

Alert | Global Anti-Corruption Enforcement & Compliance



October 2021

DOJ Announces Central America Anti-Corruption Tip Line

On Oct. 15, 2021, the Department of Justice (DOJ) announced the creation of a tip line to help assist its Anticorruption Task Force fight corruption in Central America, specifically in the Northern Triangle countries of El Salvador, Guatemala, and Honduras. The Anticorruption Task Force was established earlier in 2021 with a goal of combatting corruption, human smuggling, and trafficking in the Northern Triangle and Mexico. Assistant Attorney General Kenneth A. Polite Jr. of the DOJ's Criminal Division said, "corruption and impunity in the region undermine democracy, fuel irregular migration, and pose a threat to our national security because they sustain criminal organizations and transnational crime."

This DOJ announcement signals that anti-corruption efforts: (1) remain a priority for the Biden administration; (2) continue to focus on Central America; and (3) require the cooperation of multiple U.S. governmental agencies.

Anti-Corruption Priority for Biden Administration

The Biden administration has made anti-corruption a priority. On June 3, 2021, President Biden issued a National Security Study Memorandum (NSSM) that established fighting corruption as a "core national security interest." The NSSM directed several federal agencies, including the DOJ, to conduct an interagency review and submit a report and recommendations within 200 days of the NSSM. The NSSM's stated goal is to "promote good governance; bring transparency to the United States and global financial systems; prevent and combat corruption at home and abroad; and make it increasingly difficult for

corrupt actors to shield their activities." The subsequent establishment of the Anticorruption Task Force and recent creation of a tip line reinforce the Biden administration's commitment to fight corruption.

Central America Focus

In June 2021, the DOJ created the Anticorruption Task Force to combat corruption in Central America. The DOJ stated that it would "increase its focus on investigations, prosecutions, and asset recoveries relating to corruption in Northern Triangle countries," as well as ramp up enforcement efforts in Mexico. That effort includes aiding enforcement agencies and prosecutors in the targeted countries to support incountry prosecutions. These steps follow the FBI's 2019 creation of a dedicated international corruption squad based in the Miami Field Office, which is focused on the Latin America region.

Anti-Corruption Efforts Are Interdisciplinary

The Biden administration's efforts go well beyond just U.S. Foreign Corrupt Practices Act (FCPA) enforcement and require interdisciplinary cooperation. The NSSM review involves over a dozen federal departments and agencies, including the DOJ, the Joint Chiefs of Staff, the Central Intelligence Agency, the Department of Homeland Security, and the U.S. Mission to the United Nations. Similarly, the Anticorruption Task Force that the tip line will assist includes representatives from DOJ's FCPA Unit, the Money Laundering and Asset Recovery Section (MLARS), the Narcotic and Dangerous Drug Section (NDDS), and federal prosecutors from U.S. attorneys' offices along the southwest border.

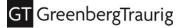
Authors

This GT Alert was prepared by:

- Cuneyt A. Akay | +1 303.572.6576 | akayc@gtlaw.com
- Michael X. Marinelli # | +1 512.320.7236 | marinellimx@gtlaw.com
- Kyle R. Freeny | +1 202.331.3118 | freenyk@gtlaw.com
- Sandra D. Gonzalez | +1 512.320.7234 | gonzalezsd@gtlaw.com
- Jared E. Dwyer | +1 305.579.0564 | dwyerje@gtlaw.com
- Benjamin G. Greenberg | +1 305.579.0850 | greenbergb@gtlaw.com
- Hugo López Coll | +52 55.5029.0008 | lopezh@gtlaw.com
- Daniel Pulecio-Boek | +1 202.331.3117 | pulecioboekd@gtlaw.com
- * Admitted in the District of Columbia. Not admitted in Texas.

Albany. Amsterdam. Atlanta. Austin. Boston. Chicago. Dallas. Delaware. Denver. Fort Lauderdale. Germany.¬ Houston. Las Vegas. London.* Los Angeles. Mexico City.+ Miami. Milan.» Minneapolis. New Jersey. New York. Northern Virginia. Orange County. Orlando. Philadelphia. Phoenix. Sacramento. Salt Lake City. San Francisco. Seoul.∞ Shanghai. Silicon Valley. Tallahassee. Tampa. Tel Aviv.^ Tokyo.^x Warsaw.~ Washington, D.C.. West Palm Beach. Westchester County.

This Greenberg Traurig Alert is issued for informational purposes only and is not intended to be construed or used as general legal advice nor as a solicitation of any type. Please contact the author(s) or your Greenberg Traurig contact if you have questions regarding the currency of this information. The hiring of a lawyer is an important decision. Before you decide, ask for written information about the lawyer's legal qualifications and experience. Greenberg Traurig is a service mark and trade name of Greenberg Traurig, LLP and Greenberg Traurig, P.A. ¬Greenberg Traurig's Berlin office is operated by Greenberg Traurig Germany, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. *Operates as a separate UK registered legal entity. +Greenberg Traurig's Mexico City office



is operated by Greenberg Traurig, S.C., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. »Greenberg Traurig's Milan office is operated by Greenberg Traurig Santa Maria, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. [®]Operates as Greenberg Traurig LLP Foreign Legal Consultant Office. [^]Greenberg Traurig's Tel Aviv office is a branch of Greenberg Traurig, P.A., Florida, USA. [®]Greenberg Traurig's Tokyo Office is operated by GT Tokyo Horitsu Jimusho and Greenberg Traurig Gaikokuhojimubengoshi Jimusho, affiliates of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. [~]Greenberg Traurig's Warsaw office is operated by GREENBERG TRAURIG Nowakowska-Zimoch Wysokiński sp.k., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, P.A. and Greenberg Traurig, P.A. and Greenberg Traurig, LP. Certain partners in GREENBERG TRAURIG Nowakowska-Zimoch Wysokiński sp.k., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, P.A. and Greenberg Traurig, P.A. and Greenberg Traurig, LP. Certain partners in GREENBERG TRAURIG Nowakowska-Zimoch Wysokiński sp.k., are also shareholders in Greenberg Traurig, P.A. Images in this advertisement do not depict Greenberg Traurig attorneys, clients, staff or facilities. No aspect of this advertisement has been approved by the Supreme Court of New Jersey. ©2021 Greenberg Traurig, LLP. All rights reserved.