

## Michael DeBernardis Examines Impacts of Shifting Anti-Corruption Priorities on Companies

### Articles & Press

Hughes Hubbard & Reed LLP • A New York Limited Liability Partnership  
One Battery Park Plaza • New York, New York 10004-1482 • +1 (212) 837-6000

Attorney advertising. This advisory is for informational purposes only and is not intended as legal advice. Prior results do not guarantee a similar outcome. For more information: <https://www.hugheshubbard.com/legal-notices>.

---

**Jan. 28, 2026** – Michael DeBernardis spoke to [Anti-Corruption Report](#) about the past year being a “rollercoaster” for attorneys who focus their practice on Foreign Corrupt Practices Act (FCPA) enforcement, specifically given the impact of the Trump administration’s policies on in-house teams and their defense counsel.

In the article, DeBernardis discussed the disbandment of the U.S. Securities & Exchange Commission’s FCPA Unit, which had worked with the U.S. Department of Justice and been the primary regulator for smaller cases that relied on the books-and-records and internal controls provisions of the FCPA and targeted issuers.

“These cases often involved smaller dollar amounts or improper use of gifts and hospitality,” DeBernardis said, and “are clearly disfavored by the Trump administration,” as indicated by language specifically targeting these types of cases in the administration’s FCPA executive order. As a result, such cases are unlikely to be an enforcement focus, “by the SEC or otherwise, moving forward,” he said.

DeBernardis also discussed how the shift in policies, focuses and resources – paired with the DOJ’s insistence that FCPA enforcement will continue – impacts in-house compliance teams.

“It is a challenging time to be an in-house compliance professional,” DeBernardis said. “While in-house teams must continue to implement anti-corruption programs, the shifting enforcement priorities are making it difficult to identify exactly where to place limited compliance resources.”

Lastly, DeBernardis discussed the impact of the enforcement shifts on his practice, which have been minor, while often including a geographic focus.

“Clients are more concerned with operations in Latin America, whether because of the stated goal to focus FCPA enforcement on schemes implicating cartels, the broader move to designate certain cartels as Foreign Terrorist Organizations or just an apparent geopolitical focus shift from the Trump administration to Latin America,” DeBernardis said.

[Read the article.](#)

## **Related People**



**Michael A. DeBernardis**

## **Related Areas of Focus**

[Global Investigations, Enforcement and Compliance](#)

[Sanctions, Export Controls & Anti-Money Laundering](#)

[White Collar & Regulatory Defense](#)