

**GIBSON DUNN**



**White Collar Defense & Investigations Update**

February 3, 2026

## **Corporate Resolutions 2025 Year-End Update**

*This update analyzes corporate criminal enforcement in 2025 by the numbers and in context of the new United States Presidential Administration's priorities and policy initiatives.*

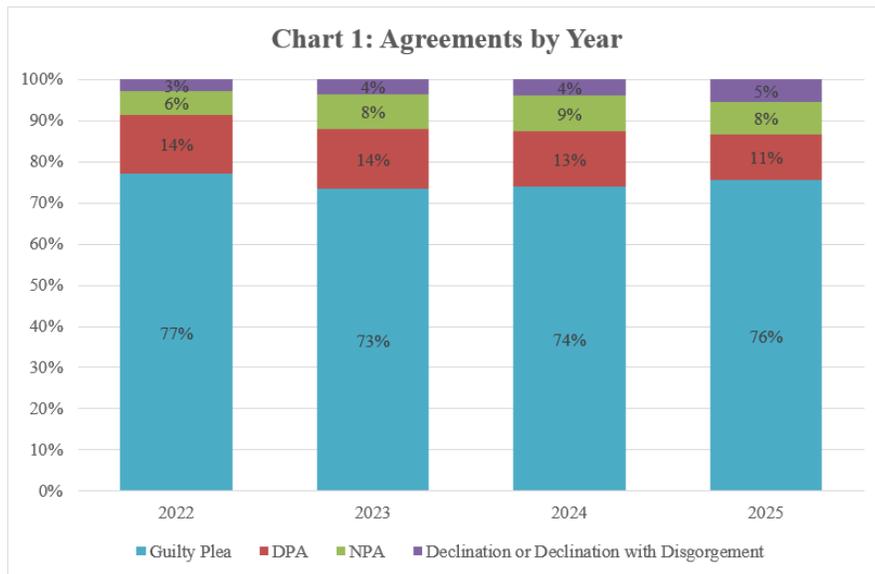
The change in United States Presidential Administrations in early 2025 involved immediate and significant pronouncements regarding a re-orientation of the U.S. government's corporate criminal and civil enforcement priorities. Many commentators projected that these policy statements would result in dramatic changes in how the government pursues criminal and civil investigations, and in how corporate subjects and defendants might approach resolving those investigations. Many also raised questions whether corporate enforcement overall would sharply decline. Given the timelines of investigations and corporate enforcement actions, it is too early to comprehensively assess the impact of these changes. The incubation of complicated criminal investigations is quite extended and always slows in Administration changes. By the numbers and consistent with our experience handling government investigations for a wide range of clients, total corporate resolutions in 2025 notably did not dramatically depart from prior years—although overall recoveries were lower than in recent years.

Gibson Dunn's tally closed out the year in corporate enforcement with 74 public declinations, declinations with disgorgement, non-prosecution agreements (NPAs), deferred prosecution agreements (DPAs), and corporate guilty pleas from the U.S. Department of Justice (DOJ), as compared to 2024's 104, and 2023's 83, total corporate agreements. This is also sufficient data for us to at least begin to place enforcement actions in the context of the Administration's early policy pronouncements, and we offer some preliminary observations along these lines in the sections that follow.

In particular, in this client alert, we: (1) report key statistics regarding corporate resolutions, including an analysis of NPAs, DPAs, and Corporate Enforcement and Voluntary Self-Disclosure Policy (CEP or Corporate Enforcement Policy) declinations from 2000 through 2025 and of corporate guilty pleas between 2022 and 2025, based on data compiled by Gibson Dunn; (2) assess developments in DOJ enforcement policy and priorities in 2025, as well as how completed enforcement actions fit within those priorities; and (3) survey recent developments in DPA- and plea agreement-like regimes in select international jurisdictions. We conclude this update with a table describing key information from the 74 corporate agreements executed in 2025, and attach an Appendix summarizing them in greater detail.

