



Expeditors International
of Washington, Inc.

1015 Third Avenue
Seattle, WA 98104-1190

Tel: 206-674-3400
Fax: 206-682-9777

Federal Maritime
Commission No. 2268

Date: February 17, 2025

To Whom: All Expeditors Customers, Service Providers, and Others Worldwide

Title: U.S. 'Pauses' FCPA Enforcement

The Trump Administration last week ordered a "pause" in the enforcement of the Foreign Corrupt Practices Act (FCPA), a U.S. law in force since 1977. The FCPA makes it illegal for a U.S. person (or company) to, "offer, pay, or promise to pay money or anything of value to any foreign official for the purpose of obtaining or retaining business." President Trump's Executive Order pausing enforcement is available [here](#). For more detail about the FCPA generally, click [here](#).

The FCPA expands beyond the U.S. and covers foreign persons or companies that commit acts in furtherance of bribery in the territory of the United States, as well as U.S. or foreign public companies listed on stock exchanges in the United States, which are required to file periodic reports with the U.S. Securities and Exchange Commission.

Further, the FCPA accounting provisions require publicly listed companies to make and keep accurate books and records and to devise and maintain an adequate system of internal accounting controls. These provisions also prohibit individuals and businesses from knowingly falsifying books and records or knowingly circumventing or failing to implement a system of internal controls.

We ask you to join us:

1. Bribery is still illegal in the U.S. and every other country in the world. The enforcement of those laws varies, but not the illegality of the bribe or attempted bribe. The U.K. Bribery Act of 2010 applies to Expeditors and its employees, customers, and service providers. Enforcement of the U.K. Bribery Act is not on pause.
2. Anti-corruption training, escalation procedures, etc. are critical for those for whom principled compliance is second nature.

The pause does not mean the FCPA does not matter anymore. Considering the pause of the FCPA, we ask all to remain vigilant, refuse to compromise, and continue to escalate. The FCPA has not been overturned as a law.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Dickerman", with a long horizontal flourish extending to the right.

Jeff Dickerman
Senior Vice President & General Counsel