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Government Investigations & White Collar Alert

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Fixing immigration through a corruption crackdown: DOJ Task Force takes aim at the Northern Triangle

By Mark Knights and Michael Strauss

Corruption in Central America is a “root cause of migration”



What's the Impact

- / The U.S. Department of Justice recently formed an Anticorruption Task Force
- / The Task Force now has a new way to generate investigatory leads: an international “tip line”
- / Having your own anonymous tip line for employees to report suspicious behavior is an absolute necessity to combat corruption

Corruption in Central America—specifically in the “Northern Triangle” of El Salvador, Guatemala, and Honduras—is a “root cause of migration” to the United States.¹ The U.S. Department of Justice, through its recently formed Anticorruption Task Force, is committed to transparently and swiftly prosecuting corrupt actors. The Task Force is an amalgam of prosecutors from DOJ’s Foreign Corrupt Practices Act, Kleptocracy Asset Recovery Initiative, and Narcotic and Dangerous

¹ [U.S. Department of Justice, *Justice Department Anticorruption Task Force Launches New Measures to Combat Corruption in Central America* \(Oct. 15, 2021\)](#)

Drug Section units. It is supported by agents from the FBI, DEA, and DHS, who will partner with U.S. embassies in the region to investigate allegations of fraud.

And the Task Force now has a new way to generate investigatory leads: an international “tip line.” Northern Triangle tipsters are encouraged to provide information about corruption or corrupt actors. How the Task Force will evaluate these tips or whether tipsters will be rewarded for coming forward is unknown. That DOJ has opened up this direct line of communication for potential whistleblowers, however, should put any business operating in the Northern Triangle on alert.

Having your own anonymous tip line for employees to report suspicious behavior has long been a recommended practice to combat corruption. But with DOJ cracking down on corruption and creating new avenues for tipsters to come forward, an internal tip line should now be regarded as an absolute necessity—whether your company does business in the Northern Triangle or otherwise. Any company serious about combatting corruption will want to know about wrongdoing before the government does, and should create both a compliance culture and infrastructure that encourages and enables employees to come forward with information about their observations, before they feel the need to contact DOJ.

For more information on the content of this alert, please contact your Nixon Peabody attorney or:

[Mark Knights](#)

603.628.4027

mknights@nixonpeabody.com

[Michael E. Strauss](#)

603.628.4074

mestrauss@nixonpeabody.com
