

## Analysis of FCPA Cases 2016-2019

Defendants	Date	US / US Subsidiary / Non-US	Amount of Fine	Individual / Company
General Cable Corporation	12/29/16	US	\$75,000,000	Company
Karl J. Zimmer	12/29/16	US	\$82,000,000	Company
Teva Pharmaceutical	12/22/16	Non-US; Israel	\$519,000,000	Company
Braskem S.A.	12/21/16	Non-US; Brazil	\$957,000,000	Company
JPMorgan	11/17/16	US	\$264,000,000	Company
Embraer	10/24/16	Non-US; Brazil	\$205,000,000	Company
GlaxoSmithKline	9/30/16	Non-US; UK	\$20,000,000	Company
Och-Ziff	9/29/16	US	\$412,000,000	Company
Anheuser-Busch InBev	9/28/16	Non-US; Belgium	\$6,000,000	Company
Nu Skin Enterprises	9/20/16	US	\$765,000	Company
Jun Ping Zhang	9/12/16	US	\$46,000	Individual
AstraZeneca	8/30/16	Non-US; UK	\$5,000,000	Company
Key Energy Services	8/11/16	US	\$5,000,000	Company
LAN Airlines	7/25/16	Non-US; Chile	\$22,000,000	Company
Johnson Controls	7/11/16	US	\$14,000,000	Company
Analogic Corp. and Lars Frost	6/21/16	US	\$15,000,000	Company
Akamai Technologies	6/7/16	US	\$650,000	Company
Nortek	6/7/16	US	\$300,000	Company
Las Vegas Sands	4/7/16	US	\$9,000,000	Company
Novartis AG	4/7/16	Non-US; Switzerland	\$25,000,000	Company
Nordion Inc. and employee	3/3/16	Non-US; Canada	\$500,000	Company
Qualcomm	3/1/16	US	\$7,500,000	Company
VimpelCom	2/18/16	Non-US; Netherlands	\$795,000,000	Company
PTC	2/16/16	US	\$28,000,000	Company
SciClone Pharmaceuticals	2/4/16	US	\$12,000,000	Company
Ignacio Cueto Plaza	2/4/16	Non-US; Chile	\$75,000	Individual
SAP SE	2/1/16	Non-US; Germany	\$3,700,000	Company
Telia	9/21/17	Non-US; Sweden	\$965,000,000	Company
Alere, Inc	9/28/17	US	\$13,000,000	Company
Halliburton	7/27/17	US	\$75,000	Company
Orthofix International	1/18/17	US	\$6,000,000	Company
SQM	1/13/17	Non-US; Chile	\$30,000,000	Company
Biomet	1/12/17	US	\$30,000,000	Company
Cadbury Limited/Mondelez International	1/6/17	Non-US; UK	\$13,000,000	Company
Polycom	12/26/18	US	\$16,000,000	Company
Centrais Eletricas Brasileiras S.A.	12/26/18	Non-US; Brazil	\$2,500,000	Company
Paul A. Margis and Takeshi "Tyrone" Uonaga	12/18/18	Non-US; Japan	\$125,000	Individuals

Vantage Drilling International	11/19/18	US	\$5,000,000	Company
Stryker Corp.	9/28/18	US	\$7,800,000	Company
Petroleo Brasileiro S.A.	9/27/18	Non-US; Brazil	\$1,780,000,000	Company
Patricio Contesse Gonzalez	9/25/18	Non-US; Chile	\$125,000	Individual
United Technologies	9/12/18	US	\$14,000,000	Company
Joohyun Bahn	9/6/18	US	\$225,000	Individual
Sanofi	9/4/18	Non-US; France	\$25,000,000	Company
Legg Mason	8/27/18	US	\$34,000,000	Company
Credit Suisse Group AG	7/5/18	Non-US; Switzerland	\$30,000,000	Company
Beam Suntory Inc.	7/2/18	US; Indian subsidiary	\$8,000,000	Company
Panasonic Corp	4/30/18	Non-US; Japan	\$143,000,000	Company
The Dun & Bradstreet Corp.	4/23/18	US	\$9,000,000	Company
Kinross Gold	3/26/18	Non-US; Canada	\$950,000	Company
Elbit Imaging	3/9/18	Non-US; Israel	\$500,000	Company
Tim Leissner	12/16/19	US	\$1,425,000	Individual
Ericsson	12/6/19	Non-US; Sweden	\$1,000,000,000	Company
Westport and Nancy Gougarty	9/27/19	Non-US; Canada	\$4,100,000	Company / Individual
Barclays	9/27/19	Non-US; UK	\$6,300,000	Company
Quad/Graphics, Inc.	9/26/19	US	\$10,000,000	Company
TechnipFMC plc	9/19/19	US/ Non-US; France, UK	\$5,000,000	Company
Sridhar Thiruvengadam	9/13/19	US	\$50,000	Individual
Juniper Networks	8/29/19	US	\$11,700,000	Company
Deutsche Bank AG	8/22/19	Non-US; Germany	\$16,000,000	Company
Microsoft Corporation	7/22/19	US	\$24,000,000	Company
Walmart Inc.	6/20/19	US	\$144,000,000	Company
Telefonica Brasil S.A.	5/9/19	Non-US; Brazil	\$4,125,000	Company
Fresenius Medical Care AG & Co.	3/29/19	Non-US; Germany	\$231,000,000	Company
Mobile TeleSystems PJSC	3/6/19	Non-US; Russia	\$850,000,000	Company
Cognizant	2/15/19	US	\$25,000,000	Company
Gordon Coburn and Steven E. Schwartz	2/15/19	US	\$2,500,000	Individuals

Total = \$8,952,036,000  
Average = \$133,612,477.61

Sources: SEC's FCPA Enforcement Actions

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