

## 2023 FCPA Year in Review

The FCPA Clearinghouse’s 2023 Year in Review provides an overview of some of the more notable trends and statistics to emerge from last year’s FCPA enforcement activity.

### **Enforcement Statistics**

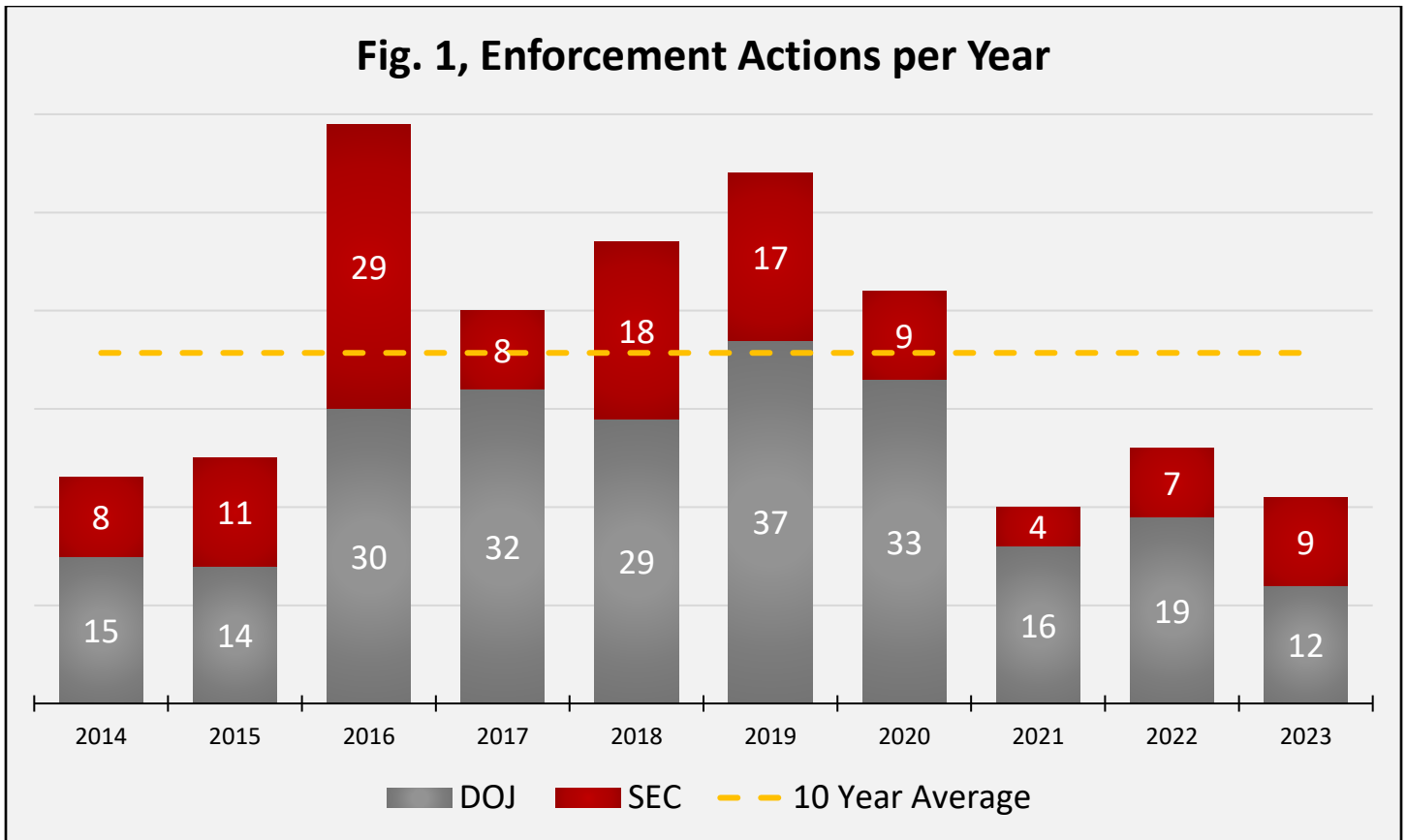
There are a number of different ways to define FCPA enforcement activity and to count the number of new actions initiated each year. The FCPA Clearinghouse does not advocate one counting methodology over another, but instead presents the data in a number of different ways so that users can make their own informed judgments. Because our counting methodologies rely on defined terms (which are denoted below in bold), we make those definitions available at the “[Definitions](#)” tab of the [About Us](#) page.

The DOJ and SEC filed 21 FCPA-related **[Enforcement Actions](#)** in 2023. Last year’s enforcement activity remained well below the ten-year average of 36 and marked the second lowest year of enforcement activity in a decade.<sup>1</sup> Figure 1 presents the number of enforcement actions filed per year for each of the last 10 years. For purposes of these analytics, we treat declinations with disgorgement pursuant to the [DOJ’s Revised Corporate Enforcement Policy](#) as enforcement actions.

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<sup>1</sup> These numbers – along with other statistics noted in this report – may change if new cases that were initiated in 2023 are unsealed or publicly announced in subsequent months or years.

**Fig. 1, Enforcement Actions per Year**



While the government filed fewer actions last year, the number of [FCPA Matters](#), which are groups of related enforcement actions that share a common bribery scheme, actually increased. These numbers indicate that collectively the SEC and DOJ prosecuted more unique bribery schemes in 2023 than in each of the prior two years, although the 12 FCPA Matters initiated last year still reflect a decline from the ten-year average of 15. Figure 2 presents the number of FCPA Matters initiated per year for each of the last ten years.

