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Also in this issue:

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DOJ's New Fraud Division Sets Enforcement Priorities and Reshapes White Collar Enforcement Landscape

On August 13, 2026, Colin M. McDonald, Assistant Attorney General for the Department of Justice's National Fraud Enforcement Division (the "Fraud Division"), issued the first memorandum outlining the enforcement priorities and organizational structure of the Fraud Division (the "Memorandum"). Based on the Memorandum, DOJ intends for the Fraud Division to become a significant new enforcement component, with a broad mandate, substantial resources, and an emphasis on data-driven investigations.[1] DOJ published a final rule on August 18, 2026 (effective

Continued on page 2

1. Memorandum from Colin M. McDonald, Assistant Attorney General, National Fraud Enforcement Division, *The Fraud Division's Enforcement Priorities* (Aug. 13, 2026), https://www.justice.gov/opa/media/1457756/dl; U.S. Dep't of Justice, *Assistant Attorney General Colin M. McDonald Issues Memorandum on the National Fraud Enforcement Division's Enforcement Priorities* (Aug. 13, 2026), https://www.justice.gov/opa/pr/assistant-attorney-general-colin-m-mcdonald-issues-memorandum-national-fraud-enforcement.

Continued from page 1

on August 24) that codified the Fraud Division's jurisdiction and reassigned to it specified fraud authorities that had been the purview of DOJ's Criminal Division.[2]

DOJ established the Fraud Unit in April as a new unit that centralized fraud enforcement, but left unanswered important questions about its scope, resources, and relationship with existing DOJ components.[3] Four months later, with the Memorandum and the related rule, DOJ has begun to answer some of those questions.

The Fraud Division will incorporate approximately 500 attorneys and staff, including specialized prosecutors, investigators, asset recovery personnel, corporate enforcement experts, and data scientists. DOJ intends to deploy its personnel nationwide in coordination with U.S. Attorneys' Offices and other agencies. It also plans to grow the Fraud Division over the next two years. As a result, companies should expect DOJ to have greater capacity to identify potential misconduct proactively and to pursue matters that cross traditional subject matter and span multiple U.S. Attorneys' Offices.

The Criminal Division's longstanding Fraud Section recently was renamed the White Collar and Corporate Enforcement Section (the "White Collar Section"). The renamed Section retains the FCPA Unit along with other areas of private sector white collar enforcement. The restructuring raises two related questions for companies, which we address below. First, where will the increasingly well-resourced Fraud Division concentrate its attention? Second, what does the FCPA Unit's position look like within a smaller, more narrowly focused White Collar Section?

Centralized Fraud Enforcement in the Digital Era

The Memorandum suggests that DOJ views the creation of the Fraud Division as a significant reorganization, characterizing its initial efforts as the beginning of a "sea change" in federal fraud enforcement. The Division's structure includes specialized sections tackling subject matters including public trust and financial integrity; health care fraud; tax; global trade and commerce; and corporate misconduct.

Likewise, the Memorandum's emphasis on data analytics signals that DOJ intends to mine large-scale government and commercial data for statistical red flags in addition to relying on whistleblower complaints and other sources. DOJ's National Fraud Detection Center, located within the Fraud Division, will parse through cross-agency data systems to identify fraud in government programs.

Continued on page 3

2. Establishing the National Fraud Enforcement Division, 91 Fed. Reg. 53357 (Aug. 18, 2026) (codified at 28 C.F.R. §§ 0.55, 0.70–0.71).

3. Debevoise & Plimpton LLP, *DOJ Establishes National Fraud Enforcement Division to Centralize and Expand Fraud Enforcement* (Apr. 13, 2026), https://www.debevoise.com/insights/publications/2026/04/doj-establishes-national-fraud-enforcement-div.

Continued from page 2

Prosecutors in the Fraud Division will have access to dedicated investigators, appellate counsel, corporate enforcement specialists, automated litigation support, data scientists, and other technological capabilities to identify fraud.

For companies, two aspects of these developments are particularly noteworthy. First, DOJ is investing in its ability to develop investigations from government-held data. The Department describes the Fraud Division's mission as including the use of advanced data-driven investigative techniques and coordination with agencies administering taxpayer-funded programs. It also includes development of systems to facilitate the identification and investigation of fraud. Companies operating in data-rich regulated environments, particularly government contracting, health care, customs, and trade, should expect that DOJ increasingly will compare government-held information across programs and agencies to identify potential misconduct.

