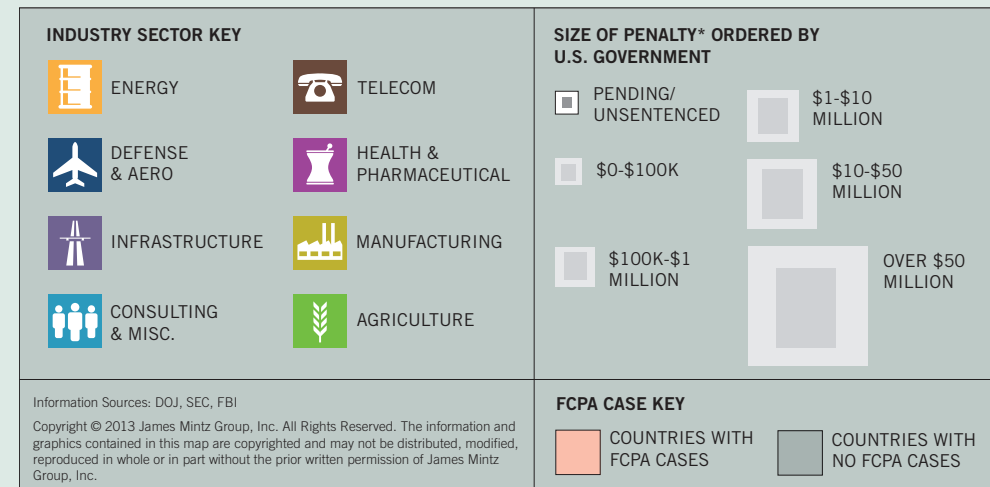


# WHERE THE BRIBES ARE

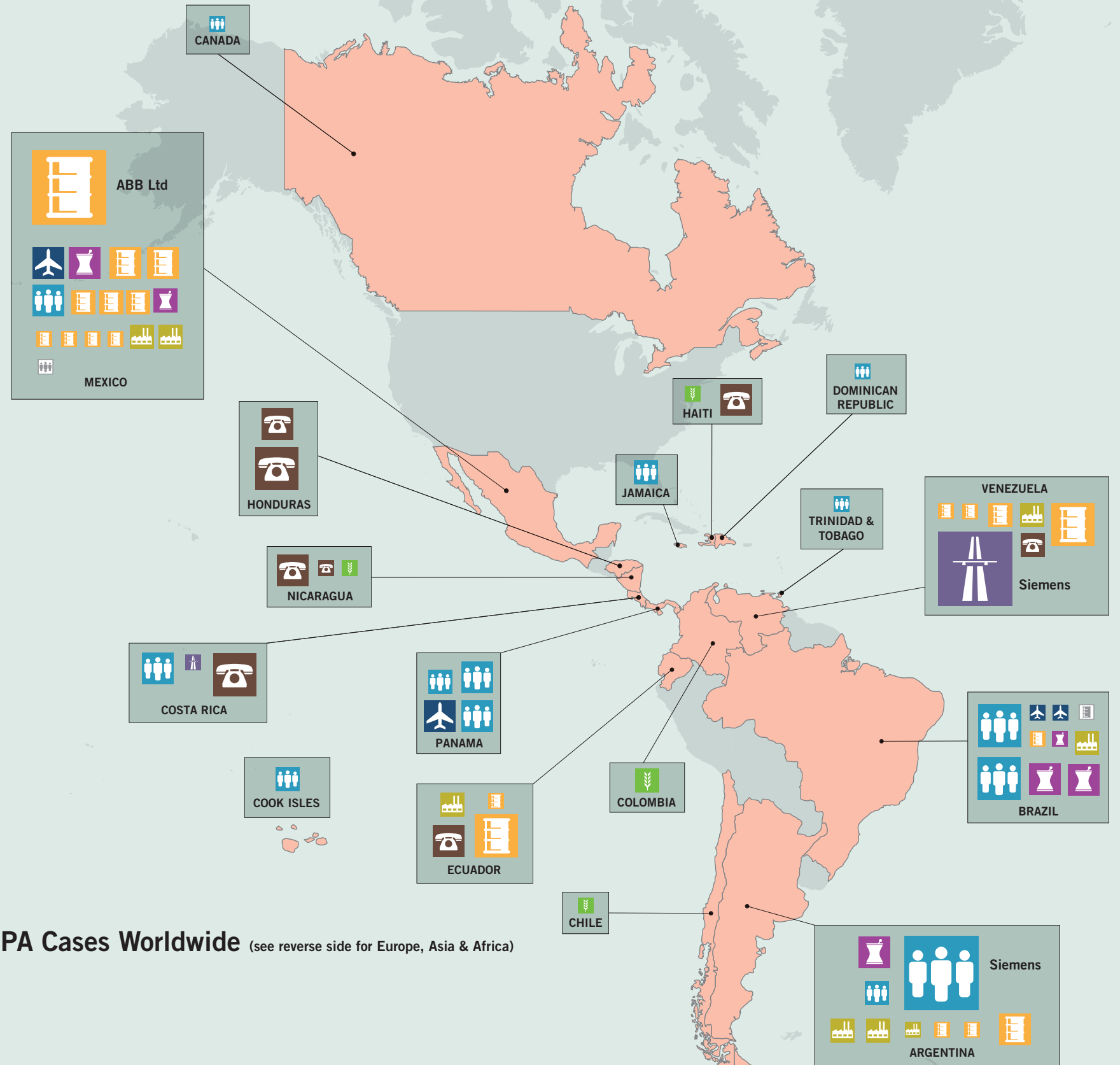
## U.S. Government FCPA Cases Since the 1970s