**Fig. 2, FCPA Matters per Year**

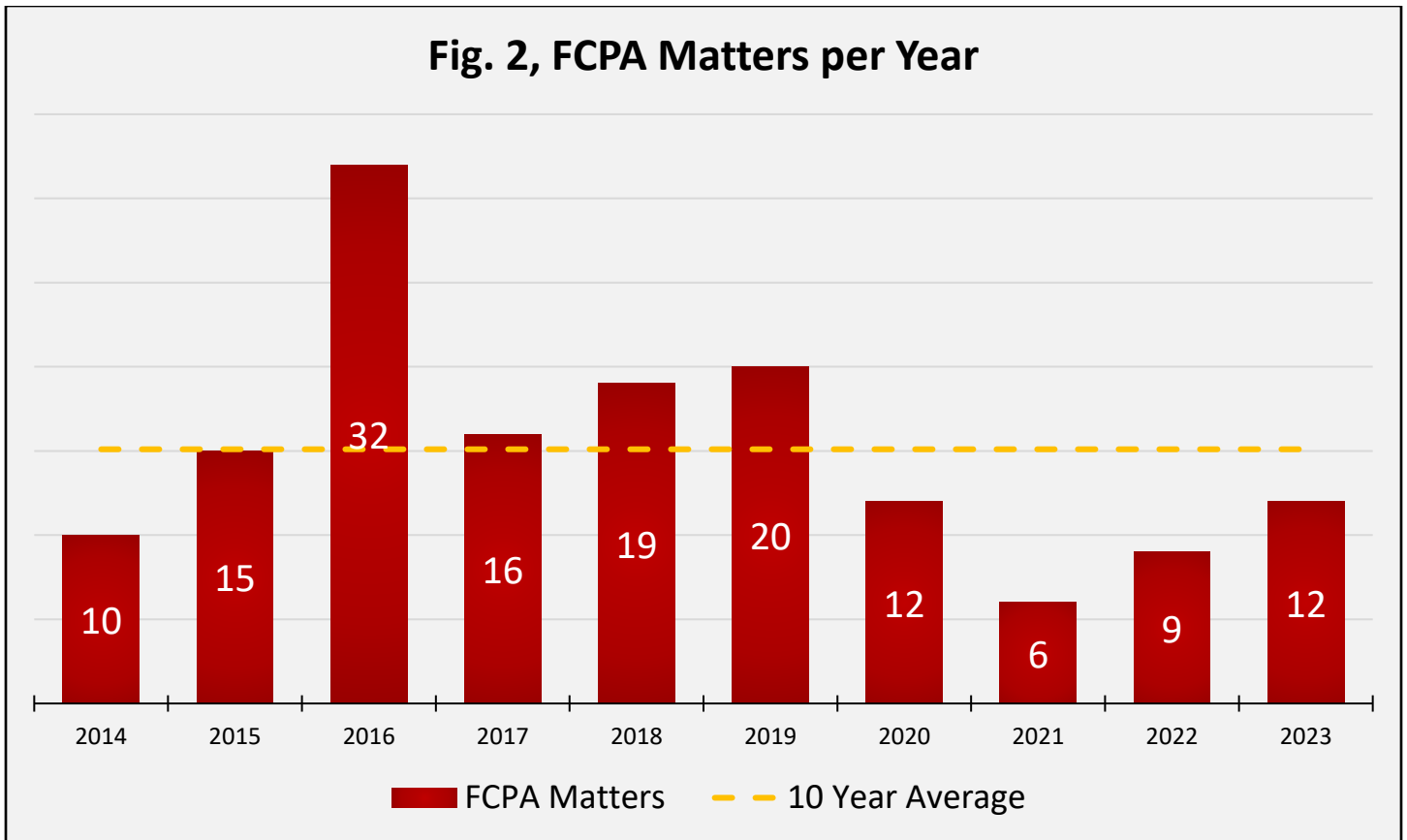
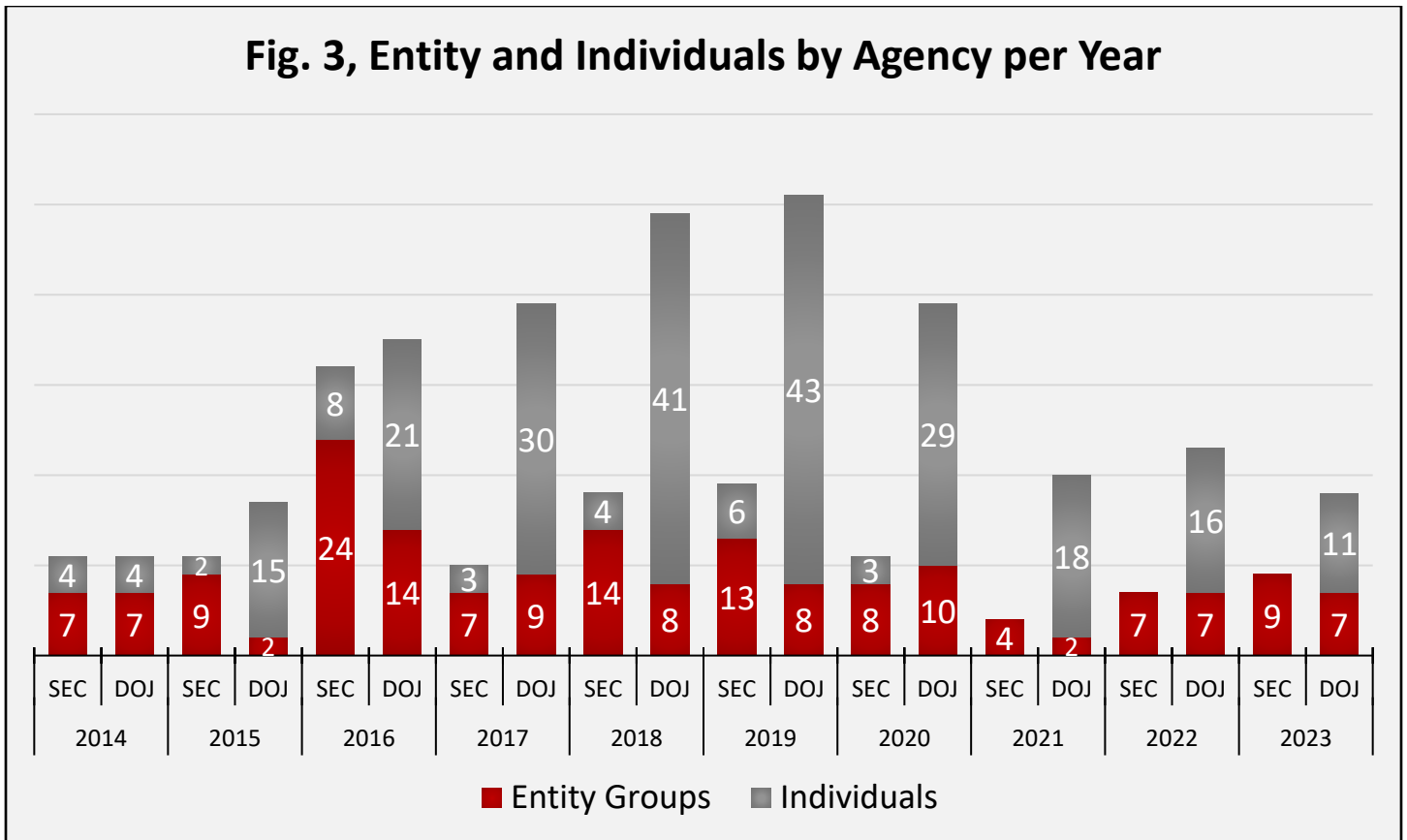


