

*This is your Release #17 (October 2012)*

# **Doing Business Under the Foreign Corrupt Practices Act**

**by Don Zarin**

*Holland & Knight, Washington, D.C.*

Don Zarin has updated eleven chapters of his treatise and added one new appendix to help you avoid the pitfalls in international business transactions.

Highlights of this Release #17 include:

**Expanded section 4:4.2, Agency or Instrumentality of Foreign Government**, discussing a recent case in which a California court spelled out factors to consider in determining whether an entity is an instrumentality of a foreign government.

**Completely rewritten section 13:4, The ICC**, discussing how on November 17, 2011, the International Chamber of Commerce (ICC) updated and strengthened its Rules for Combating Corruption, which are intended to provide guidance for companies to fight corruption.

**New section 13:10, The Asian Development Bank**, discusses how the Asian Development Bank was the first multilateral development bank to adopt a policy on governance and has approved a comprehensive Anticorruption Policy and a subsequent Second Governance and Anticorruption Action Plan.

Thank you for subscribing to *Doing Business Under the Foreign Corrupt Practices Act*. If you have questions about this product, or would like information on our other products, please contact customer service at (800) 260-4PLI.

Practising Law Institute  
810 Seventh Avenue  
New York, New York 10019  
**#38174**



**FILING INSTRUCTIONS**

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**REMOVE OLD PAGES  
NUMBERED:**

- Title page to 13-17
- I-1 to I-12

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