The Foreign Corrupt Practices Act, passed in 1977, has led to more than 200 cases covering activity in about 80 countries.



The size of each box within a country box corresponds to the approximate size of the penalty the government assessed. The penalty includes corporate and executive fines, disgorgement, interest, etc. In multi-nation bribery cases, a country's penalty was estimated according to the ratio of the bribes in that country to the total bribes in the case. We combined cases in which a company and its subsidiaries or executives were charged separately. If the bribes were not specified, the penalty was divided evenly among the countries involved. Technically the BAE charges were not brought under the FCPA, but they are commonly included in lists of FCPA cases because the company admitted making payments to foreign officials. We have omitted two cases, one a 1980 SEC case that contained scant information about the countries involved, and another a DOJ case in 2011 that involved alleged payoffs for UN contracts. Cases in which penalties totaled less than \$1 million are represented by the smallest boxes.

Updated as of Feb. 21, 2013

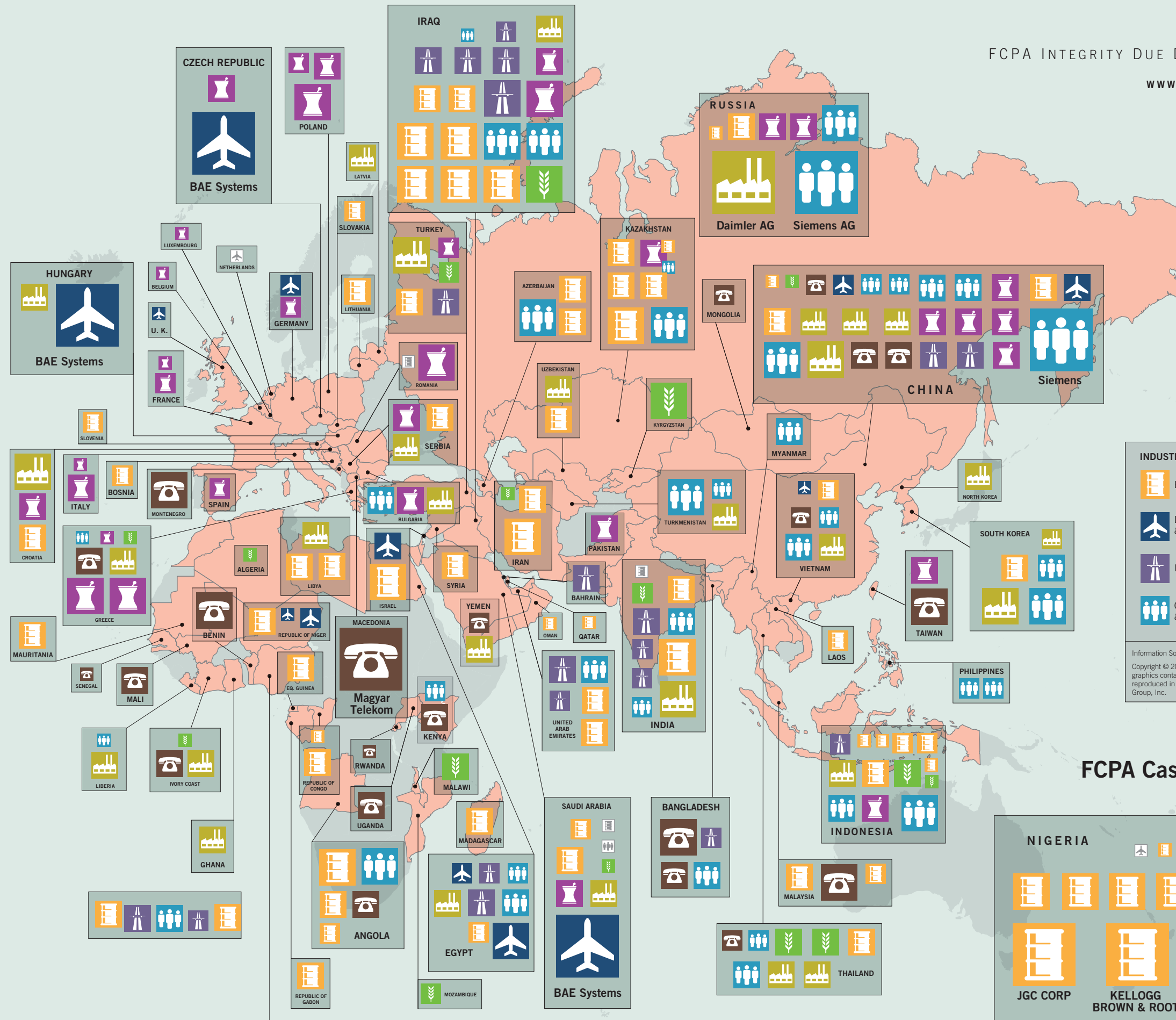


FCPA Cases Worldwide (see reverse side for Europe, Asia & Africa)