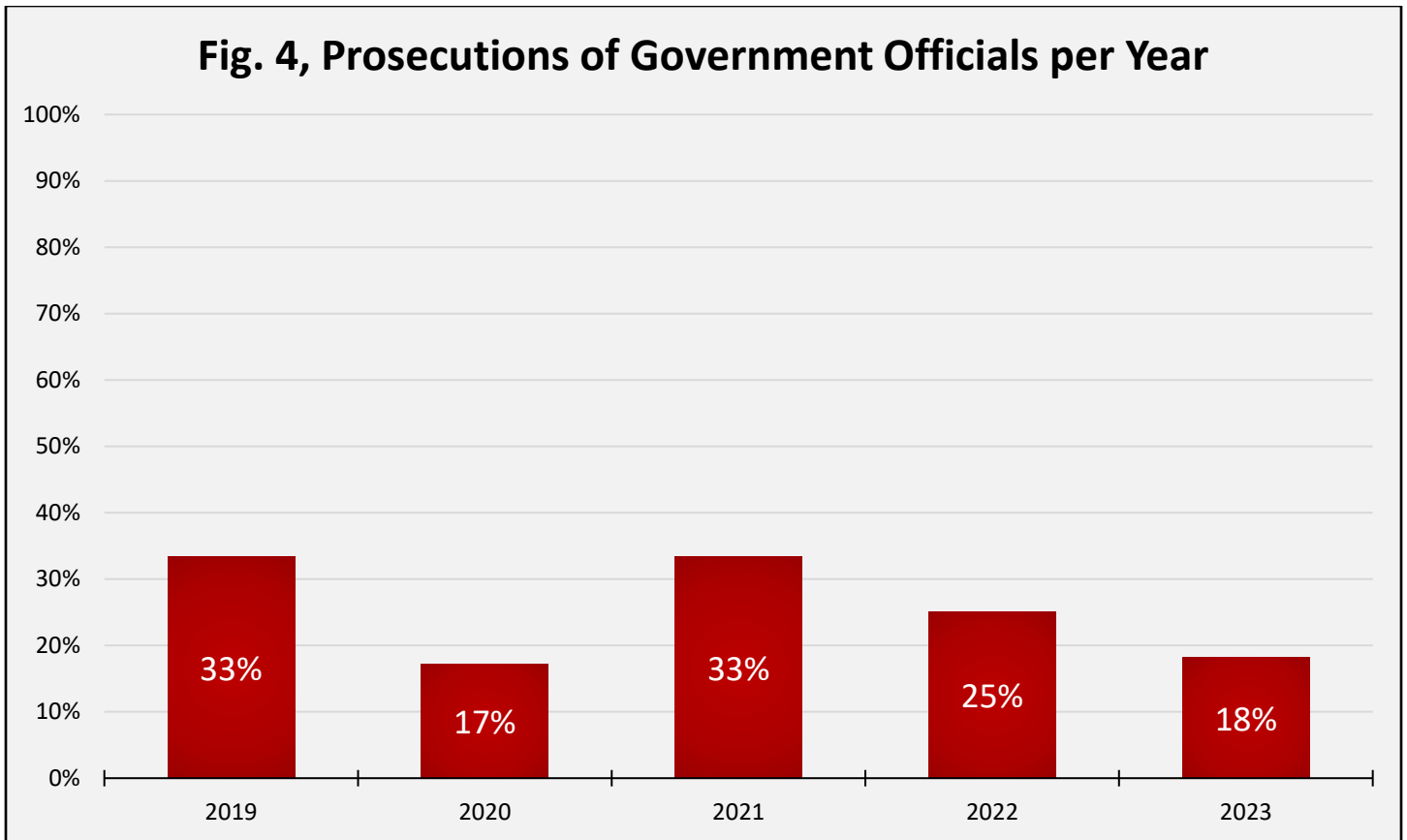
Figure 3 depicts the number of [Entity Groups](#) and individuals subject to FCPA-related enforcement activity over the last ten years. In 2023, the SEC sued nine entity groups and no individual defendants for FCPA-related violations, while the DOJ charged seven entity groups and 11 individual defendants. Enforcement activity involving entity groups increased slightly last year compared to the prior few years, while enforcement activity involving individual defendants continued to decline. The SEC has not sued an individual defendant for FCPA-related offenses since 2020, and the number of individuals criminally prosecuted by the DOJ for FCPA-related offenses decreased from a high of 43 in 2019 to just 11 in 2023, which is 52 percent below the ten-year average of 23. In fact, much of the decline in enforcement activity over the past few years can be attributed to a decline in individual criminal prosecutions.

**Fig. 3, Entity and Individuals by Agency per Year**



It is also worth noting that a majority of the individual defendants prosecuted by the DOJ last year for FCPA-related crimes had no employment or agency relationship with a major public company either prosecuted by U.S. authorities or involved in a publicly-disclosed investigation, which suggests that the government’s emphasis on holding individuals accountable for corporate misconduct may not be yielding the intended results. Additionally, over the last five years, roughly a quarter of the individuals the DOJ has prosecuted in FCPA-related enforcement actions have been foreign government officials charged with bribery-adjacent crimes like money laundering or wire fraud. Figure 4 shows foreign government officials as a percentage of all individual defendants prosecuted by the DOJ in each of the last five years.

**Fig. 4, Prosecutions of Government Officials per Year**

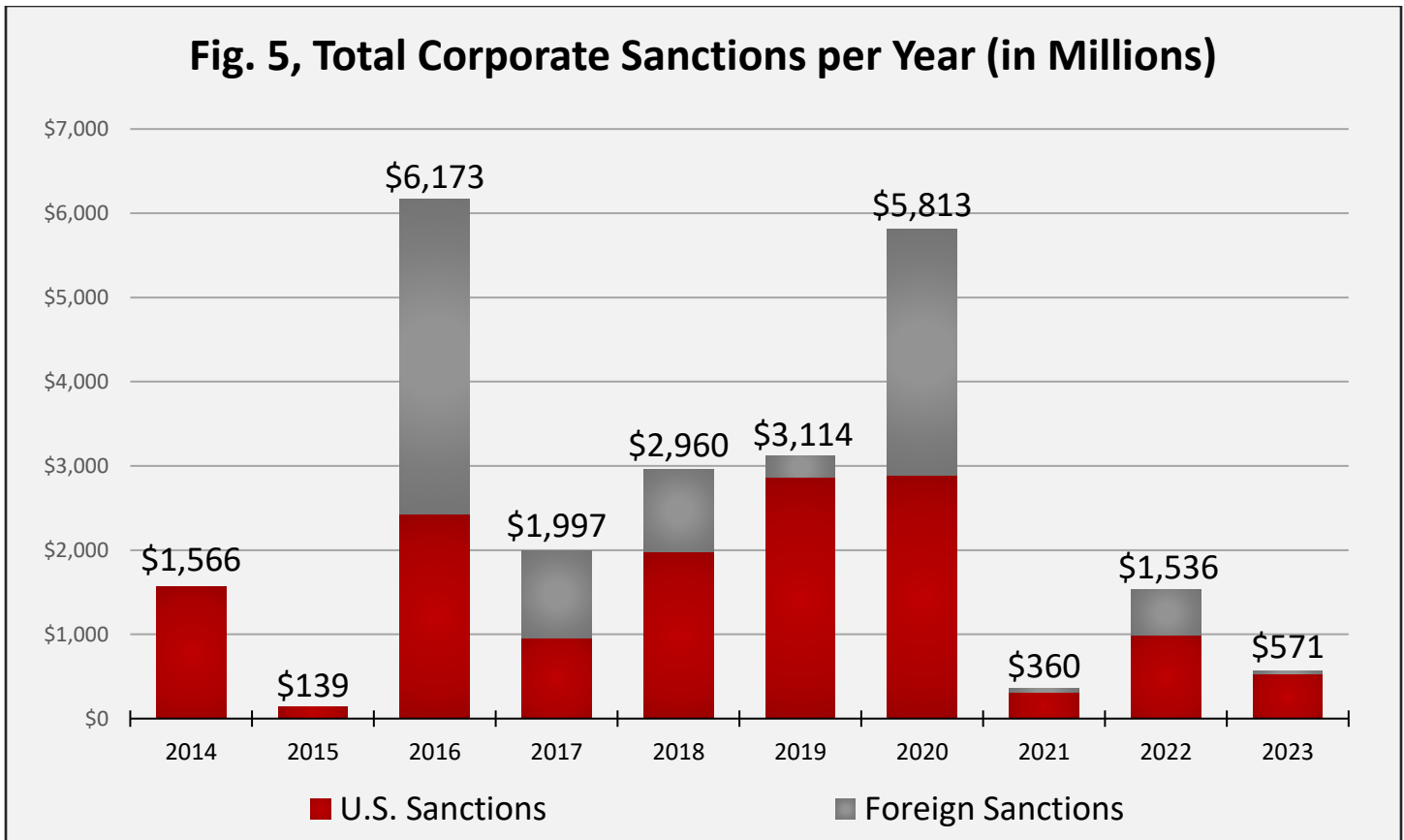


Appendix 1 to this report provides a list of all FCPA-related enforcement actions initiated in 2023, along with a few actions that were announced in 2023 but initially filed under seal in prior years. The latter actions are noted here for reference only; they are not included in the 2023 annual statistics.

### **Sanctions**

Despite the slight increase in corporate enforcement activity in 2023, aggregate sanctions imposed on entity groups for FCPA-related violations declined by almost 70 percent during the same time period. Last year, U.S. regulators imposed just under \$571 million in sanctions against entity groups in FCPA-related enforcement actions, compared to over \$1.5 billion in 2022. The average sanction imposed on entity groups in 2023 (\$43 million) was also well below the ten-year average of \$184 million. Figure 5 shows the [total sanctions imposed on entity groups](#) in FCPA-related enforcement actions, including amounts imposed by the SEC or DOJ that were ultimately owed to foreign regulators pursuant to global resolutions or parallel foreign actions.

