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## the art of self defense

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*MSK Client Alert*

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Corporate compliance programs come in all shapes and sizes and apply whether your company is privately owned or publicly traded. These internal controls take the form of accounting and audit procedures, import-export/regulatory policies, employment guidelines, ethics/anti-corruption initiatives and so on. The intent of any compliance program is to ensure that employees know what is expected of them and that their behavior complies with and is consistent with the "rules of the road" for your business or industry. A recent letter from Andrew Weissmann, Chief of the Fraud Section, Criminal Division, U.S. Department of Justice, affirms the importance of not only having a robust compliance program, but the need to ensure the adequacy of internal enforcement of that program, in this context, for underscoring the compliant nature of the company and mitigating the consequences of any misdeeds which may occur, in the face of enforcement action by any of the federal agencies with jurisdiction over your company.

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### **practice areas**

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