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Gerry Zack (gerry.zack@corporatecompliance.org, twitter.com/gerry_zack, [linkedin.com/in/gerryzack](https://www.linkedin.com/in/gerryzack)) is CEO of SCCE & HCCA in Eden Prairie, MN. Please feel free to contact Gerry anytime to share your thoughts: +1 612.357.1544 (cell), +1 952.567.6215 (direct).

Good things happen when enforcement listens

By Gerry Zack, CCEP, CFE, CIA

In September, U.S. Department of Justice (DOJ) Deputy Attorney General Lisa O. Monaco announced new guidelines the department will use in connection with criminal enforcement. Those guidelines, described in a September 15 memorandum entitled “Further Revisions to Corporate Criminal Enforcement Policies,” reflect a thoughtful consideration of input DOJ received since announcing in 2021 that plans were underway for revising these guidelines and creating the Corporate Crime Advisory Group (CCAG).^[1]

CCAG held many meetings with outside experts representing numerous interested parties, from in-house attorneys to academics, members of the business community and defense bar, ethicists, audit committee members, and public interest groups. I was pleased to represent SCCE in one of these listening sessions.

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