**Fig. 5, Total Corporate Sanctions per Year (in Millions)**

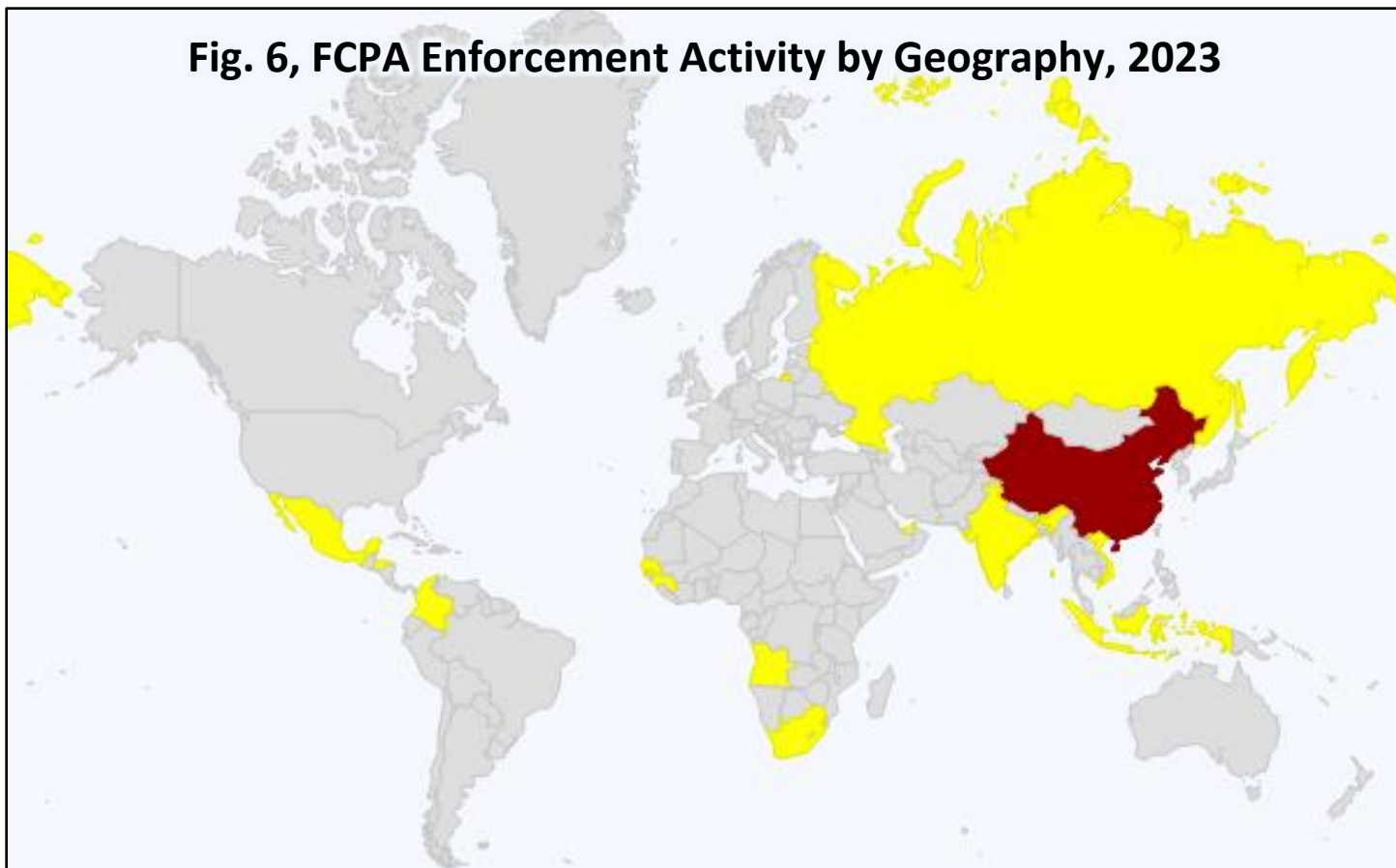


As in past years, sanctions imposed on just a small minority of companies made up the bulk of the sanctions that government regulators imposed on FCPA violators in 2023. Specifically, sanctions imposed on [Albemarle Corporation](#) (\$219 million), [Grupo Aval Acciones y Valores S.A.](#) (\$81 million), and [Koninklijke Philips N.V.](#) (\$62 million), three of the thirteen companies charged with FCPA-related violations in 2023, comprised 77 percent of the total sanctions imposed that year.

### **Geography**

The 12 FCPA Matters initiated in 2023 involved bribery payments to officials in 13 different countries. For the first time since 2020, China claimed the top spot as the country most frequently implicated in FCPA-related bribery schemes resulting in enforcement actions, with four separate schemes. The remaining 12 countries implicated in 2023 all had one bribery scheme each. When examined by region, Asia was most frequently implicated, with just over two-fifths of the FCPA-related bribery schemes citing possible misconduct in the region. Africa came in second place with a quarter of the schemes. The regional rankings for 2023 are as follows: Asia (7), Africa (4), Latin America (3), the Middle East (1), and Europe (1). Figure 6 shows all the countries implicated in FCPA enforcement actions in 2023.

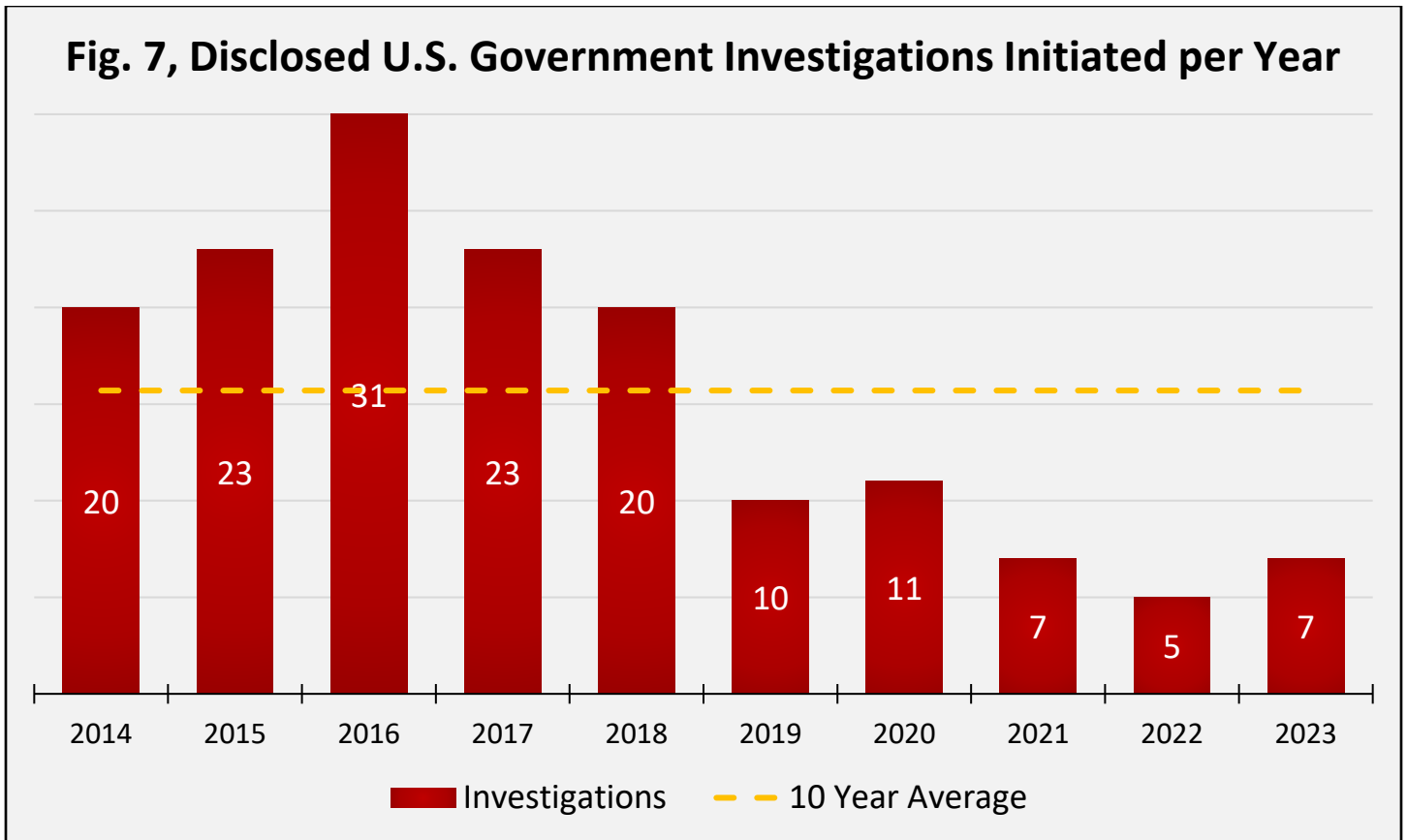
**Fig. 6, FCPA Enforcement Activity by Geography, 2023**



