



---

## doj defines compliance

---

*MSK Client Alert*

March 15, 2017

In the span of the last 18 months, the topic of corporate compliance programs has gotten considerable attention from the Department of Justice ("DOJ") and now finally, DOJ has published significant details about how it is likely to measure the sufficiency of any company's compliance program.

First, some background. In September 2015, the Yates memo was published, see DOJ Sets Its Sights on Officers and Directors for more details. In short, then Deputy Attorney General Yates reminded the DOJ offices nationwide, if a corporation has violated the law, its level of cooperation will be measured, in large part, by whether it provides "all" the relevant details, which means did the company identify the individuals whose actions or inactions resulted in the violations under consideration, and provide supporting documentation to show what happened and how those individuals were involved. If the company did not do so, it does not get full credit under the Sentencing Guidelines.

**[View Full Alert](#)**

### **attorneys**

Susan Kohn Ross

### **practice areas**

international trade  
regulatory