

Simpson Thacher Attorneys Author Article on Updated FCPA Resource Guide

07.30.20



Partners Cheryl Scarboro, Jeffrey Knox, Nick Goldin and Adam Goldberg, and Associate David Caldwell authored an article titled, “DOJ and SEC Update FCPA Resource Guide,” which was published by the *Harvard Law School Forum on Corporate Governance*. The article analyzed the recently-released second edition of joint guidance from the DOJ and SEC on the FCPA, which was revised to reflect recent case law, DOJ policies and enforcement actions. It further noted how the most notable changes included those made to account for the Second Circuit’s 2018 decision in *United States v. Hoskins* relating to anti-bribery jurisdiction over non-U.S. nationals based on conspiracy or accomplice liability. The article additionally highlighted how the updated resource guide references a number of recent DOJ policies related to corporate compliance programs and enforcement; provides guidance with respect to anti-corruption compliance in the context of merger-and-acquisition due diligence; and makes several other changes that companies, individuals and compliance professionals may find helpful in addressing potential FCPA compliance risks.

To read the full article, please [click here](#).

Authors and
Contacts

Cheryl Scarboro

Of Counsel

cscarboro@stblaw.com

+1-202-636-5529

Nicholas Goldin

Partner

ngoldin@stblaw.com

+1-212-455-3685

Jeffrey Knox

Partner

jeffrey.knox@stblaw.com

+1-202-636-5532

David Caldwell

Counsel

dcaldwell@stblaw.com

+1-212-455-2612