### **Investigations**

As of the close of 2023, at least 33 companies appear to be the subject of ongoing FCPA-related investigations by U.S. authorities. Seven companies disclosed in their SEC filings in 2023 a new FCPA-related [Investigation](#) commenced by U.S. authorities ([AUB Group Limited](#), [Azure Power Global Ltd.](#), [Inotiv, Inc.](#), [Pfizer Inc.](#), [Stanley Black & Decker, Inc.](#), [Stryker Corporation](#), and [Trafigura Group Pte. Ltd.](#)). This marks the first increase in the number of disclosed investigations after two years of declines, although the number of new investigations disclosed last year remains well below the ten-year average of 16 and far below the high-water mark of 31 investigations set in 2016. Disclosed investigations per year do not reflect the total number of investigations initiated each year, as some investigations may never be disclosed and others may be disclosed months or even years after the initiation date. However, trends in disclosed investigations may provide some insight into future enforcement activity. Figure 7 shows the number of FCPA investigations initiated by the U.S. government in each of the last ten years.

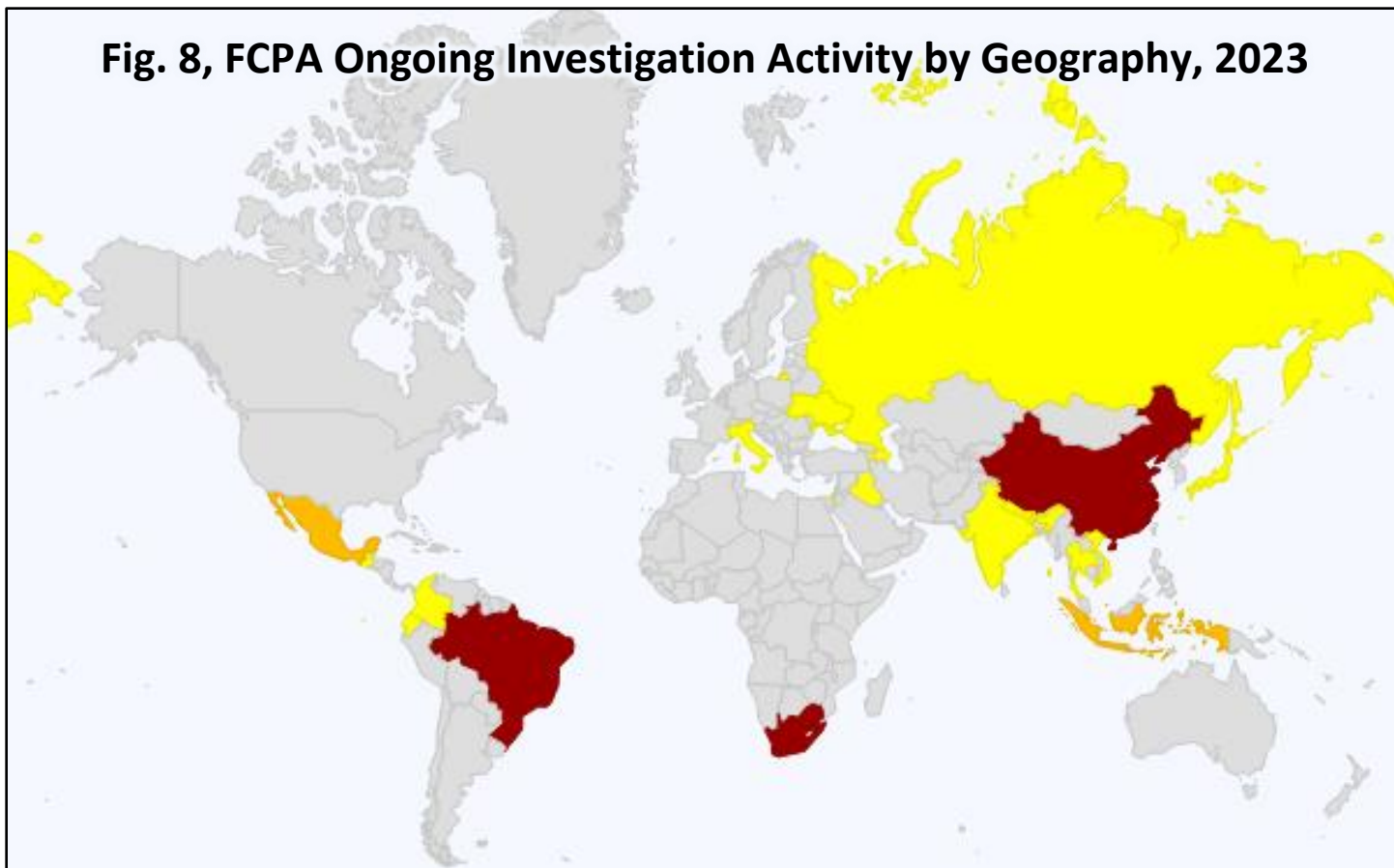
**Fig. 7, Disclosed U.S. Government Investigations Initiated per Year**



The three countries most frequently cited in connection with all FCPA-related investigations ongoing in 2023 remain the same as in 2022 and 2021. Brazil, China, and South Africa all tied for the top spot on the list, with four companies disclosing investigations into possible FCPA-related misconduct in each country. When examined by region, Asia took the top spot, with just over a quarter of all ongoing FCPA-related investigations citing possible misconduct in the region. Latin America came in second place with just under 21 percent of investigations. The regional rankings for 2023 are as follows: Asia (11), Latin America (9), Europe (5), Africa (4), and the Middle East (2). Figure 8 shows the countries implicated in ongoing FCPA-related investigations as of the close of 2023.



