

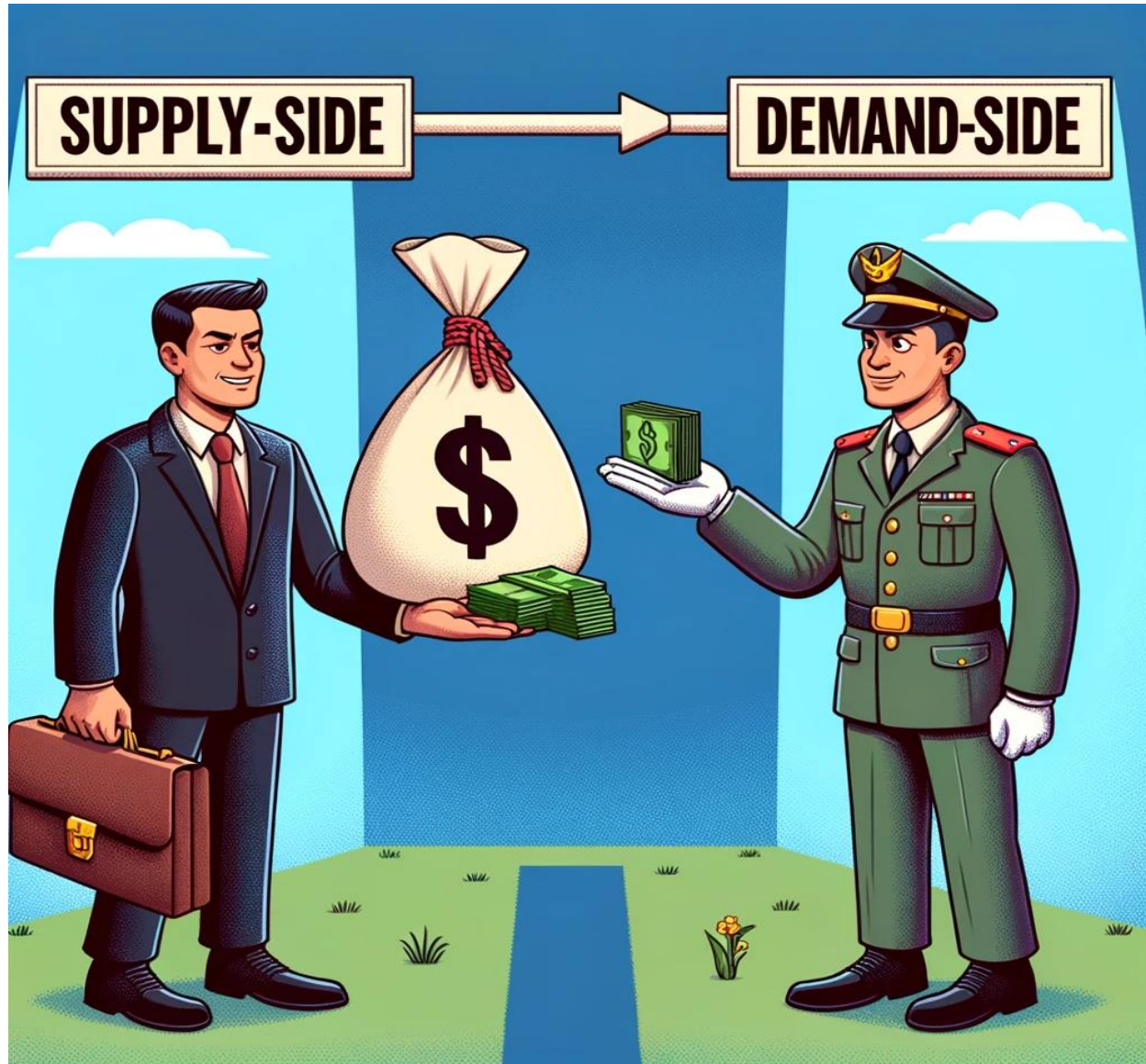
COMBATTING CORRUPTION'S DEMAND SIDE: NEW U.S. LEGISLATION AND BEYOND

20TH ANNUAL IBA ANTI-CORRUPTION CONFERENCE
PARIS, FRANCE

June 12, 2024



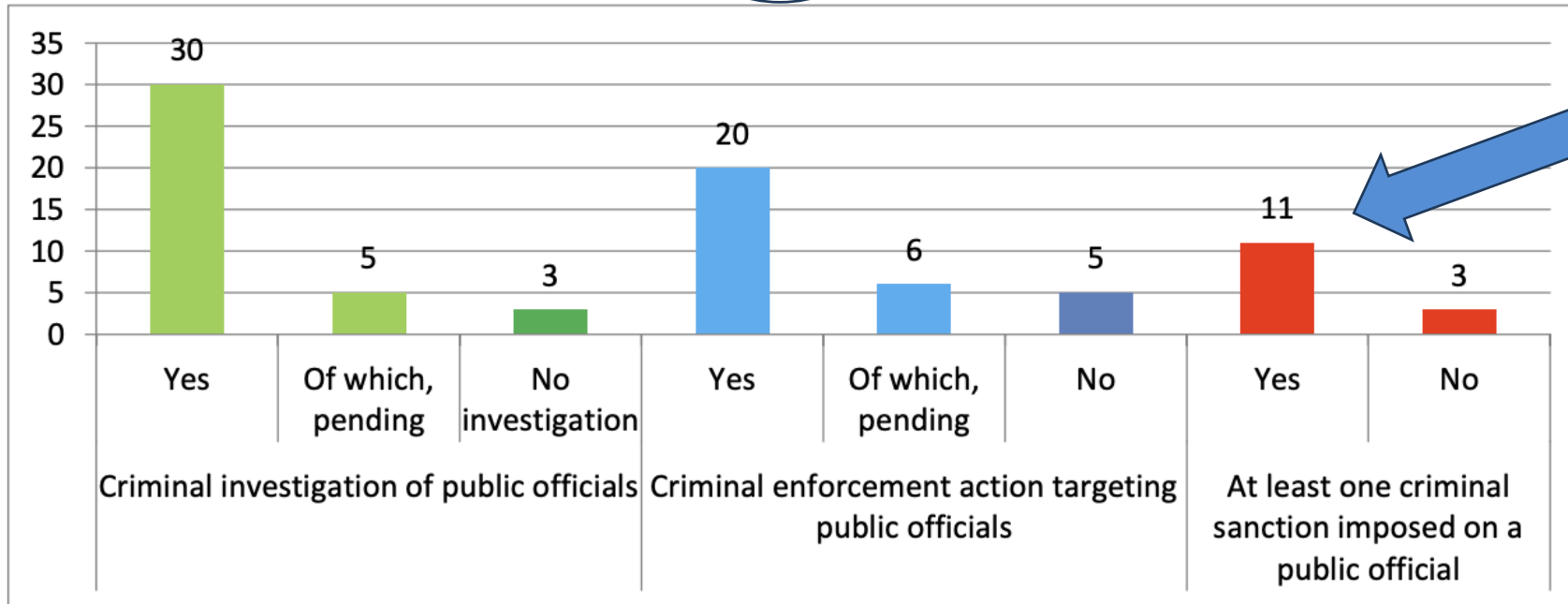
Basic Bribery Concept



Lackluster Global Demand-Side Enforcement

Figure 3. Demand-side case development: investigation, prosecution and sanctions

(out of 33 cases where details of case development are known and out of a total of 55 cases covered by the survey)



Source: OECD Working Group on Bribery “Flip side” Survey.

Source: OECD (2018), *Foreign Bribery Enforcement: What Happens to the Public Officials on the Receiving End?*

Battle Against Corruption Has Become a Central Interest of U.S. National Security



- 2015 Obama Anticorruption Strategy – change behavior of foreign officials
 - Declares critical to U.S. national security interests
- 2021 Biden Anticorruption Strategy –
 - Hold corrupt actors accountable
 - Emphasize multilateral cooperation and improve diplomatic commitment



Battle Against Corruption is a Central Interest of U.S. National Security



“Fighting foreign corruption is not a service we provide to the global community, but rather a necessary enforcement action to protect our own national security interests and the ability of our U.S. companies to compete on a global scale.”

*-Assistant Attorney General
Leslie R. Caldwell, October 2014*

FEPA – Key Issues

- Legal Issues
- Diplomatic and Cultural sensitivities
- Business advantages
- Compliance advantages
- Deterrence?
- What's good for the goose....



What's Good for the Goose...