"For companies, two aspects of these developments are particularly noteworthy. First, DOJ is investing in its ability to develop investigations from government-held data…. Second, the new structure may facilitate investigations that touch upon multiple traditional enforcement categories."

Second, the new structure may facilitate investigations that touch upon multiple traditional enforcement categories. For example, the same conduct may implicate procurement representations, improper payments, customs declarations, sanctions restrictions, tax consequences, and money laundering. By bringing multiple substantive enforcement functions, analytics capabilities, and asset recovery resources within a single Division, DOJ appears intent on reducing institutional barriers to pursuing these issues in a more integrated manner. This is likely to be especially important for companies with internal compliance functions that are siloed by specific subject-matter areas.

Five Broad Enforcement Priorities

The Memorandum identifies five principal enforcement priorities, several of which carry particular implications for multinational companies and anti-corruption practitioners. Those five priorities are: (1) public trust and financial integrity, including government procurement and benefits fraud; (2) global trade and commerce, including customs and trade fraud; (3) health care fraud; (4) internal revenue (tax) fraud; and (5) corporate misconduct.

Continued on page 4

Continued from page 3

DOJ identifies government procurement fraud as a "critical priority," citing defective pricing, bid rigging, self-dealing, bribery, product substitution, and billing fraud. The Fraud Division also will focus on fraud involving government benefits and grant programs and other conduct that misuses taxpayer funds. Companies that contract with the U.S. government or receive federal funding should weigh their enforcement exposure. This is particularly true with respect to corruption issues that may appear in tandem with fraud. A payment made to influence a public procurement decision, for example, may present bribery issues while the surrounding procurement conduct may raise separate fraud, antitrust, or money laundering concerns. Any government-facing misconduct should be assessed through more than an anti-corruption lens. Internal investigations involving tenders, certifications, government pricing, or public funds should consider at an early stage the range of enforcement exposure that the same fact pattern may implicate.

The Fraud Division also will lead DOJ's coordinated criminal enforcement strategy concerning customs and trade violations and supply chains involving forced labor. Through the Trade Fraud Task Force, DOJ will seek to identify illicit transfers of goods, country-of-origin fraud, undervaluation to evade duties, sanctions evasion, and foreign forced-labor schemes. This continues DOJ's increasing emphasis on trade fraud and related national security concerns. In appropriate cases, the Fraud Division will work in parallel with DOJ's Civil Division, which enforces tariff evasion and other forms of fraud on the federal government through the False Claims Act, among other civil statutes.

The Fraud Division's focus on trade fraud also creates important points of intersection with anti-corruption compliance. Customs brokers, freight forwarders, and other intermediaries can create third-party corruption risk. Customs interactions often involve foreign government officials, and efforts to circumvent duties, origin requirements, or sanctions may involve payments, false documentation, or other conduct that yields multiple bases for enforcement.

Health care enforcement also will form a major part of the new Division's focus. DOJ intends to use analytics in matters involving Medicare and Medicaid, controlled substances, telemedicine, home health and hospice services, and deceptive marketing. Tax enforcement likewise will remain a priority, with prosecutors targeting fraudulent return preparation, concealment of income, and abusive tax schemes and use tax offenses alongside other fraud charges as appropriate. This reflects the Division's broader emphasis on pursuing misconduct across traditional enforcement categories rather than within a single regulatory space.

Continued on page 5

Continued from page 4

The Memorandum also makes clear that the Fraud Division's emphasis on fraud involving taxpayer dollars includes corporate enforcement. The Memorandum observes that the Division already has a "strong pipeline of ongoing corporate matters" and that the Division will prioritize anti-fraud corporate enforcement. The Division includes a dedicated Corporate Enforcement Section, and the Memorandum reiterates DOJ's commitment to rewarding companies that voluntarily self-disclose, cooperate, and remediate.

There is already some evidence of what that approach may look like. On July 29, 2026, the Fraud Division declined to prosecute Campus Eye Management Holdings, LLC and its subsidiary for alleged health care fraud and kickbacks in light of the companies' voluntary self-disclosure, cooperation, and remediation pursuant to DOJ's Department-wide Corporate Enforcement and Voluntary Self-Disclosure Policy. DOJ simultaneously indicted the companies' former CEO and founder on seven counts of health care fraud and Anti-Kickback Statute violations arising from the same conduct, underscoring that a corporate declination does not extend to culpable individuals.[4] The matter marked the first time that DOJ declined to prosecute a health care company under the Department-wide policy and illustrates that the Fraud Division will not only prosecute individual fraud schemes but also handle corporate resolutions and declinations under DOJ's broader corporate enforcement framework.

