



## Anti-Corruption Committee Newsletter February 2010

### *U.S. Enforcement Actions*

<a href="#"><u>BAE Systems PLC Pleads Guilty to FCPA and Other Violations, Fined \$400 Million</u></a>	1
<a href="#"><u>Alcatel-Lucent May Pay Over \$137 Million for FCPA Violations</u></a>	1
<a href="#"><u>Virginia Resident Pleads Guilty to Bribing Former Panamanian Government Officials</u></a>	1
<a href="#"><u>Florida Businessman Pleads Guilty to Money Laundering in a Foreign Bribery Scheme</u></a>	2
<a href="#"><u>U.S. Authorities Investigate Eli Lilly &amp; Co. for Possible FCPA Violations</u></a>	2
<a href="#"><u>U.S. Seeks Extradition of a British Businessman in Connection with Nigerian Bribery</u></a>	2

### *Africa*

<a href="#"><u>Corruption Scandals Force Kenyan Leaders to Consider Action</u></a> <i>by Michael Okelloh</i>	2
--	---

### *Asia*

<a href="#"><u>New Anticorruption Code for Chinese Communist Party Officials</u></a>	3
--	---

### *Europe*

<a href="#"><u>Russian President Fires Interior Ministry Officials to Reduce Police Corruption</u></a>	4
<a href="#"><u>U.K.'s SFO Announces Settlement with BAE but the High Court Grants Injunction</u></a>	4
<a href="#"><u>U.K. to Repatriate £43 Million to Nigeria</u></a>	5

### *The Americas*

<a href="#"><u>Brazil's Congress to Consider an Anticorruption Bill</u></a>	5
<a href="#"><u>Chilean Authorities Seek Fresh Evidence against Pinochet</u></a>	5
<a href="#"><u>Peru Creates the Anti-Corruption Commission</u></a>	5
<a href="#"><u>Senate Bill S. 1700: Energy Security Through Transparency Act</u></a> <i>by Heather A. Lowe and Matthew Wright</i>	6
<a href="#"><u>Senate Report and Hearings: Keeping Foreign Corruption Out of the United States</u></a> <i>by Heather A. Lowe and Matthew Wright</i>	7
<a href="#"><u>U.S. Department of Justice Official: The New Chapter in White Collar Criminal Enforcement</u></a>	8

### *Committee Events*

<a href="#"><u>ABA Section of International Law Spring Meeting</u></a>	8
--	---

<a href="#"><u>Editors and Submissions</u></a>	9
<a href="#"><u>About the Anti-Corruption Committee</u></a>	9

*All opinions expressed are those of the author.*

## **U.S. ENFORCEMENT ACTIONS**

### **BAE Systems PLC Pleads Guilty to FCPA and Other Violations, Fined \$400 Million**

On February 5, 2010, the U.S. Department of Justice announced reaching the settlement agreement with BAE Systems PLC (BAE). The settlement involved BAE's business dealings in Saudi Arabia, the Czech Republic and Hungary. On March 1, BAE pleaded guilty to conspiring to defraud the United States by impairing and impeding its lawful functions, to make false statements about its Foreign Corrupt Practices Act (FCPA) compliance program, and to violate the Arms Export Control Act and International Traffic in Arms Regulations. BAE is sentenced to pay a \$400 million fine, one of the largest criminal fines in the history of the Department of Justice's ongoing effort to combat overseas corruption in international business and enforce U.S. export control laws. The February 5 announcement of the Department of Justice settlement with BAE was coordinated with the announcement of the settlement agreement reached between BAE and U.K.'s Serious Fraud Office (*see infra*, [p. 5](#)).

Source: <http://www.justice.gov/opa/pr/2010/March/10-crm-209.html>

### **Alcatel-Lucent May Pay Over \$137 Million for FCPA Violations**

In its Securities and Exchange Commission (SEC) filing of February 11, 2010, Alcatel-Lucent SA disclosed its agreements in principle with the SEC and the Department of Justice to pay a total of \$137.4 million to avoid U.S. prosecution for alleged FCPA violations in Costa Rica, Taiwan and Kenya. In addition to the criminal fine, disgorgement of profits and prejudgment interest, the company would also change its internal procedures and agree to a three-year French anticorruption compliance monitor to evaluate the effectiveness of Alcatel-Lucent's internal controls, record-keeping and financial reporting policies and procedures.