Key Statistics

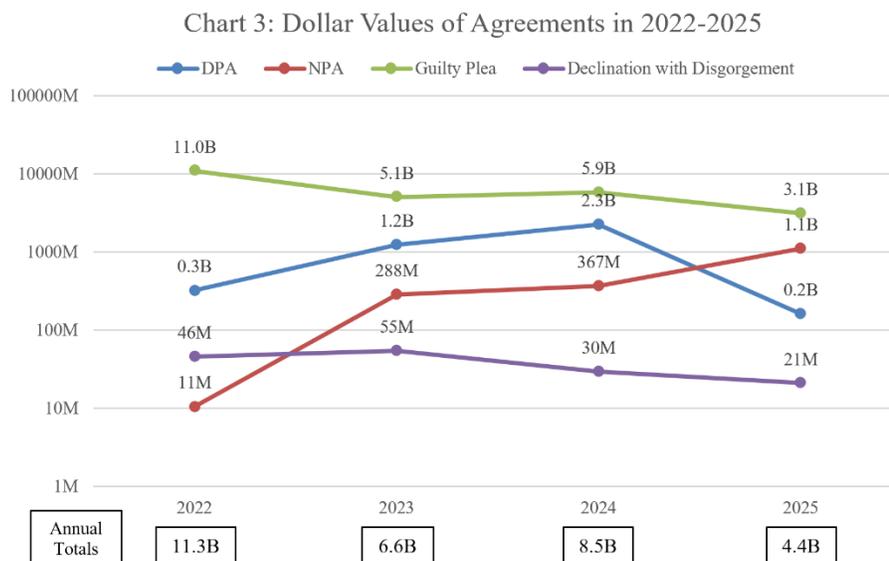
**Chart 1** reflects the relative mix of NPAs, DPAs, declinations and declinations-with-disgorgement, and guilty pleas since we began tracking plea agreements in 2022. As a reminder, declination-with-disgorgement is a rather new resolution vehicle that falls between a traditional declination and an NPA.



**Charts 2 and 3** below focus on 2022 through 2025, and show the numbers of DPAs, NPAs, plea agreements, and declinations with disgorgement in those years, as well as recoveries associated with each category of agreement.<sup>[1]</sup> These charts illustrate that while DOJ has used all forms of resolution, the relative proportion of guilty pleas to other forms of resolution has not changed significantly in the three years, with 2–3% movement in each category. Consistent with the higher number of plea agreements relative to other forms of resolution, recoveries associated with guilty pleas also have always been highest. At \$3.1 billion, recoveries associated with plea agreements in 2025 more than doubled those associated with NPAs, DPAs, and declinations with disgorgement, at a ratio of 2.4. Overall recoveries across categories, at \$4.4 billion, are down since 2024, when they totaled approximately \$8.5 billion, continuing an overall downward trajectory since we began tracking all categories in 2022.



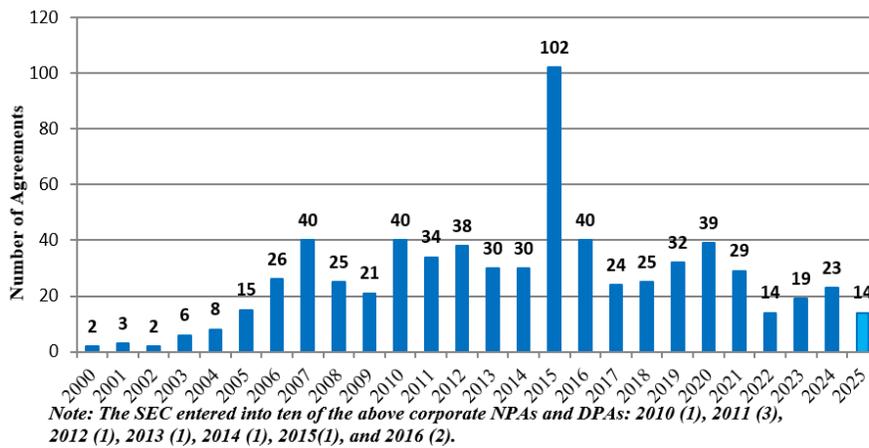
*[Values shown on a logarithmic scale.]*



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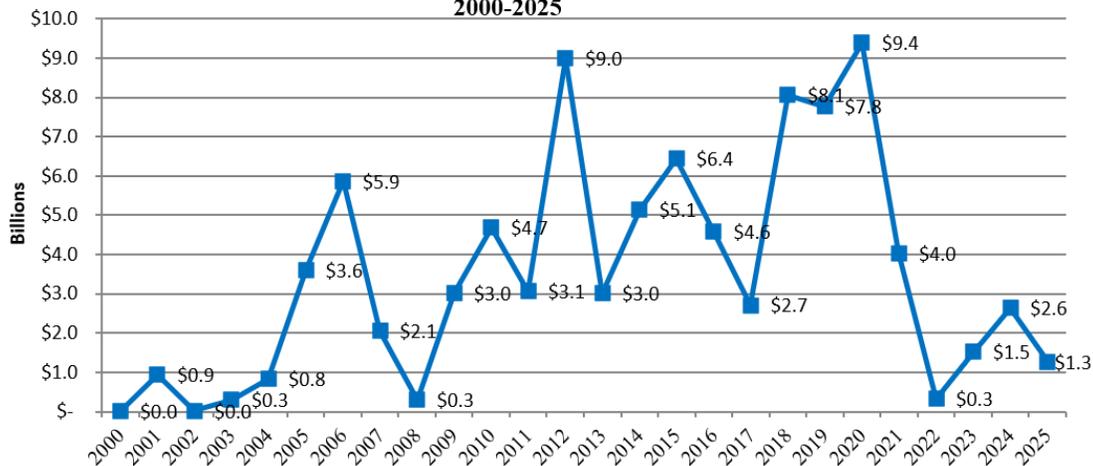
**Chart 4** below reflects the NPAs and DPAs that Gibson Dunn has identified through public-source research from 2000 through the end of 2025. Of the 14 total agreements in 2025, there were eight DPAs and six NPAs. The SEC, consistent with its trend since 2016, did not enter any NPAs or DPAs in 2025.