# WHERE THE BRIBES ARE

## U.S. Government FCPA Cases Since the 1970s

The Foreign Corrupt Practices Act, passed in 1977, has led to more than 200 cases covering activity in about 80 countries.



| INDUSTRY SECTOR KEY |                         | SIZE OF PENALTY* ORDERED BY U.S. GOVERNMENT |                     |
|---------------------|-------------------------|---|---------------------|
|                     | ENERGY                  |   | PENDING/UNSENTENCED |
|                     | DEFENSE & AERO          |   | \$1-\$10 MILLION    |
|                     | INFRASTRUCTURE          |   | \$0-\$100K          |
|                     | CONSULTING & MISC.      |   | \$10-\$50 MILLION   |
|                     | TELECOM                 |   | \$100K-\$1 MILLION  |
|                     | HEALTH & PHARMACEUTICAL |   | OVER \$50 MILLION   |
|                     | MANUFACTURING           |   |                     |
|                     | AGRICULTURE             |   |                     |

Information Sources: DOJ, SEC, FBI  
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| FCPA CASE KEY |                              |
|---------------|------------------------------|
|               | COUNTRIES WITH FCPA CASES    |
|               | COUNTRIES WITH NO FCPA CASES |

Updated as of Feb. 21, 2013

### FCPA Cases Worldwide (see reverse side for The Americas)