Sources: [http://www1.alcatel-lucent.com/4q2009/pdf/Consolidated-Financial-Statements-2009-GB\\_11feb10.pdf](http://www1.alcatel-lucent.com/4q2009/pdf/Consolidated-Financial-Statements-2009-GB_11feb10.pdf);  
<http://www.bloomberg.com:80/apps/news?pid=20601085&sid=aCuL2QwWzEXA>

### **Virginia Resident Pleads Guilty to Bribing Former Panamanian Government Officials**

John Warwick of Virginia pleaded guilty in connection with his role in a conspiracy to pay bribes to former Panamanian government officials. According to the indictment, Warwick and others conspired, in violation of the FCPA, to make corrupt payments totaling more than \$200,000 to Panamanian government officials for awarding contracts to maintain lighthouses and buoys along Panama's waterway. Warwick faces a maximum of five years in prison and a fine of the greater of \$250,000 or twice the gain or loss. As part of his plea agreement, Warwick has agreed to forfeit \$331,000, which represents the proceeds of this crime.

Source: <http://www.justice.gov/opa/pr/2010/February/10-ag-134.html>

## **Florida Businessman Pleads Guilty to Money Laundering in a Foreign Bribery Scheme**

Jean Fourcand, President of the Miami-based Fourcand Enterprises, Inc., recently pleaded guilty to engaging in monetary transactions involving property derived from a scheme to bribe former government officials in the Haiti state-owned telecommunications company, Telecommunications D'Haiti (Haiti Teleco). The charged crime carries a maximum penalty of 10 years in prison and a fine of the greater of \$250,000 or twice the value of the property involved in the transaction. As part of his guilty plea, Fourcand agreed to forfeit \$18,500.

Source: <http://www.justice.gov/opa/pr/2010/February/10-crm-167.html>

## **U.S. Authorities Investigate Eli Lilly & Co. for Possible FCPA Violations**

In its latest SEC filing, the pharmaceutical company Eli Lilly & Co. (Lilly) disclosed that the U.S. Department of Justice and the SEC recently widened their ongoing FCPA probe into Lilly's activities in several (unnamed) countries. The pharmaceutical industry faces particular challenges regarding violations of the FCPA because of government control of healthcare systems in many foreign countries.

Source: <http://www.nasdaq.com/asp/stock-market-news-story.aspx?storyid=201002231420dowjonesdjonline000135&title=us-expands-probe-of-lillys-compliance-with-antibribery-law>

## **U.S. Seeks Extradition of a British Businessman in Connection with Nigerian Bribery**

The United States seeks to extradite Wojciech Chodan, a British citizen and a retired sales executive, to Texas to face charges for his role in channeling more than \$100 million in bribes to Nigerian politicians and officials as part of a decade-long bribery scheme. The scheme was connected with Halliburton's efforts to secure a contract worth \$6 billion to build gas plants at Bonny Island off the coast of Nigeria. If extradited and convicted, Mr. Chodan could face up to 55 years in prison. Last year, Halliburton settled the Nigerian bribery case with the U.S. authorities and agreed to pay a \$579 million fine.

Source: <http://www.guardian.co.uk/business/2010/feb/22/us-seeks-extradition-uk-pesioner>

## ***AFRICA***

### **Corruption Scandals Force Kenyan Leaders to Consider Action**

*By Michael Okelloh, Esq.  
Transparency International-Kenya*

Kenya's President Mwai Kibaki and Prime Minister Raila Odinga summoned over 50 top government officials to an anti-corruption workshop on February 5, 2010 in the wake of rising

reports of corruption in their Grand Coalition Government (GCG).<sup>1</sup>

The frequency of reports of grand corruption has mocked the two-year-old GCG's 'zero tolerance to corruption' promise, with the maize and Free Primary Education Programme (FPEP) scandals dominating public debate since the start of this year.<sup>2</sup> The maize scandal, which first broke out in late 2008, reportedly involved a Kshs. 2 billion (US\$26.1 million) loss through corrupt sale to well-connected middlemen of government-subsidized maize meant for the poor.<sup>3</sup> The FPEP scandal erupted in December 2009 in the Ministry of Basic Education. This was after U.K.'s Department for International Development (DfID) withheld Kshs. 1.2 billion funding to the 2003-initiated FPEP over the alleged theft of Kshs. 100 million by ministry officials.<sup>4</sup> The U.S. subsequently suspended a \$7 million capacity-building support to the FPEP over corruption in the programme.<sup>5</sup>

By February 14th, three civil servants had been charged in court over the FPEP scam,<sup>6</sup> while four chief executive officers of four ministries, including two aides of the Prime Minister, had been suspended for three months pending further investigations over the FPEP and maize scandals.<sup>7</sup> The Kenya Anti Corruption Commission (KACC), whose director and two assistant directors resigned in late 2009 amidst public and parliamentary pressure over their irregular re-appointment by the President, has recently investigated a number of senior present and past public servants and recommended their prosecution by the Attorney General.<sup>8</sup> Therefore, many Kenyans hope that KACC will also investigate and recommend the prosecution of top politicians, not merely civil servants, adversely named in the maize and FPEP scams.