**Chart 4: Corporate NPAs and DPAs  
2000-2025**



**Chart 5** reflects total monetary recoveries related to publicly available NPAs and DPAs from 2000 through the end of 2025. At approximately \$1.3 billion, 2025 recoveries associated with DPAs and NPAs are lower than those in 2023 and 2024 and continue their overall downward trend, ranking as the 19th lowest of our 26 years of annual totals.

**Chart 5: Total Monetary Recoveries Related to NPAs and DPAs  
2000-2025**



Although it would be impossible to determine with certainty the root cause of the relative decline in NPAs and DPAs that began around 2022, the shift coincided with significant updates announced in the September 2022 Monaco Memorandum (which we analyzed in depth in our [October 3, 2022 publication](#)) that broadened policies on voluntary self-disclosure and signaled a meaningful pivot in prosecutors’ charging assessments and continued with remarks earlier this year by then-Head of the Criminal Division, Matthew Galeotti.

We note a few statistics and possible trends, although it is difficult to say whether they reflect any shift in focus, standards, or priorities of the current Administration. Indeed, the flat line of some of these statistics remaining constant may prove just as informative as other increasing or

decreasing trends. In addition, the continued substantial corporate investment from the last 25 years pays dividends of fewer systemic investigations.

- Since 2022, all “blockbuster” resolutions involving criminal penalties and forfeiture totaling \$1 billion or more across parallel criminal and civil settlements involved plea agreements—with three in that category in 2022, one in 2023, three in 2024, and one in 2025. Looking back over time, we note six NPAs and DPAs involving criminal penalties of \$1 billion or more, between 2009 and 2020, although two of these resolutions involved ancillary guilty pleas by subsidiaries or affiliated companies.
- Six resolutions in 2025 cited voluntary disclosure. They were pursued by a broader group of prosecuting offices than the prior year, and present a more complex range of results, ranging from a declination and declinations with disgorgement (three) to NPAs (two). Insofar as these cases almost certainly involved voluntary self-disclosures during the prior administration, it is difficult to read too much into these outcomes, and time will tell whether there is any shift in this Administration’s approach to voluntary self-disclosure.
- Historically, corporate declinations or declinations with disgorgement publicly announced pursuant to DOJ Criminal Division’s Corporate Enforcement and Voluntary Self-Disclosure Policy (CEP) since 2016 involved the Fraud Section. While this technically remained true in 2025, with the Fraud Section announcing three declinations under the CEP, DOJ’s National Security Division (NSD) also issued two declinations in 2024 and one declination in 2025 under its parallel NSD Enforcement Policy for Business Organizations, which NSD revised in 2024. While the number of announced declinations with disgorgement has remained fairly constant over the past four years, the three traditional declinations (i.e., public declinations without disgorgement) announced in 2024–2025 reflect an increase from prior years, which had not featured such declinations since 2019.
- The Criminal Division of Main Justice has continued to feature heavily in DPAs, NPAs, and declinations with disgorgement following DOJ’s underscoring in 2023 that the CEP applied to all corporate criminal matters. Since 2018, when DOJ expanded the predecessor to the CEP to reach beyond the Foreign Corrupt Practices Act (FCPA), the Criminal Division’s Fraud Section has been involved in approximately one-third (75) of all announced (215) DPAs, NPAs, and declinations with disgorgement (35%). Since 2023, it has been involved in 33 of all 261 corporate resolutions of any type, resulting in total resolution amounts of \$6.9 billion. For its part, the Money Laundering, Narcotics and Forfeiture Section (MNF, previously known as the Money Laundering and Asset Recovery Section, MLARS) of DOJ’s Criminal Division has participated in five resolutions from 2022 through 2025, resulting in total resolution amounts of \$6.4 billion.
- For plea agreements, a similar distinction goes to environmental-related prosecutions. Of the 248 corporate guilty pleas publicly announced from 2022–2025, 87 (35%) involved DOJ’s Environmental Natural Resources Division and/or the Environmental Protection Agency.
- DOJ’s Antitrust Division had eight public NPAs and DPAs in 2020-21, three in 2023, and none in 2022, 2024, and 2025. But in 2022–2025, it also entered 17 plea agreements—adding two in 2025. Of these plea agreements, 12 were tied to schemes publicly disclosed in years prior.
- Approximately 51% (362) of all 709 corporate DPAs, NPAs, and public declinations in our 26 years of data involve an allegation or charge of fraud of some sort, ranging from bank

