

CEP Magazine – October 2019 Decentralization of compliance?

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The recent Walmart non-prosecution agreement (NPA) is the latest example of the caution that should be exercised whenever the idea of decentralization of compliance is proposed. Let's just say the U.S. Department of Justice was not a big fan of the concept in this case. But there's more to it than simply an across-the-board criticism of the idea of decentralization. As always, all of the circumstances need to be considered.

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