## ASIA

### New Anti-Corruption Code for Chinese Communist Party Officials

Communist Party officials in China are now subject to a new 52-point ethics code. The code forbids party officials from taking part in property speculation and profit-making deals and bans fancy government buildings, lavish weddings, funerals and overseas tours.

---

<sup>1</sup> "Kibaki, Raila Talk Tough On Graft":

<http://www.marsgroupkenya.org/multimedia/?StoryID=279833&p=Ministry+of+Education>

<sup>2</sup> "Audit firm shows big names involved in genesis of maize scandal," *The Standard*, February 10, 2010:

<http://www.standardmedia.co.ke/InsidePage.php?id=2000002947&cid=4&story=Audit%20firm%20shows%20big%20names%20involved%20in%20genesis%20of%20maize%20scandal>

<sup>3</sup> "Auditor: Kenya lost millions in corrupt food deal," *The Associated Press*, February 11, 2010:

<http://www.msnbc.msn.com/id/35345701/ns/business>

<sup>4</sup> "UK withholds Kenya grant over corruption," *Daily Nation*, December 14, 2009: <http://www.nation.co.ke/News/-/1056/820998/-/item/0/-/109gea5z/-/index.html>

<sup>5</sup> "US suspends Kenya education cash," *Daily Nation*, January 27, 2010: <http://www.nation.co.ke/News/-/1056/849984/-/vpg3t6/-/index.html>

<sup>6</sup> "Education bosses in court over missing money," *The Standard*, February 13, 2010:

<http://www.standardmedia.co.ke/InsidePage.php?id=2000003181&cid=4&>

<sup>7</sup> "Top government officials sent home," *The Standard*, February 14, 2010:

<http://www.standardmedia.co.ke/InsidePage.php?id=2000003243&cid=4&ttl=Top%20Government%20officials%20sent%20home>

<sup>8</sup> "KACC goes for big shots in war on vice," *The Standard*, February 5, 2010:

<http://www.standardmedia.co.ke/InsidePage.php?id=2000002519&catid=4&a=1>

Source: <http://news.bbc.co.uk:80/2/hi/asia-pacific/8533410.stm>

## EUROPE

### Russian President Fires Interior Ministry Officials to Reduce Police Corruption

President of Russia Dmitry Medvedev fired over a dozen of top officials in the Interior Ministry in an attempt to reduce police corruption. The Interior Minister has been given one month to come up with a plan to combat corruption in the police force. A new presidential decree intended to reform the Interior Ministry has also been signed by President. The decree provides for the reduction of the police force by 20 percent by January 1, 2012 and the closing of two departments of the Interior Ministry to fund pay raises.

Sources:

[http://www.rferl.org/content/Medvedevs\\_Police\\_Reform\\_Is\\_More\\_About\\_Control\\_Than\\_Reform/1923207.html](http://www.rferl.org/content/Medvedevs_Police_Reform_Is_More_About_Control_Than_Reform/1923207.html);

[http://www.google.com:80/hostednews/afp/article/ALeqM5iiM3tldjLTEMV6Bz5mkK8Pu5a6\\_Q](http://www.google.com:80/hostednews/afp/article/ALeqM5iiM3tldjLTEMV6Bz5mkK8Pu5a6_Q)

### U.K.'s SFO Announces Settlement with BAE but the High Court Grants Injunction

On February 5, 2010, the U.K.'s Serious Fraud Office (SFO) announced a settlement with BAE Systems PLC (BAE). BAE will plead guilty in the Crown Court to an offence under section 221 of the Companies Act 1985 of failing to keep reasonably accurate accounting records in relation to its activities in Tanzania. The company will pay £30 million fine. The news came on the same day the U.S. Department of Justice announced its own settlement with BAE. While the U.S. agreement involved BAE's business dealings in Saudi Arabia, the Czech Republic and Hungary, the SFO agreement concentrated on the company's operations in Tanzania.