or mail fraud to FCPA violations. Since we began tracking plea agreements in 2022, the percentage is slightly lower at 30%, i.e., 100 of the total 331 negotiated corporate resolutions—55 of which were guilty pleas.

- U.S. Attorneys' Offices continue to play an important role in corporate prosecutions, which were historically concentrated in the biggest DOJ offices or Main Justice units. 85% of 2025's 74 corporate negotiated resolutions involved a U.S. Attorney's Office.
- Monitoring obligations, whether in the form of an independent monitor or self-reporting, have continued to feature in corporate resolutions at approximately the same rate for three of the past four years. As a percentage, 23–52% of all publicly reported DPAs, NPAs, and declinations for which data is available for each year between 2022 and 2025 included a monitoring obligation: 25% in 2022, 23% in 2023, 52% in 2024, and 39% in 2025. While these percentages reflect a steep decline from the prior three years, which ranged from 59–73% (59% in 2019, 73% in 2020, and 69% in 2021), monitorships and self-reporting are not extinct. That said, as discussed in more detail below, in 2025, DOJ terminated several monitorships early and also instituted policy to reduce and narrow the imposition of monitorships.

Gibson Dunn negotiated one of the first DPAs by Main Justice on December 30, 2001 – almost 25 years ago. In the last 25 years, the template forms remain varied and it remains that there is no DOJ-required template across divisions and U.S. Attorneys' Offices. The evolution in form, structure, and elements of corporate resolutions will no doubt continue. As noted, more than 20 years ago, Gibson Dunn led the dramatic shift toward increased use of NPAs and DPAs in corporate cases and has recently been at the forefront of convincing DOJ to allow more self-monitoring and addressing the apparent shift back toward plea agreements.

### **2025 Developments in DOJ Corporate Enforcement Policy, in Context**

2025 saw a significant overhaul in DOJ's approach to corporate enforcement, with new stated focuses on immigration, anti-cartel operations, and preventing and punishing harms to ordinary consumers and investors. At the same time, DOJ announced an intent to reduce the impact of government investigations on law-abiding companies and to reward voluntary disclosures and cooperation with well-defined benefits earned according to objective criteria.

This new approach was foreshadowed in two policy memoranda issued by Attorney General Pamela Bondi on February 5, 2025. The first of these rescinded a prior memorandum from the former Attorney General entitled *Issuance and Use of Guidance Documents by the Department of Justice* (July 1, 2021).<sup>[2]</sup> The second memorandum, titled *Total Elimination of Cartels and Transnational Criminal Organizations*, directed DOJ to “work urgently” to “eliminat[e] these threats to U.S. sovereignty,” and signaled the Attorney General's intent to empower U.S. Attorneys' Offices to investigate and prosecute cases with less direct involvement by Main Justice.<sup>[3]</sup> These memoranda were followed, on May 12, 2025, by an announcement from DOJ's Criminal Division that it was “turning a new page” in its approach to white collar and corporate enforcement.

The Criminal Division in parallel issued four foundational guidance documents:

- A memorandum<sup>[4]</sup> outlining the new White-Collar Enforcement Plan (“Enforcement Plan”);

- An update<sup>[5]</sup> to the Criminal Division Corporate Enforcement and Voluntary Self-Disclosure Policy (“Corporate Enforcement Policy”);
- An update<sup>[6]</sup> to the Department of Justice Corporate Whistleblower Awards Pilot program, and;
- An updated memorandum<sup>[7]</sup> describing the process for implementing monitorships and selecting monitors (collectively, the “May 12, 2025 Guidance Documents”), which we reported on in a [client alert](#) issued on May 19, 2025.

