

## **Attorney General Memorandum Redirects U.S. Anti-Corruption Efforts Raising Questions and Concerns**

A statement from Transparency International U.S.  
February 6, 2025

*Washington, DC*—On February 5, 2025, Attorney General Pam Bondi circulated a Memorandum to U.S. Justice Department employees with the subject heading “Total Elimination of Cartels and Transnational Criminal Organizations.”

The Memorandum explains the outlined changes as a step toward implementing President Trump’s January 20, 2025, Executive Order entitled “Designating Cartels And Other Organizations As Foreign Terrorist Organizations And Specially Designated Global Terrorists.”

Among the changes are directives to (1) eliminate the KleptoCapture Task Force and the Kleptocracy Asset Recovery Initiative (KARI); (2) prioritize Foreign Corrupt Practices Act (FCPA) and Foreign Extortion Prevention Act (FEPA) investigations that are related to foreign bribery that facilitates the criminal operations of cartels and transnational criminal organizations (TCOs); (3) shift focus away from FCPA and FEPA investigations and cases that do not involve such a connection; and (3) remove the “bureaucratic impediment” requiring that investigations and prosecutions under the FCPA or FEPA regarding foreign bribery associated with cartels and TCOs first be authorized by, as well as conducted solely by, the Criminal Division and the Fraud Section, respectively, of the Department of Justice in Washington, D.C.

Transparency International U.S Executive Director Gary Kalman issued the following statement:

The elimination of the KleptoCapture Task Force and the Kleptocracy Asset Recovery Initiative will significantly diminish the U.S.’s ability to counter the transnational corruption that continues to threaten core U.S. security and economic interests, and that leaves the victims of corruption around the world with incomplete justice.

These anti-kleptocracy initiatives have been instrumental in U.S. efforts to enforce and ensure effective impacts of our sanctions, for example. They have led to the identification, freezing, and seizing of billions of dollars controlled by supporters of America's adversaries. In particular, the effectiveness of new and more comprehensive sanctions on Iran will rely on the ability of the Justice Department and other partners to counter financial secrecy and track the illicit finances that are moved around the world.

For these reasons, we strongly urge the Attorney General to reconsider these decisions and to reinstitute both initiatives, perhaps under a sharper, America First focus.

Similarly, for more than 50 years, the Foreign Corrupt Practices Act (FCPA) has been a model for countering corruption around the world, leading to untold numbers of corrupt officials and other criminals being held accountable. And the recent addition of the bipartisan Foreign Extortion Prevention Act, the most important anti-foreign-bribery law since the FCPA, empowers the U.S. Government to protect American citizens and businesses from bribe demands that take place abroad. While we are pleased that future FCPA and FEPA investigations and prosecutions regarding transnational criminal organizations and cartels will have fewer bureaucratic loopholes to jump through, the Memorandum's overall, narrowed focus of enforcement for these laws risks allowing corrupt markets around the world to flourish—to the clear detriment of U.S. business and national security interests.

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Transparency International U.S. is part of the world's largest coalition against corruption. In collaboration with national chapters in more than 100 countries, we are leading the fight to turn our vision of a world free from corruption into reality.

#### **Related Resources**

- Read the [DOJ memorandum](#) dated February 5, 2025.

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