Potential Implications for FCPA Enforcement

The recent changes transfer significant enforcement responsibilities from the Criminal Division's White Collar Section to the new Fraud Division, but do not reference the FCPA. FCPA and Foreign Extortion Prevention Act ("FEPA") matters continue to be handled by the Criminal Division's FCPA Unit, which is part of the newly-renamed White Collar and Corporate Enforcement Section.[5] Beyond the FCPA Unit, that Section retains the Health & Safety Unit, the Securities, Market, and Private Fraud Unit, and the Filter and Special Projects Unit. It also includes the Corporate Enforcement and Compliance Unit, which is responsible for all aspects of the Section's corporate criminal enforcement practice, including advising prosecuting teams on the compliance elements of corporate resolutions, evaluating companies' compliance programs against DOJ's Evaluation of Corporate Compliance Programs framework, and helping draft key corporate enforcement

Continued on page 6

4. *See* U.S. Dep't of Justice, *Fraud Division Resolves Fraud Investigation of Eye Care Group Under New Corporate Enforcement Policy; Health Care Executive Charged for Alleged Fraud and Kickbacks* (July 29, 2026), https://www.justice.gov/opa/pr/fraud-division-resolves-fraud-investigation-eye-care-group-under-new-corporate-enforcement.

5. U.S. Dep't of Justice, Criminal Division, *Foreign Corrupt Practices Act Unit*, https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act (last updated Aug. 18, 2026).

Continued from page 5

policy documents. Thus, although the new Fraud Division represents a substantial new locus of white-collar enforcement, not all corporate enforcement has migrated from the Criminal Division.

Nevertheless, the number of prosecutors in the FCPA Unit declined from 32 in 2024 to 22 in 2025, according to a DOJ report, and reports indicate that this decline has continued in 2026.[6] That reduction occurred alongside the broader recalibration of FCPA enforcement. DOJ's June 2025 FCPA Guidelines directed prosecutors to focus on matters implicating specified U.S. national interests, including activities involving cartels and transnational criminal organizations, harm to U.S. companies, national security interests, and substantial bribery schemes.[7] Although the combination of reduced personnel and more targeted enforcement criteria suggests that the FCPA Unit likely will not return to earlier enforcement levels in the near term, DOJ is seeking to replenish the FCPA Unit's ranks, at least to some extent: a June 23, 2026 vacancy announcement sought trial attorneys for the FCPA Unit.[8]

The restructuring may also create a clearer distinction: the Fraud Division will emphasize taxpayer-funded and public fisc fraud, while the White Collar Section will continue to be responsible for private sector financial crime and FCPA matters. Within that private-sector remit, the Securities, Market, and Private Fraud Unit retains a broad docket spanning securities, market manipulation, and investment fraud, while the FCPA Unit has updated priorities and thinned ranks. This division of labor is not, however, ironclad. The Fraud Division and the Criminal Division retain concurrent authority over a range of fraud matters. Companies whose conduct involves both a government-funded program and a foreign-bribery angle may grapple with the logistics and sequencing of voluntary disclosure. The Department-wide Corporate Enforcement and Voluntary Self-Disclosure Policy contemplates disclosure to the "appropriate" DOJ component but does not resolve how the appropriate component should be identified if a matter plausibly implicates both the Fraud Division's and the FCPA Unit's mandates.

Continued on page 7

6. U.S. Dep't of Justice, Criminal Division, *Fraud Section Year in Review 2025*, at 12 (Jan. 2026), https://www.justice.gov/criminal/media/1425226/dl; U.S. Dep't of Justice, Criminal Division, *Fraud Section Year in Review 2024*, at 12 (Jan. 2025), https://www.justice.gov/criminal/media/1385111/dl; *see also* Gaspard Le Dem & Mark Taylor, *FCPA Unit Loses Star Trio as Ranks Thin*, Global Investigations Review (June 17, 2026), https://globalinvestigationsreview.com/just-anti-corruption/article/fcpa-unit-loses-star-trio-ranks-thin.

7. Memorandum from Todd Blanche, Deputy Att'y Gen., *Guidelines for Investigations and Enforcement of the Foreign Corrupt Practices Act (FCPA)* (June 9, 2025), https://www.justice.gov/dag/media/1403031/dl; *see also* Andrew M. Levine, et al., *DOJ Issues FCPA Enforcement Guidelines, Focusing on Conduct Harming U.S. Economic and National Security Interests*, Debevoise & Plimpton LLP (June 2025), https://www.debevoise.com/insights/publications/2025/06/doj-issues-fcpa-enforcement-guidelines-focusing.