The Enforcement Plan memorandum identified three principles of criminal enforcement that would guide DOJ’s efforts, “focus, fairness, and efficiency,” for which we provide additional details, and which we analyze in the context of 2025’s enforcement actions, below.

### ***Focus – Enforcement Priorities in Context***

The Enforcement Plan stated that the Criminal Division will be “laser-focused on the most urgent criminal threats to the country,” and listed ten high-impact areas that the Criminal Division will prioritize investigating and prosecuting to combat those harms.<sup>[8]</sup> Given some thematic overlap in the ten areas, for purposes of analysis, we have reduced these priorities to nine key topics: (1) Healthcare, Procurement, Investor, and Consumer Fraud, (2) Foreign Bribery Enforcement, (3) National Security Offenses, (4) Tariffs and Customs Enforcement, (5) Money Laundering Enforcement, (6) Fraud Cases with Individual Victim Losses, (7) Federal Food, Drug, and Cosmetic Act Enforcement, (8) Focus on China, and (9) Digital Assets.<sup>[9]</sup> We address each below, noting how these enforcement areas have fared in view of publicly announced corporate criminal resolutions in 2025.

Overall, across the criminal resolutions we have tracked this year, enforcement activity has partially aligned with DOJ’s stated priorities, with certain areas showing more activity than others. The strongest follow-through is seen in national security and China-related matters, where DOJ has brought multiple export control and sanctions cases, a number of which have involved Chinese-affiliated entities. We also have noted a strong follow-through in bringing cases relating to healthcare fraud, with multiple resolutions focused on Medicare and Medicaid fraud.

By contrast, other areas of priority have not resulted in notable shifts in the numbers of related corporate resolutions. For example, the DOJ has brought forth a limited number of corporate criminal prosecutions relating to transnational criminal organizations, immigration, controlled substances, and fraud harming individual victims. Most prosecutions in these priority areas have targeted individuals rather than corporations. Overall, enforcement in 2025 did not greatly shift in light of DOJ’s new priorities, but it is the early days in the new Administration, and we will continue to monitor these areas to see how they evolve, over the coming months and years.

- *Healthcare, Procurement, Investor, and Consumer Fraud*

To address “[r]ampant health care fraud and program and procurement fraud,” the Enforcement Plan stated that the “Criminal Division will lead the fight in holding accountable those who exploit these programs and harm the public fisc for personal gain.”<sup>[10]</sup> The focus on health care and procurement fraud aligns with recent Executive Orders of President Trump on these topics,<sup>[11]</sup> and we have indeed seen criminal enforcement activity consistent with a prioritization

of the healthcare fraud space. 2025's public enforcement actions included seven criminal resolutions targeting misconduct in this space.[\[12\]](#)

This demonstrates an increase in enforcement activity relating to healthcare fraud compared to previous years. In 2024, we identified four criminal resolutions relating to healthcare fraud, and in 2023, we identified one. In 2025, almost all corporate resolutions in this area involved allegations that companies engaged in fraud related to Medicare and Medicaid, such as submitting fraudulent claims and thereby improperly diverting federal funds.[\[13\]](#)

As a further enhancement of its healthcare enforcement capabilities, the Criminal Division announced on September 23, 2025, that it would be expanding its Health Care Fraud Unit's New England Strike Force, to include resources in the District of Massachusetts.[\[14\]](#) The move was intended to bring more enforcement resources to Massachusetts, "accelerat[ing] the detection, investigation, and prosecution of complex fraud crimes."[\[15\]](#) Boston is a prominent hub for healthcare institutions, life sciences companies, and startups, and the U.S. Attorney's Office for the District of Massachusetts already has an elite reputation in health care fraud enforcement.[\[16\]](#) The U.S. Attorney's Office there has been a leader for more than a decade, charging a wide variety of healthcare fraud cases. At the time of the press release for the Strike Force expansion, its Health Care Fraud Unit and Affirmative Civil Enforcement Unit had already recovered over \$450 million in fraudulently obtained funds in FY 2025.[\[17\]](#) The Administration's sharp focus on fraud has continued into 2026, with the White House announcing formation of a new DOJ Division for National Fraud Enforcement—a development that we are following closely.[\[18\]](#)

