**Key Takeaways from the FCPA Enforcement Action Involving Alere Inc.**

**Enforcement Action:** SEC Administrative Proceeding (Alere Inc.) – September 28, 2017

**Total Sanctions:** $13,023,885

$0 $13 million $1.7 billion

83rd highest monetary sanction (of 192 total monetary sanctions against corporations in FCPA Groups to date)

**Type of Bribery:** Money

**Geography:** Colombia, India

**Industry:** Healthcare - the 32nd FCPA Group involving the Healthcare industry

**Implicated Companies:**
- Alere Inc. (ticker: ALR, exchange: NYSE)
- Alere Colombia S.A. (subsidiary of Alere Inc.)
- Standard Diagnostics, Inc. (subsidiary of Alere Inc.)
- Alere Medical Private Ltd. (subsidiary of Alere Inc.)

**Individuals Prosecuted:** None

**Description & Notes on the Resolution:**
According to the cease and desist order, between 2011 and 2016, Alere Inc., a Massachusetts-based healthcare company, committed various accounting violations, including mischaracterizing in Alere's books and records payments made to government officials by Alere's subsidiaries in Colombia and India. In Colombia, Alere's subsidiary made payments of approximately $275,000 to a management level employee at a government-run entity between 2007 and 2012 in order to sell approximately $7.6 million worth of products, on which the company made profits of approximately $3.18 million. In India, Alere's subsidiary paid its India distributor an increased commission intended for local government officials in order to increase the sales of its products there by 400%. Alere retained approximately $150,000 in profits from the increased contracts even after new management discovered the commissions and ended the practice. Under the terms of the settlement, the SEC ordered Alere to cease and desist violations of the books and records and internal controls provisions of the FCPA as well as several other accounting rules and further ordered the company to pay a civil penalty of $9.2 million, disgorgement of $3,328,689, and prejudgment interest of $495,196.

**Mitigating / Aggravating Factors:**

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<th>Self-Reported</th>
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**Compliance / Reporting:**

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<th>Compliance Obligation</th>
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<th>Length of Reporting</th>
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<tbody>
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<td>No</td>
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