8. U.S. Dep't of Justice, *Criminal Division Trial Attorney Vacancy Announcement* (June 23, 2026), https://www.usajobs.gov/job/874061900.

DOJ's New Fraud Division Sets Enforcement Priorities and Reshapes White Collar Enforcement Landscape

Continued from page 6

Key Takeaways

The recent changes to DOJ's fraud enforcement structure and priorities suggest several notable developments in white collar enforcement:

- **DOJ is backing its fraud enforcement priorities with substantial resources.** The Fraud Division is expected to have approximately 500 attorneys and staff, with further growth planned, dedicated subject-matter sections, and significant data-analytics capabilities. The scale of that investment suggests that the Division's identified priorities will remain a focus of enforcement activity.
- **DOJ's expanded detection capabilities may increase pressure on companies to identify and assess misconduct quickly.** The National Fraud Detection Center, data analytics, and increased interagency information sharing may allow DOJ to identify potential misconduct without relying on whistleblowers, corporate disclosures, or other traditional leads. These capabilities are likely to affect how quickly companies would need to assess potential misconduct. This is especially true if they want the option to be able to make a qualifying voluntary self-disclosure.

"The FCPA Unit may emerge from the restructuring smaller in absolute terms but more central to a Criminal Division reduced portfolio that is increasingly concentrated on private-sector white collar enforcement."

- **DOJ's restructuring may increase coordination across enforcement areas.** The Fraud Division combines responsibilities for government procurement, global trade and customs, tax, and corporate misconduct, among other areas. Conduct involving these areas also may implicate corruption, sanctions, money laundering, or other offenses, making the allocation and coordination of overlapping DOJ investigations an important issue to watch.

Continued on page 8

Continued from page 7

- **The effect of DOJ's restructuring on FCPA enforcement remains uncertain.** The FCPA Unit has fewer prosecutors than in the recent past but remains a distinct unit in the newly renamed White Collar and Corporate Enforcement Section. The FCPA Unit may emerge from the restructuring smaller in absolute terms but more central to a Criminal Division reduced portfolio that is increasingly concentrated on private-sector white collar enforcement.

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Continued on page 9

Jury Convicts Former Investment Banker in Ghana Bribery Case

On August 6, 2026, a federal jury in the Eastern District of New York convicted former Goldman Sachs investment banker Asante Kwaku Berko of FCPA and money laundering offenses arising from an alleged scheme to pay more than $1 million in bribes to government officials in connection with the development and financing of a power plant in Ghana. Following a nine-day trial, the jury found Berko guilty of conspiring to violate and violating the Foreign Corrupt Practices Act, and conspiracy to commit money laundering. Berko, a dual U.S.-Ghanaian citizen, faces a maximum penalty of 30 years in prison and is scheduled to be sentenced on November 10, 2026.[1]

The criminal conviction marks another successful prosecution of an individual for FCPA violations following the Trump Administration's resumption of FCPA enforcement in June 2025 following the pause that began with the President's Executive Order issued on February 10, 2025. The Berko case was among the preexisting prosecutions permitted to proceed following DOJ's 2025 review of pending FCPA matters. It follows a 2021 civil resolution in which Berko agreed, without admitting or denying the SEC's allegations, to disgorge $275,000 and pay approximately $54,000 in prejudgment interest in connection with substantially related conduct.[2]

Background

Beginning in December 2014, Berko, then an Executive Director in Goldman Sachs's Investment Banking Division, was responsible for helping to arrange and manage a transaction between Goldman client Aksa Enerji Uretim A.S. ("Aksa"), a Turkish energy company, and the Republic of Ghana. Development of the plant required approvals from various Ghanaian officials and government bodies.[3]

Continued on page 10

1. U.S. Attorney's Office, Eastern District of New York, Press Release, "Former Goldman Sachs Investment Banker Convicted of Foreign Bribery and Money Laundering" (Aug. 6, 2026), https://www.justice.gov/usao-edny/pr/former-goldman-sachs-investment-banker-convicted-foreign-bribery-and-money-laundering ("EDNY Conviction Release"); U.S. Dep't of Justice Press Release, "Former Banker Convicted for Scheme to Bribe Ghanaian Officials" (Aug. 6, 2026), https://www.justice.gov/opa/pr/former-banker-convicted-scheme-bribe-ghanaian-officials ("DOJ Conviction Release"). The statutory maximum sentence identified by DOJ is not necessarily indicative of the sentence that will be imposed; the district court will consider the U.S. Sentencing Guidelines and the factors set forth in 18 U.S.C. § 3553(a).