- *Foreign Bribery Enforcement*

Following President Trump's February 10, 2025 Executive Order[\[19\]](#) pausing enforcement of the Foreign Corrupt Practices Act,[\[20\]](#) on May 12, 2025, the Criminal Division released Guidance Documents resuming the prosecution of cases involving foreign bribery. On June 9, 2025, DOJ rolled out updated guidance for FCPA enforcement in the form of a memorandum to the Head of the Criminal Division, issued by Deputy Attorney General Todd Blanche (the "June 9 Blanche Memo").[\[21\]](#) The Enforcement Plan asserted that the Criminal Division would take a targeted approach to protect American interests, prioritizing offenses that include "[b]ribery and associated money laundering that impact U.S. national interests, undermine U.S. national security, harm the competitiveness of U.S. businesses, and enrich corrupt foreign officials."[\[22\]](#) The June 9 Blanche Memo expanded upon this framing, laying out a "non-exhaustive" list of factors that the Criminal Division will balance in deciding whether to prosecute FCPA offenses, with no single factor being "necessary or dispositive."[\[23\]](#) The list includes whether the alleged misconduct: (1) "is associated with the criminal operations of a Cartel or TCOs (Transnational Criminal Organizations)," "utilitizes money launderers or shell companies that engage in money laundering for Cartels or TCOs," or "is linked to employees of state-owned entities or other foreign officials who have received bribes from Cartels or TCOs;" (2) "deprived specific and identifiable U.S. entities of fair access to compete"; (3) "involves key infrastructure or assets"; or (4) "bears strong indicia of corrupt intent tied to particular individuals and serious misconduct."[\[24\]](#)

As discussed further in our [2025 FCPA Year-End Update](#), despite the FCPA enforcement "pause," other indicators, including the guidance discussed directly above and individual FCPA

charges, suggest that FCPA enforcement is shifting but not gone altogether. There were only two corporate criminal FCPA resolutions in 2025 from which to draw conclusions about how the new FCPA Guidelines will be implemented going forward. For the first, a declination with disgorgement, the facts in the declination letter (as is typical of such documents) were too brief to identify which (if any) of the four FCPA Guideline factors apply. The second and final corporate FCPA resolution, a DPA with Comunicaciones Celulares S.A., d/b/a TIGO Guatemala (“TIGO”), highlighted an alleged connection between the conduct and a cartel or TCO. According to the criminal information, TIGO used the services of a banker who also allegedly laundered money for narco-traffickers and who used cash from illegal drug sales to pay bribes. Thus far, there have not been any concluded corporate FCPA enforcement actions highlighting any of the other three factors.

- *National Security Offenses*

In a memorandum<sup>[25]</sup> issued on her first day in office, Attorney General Bondi temporarily suspended requirements that the NSD approve most terrorism and International Emergency Economic Powers Act (“IEEPA”) charges brought by U.S. Attorney’s Offices, for the express purpose of promoting “aggressive” prosecution of such offenses.<sup>[26]</sup> (That 90-day suspension has since elapsed.) The May 12, 2025 Guidance Documents prioritized criminal enforcement of national security offenses, including terrorism and sanctions evasion.<sup>[27]</sup> They also emphasized that terrorism includes a focus on “recently designated Cartels and TCOs,”<sup>[28]</sup> a theme on which Mr. Galeotti expanded during remarks on September 17, 2025, in which he referenced cartels and TCOs, particularly those operating in “Mexico and the Western Hemisphere” as among the “key threats to the United States.”<sup>[29]</sup> In this same speech, Mr. Galeotti further emphasized an enforcement focus on the national security threats presented by “rogue nation-states like North Korea and Iran.”<sup>[30]</sup>

Recognizing that complex investigations and enforcement actions can take years to complete so investigations initiated in 2025 may not become public for some time, we note that several public cases this year have included a national security focus, with two declinations and three guilty pleas announced that involved companies admitting to violating U.S. export controls and sanctions laws such as the International Emergency Economic Powers Act, the Trading with the Enemy Act, and the Export Control Reform Act (“ECRA”). Another notable example is the November 2025 Comunicaciones Celulares S.A. DPA relating to an alleged government bribery scheme involving the proceeds of narco-trafficking (although we note that this matter was under investigation for many years preceding the DPA).<sup>[31]</sup>

- *Tariffs and Customs Enforcement*

The May 12, 2025 Guidance Documents also made clear that the Criminal Division will prioritize violations of tariff and customs laws.<sup>[32]</sup> Investigations of such violations were listed as priorities in the Enforcement Plan, and the updated whistleblower program added such violations as express subject areas for whistleblower rewards.<sup>[33]</sup> These updates added to other indications by the Trump Administration that tariff enforcement would be heavily emphasized, as Gibson Dunn previously covered in client alerts [here](#) and [here](#).

