolution with the SEC after a multi-year anti-corruption investigation by the DOJ and SEC. WPP was one of only four companies to resolve FCPA charges with the US government in 2021.
- Helped **Panasonic Corporation** achieve a settlement with the DOJ/SEC resolving allegations that the company violated the FCPA, then advised the company on compliance enhancements during the post-settlement reporting period.
- Served as a DOJ/SEC–appointed independent FCPA compliance monitor for German medical company **Fresenius** in connection with the company’s \$231 million resolution of charges that it violated the FCPA.
- Represented **Analogic** in settlements with the DOJ and SEC related to conduct in Russia and elsewhere and advised on compliance enhancements during the post-settlement reporting period.
- Represented **Johnson Controls** in a settlement with SEC and one of the first declinations under the DOJ’s Pilot Program (now Corporate Enforcement Policy).
- Represented **PTC, Inc.** in settlements with the DOJ and SEC related to conduct in China.
- Represented **Key Energy** in an SEC settlement and DOJ declination related to alleged conduct in Mexico, including advising on anti-corruption compliance policies, procedures and training.
- Represented **LATAM Airlines** in settlements with the DOJ/ SEC, including ongoing assistance to the company in its obligations under the monitorship imposed under those settlements.
- Represented **three different global financial services corporations** in SEC and/or DOJ investigations into the hiring of relatives of government officials, negotiating the first FCPA settlement for a bank involved in these investigations. We subsequently obtained an SEC settlement for another of the banks, and a declination by the SEC for the third.
- Represented **dozens of individual executives and employees** in numerous DOJ and SEC FCPA investigations.

For more information, please contact:

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Global Investigations Review

Consistently ranks us at or near the top of its list of the world’s leading investigations and compliance practices.

Global Investigations Review Just Anti-Corruption

Gave WilmerHale’s Washington DC office an “elite” ranking for FCPA, placing the firm among the top in the nation’s capital.

Chambers USA

Consistently ranks the practice in Band 1, with one commentator saying, “The firm is exceptional in this area. The team is very practical and hands-on.”