

CEP Magazine - April 2022 What does the 'E' in your 'C&E program' stand for?

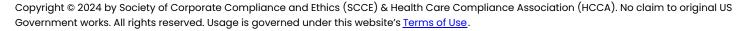
By Jeffrey M. Kaplan

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In the beginning—when Chapter Eight of the Federal Sentencing Guidelines went into effect in 1991—there were mostly ethics officers. By the early to mid-2000s, having a compliance & ethics (C&E) officer had become the predominant model. Among other things, this was in response to the enactment of the Sarbanes–Oxley Act in 2002 and amendments to Chapter Eight in 2004.

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