Consistent with this focus, on August 29, 2025, DOJ announced a new “Trade Fraud Task Force” to increase enforcement actions against parties who unlawfully import prohibited goods or seek to evade tariffs and other duties.<sup>[34]</sup> The announcement contained few specifics about the membership or authority of the task force, but as reported by Civil Division Deputy Assistant Attorney General Brenna Jenny, it aims to “enhance[] coordination and information sharing with [the Division’s] law enforcement colleagues.”<sup>[35]</sup> The announcement indicated that the task force is in furtherance of the administration’s “America First Trade Policy,” and it will encompass civil claims under the Tariff Act of 1930 and the False Claims Act as well as criminal prosecutions under Title 18’s trade fraud and conspiracy provisions.<sup>[36]</sup>

The announcement also welcomed referrals by those in industries harmed by unfair trade practices and encouraged cooperation through use of the Criminal Division’s Corporate Whistleblower Program.<sup>[37]</sup> We discussed several other potential implications of the program in a [September 8, 2025 client alert](#). Thus far, it appears that no criminal enforcement actions have been taken against corporate entities that involve alleged violations of tariffs or customs laws; corporate resolutions involving alleged customs and tariffs evasion have been limited to civil settlements.

- *Money Laundering Enforcement*

Under the principles of the May 12, 2025 Guidance Documents, the Criminal Division will continue to prosecute cases involving violations of applicable money laundering laws, with a particular focus on complex money laundering and offenses that implicate U.S. sanctions.<sup>[38]</sup> The Enforcement Plan decried “exploitation of our financial system” that can “enable underlying criminal conduct,” and warned that “[f]inancial institutions, shadow bankers, and other intermediaries aid U.S. adversaries by processing transactions that evade sanctions.”<sup>[39]</sup> The updated whistleblower program also maintains the Department’s focus on violations by financial institutions or their employees for schemes involving money laundering and violations of the Bank Secrecy Act.<sup>[40]</sup>

In 2025, the US government resolved four money laundering-related corporate investigations, of which three were concluded before issuance of the May 12, 2025 Guidance Documents.<sup>[41]</sup> After May 12, 2025, the DOJ Criminal Division secured a guilty plea for violations related to effective AML programs, operating an unlicensed money transmitting business, and violating the Travel Act.<sup>[42]</sup> Given the limited data points, it is too early to tell how DOJ’s express focus on money laundering enforcement will play out as compared to historical practice.

- *Fraud Cases with Individual Victim Losses*

In line with the Criminal Division’s focus on vindicating the rights of victims impacted by white collar and corporate crime, the Enforcement Plan also tasked the Criminal Division with seeking forfeiture to compensate victims,<sup>[43]</sup> along with “prioritiz[ing] schemes involving senior-level personnel or other culpable actors, demonstrable loss, and efforts to obstruct justice.”<sup>[44]</sup> The Enforcement Plan focused on certain crimes that defraud victims, including Ponzi schemes,

investment fraud, elder fraud, market manipulation, and “fraud that threatens the health and safety of consumers.”[\[45\]](#)

In 2025, the number of criminal corporate resolutions in this space does not appear to have increased compared to prior years. Instead, fraud cases involving individual victim losses have overwhelmingly targeted individual defendants, with corporations involved only in a minority of cases.

Among the limited corporate cases identified, two involve cryptocurrency-related schemes in which companies manipulated markets by artificially inflating the value of crypto assets, resulting in demonstrable investor losses and ultimately guilty pleas.[\[46\]](#) In addition, DOJ issued a declination to an investment bank following the firm’s voluntary self-disclosure of misconduct by two employees who manipulated the secondary and futures markets. Consistent with the Enforcement Plan’s emphasis on compensating victims, the declination involved disgorgement and establishment of a victim compensation fund.[\[47\]](#)

- *Federal Food, Drug, and Cosmetic Act Enforcement*

As part of a broader reorganization of the Department—and as explained in this Gibson Dunn [May 16, 2025 client alert](#)—the criminal enforcement work (and most prosecutors) of Civil Division’s Consumer Protection Branch has now moved to the Criminal Division to become a new consumer protection unit of the Fraud Section. Through that move, the Criminal Division is now positioned to lead criminal enforcement of the Federal Food, Drug, and Cosmetic Act (“FDCA”), and the Enforcement Plan made clear that the Criminal Division will exercise that authority and pursue corporate violations of the Controlled Substances Act. This focal area includes an express focus on the unlawful manufacture and distribution of chemicals and equipment used to create counterfeit pills laced with fentanyl and unlawful distribution of opioids.