On the same day as the announcement of the BAE settlement, SFO dropped charges against the Count Alfons Mensdorff-Pouilly, BAE's intermediary in relation to sales of fighter jets to the Central European countries.

On February 26, 2010, two NGOs, Campaign Against Arms Trade (CAAT) and The Corner House, challenged the SFO/BAE settlement agreement in court. The NGOs argued that "[t]he SFO's proposed settlement with BAE is unlawful because the SFO did not follow the correct prosecution guidance on plea bargains; the agreement does not reflect the seriousness and extent of BAE's alleged corruption and bribery offences, and because it does not provide the court with adequate sentencing powers." On March 1, the High Court granted an injunction prohibiting the Director of the Serious Fraud Office from taking any further steps in its plea bargain settlement with BAE. The injunction is in force until the court decides whether or not to give permission to CAAT and The Corner House to apply for a judicial review of the settlement. The court will make this decision by March 20, 2010.

Sources: <http://www.sfo.gov.uk/press-room/latest-press-releases/press-releases-2010/bae-systems-plc.aspx>; <http://www.sfo.gov.uk/press-room/latest-press-releases/press-releases->

[2010/sfo-withdraws-proceedings-against-count-alfons-mensdorff-pouilly.aspx;](http://www.thecornerhouse.org.uk/item.shtml?x=566021)  
[http://www.thecornerhouse.org.uk/item.shtml?x=566021;](http://www.thecornerhouse.org.uk/item.shtml?x=566021) <http://www.thecornerhouse.org.uk/>

### **U.K. to Repatriate £43 Million to Nigeria**

The British Government promised to repatriate £43 million siphoned by corrupt Nigerian government officials to offshore accounts. The declaration was made by Michael Dockree, the liaison officer for West Africa of the Serious Organised Crime Agency (SOCA), during his visit to Nigeria in early February.

Source: <http://www.assetrecovery.org/kc/node/6c3bbe0c-10af-11df-88c3-599b06b766bd.0;jsessionid=1EF2F7C1C3BD0FD821C03CAE22A3695A>

## **THE AMERICAS**

### **Brazil's Congress to Consider an Anticorruption Bill**

On February 8, 2010, Brazil's President Lula sent to Congress an anticorruption bill which would impose fines on companies bribing officials in Brazil and abroad. The bill provides that a company caught bribing government officials would be fined 1 to 30 percent of the company's gross income and could even be shut down. The bill is an attempt to bring Brazil's domestic law in compliance with the requirements of the UN and OECD anticorruption conventions which the country ratified.

Source: <http://www.reuters.com/article/idUSN0853166620100208>

### **Chilean Authorities Seek Fresh Evidence against Pinochet**

A plea bargain between BAE Systems and the U.S. and U.K. authorities prompted Chilean investigators to seek new evidence in the pursuit of bribery and embezzlement charges against former dictator Gen. Augusto Pinochet. Pinochet is suspected of having received millions of dollars in bribes from BAE and other companies in 1973-1998 during his tenures as dictator, Army Commander-in-Chief and Senator-for-Life. Pinochet's family members continue to deny the charges amidst continued investigation by Chilean authorities.

Source: <http://en.mercopress.com/2010/02/09/looking-for-the-pinochet-link-in-false-accounting-plea-by-british-arms-giant>

### **Peru Creates the Anti-Corruption Commission**

On February 2, 2010, the government of Peru announced the creation of the High Level Commission for Anti-Corruption that will design strategies and policies aimed at promoting ethics, transparency and anticorruption. The Commission will not conduct investigations but be a policy-making body headed by the president of Peru's judicial system, Javier Villa. Members of the new Commission include a number of senior-level government and judicial officials

including the president of the constitutional tribunal, the attorney general, the national ombudsman, the minister of justice, as well as the president of the national confederation of private business institutions.

Source: <http://www.peruviantimes.com:80/peru-government-announces-creation-of-anti-corruption-commission/024745>

### **Senate Bill S. 1700: Energy Security Through Transparency Act**

*By Heather A. Lowe, Esq. and Matthew Wright  
Global Financial Integrity, Washington, D.C.*

The Senate Committee on Banking, Housing and Urban Affairs is considering a Bill designed to provide greater transparency for payments made to governments and officials (both U.S. and foreign) by companies operating in the extractive industries. Introduced last September, the Energy Security Through Transparency Act (S. 1700) is gaining momentum and would require issuers operating in the extractive industries that are registered with the Securities and Exchange Commission to disclose on an annual basis such payments made by the issuer or any of its subsidiaries or partners. Specifically, the disclosure would have to include the type and total amounts of payments made to each foreign government and official for each of the issuer's extraction projects. The types of payments to be reported on a disaggregated basis include payments (other than *de minimis*) that are made to further the commercial development of oil, natural gas, or minerals, including taxes, royalties, fees, licenses, production entitlements, bonuses and other material benefits, as determined by the SEC.

