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By Nina Youngstrom

◆ In a Sept. 15 memo, the Department of Justice (DOJ) announced revisions to its memo on corporate criminal enforcement policies. For one thing, DOJ reinforced its Individual Accountability Policy and emphasized timeliness. “Going forward, in connection with every corporate resolution, Department prosecutors must specifically assess whether the corporation provided cooperation in a timely fashion,” the memo said.^[1] Deputy Attorney General Lisa O. Monaco explained the changes to the memo in a speech the same day.^[2]

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