
Perspective on the Pause – Putting DOJ’s New FCPA Enforcement Approach Into Context

Date: 02/13/25

On February 10, 2025, President Trump issued an Executive Order, “[Pausing Foreign Corrupt Practices Act Enforcement to Further American Economic and National Security](#),” which directs the Attorney General to pause Foreign Corrupt Practices Act (FCPA) actions for a period of 180 days to:

- review all existing FCPA investigations or enforcement actions; and
- issue updated FCPA guidelines and policies to align with the current administration’s economic interests and foreign policy objectives.

The Attorney General has also been instructed to cease the initiation of any new FCPA investigations or enforcement actions during the 180-day pause, subject to individual exceptions. The Executive Order grants the Attorney General further authority to extend the review period for an additional 180 days at her discretion. Finally, the Executive Order instructs the Attorney General to determine, following the issuance of the revised guidelines or policies, “whether additional actions, including remedial measure with respect to inappropriate past FCPA investigations and enforcement actions, are warranted” and to take such actions, as appropriate.

An expanded version of this memorandum was [re-published by ALM’s Corporate Counsel](#).

Read our key takeaways and analysis in the link below.

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