

## SEC v. Tyco Int'l Ltd. (S.D.N.Y. 2006)

### Nature of the Business.

Tyco International Ltd. ("Tyco"), a Bermuda corporation, manufactures and provides services in fire protection and safety systems, electronic security services, electrical and electronic components, medical products, and engineered products and services. Tyco is listed on the New York Stock Exchange.

### Influence to be Obtained.

Payments were made to secure construction and other service contracts for government-controlled projects.

### Enforcement.

In April 2006, Tyco and the SEC reached a settlement with respect to a host of alleged violations of the securities laws and other laws, including a single count alleging an FCPA violation. Tyco agreed to pay a \$50 million fine and \$1 in disgorgement as part of the settlement, which allows Tyco to avoid admitting any of the allegations.

### Key Facts

**Citation.** *SEC v. Tyco Int'l Ltd.*, No. 06-cv-2942 (S.D.N.Y. 2006).

**Date Filed.** April 17, 2006.

**Country.** Brazil, South Korea.

**Date of Conduct.** 1996 – 2002.

**Amount of the Value.** Not Stated.

**Amount of Business Related to the Payment.** Not Stated.

**Intermediary.** Lobbyists.

**Foreign Official.** Foreign officials in Brazilian municipal water and waste treatment systems and South Korean officials, including Minister of Construction and Finance and a military general.

**FCPA Statutory Provision.** Anti-Bribery; Internal Controls; Books-and-Records.

**Other Statutory Provision.** Mail Fraud; Wire Fraud; Proxy Disclosure Violations; Reporting Violations.

**Disposition.** Complaint and Consent Order.

**Defendant Jurisdictional Basis.** Issuer.

**Defendant's Citizenship.** Bermuda.

**Total Sanction.** \$50,000,001.

**Compliance Monitor/Reporting Requirements.** None.

**Related Enforcement Actions.** None.

**Total Combined Sanction.** \$50,000,001.