

## David Smyth Discusses Charity and Compliance for Pharmaceutical Compliance Monitor

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On February 22, 2016, *Pharmaceutical Compliance Monitor* published “Charity That Isn’t So Charitable,” an article by Brooks Pierce partner David Smyth. The article discusses contributions made to overseas charities by pharmaceutical companies and how these contributions may run afoul of the Foreign Corrupt Practices Act.

Smyth warns that even donations to charity can appear noncompliant with the FCPA, especially if the charity in question is connected to a prominent foreign official who can provide the company extra business in turn. He provides case studies of pharmaceutical companies who were investigated by the SEC for violations against the FCPA. Smyth also offers tips for companies wishing to avoid an SEC investigation while conducting philanthropic activities abroad.

Smyth writes, “Asking these questions and rigorously demanding answers will put companies on strong footing for FCPA compliance...Empowering personnel to recognize these issues before they become problematic can save enormous sums in the long run.”

To read the article in full, visit <http://www.pharmacompliancemonitor.com/charity-that-isnt-so-charitable/10457/>.

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