The Bill would likely cover the vast majority of the major companies in the extractive industries, both in the U.S. and abroad (including those operating on Federal lands). Fourteen of the world's top 15 oil and gas companies<sup>9</sup> and eight of the world's 10 most successful mining companies<sup>10</sup> are registered with the SEC. Nearly all of the largest oil and gas companies (by proven reserve) which are not registered with the SEC are national companies which usually limit operation to their home country.

Section 2 of the Bill, "Findings," states that a primary purpose of the Bill is to increase the reliability of commodity supplies and energy security for the U.S. through the promotion of good governance within the extractive industry. In addition, Section 2 states that the transparency in revenue payments made to foreign governments in which extractive resources are located will enable the citizens of these nations to hold their leaders more accountable for the tax revenues that are collected, and thus reduce regional violence, poverty rates, and the proliferation of terrorism. Shareholders are also expected to benefit from greater knowledge of the details of these payments, which will allow better assessment of financial risks and stability of foreign investment climates. Implicit in the stated goals is that the legislation is intended to have a chilling effect on the prevalence of kleptocracy with respect to revenues from the extractive industry.

---

<sup>9</sup> According to sales in 2007, as ranked by Fortune magazine.

<sup>10</sup> As ranked in the 2007 Forbes Global 2000

Senator Lugar (R – IN) is the Bill’s sponsor, and the list of cosponsors as of February 18, 2010 include Senators Wicker (R – MS), Bayh (D – IN), Durbin (D – IL), Leahy (D – VT), Schumer (D – NY), Cardin (D – MD), Feingold (D – WI), Menendez (D – NJ), and Whitehouse (D – RI). A companion Bill in the House of Representatives, also to be entitled the Energy Security Through Transparency Act, is expected to be introduced within the next few weeks.

### **Senate Report and Hearing: Keeping Foreign Corruption Out of the United States**

*By Heather A. Lowe and Matthew Wright  
Global Financial Integrity, Washington, D.C.*

The United States Senate Committee on Homeland Security and Governmental Affairs’ Permanent Subcommittee on Investigations released a report in February entitled *Keeping Foreign Corruption Out of the United States: Four Case Studies* (the Report), detailing through four case studies gaps in U.S. laws that allow corrupt foreign money to enter the U.S. The Subcommittee also held a hearing following the release of the Report, in which Senator Carl Levin, chairman of the Subcommittee, and Senator Tom Coburn, the Subcommittee’s ranking minority member, questioned a series of witnesses related to the case studies in the Report as well as officials from three government agencies.

The four case studies examined transfers of funds to the U.S. and purchases of multi-million dollar items in the U.S., by (i) Teodoro Nguema Obiang Mangue, the son of the President of Equatorial Guinea, (ii) Omar Bongo, former President of Gabon (now deceased), (iii) Atiku Abubakar, the former vice president of Nigeria, and his fourth wife, U.S. citizen Jennifer Douglas, and (iv) Pierre Falcone, an Angolan arms dealer who was recently convicted of money laundering and arms dealing in France. The Report highlighted how these individuals used professionals, such as real estate agents, escrow agents, lobbyists and lawyers, and their client accounts to facilitate the laundering of hundreds of millions of dollars in the U.S. Certain banks were also identified as lacking sufficient know your customer diligence in that they permitted receipt of the alleged proceeds of corruption and, in some cases, actively facilitated the transfer of funds to jurisdictions where its receipt would not cause legal problems. Two lawyers, a lobbyist, a real estate agent, an escrow agent, and representatives of both HSBC and Bank of America were called to testify at the hearing. In addition to witnesses related to the case studies, Hon. David Johnson, the Assistant Secretary for the U.S. Department of State, Janice Ayala, Assistant Director for Immigration and Customs Enforcement, and James Freis, Jr., Director of the Financial Crimes Enforcement Network (FinCEN) spoke.