2. U.S. Sec. & Exch. Comm'n Litigation Release No. 25121, "SEC Obtains Final Judgment Against Former Executive of Financial Services Company" (June 23, 2021), https://www.sec.gov/enforcement-litigation/litigation-releases/lr-25121; *see* Kara Brockmeyer, et al., "The Year 2025 in Review: An FCPA Enforcement Reset and Other Global Anti-Corruption Developments," FCPA Update, Vol. 17, No. 6 (Jan. 2026), https://www.debevoise.com/insights/publications/2026/01/fcpa-update-january-2026.

3. EDNY Conviction Release; DOJ Conviction Release.

Jury Convicts Former Investment Banker in Ghana Bribery Case
Continued from page 9

DOJ alleged that Berko and his co-conspirators paid or agreed to pay more than $1 million in bribes to officials at several levels of the Ghanaian government to ensure that Aksa secured the necessary approvals to build and operate the plant. At trial, DOJ introduced evidence of Berko and his co-conspirators discussing paying $1 million to Ghana's Minister of Power, who was responsible for obtaining key approvals for the project, and $250,000 to the Minister's senior adviser.[4] DOJ also presented evidence showing that five Ghanaian officials each received $5,000 payments during an all-expenses-paid trip to Turkey to inspect equipment for the proposed plant.[5] Following the Ghanaian parliament's ratification of the power plant agreement in July 2015, Berko and his co-conspirators exchanged detailed emails concerning the alleged bribe payments. In one August 2015 exchange, the co-conspirators discussed approximately $250,000 in payments, including $46,000 that Berko had paid personally to members of parliament. In another exchange, they referred to a recipient awaiting the "holy rain"—a reference to an alleged bribe payment—and noted that the recipient "would appreciate it sooner rather than later."[6]

The evidence also reflected extensive efforts to conceal the alleged scheme and bribe payments. Berko used a personal email account to discuss the project and bribe payments, directed his co-conspirators to do the same, and provided false information to Goldman's compliance team responsible for reviewing the transaction. DOJ also stated that Berko and his co-conspirators concealed and laundered the payments through shell companies, sham invoices, nominee account holders, cash withdrawals, and U.S. and foreign bank accounts.[7]

The scheme was not apparent to Goldman's legal and compliance personnel at the outset. According to the SEC's 2020 complaint, Berko failed to disclose the true role of a Ghanaian intermediary involved in the project and withheld information relevant to Goldman's review of the transaction. As Goldman subjected the proposed transaction to enhanced diligence, however, compliance personnel reviewed Berko's work emails in March 2016 and identified the intermediary's involvement. Legal and compliance personnel then pursued additional information from Berko and Aksa concerning the intermediary and related payments. The SEC alleged that Berko continued to conceal the intermediary's actual role and assisted Aksa personnel in preparing misleading responses to the firm's questions. After Aksa declined to provide further information, Goldman terminated its involvement in the project by August 2016. According to the SEC, between

Continued on page 11

4. EDNY Conviction Release; DOJ Conviction Release.
5. DOJ Conviction Release.
6. EDNY Conviction Release.
7. EDNY Conviction Release; DOJ Conviction Release.

Continued from page 10

September 2016 and February 2017, Aksa paid Berko $2 million as compensation for facilitating the bribery scheme. In announcing its civil case against Berko, the SEC stated that the firm's legal and compliance personnel "took appropriate steps to prevent the firm from participating in the transaction."[8]

Analysis and Takeaways

The conviction reinforces DOJ's continued focus on individual FCPA prosecutions. Although the criminal case was charged before the Trump Administration's 2025 pause and review of pending FCPA matters, DOJ elected to continue the prosecution following that review and proceeded to trial. The decision to continue with this prosecution involving an individual defendant provides further confirmation that cases against individuals involving substantial bribe payments, personal enrichment, and extensive concealment efforts are enforcement priorities for this Administration.

"The decision to continue with this prosecution involving an individual defendant provides further confirmation that cases against individuals involving substantial bribe payments, personal enrichment, and extensive concealment efforts are enforcement priorities for this Administration."