**Fig. 8, FCPA Ongoing Investigation Activity by Geography, 2023**



According to information disclosed in SEC filings and other public documents, last year 13 entity groups reported that either the SEC, DOJ or both agencies had resolved during the 2023 calendar year publicly disclosed investigations into potential FCPA violations by the companies. The SEC resolved eight publicly-disclosed investigations by enforcement action ([3M Company](#), [Albemarle Corporation](#), [Clear Channel Outdoor Holdings](#), [Frank's International N.V./Expro Group Holdings N.V.](#), [Gartner, Inc.](#), [Grupo Aval Acciones y Valores S.A.](#), [Rio Tinto plc](#), and [Flutter Entertainment plc/The Stars Group, Inc.](#)), and the DOJ resolved five ([Albemarle Corporation](#), [AUB Group Limited](#), [two separate investigations of Ericsson LM Telephone Company](#), and [Grupo Aval Acciones y Valores S.A.](#)). The DOJ also concluded two investigations without pursuing any further action ([3M Company](#) and [Companhia Energetica de Minas Gerais – CEMIG](#)) and declined to prosecute two companies pursuant to the agency's FCPA Corporate Enforcement Policy ([Corsa Coal Corporation](#) and [Lifecore Biomedical, Inc.](#)).

Although not included in the statistics noted above, several investigations that were closed without further action in 2022 were not disclosed until 2023, including SEC investigations into [Companhia Energetica de Minas Gerais – CEMIG](#) and [Kosmos Energy Ltd.](#) and a DOJ investigation into [ABB Ltd.](#) Although the SEC also filed an enforcement action against [Koninklijke Philips N.V.](#) in 2023, that company did not publicly disclose the investigation in advance of resolution.

### **Opinion Procedure Releases**

The DOJ issued two new Opinion Procedure Releases this year, the first in August and the second in October.

The first Opinion Procedure Release ([23-01](#)) came in response to a request from a U.S.-based child welfare agency. The child welfare agency wanted to know its exposure to possible FCPA enforcement if it were to pay for two government officials to travel to the United States for a five-day trip for the purpose of completing post-

adoption supervision, which would include meeting with families and their adopted children, and meeting with the child welfare agency's leadership at its offices to learn more about its processes and regulations.

In its analysis, the DOJ stated that the intended trip does not appear to demonstrate the requisite corrupt intent to wrongfully influence government officials. The DOJ further noted that anticipated expenses appear to be "reasonable and bona fide expenditure[s], such as travel and lodging expenses, incurred by or on behalf of a foreign official . . . directly related to . . . the promotion, demonstration, or explanation of products or services," and thus would fall within an affirmative defense to FCPA liability. Consistent with two earlier Opinion Procedure Releases that addressed similar questions by adoption agencies ([11-01](#) and [12-02](#)), the Department concluded that it would not take any enforcement action under the anti-bribery provisions of the FCPA.

The second Opinion Procedure Release ([23-02](#)) came in response to a request from a U.S.-based company that provides training events and related logistical support for foreign government personnel pursuant to its contract with an unnamed U.S. government agency. The logistical support includes stipends for foreign officials who attend these training events to pay for certain meals and to reimburse driving mileage costs. The stipends would be paid to U.S. government officials who, in turn, would remit the amounts to the foreign officials.

Once again, the DOJ stated that the intended stipends do not appear to demonstrate the requisite corrupt intent on the part of the company to wrongfully influence the recipients, which is demonstrated, in part, by the unnamed agency's belief that the Foreign Assistance Act of 1961 authorizes the payments to foreign officials. Moreover, the payments do not appear to be for the purpose of assisting the company to obtain or retain business.

## **Policy Changes**

### **Criminal Division's Corporate Enforcement Policy**

In January, Assistant Attorney General Kenneth A. Polite, Jr. [announced](#) revisions to the DOJ Criminal Division's [Corporate Enforcement Policy](#) (CEP), which applies to all corporate criminal matters handled by the Department, including FCPA cases. The revisions loosen the requirements to receive a declination and increase the reductions companies can receive off the bottom end of the U.S. Sentencing Guidelines fine range when criminal resolutions are warranted. Under the revised guidance, prosecutors can decide that declinations are warranted for companies with prior criminal convictions or other aggravating factors – even if those factors would have precluded a declination in the past – so long as the company: (1) voluntarily disclosed the misconduct immediately upon discovering it; (2) had in place both at the time of the misconduct and at the time of the disclosure an effective compliance program and system of internal accounting controls that enabled the identification of the misconduct and led to the company's voluntary disclosure; and (3) provided extraordinary cooperation with the Department's investigation and undertook extraordinary remedial measures.

If a company voluntarily self-discloses misconduct, fully cooperates, and timely and appropriately remediates, but a criminal resolution is still warranted, the Department will now recommend a reduction of at least 50% but as high as 75% off of the low end of the U.S. Sentencing Guidelines fine range, except in the case of a criminal recidivist. In that case, the reduction will generally not be from the low-end of the fine range. Moreover, the Department generally will not require a corporate guilty plea—including for criminal recidivists—absent multiple or particularly egregious aggravating circumstances.

### **Voluntary Self-Disclosure**

In February, United States Attorneys' Offices from across the country jointly [announced](#) a new [Voluntary Self-Disclosure Policy](#) that establishes a national standard for voluntary self-disclosure credit in corporate criminal enforcement actions brought by U.S. Attorneys' Offices (USAO). The USAO policy defines a "voluntary self-disclosure" as one that is:

1. voluntary and not subject to a preexisting obligation to disclose pursuant to regulation, contract, or prior DOJ resolution;
2. timely, i.e. prior to an imminent threat of disclosure or government investigation, prior to the misconduct being publicly disclosed or otherwise known to the government, and within a reasonably prompt time after the company becomes aware of the misconduct; and
3. substantive, including all relevant facts concerning the misconduct that are known to the company at the time of the disclosure.

Absent the presence of an aggravating factor, the USAO will not seek a guilty plea where a company has (a) voluntarily self-disclosed in accordance with the criteria set forth above, (b) fully cooperated, and (c) timely and appropriately remediated the criminal conduct. In addition, the USAO may choose not to impose a criminal penalty, and in any event will not impose a criminal penalty that is greater than 50% below the low end of the U.S. Sentencing Guidelines fine range.

If a guilty plea is warranted due to aggravating factors<sup>2</sup> but the company has voluntarily self-disclosed, fully cooperated, and timely and appropriately remediated the criminal conduct, then the USAO will recommend at least 50% and up to a 75% reduction off the low end of the U.S. Sentencing Guidelines fine range. Moreover, the USAO will not recommend appointment of a monitor for companies that have met the above criteria and can demonstrate that they have implemented and tested an effective compliance program by the time of the resolution.

Although the new USAO policy is intended to align generally with existing voluntary self-disclosure policies in place at the Criminal Division, it differs in certain key respects. First, assuming a company meets all the criteria laid out in the USAO policy and absent aggravating factors, the company can be assured only that it will not have to plead guilty. Prosecutors will have discretion to resolve the matter either through a declination, non-prosecution agreement, or deferred prosecution agreement. At the Criminal Division, by contrast, a declination is presumed. Second, the USAO policy establishes no specific benefit for a company that fully cooperates and remediates but does not voluntarily self-disclose. Third, while both the USAO policy and the Criminal Division's CEP define aggravating circumstances to include involvement by executive management and pervasiveness of the misconduct, the USAO policy adds misconduct that "poses a grave threat to national security, public health, or the environment." Finally, the CEP provides a path to achieve a declination even when aggravating circumstances are present, while the USAO policy does not.

### **Selection of Monitors and Evaluation of Corporate Compliance Programs**

In March, the DOJ issued new guidance on the [selection of monitors](#) in criminal division matters and the Department's evaluation of corporate compliance programs. In the matter of monitors, the DOJ laid out ten non-exhaustive criteria prosecutors should consider when assessing the necessity of a monitor. While prosecutors should have no presumption for or against the imposition of a monitor, those criteria broadly address the quality and effectiveness of the company's compliance policies and internal controls both at the time of the misconduct and resolution, who was involved in the misconduct, the risk of recurrence, and the regulatory framework in which the company operates.

