

foiapa

From: Request@ip-10-170-20-161.ec2.internal
Sent: Tuesday, June 05, 2018 6:37 AM
To: foiapa
Subject: Request for Document from MAHAJAN, MALLIKA

Ms. MALLIKA MAHAJAN
MUENCHENDORF STRASSE 2
LAXENBURG, Foreign Country 2361
Austria

[REDACTED]
[REDACTED]
International Anti-Corruption Academy

Request:
COMP_NAME: Non Prosecution Agreements under FCPA
DOC_DATE: 2002 to 2017
TYPE: Orders (describe type)

COMMENTS: I am a Research Fellow at the International Anti-Corruption Academy at Laxenburg, Austria. My topic of research is the most effective corporate compliance programs. I will be using NPAs signed under the FCPA as a proxy. For this purpose, I require the following:

1. Year wise, (calendar) number of NPA s signed
2. Year-wise, names of corporation with whom NPAs have been signed
3. Copies of NPAs signed
4. Any other document which demonstrates why the corporation were given NPAs instead of being prosecuted.

I will be grateful for a prompt response.

FEE_AUTHORIZED: Willing to Pay \$61

FEE_WAIVER_REQUESTED: Yes

FEE_WAIVER_COMMENT: It is required for research purposes. It is intended for broad public interest as it will enable the wider public to appreciate that corporations with robust compliance programs get the benefit of Non Prosecution Agreements. Robust compliance programs enable certain corporation to self-detect and therefore self-report wrongdoing within themselves. This self-discovery enables them to get a lenient treatment from US Government authorities.

EXPEDITED_SERVICE_REQUESTED: Yes

Fee Waiver Requested

Expedited Treatment Requested

EXPEDITE_COMMENT: The research fellowship requires me to publish the paper within three months which ends on 31st August 2018.



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
STATION PLACE
100 F STREET, NE
WASHINGTON, DC 20549-2465

Office of FOIA Services

July 3, 2018

Ms. Mallika Mahajan
Muenchendorf Strasse 2
Laxenburg, 2361
Austria

RE: Freedom of Information Act (FOIA), 5 U.S.C. § 552
Request No. 18-02129-FOIA

Dear Ms. Mahajan:

This letter is in response to your request, dated and received in this office on June 5, 2018, for access to the following information regarding Non Prosecution Agreements (NPA) under FCPA.

1. Year wise, (calendar) number of NPAs signed.
2. Year wise, name of corporation with whom NPAs have been signed.
3. Copies of NPAs signed.
4. Any other document which demonstrates why the corporations were given NPAs instead of being prosecuted.

Information relating to items 1 through 3 are available on our website at the following links.

<https://www.sec.gov/news/press-release/2013-2013-65htm>
<https://www.sec.gov/news/pressrelease/2016-109.html>

You may access the links below to retrieve information pertaining to item 4 of your request.

<https://www.sec.gov/news/pressrelease/2016-109.html>
<https://www.sec.gov/spotlight/enforcement-cooperation-initiative.shtml>
<https://www.sec.gov/news/speech/ceresney-fcpa-keynote-11-17-15.html>
<https://www.sec.gov/news/speech/speech-ceresney-113016.html>

Further, additional internal nonpublic records relating to item 4 may also be available in various investigative files. However, in order to identify and retrieve any potentially responsive records would require the staff to search through a number of records and conduct a page by page review of all

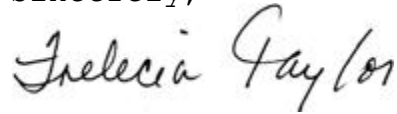
Ms. Mallika Mahajan
July 3, 2018
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records. If you are interested in obtaining such records, please submit another request and identify the specific records of interest to you.

If you have any questions, please contact me at taylorf@sec.gov or (202) 551-8349. You may also contact me at foiapa@sec.gov or (202) 551-7900. You also have the right to seek assistance from Dave Henshall at (202) 551-7900 as a FOIA Public Liaison for this office, or contact the Office of Government Information Services (OGIS) for dispute resolution services. OGIS can be reached at 1-877-684-6448 or Archives.gov or via e-mail at ogis@nara.gov.

Sincerely,

A handwritten signature in cursive script that reads "Felecia Taylor".

Felecia Taylor
FOIA Lead Research Specialist