

CONTENTS

Claudius O. Sokenu <i>Partner, Arnold & Porter LLP</i> FCPA COMPLIANCE ISSUES IN THE GLOBAL MARKETPLACE: NEW CHALLENGES FOR MULTINATIONAL CLIENTS	7
Zack Harmon <i>Partner, King & Spalding LLP</i> CONFRONTING THE NEW CHALLENGES OF FCPA COMPLIANCE: RECENT TRENDS IN FCPA ENFORCEMENT AND PRACTICAL GUIDANCE FOR MEETING THESE CHALLENGES	51
Obiamaka P. Madubuko <i>Partner, White Collar & Securities Defense Practice Group, McDermott Will & Emery LLP</i> EMERGING MARKETS: RISKY BUSINESS OR GOLDEN OPPORTUNITIES?	79
Philip H. Hilder <i>Principal, Hilder & Associates PC</i> UNDERSTANDING FCPA COMPLIANCE REQUIREMENTS: A GUIDE FOR GLOBAL COMPANIES	103
Robert L. Brown <i>Member, Greenebaum Doll & McDonald PLLC</i> MAJOR DEVELOPMENTS IN FCPA ENFORCEMENT AND WHAT THEY MEAN FOR GLOBAL CLIENTS	117
Edward C. O'Callaghan <i>Partner and Co-Practice Group Leader, Government Investigations and White Collar Defense, Nixon Peabody LLP</i> STEPPED-UP FCPA ENFORCEMENT EFFORTS MEAN NEW CHALLENGES FOR MULTINATIONAL CLIENTS	131

Gary D. Anderson <i>Shareholder, Greenberg Traurig LLP</i> <i>STRATEGIES FOR EFFECTIVE FCPA COMPLIANCE IN TODAY'S GLOBAL REGULATORY ENVIRONMENT</i>	143
Marsha Z. Gerber <i>Partner, Fulbright & Jaworski LLP</i> <i>CURRENT TRENDS IN FCPA ENFORCEMENT AND OTHER TIMELY KNOWLEDGE NECESSARY FOR FCPA COMPLIANCE IN TODAY'S ENVIRONMENT</i>	177
Appendices	197

APPENDICES

Appendix A: § 78m. Periodical and Other Reports	198
Appendix B: § 78dd-1. Prohibited Foreign Trade Practices by Issuers	220
Appendix C: § 78dd-2. Prohibited Foreign Trade Practices by Domestic Concerns	228
Appendix D: Section 9-28.800 US Attorneys' Manual	238
Appendix E: Sentencing Guidelines	242
Appendix F: Third Party Business Justification Form	291
Appendix G: Third Party Due Diligence Questionnaire	312
Appendix H: FCPA Cross Border Deal Due Diligence Checklist	332
Appendix I: Sub-Saharan Africa Growth Domestic Product ("GDP") Growth (Annual Percentage)	334
Appendix J: Standard Terms and Conditions	335
Appendix K: Anti-Bribery Policy	339
Appendix L: Economic Growth in China	341
Appendix M: GT Alert: FCPA Compliance After the Rio Tinto Verdict	348
Appendix N: Third Party Anti-Corruption Due Diligence Checklist	360
Appendix O: Merger/Acquisition Anti-Corruption Due Diligence Checklist	361