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Michael DeBernardis Discusses Takeaways from New FCPA Enforcement Guidelines

Articles & Press

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Jan. 16, 2026 – Michael DeBernardis spoke to [Anti-Corruption Report](#) on the takeaways since new Foreign Corrupt Practices Act (FCPA) enforcement guidelines were issued in June 2025 by Deputy Attorney General Todd Blanche.

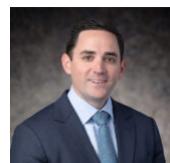
The memo issued by Blanche responded to a February executive order issued by President Donald Trump that temporarily paused new FCPA investigations and called for a reorientation of FCPA enforcement priorities to better align with the current administration's economic and national security interests.

According to DeBernardis, it's too soon to make a determination on how the volume and conduct of prosecutions will be shaped by the memo and overall priorities of the Trump administration.

One case per month in the second half of 2025 is too small a sample size to evaluate the impact of the Blanche Memo, DeBernardis told the publication. In both the LiMu and Millicom settlements, "we have seen an effort for the DOJ to tie its decisions directly to one of the stated priorities," he said.

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Michael A. DeBernardis

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