

## **InVision Technologies, Inc. / GE InVision, Inc.**

**Case ID:**

ST-221

**Case Cluster :**

InVision Technologies, Inc.

**Jurisdiction of Settlement:**

United States

**Jurisdiction of Settlement / Enforcement Agency:**

Securities and Exchange Commission

**Jurisdiction of Foreign Public Official(s) :**

China, Philippines, Thailand

**Year of Settlement:**

2005

**Month/Day of Settlement (or Notes):**

02/14

**Other Jurisdictions of Settlement:**

Unknown

**Settlement with Individual or Legal Person?:**

Legal Person

**Type of Settlement:**

Civil

**Legal Form of Settlement:**

Consent to Cease-and-Desist Order

**Monetary Sanctions (Types):**

Disgorgement of Profits, Prejudgment Interest, Civil Penalty

**Total Monetary Sanctions (US\$):**

\$1,117,703.57

**Civil Disgorgement of Profits (US\$) :**

\$589,000

**Civil Prejudgment Interest (US\$) :**

\$28,703.57

**Civil Fine / Penalty (US\$):**

\$500,000

**Monetary Sanctions Returned / Ordered Returned (US\$):**

\$0

**UNCAC Articles(s) Implicated:**

Art.16

Art.26

**OECD Anti-Bribery Convention Articles Implicated:**

Art. 1, Art. 2, Art. 8

**Offenses - Alleged:**

Bribery of foreign officials, Internal controls violations, Falsification of books and records

**Offenses - Settled:**

No admission or denial of allegations

**Public Procurement Contract / SOE Involved?:**

Yes

**Summary:**

According to the US Department of Justice Report to Congress, "Appendix C: Summaries of Foreign Corrupt Practices Act Enforcement Actions by the United States, January 1, 1998 - September 30, 2010," InVision Technologies, Inc. at 100-101, location and time period of misconduct: Thailand (2002-2004), China (2002-2004), Philippines (2001-2002); company became aware of a high probability that its agents or distributors in Thailand, China and the Philippines had paid or offered to pay money to foreign officials or political parties in connection with transactions or proposed transactions for the sale by InVision of its airport security screening machines. In 2005, SEC settled with GE InVision, InVision's corporate successor. David Pillor was InVision's senior vice president for sales and marketing. Resulting criminal enforcement actions: In Re InVision Technologies, Inc. (December 6, 2004); Civil enforcement actions: SEC v. David M. Pillor (N.D. Cal., August 15, 2006), SEC v. GE InVision, Inc. (N.D. Cal., February 14, 2005), In the Matter of GE InVision, Inc. (February 14, 2005)

**Sources :**

US Department of Justice Report to Congress, Appendix C "Summaries of Foreign Corrupt Practices Act Enforcement Actions by the United States, January 1, 1998 - September 30, 2010," InVision Technologies, Inc. at 100-101, accessed at [www.justice.gov/criminal/fraud/fcpa/docs/response3-appx-c.pdf](http://www.justice.gov/criminal/fraud/fcpa/docs/response3-appx-c.pdf); US Securities and Exchange Commission, Litigation Release No. 19078 / February 14, 2005, Securities and Exchange Commission v. GE InVision, Inc. (formerly known as InVision Technologies, Inc.), United States District Court for the Northern District of California, Civil Action No. C-05-0660 MEJ, "SEC Settles Charges against InVision Technologies for \$1.1 Million for Violations of the Foreign Corrupt Practices Act," accessed at <http://www.sec.gov/litigation/litreleases/lr19078.htm>, and Complaint filed February 14, 2005, accessed at <http://www.sec.gov/litigation/complaints/comp19078.pdf>