With respect to corporate compliance programs, the DOJ issued an update to its [Evaluation of Corporate Compliance Programs](#) (ECCP) policy for the first time since June 2020. The update centered on two key revisions. First, the Department issued new guidance related to the use of personal devices, communication platforms, and ephemeral messaging. Second, the department expanded its guidance on how compensation structures can help prevent misconduct.

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<sup>2</sup> The presence of an aggravating factor does not necessarily mean that a guilty plea will be required.

The ECCP update explains that a company’s policies regarding the use of personal devices, communication platforms, and messaging services (including ephemeral messaging) should be “tailored to the corporation’s risk profile and specific business needs” and ensure that “business-related electronic data and communications” can be accessed and preserved. In evaluating these policies, prosecutors should consider how they are communicated to employees and to what degree they are enforced, which electronic communication channels the company allows employees to use to conduct business, the policies and procedures governing the use of those channels, and the company’s risk management measures, including the consequences for employees who refuse to grant the company access to company communications.

The revised ECCP also highlights the role that compensation can play in fostering a culture of compliance. In evaluating a corporate compliance program, prosecutors can consider, among other things, whether a company has incentivized compliance by designing compensation systems that defer or escrow certain compensation tied to conduct consistent with company values and policies, and whether it has enforced contract provisions that permit the company to recoup previously awarded compensation if the recipient engaged in corporate misconduct. Prosecutors may also consider whether the company ties meeting certain compliance performance metrics to the reward of management bonuses, offers opportunities for managers and employees to serve as compliance champions, and/or makes working on compliance a means of career advancement.

In connection with the revised compensation guidance in the ECCP, the Criminal Division initiated the “Compensation Incentives and Clawbacks Pilot Program,” which requires any company subject to a criminal resolution to “implement criteria related to compliance in its compensation and bonus system.” While not an exhaustive list, these criteria may include measures such as (1) prohibiting bonuses for employees who fail to satisfy compliance performance requirements, (2) disciplinary measures for employees who violate applicable law as well as for managers who knew or should have known about the misconduct, and (3) incentives for employees who demonstrate commitment to the company’s compliance policies. Furthermore, if the disciplinary measures for employees or managers include recoupment of compensation, prosecutors may reduce a fine by up to 100 percent of the amount recouped by the company.

### **New Safe Harbor Policy for Voluntary Self-Disclosures Made in Connection with Mergers and Acquisitions**

In October, Deputy Attorney General Lisa O. Monaco [announced](#) a new policy designed to encourage voluntary self-disclosures by companies in connection with mergers and acquisitions. The new policy creates a Safe Harbor period during which an acquiring company can voluntarily disclose criminal misconduct at an acquired company. If the misconduct is disclosed within six months from the date of closing and the company cooperates with the ensuing investigation and engages in timely and appropriate remediation, restitution, and disgorgement, the acquiring company can expect to receive a declination. The presence of aggravating factors at the acquired company will not impact in any way the acquiring company’s ability to receive a declination. Moreover, misconduct disclosed under the Safe Harbor Policy will not be factored into future recidivist analysis for the acquiring company.

The new Safe Harbor policy aims to ensure that companies with effective compliance programs are not discouraged from acquiring companies with ineffective compliance programs and a history of misconduct. It should be noted, however, that the new Safe Harbor Policy only applies to criminal conduct discovered in bona fide, arms-length M&A transactions and not to misconduct that was otherwise required to be disclosed, already public, or known to the DOJ.

### **Foreign Extortion Prevention Act**

While the FCPA criminalizes “supply-side” misconduct by penalizing those who offer bribes to foreign government officials, until recently, no federal statute permitted prosecutors to hold foreign officials who solicit or accept bribes accountable for their misconduct. To get around this deficiency, the DOJ generally



pursued foreign officials for their role in bribery schemes under other federal laws such as money laundering statutes, mail and wire fraud statutes, and the Travel Act. Now that deficiency has been corrected. On December 22, President Biden signed the National Defense Authorization Act into law. Tucked into that spending bill was the Foreign Extortion Prevention Act (FEPA), which criminalizes demand-side bribery by foreign officials. The law creates criminal liability for foreign government officials who corruptly demand or receive “anything of value” from a U.S. citizen, company or issuer, or anyone located within the territory of the United States, when made to obtain or retain business. FEPA did not alter the FCPA directly, instead amending the domestic bribery statute, 18 U.S.C. § 201, to add “foreign officials” as a class of persons to whom existing federal bribery prohibitions apply. Figure 4, *infra*, which shows foreign government officials as a percentage of all individual defendants prosecuted by the DOJ for FCPA-related crimes, provides some indication of the types of individuals who could be targeted under the new law.

FEPA shares many similarities with the FCPA and is largely intended to be a companion statute. Like the FCPA, FEPA maintains a broad jurisdictional scope and requires a corrupt intent and a quid pro quo. There are, however, a few differences between the two Acts. Any official convicted under FEPA could be subject to fines of \$250,000 or three times the value of the bribe and up to 15 years in prison, which is stricter than the five-year maximum under the FCPA. FEPA’s definition of “foreign official” goes beyond the FCPA’s by referring to individuals who act in unofficial capacities as well as official capacities. Finally, FEPA creates no parallel jurisdiction for the SEC to bring a civil enforcement action.

FEPA is a step forward in the Biden administration’s stated efforts to combat foreign corruption, although questions remain as to how the new law will be enforced and whether it will result in additional enforcement activity. Foreign officials who are charged under the new statute may raise jurisdictional and immunity challenges. Moreover, charging foreign officials could lead to diplomatic tensions and possible repercussions by other countries.

