Corrigenda

Pages 25-26:
The last two paragraphs of Chapter 1, Section B. 4, have been deleted and replaced with the following text:

Similarly, in the resolution of the Johnson & Johnson (J&J)/DePuy case, the United States and the United Kingdom simultaneously resolved investigations into some of the same misconduct. In the U.S., J&J’s criminal fine was reduced by 25%, in part in light of anticipated fines in the U.K. and Greece, noting in the deferred prosecution agreement, “J&J and the Department agree that this fine is appropriate given [...] penalties related to the same conduct in the United Kingdom and Greece [...]” J&J was also required to disgorge profits from the conduct in a settlement with the SEC. DePuy settled the U.K. charges by agreeing to financial penalties under a civil recovery order. In reaching the settlement, the U.K. Serious Fraud Office also took the multijurisdictional nature of the settlement into account, stating that it had “taken particular note of the fact of disgorgement and recovery in more than one jurisdiction for the same underlying unlawful conduct. [...] The Serious Fraud Office has considered the matter from a global perspective. It has worked to achieve a sanction in this jurisdiction which will form part of a global settlement that removes all of the traceable unlawful property and at the same time imposes a penalty.”