

# Enforcement Insights

## 2025 Enforcement Roundup | 2026 Expectations

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Despite a slower than expected start to enforcement in 2025, including a pause on enforcement of the Foreign Corrupt Practice Act (FCPA) and a 43-day federal government shutdown, government enforcement appeared to steady as the year came to a close. Looking to 2026, we expect increased enforcement by the Department of Justice (DOJ), consistent with the Criminal Division's [White Collar Enforcement Plan](#), which declared "[w]aste, fraud, and abuse" as its top priority followed by "[t]rade and customs fraud." As we detail below, the False Claims Act (FCA) took center stage in 2025, and we anticipate the trend will continue into and throughout 2026. Moreover, while we expect an uptick in FCPA enforcement actions in 2026 as the Fraud Section moves on from the "pause," we anticipate there may be a greater focus on individual prosecutions than we have seen in prior administrations. That said, remarks by Deputy Attorney General Todd Blanche and other DOJ officials at the December 2025 ACI FCPA and Global Anti-Corruption Conference emphasized that the DOJ remains committed to fighting foreign bribery and we ended 2025 with a FCPA corporate criminal resolution.

Meanwhile, at the Securities and Exchange Commission (SEC), we saw a shift in enforcement priorities as Chairman Paul Atkins pivoted away from regulation through enforcement and ushered in a renewed emphasis on prosecuting "genuine harm and bad acts." At the Office of Foreign Assets Control (OFAC), we saw a steady pace of enforcement throughout 2025, as the administration utilized sanctions and tariffs to address trade concerns, as well as national security concerns stemming from transnational criminal organizations (TCOs) and cartels.

We unpack the twists and turns of enforcement in 2025 here and offer our insights and expectations for 2026.