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Gee, I wonder why antitrust compliance programs aren't better?

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The Antitrust Division makes a point of this: no existing compliance program is considered for any purpose. This is a one-size-fits-all policy: no matter how diligent your compliance program, no matter how hard you tried to prevent violations, if any violation occurred, your program failed, and that was the end of it. It did not matter whether the violator was a junior salesperson out in the field who went out of her way to conceal the violation. If it was an antitrust violation, the compliance program was irrelevant.

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