

## Securities Litigation Update

FCPA Update: Implementation of U.K. Bribery Bill  
Postponed Until April 2011

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Implementation of the U.K. Bribery Bill (discussed in our [update of April 6, 2010](#)) has been postponed for nine months while the government evaluates comments to the Bill raised by various business constituencies. The delay in implementation has been viewed as a setback to U.S. efforts to achieve a global approach to combating fraud. As currently drafted, the Bill is potentially one of the toughest anti-bribery laws in the world and would apply to any U.S. company doing business in the United Kingdom. The Bill differs from the FCPA in several important respects including the elimination of the “facilitating payment” exception and imposition of a presumption of criminal liability on an organization whose employees, agents or consultants engaged in bribery to further the organization’s business. Commentators believe the delay in implementation may result in a watered-down version of the law.

Look for additional updates on the progress of the Bill and suggestions for compliance procedures.

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