The Report made eight recommendations: (i) to adopt recent proposals by the World Bank to help screen for politically exposed persons (PEPs); (ii) to repeal regulatory exemptions under the Patriot Act for real estate and escrow agents; (iii) to require that U.S. financial institutions obtain a certification with respect to each attorney-client and law office account stating that the account is not being used to circumvent money laundering or PEP regulations; (iv) to require disclosure of beneficial owners of new corporations; (v) to allow acts of foreign corruption to prevent issue of or invalidate a visa for a PEP; (vi) to strengthen enforcement of Presidential Proclamation

7750 denying visas to foreign PEPs involved with corruption; (vii) for professional organizations for attorneys (the ABA), realtors and lobbyists to issue guidance to their members prohibiting use of any financial account to accept suspect funds involving PEPs, conceal PEP activity, facilitate suspect transactions involving PEPs, or circumvent AML or PEP controls, and (viii) the United States should work with FATF to amend its Recommendations to strengthen anti-corruption and PEP controls.

The Report and the prepared testimony of the witnesses at the hearing are available at the Senate Committee on Homeland Security and Governmental Affairs website at [http://hsgac.senate.gov/public/index.cfm?FuseAction=Hearings.Hearing&Hearing\\_ID=dd873712-eb12-4ff7-ae1a-cbbc99b19b52](http://hsgac.senate.gov/public/index.cfm?FuseAction=Hearings.Hearing&Hearing_ID=dd873712-eb12-4ff7-ae1a-cbbc99b19b52)

### **U.S. Department of Justice Official: The New Chapter in White Collar Criminal Enforcement**

In his February 25, 2010 speech at the American Bar Association National Institute on White Collar Crime, Lanny A. Breuer, Assistant Attorney General for the Criminal Division, stressed that prosecution of individuals is "one cornerstone of [the] FCPA enforcement policy." Referring to the recent FCPA indictment of 22 executives and employees of companies in the military and law enforcement products industry, Breuer noted that the investigation involved "the most expansive use ever of undercover techniques to uncover FCPA violations." Criminal charges against corporations will continue to be brought when the criminal conduct is "egregious, pervasive and systemic, or when the corporation fails to implement compliance reforms, changes to its corporate culture, and undertake other measures designed to prevent a recurrence of the criminal conduct." Breuer also emphasized the opening of a new chapter in white collar criminal enforcement: "Out are the days of resting easy in the belief that only self-reporting or tipsters will bring criminality to light. In are the days of proactive and innovative white collar enforcement."

Source: <http://www.justice.gov/criminal/pr/speeches/2010/02/02-25-10aag-AmericanBarAssosiation.pdf>

## **UPCOMING COMMITTEE EVENTS**



Join us at the **ABA Section of International Law 2010 Spring Meeting**, one of the world's most important gatherings of international lawyers, in **New York City** on **April 13-17, 2010**. Get a year's worth of CLE credit (choose from over 70 cutting edge CLE programs) and enjoy

unparalleled opportunities to network. To find out more and to register for the Spring Meeting, visit <http://www.abanet.org/intlaw/spring2010/home.html>

## EDITORS AND SUBMISSIONS

**Editor:** Elena Helmer, Ohio Northern University College of Law, [e-helmer@onu.edu](mailto:e-helmer@onu.edu)

**Student Editors:** Daniel Bey and Ryan Nuss, J.D./LL.M. candidates, Ohio Northern University College of Law.

Please send draft articles, casenotes, other information or suggestions for articles for the newsletter to [e-helmer@onu.edu](mailto:e-helmer@onu.edu). The deadline is the **25th of the month**.

## ABOUT THE ANTI-CORRUPTION COMMITTEE

The Anti-Corruption Initiatives Committee facilitates efforts to deter corrupt practices in international business and promotes efforts to combat corruption, both in the United States and abroad. It provides a vehicle for constructive change by serving as a clearinghouse for information about anti-corruption laws, treaties, policies, initiatives, and programs and by promoting interaction between individuals and organizations -- domestic and international and government and non-governmental. In addition, by encouraging the development and dissemination of new ideas, initiatives and "best practices," this committee promotes discussion amongst all stakeholders of practical steps that can be taken to reduce corruption.

To join the ABA Section of International Law, go to [www.abanet.org/join/](http://www.abanet.org/join/) and select "Add a Section, Division, or Forum." To join the Committee or our listserve, go to [www.abanet.org/dch/committee.cfm?com=IC700600](http://www.abanet.org/dch/committee.cfm?com=IC700600). If you would like to be more involved in Committee activities, please contact Alexandra Wrage ([wrage@traceinternational.org](mailto:wrage@traceinternational.org)) or Kathleen Hamann ([kmhamann@starpower.net](mailto:kmhamann@starpower.net)).