### *Jarkesy*

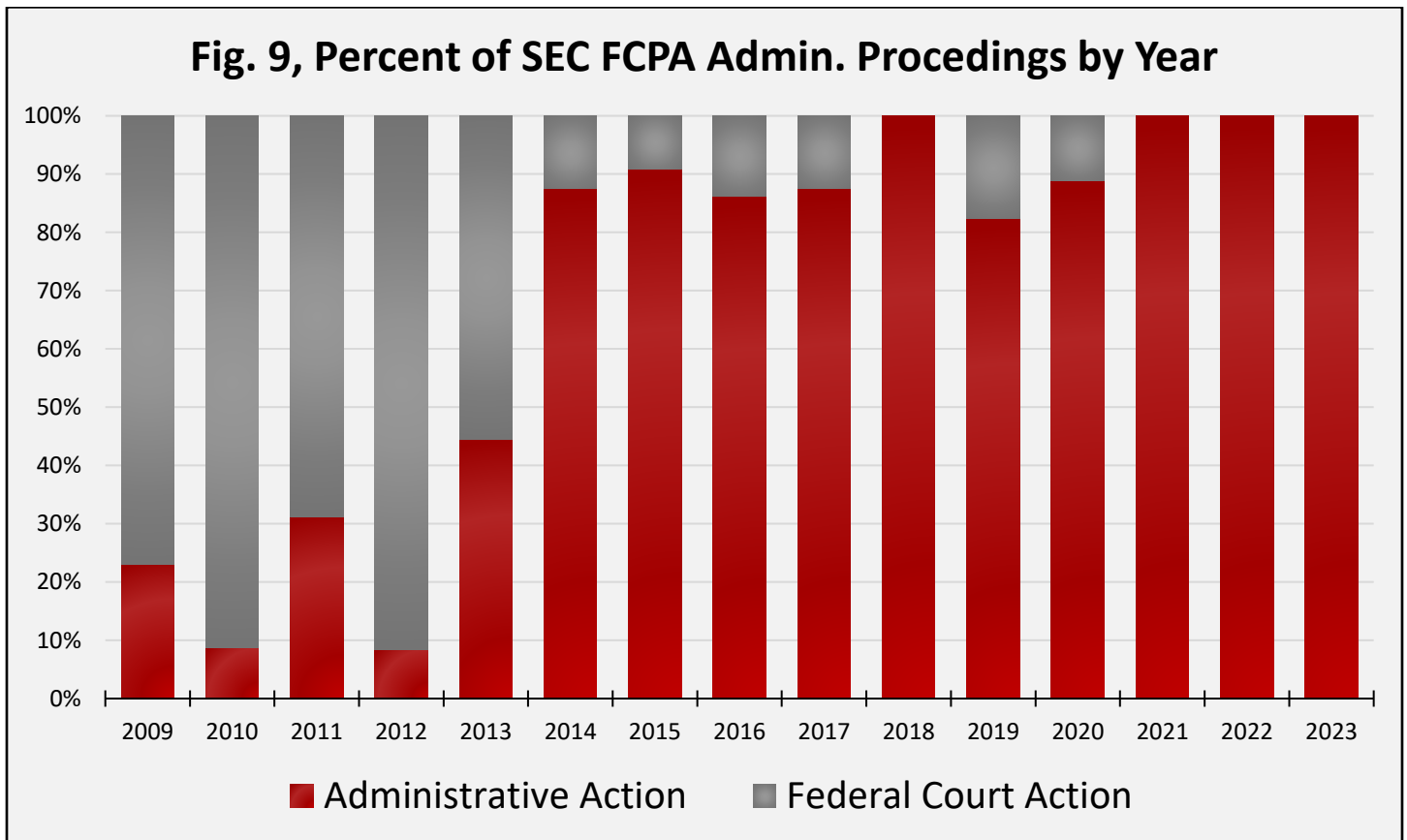
The Clearinghouse has covered developments in *Jarkesy v. SEC* several times in our quarterly and annual reports since the Fifth Circuit held in May 2022 that the SEC’s administrative law judges (ALJs) were unconstitutionally insulated from presidential removal, among other constitutional infirmities. Specifically, the court found that:

- (1) the SEC’s in-house adjudication of Petitioners’ case violated their Seventh Amendment right to a jury trial; (2) Congress unconstitutionally delegated legislative power to the SEC by failing to provide an intelligible principle by which the SEC would exercise the delegated power, in violation of Article I’s vesting of “all” legislative power in Congress; and (3) statutory removal restrictions on SEC ALJs violate the Take Care Clause of Article II.

After the Fifth Circuit [denied](#) the SEC’s petition for a rehearing en banc, the SEC appealed the decision to the Supreme Court, which heard oral arguments in the case in November. Attempting to discern the ultimate outcome of a case before the Supreme Court from oral arguments requires extreme caution. Nonetheless, it is worth noting that the primary focus of the oral argument, with the exception of a few passing remarks on the ALJ removal issues, was on the Seventh Amendment jury trial right. The justices split over whether the administrative proceeding at issue invoked a right to trial by jury. Justices Thomas and Gorsuch staked out positions generally unsympathetic to the SEC. Thomas was clear that any matter that could deprive an individual of property is subject to the jury trial provisions of the Seventh Amendment, and Gorsuch questioned Congress’ ability to move a dispute to an ALJ when the elements of the administrative proceeding and those of common law fraud were so similar. Justice Kagan, on the other hand, asserted that the existing precedent established in *Atlas Roofing Co. v. Occupational Health and Safety Review Commission* in 1976 was clear: Congress is allowed to create new rights and to allow for their enforcement outside of Article III courts. Justices Sotomayor and Jackson broadly agreed. The positions of the remaining justices, particularly Chief Justice

Roberts and Justices Kavanaugh and Barrett were less clear, but contemporaneous reporting at the time of the oral argument suggests that they appeared open to the possibility of accepting the existing statutory regime.

While not an FCPA case, *Jarkesy* could have significant implications for future FCPA enforcement. Although the SEC has statutory authority to bring FCPA enforcement actions in either federal or administrative courts, administrative actions in the FCPA context were rare prior to 2010 in large part because the SEC generally could not seek monetary penalties in those proceedings. Following the passage of the Dodd-Frank Act in 2010, the SEC obtained the authority to impose civil monetary penalties in administrative proceedings in which the SEC seeks a cease-and-desist order. Since passage of the Dodd-Frank Act, the SEC switched from filing the majority of FCPA enforcement actions in federal court to bringing the overwhelming majority in administrative court. Figure 9 shows the percentage of SEC actions filed in administrative and federal courts over the last 15 years.



### Looking Ahead

Given that FCPA-related investigations take, on average, three years to resolve, the trend toward reduced enforcement activity comes as no surprise after five years of declining investigation disclosures. Nevertheless, there was a small uptick in the number of new investigations reported last year, which, if that trend continues, could portend increased enforcement activity in the coming years. In the near term, at least one company ([Trafigura Group Pte. Ltd.](#)) has disclosed an accrual in anticipation of settling its FCPA-related investigation. Additionally, two companies ([Clear Channel Outdoor Holdings, Inc.](#) and [Ericsson LM Telephone Company](#)) appear to have ongoing investigations with one agency despite a resolution with another, suggesting that additional actions may be forthcoming. In the longer term, the enactment of FEPA may open new avenues for the DOJ to bring more enforcement actions against foreign officials who solicit or accept bribes.

## **Appendix 1: FCPA-Related Violations Initiated or Announced in 2023 [By Defendant]**

Below is a list of the FCPA-related enforcement actions initiated or announced in 2023. Links in blue were initiated in prior years but announced or unsealed in 2023. Links in red were initiated in 2023.

### [United States of America v. Samuel Bankman-Fried, et al.](#) (FCPA charges added in 2023)

- Samuel Bankman-Fried
- Zixiao (Gary) Wang
- Caroline Ellison
- Nishad Singh

### [United States of America v. Glenn Oztemel, et al.](#)

- Glenn Oztemel
- Eduardo Innecco
- Gary Oztemel

### [United States of America v. Alvaro Ledo Nass](#)

### [In the Matter of Flutter Entertainment plc, as successor-in-interest to The Stars Group, Inc.](#)

### [In the Matter of Rio Tinto plc](#)

### [In Re: Corsa Coal Corporation](#)

### [In the Matter of Frank's International N.V.](#)

### [United States of America v. Amadou Kane Diallo](#)

### [In the Matter of Koninklijke Philips N.V.](#)

### [In the Matter of Gartner, Inc.](#)

### [United States of America v. Javier Alejandro Aguilar Morales](#)

### [In the Matter of Grupo Aval Acciones y Valores S.A. and Corporacion Financiera Colombiana S.A.](#)

- Grupo Aval Acciones y Valores S.A.
- Corporacion Financiera Colombiana S.A.

### [United States of America v. Corporacion Financiera Colombiana S.A.](#)

### [In the Matter of 3M Company](#)

### [United States of America v. Orlando Alfonso Contreras Saab](#)

### [In the Matter of Clear Channel Outdoor Holdings, Inc.](#)

### [In Re Albemarle Corporation](#)

### [In the Matter of Albemarle Corporation](#)

### [United States of America v. Tysers Insurance Brokers Limited and H.W. Wood Limited](#)

- Tysers Insurance Brokers Limited
- H.W. Wood Limited

### [In Re: Lifecore Biomedical, Inc. \(f/k/a Landec Corporation\)](#)

### [United States of America v. Carl Alan Zaglin, et al.](#)

- Carl Alan Zaglin
- Aldo Nestor Marchena
- Francisco Roberto Cosenza Centeno

### [United States of America v. Freepoint Commodities LLC](#)