DOJ's June 2025 FCPA enforcement guidelines instruct prosecutors to prioritize, among other matters, serious misconduct bearing "strong indicia of corrupt intent tied to particular individuals," including substantial bribe payments, sophisticated efforts to conceal them, fraudulent conduct in furtherance of a scheme, and efforts to obstruct justice.[9] Berko's conduct, as proved at trial, appears to satisfy these factors. The evidence revealed more than $1 million in bribes, including payments directed to senior officials and members of parliament, as well as the use of shell companies, sham invoices, nominee account holders, personal email accounts, and U.S. and foreign bank accounts to conceal the scheme.[10]

Continued on page 12

8. Complaint ¶¶ 76–92, *SEC v. Berko*, No. 20-cv-01789 (E.D.N.Y. Apr. 13, 2020), https://www.sec.gov/files/litigation/complaints/2021/comp25121.pdf ("SEC Complaint"); U.S. Sec. & Exch. Comm'n Press Release No. 2020-88, "SEC Charges Former Financial Services Executive With FCPA Violations" (Apr. 13, 2020), https://www.sec.gov/newsroom/press-releases/2020-88.

9. U.S. Dep't of Justice, Office of the Deputy Attorney General, "Guidelines for Investigations and Enforcement of the Foreign Corrupt Practices Act (FCPA)" at 4 (June 9, 2025), https://www.justice.gov/dag/media/1403031/dl; *see also* Andrew M. Levine, et al., "DOJ Issues FCPA Enforcement Guidelines, Focusing on Conduct Harming U.S. Economic and National Security Interests," at 1–4, FCPA Update, Vol. 16, No. 11 (June 2025), https://www.debevoise.com/-/media/files/insights/publications/2025/07/fcpa-update-june-2025.pdf.

10. EDNY Conviction Release; DOJ Conviction Release.

Jury Convicts Former Investment Banker in Ghana Bribery Case
Continued from page 11

The decision to proceed with this prosecution is consistent with DOJ's post-pause prosecutions discussed previously in this publication, including the September 2025 conviction of Carl Zaglin.[11] As in other recent prosecutions of individuals, this case also suggests that serious, individually attributable misconduct may warrant prosecution even where other considerations identified in DOJ's FCPA enforcement guidelines are not apparent from the public record. DOJ's public account of the case does not identify a connection to cartels or transnational criminal organizations or a specific U.S. competitor that lost business as a result of the scheme. At the same time, DOJ expressly framed the verdict in terms of protecting U.S. economic interests, with Assistant Attorney General A. Tysen Duva stating that American companies "must be able to compete" fairly in the global economy and that Berko had "corrupted that fair competition."[12]

Goldman's enhanced compliance review underscores the importance and benefits of escalation and follow-through when due diligence identifies inconsistencies. DOJ stated that the evidence at trial established that Berko lied to Goldman's compliance team. The SEC similarly alleged that Berko deliberately concealed the intermediary's role, used personal communications, and withheld information from transaction-review materials. Despite the efforts to conceal, Goldman's enhanced diligence identified the intermediary, prompted further investigation by legal and compliance personnel, and ultimately led the firm to withdraw from the transaction when satisfactory answers were not forthcoming. Both DOJ and the SEC did not bring any charges against Goldman and instead credited its enhanced compliance review. This outcome underscores the importance not only of controls designed to identify corruption risks at the outset, but also of mechanisms for escalating and investigating concerns that emerge as a transaction progresses.

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11. *See* Winston M. Paes, Douglas S. Zolkind, Lauren K. Burns, & Andreas A. Glimenakis, "DOJ Secures Conviction in First Post-Pause FCPA Trial," at 1–5, FCPA Update, Vol. 17, No. 2 (Sept. 2025), https://www.debevoise.com/insights/publications/2025/09/fcpa-update-september-2025.

12. *See, e.g.*, Andrew M. Levine, et al., "DOJ Charges Mexican Nationals with Bribing PEMEX Employees in First FCPA Case Since Resuming Enforcement," at 1–5, FCPA Update, Vol. 17, No. 1 (Aug. 2025), https://www.debevoise.com/insights/publications/2025/08/fcpa-update-august-2025; Winston M. Paes, et al., "DOJ Enters into First DPA in an FCPA Case Since Resuming Enforcement," at 4–6, FCPA Update, Vol. 17, No. 4 (Nov. 2025), https://www.debevoise.com/insights/publications/2025/11/fcpa-update-november-2025; EDNY Conviction Release; DOJ Conviction Release.

FCPA Update

FCPA Update is a publication of
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