Perhaps due to the DOJ adjusting to the reorganization of the prior Consumer Protection Branch, enforcement in the FDCA space appears to have dropped significantly since 2024, with four criminal resolutions involving FDCA violations in 2025,[\[48\]](#) only one of which was a guilty plea, compared to approximately 14 in 2024, all but one of which were guilty pleas. Similarly, corporate criminal enforcement involving controlled substances has been comparatively limited thus far, with most cases being brought against individual defendants or resulting in a civil settlement. There have, however, been recent criminal indictments in this space that we will watch for future reporting.[\[49\]](#)

- *Focus on China*

The Criminal Division outlined a renewed focus on criminal conduct related to China. The Enforcement Plan, for example, made multiple references to criminal conduct involving Chinese-connected companies and entities, including variable interest entities and sophisticated money laundering operations connected to China,[\[50\]](#) and on September 17, 2025, Mr. Galeotti again emphasized an enforcement focus on “Chinese money laundering organizations” during a speech at ACAMS, the Association of Certified Anti-Money Laundering Specialists conference.[\[51\]](#)

Amid this heightened focus on China, our review shows a modest rise in enforcement actions targeting Chinese companies and China-affiliated entities or involving China relative to 2024. Export control violations dominated these cases, with four of the five export control resolutions involving some form of improper export activity involving China. Several of these cases involved the export of highly sensitive software or hardware to Chinese universities or entities with military affiliation, underscoring heightened scrutiny of transactions involving China-based end users.[\[52\]](#)

- *Digital Assets*

The Enforcement Plan outlined an emphasis on crimes involving digital assets, including (1) those involving digital assets that victimize investors and consumers, (2) those that use digital assets in furtherance of other crimes, and (3) those that involve willful violators that facilitate significant criminal activity.[\[53\]](#)

Additionally, as discussed in more detail in a [separate client alert](#), in April 2025, Deputy Attorney General Blanche issued a memorandum entitled “Ending Regulation by Prosecution” focused on the digital assets space, stating in relevant part that DOJ “will no longer pursue litigation or enforcement actions that have the effect of superimposing regulatory frameworks on digital assets while President Trump’s actual regulators do this work outside the punitive criminal justice framework.”[\[54\]](#) The memorandum included a specific directive that DOJ would not pursue “regulatory violations in cases involving digital assets—including but not limited to unlicensed money transmitting under 18 U.S.C. §1960(b)(1)(A) and (B) [or] violations of the Bank Secrecy Act, [or other registration-related charges]—unless there is evidence that the defendant knew of the licensing or registration requirement at issue and violated such a requirement willfully.”[\[55\]](#) Consistent with the April 2025 memorandum, on August 21, 2025, Mr. Galeotti clarified in delivered remarks that the DOJ will not charge regulatory violations as crimes in cases involving digital assets “in the absence of evidence that a defendant knew of the specific legal requirement and willfully violated it.”[\[56\]](#)

## ***Fairness***

### *Additional Paths to Avoid or Mitigate Corporate Criminal Enforcement*

The Criminal Division’s Enforcement Plan created additional opportunities for white collar defense attorneys to advocate for non-criminal resolutions for their corporate clients.[\[57\]](#) In particular, while it reiterated foundational principles for corporate charging decisions identified in the Justice Manual, such as whether the company self-reported, the company’s willingness to cooperate with the government, and the company’s actions to remediate the misconduct, the Enforcement Plan also emphasized that, in many cases, prosecution of individuals will suffice to “vindicate U.S. interests,” leaving civil or administrative remedies to address misconduct at the corporate level.[\[58\]](#)

The Enforcement Plan also directed the Fraud Section and the Money Laundering and Asset Recovery Section to re-review all existing agreements between the Criminal Division and companies and determine whether to terminate those agreements early based on a number of factors.[\[59\]](#) And indeed, the Criminal Division has publicly terminated several agreements early

as a result of the new policy. In particular, the Criminal Division filed motions to dismiss criminal cases against ABB Ltd., Honeywell, and Stericycle, Inc. months before their respective expirations because the companies had complied with their obligations under their deferred prosecution agreements.<sup>[60]</sup> The Division also terminated its non-prosecution agreement with Albemarle Corporation more than a year early, concluding that the terms of the agreement had been satisfied, and it cut short two monitorships placed on Glencore, using its “sole discretion” after having “assessed the facts and circumstances.”<sup>[61]</sup>

For future resolutions, the Enforcement Plan suggested that the duration of resolutions will be shorter than before, directing that prosecutors “must impose a term that is appropriate and necessary in light of, among other things, the severity of the misconduct, the company’s degree of cooperation and remediation, and the effectiveness of the company’s compliance program at the time of resolution.”<sup>[62]</sup> The Enforcement Plan stated that these terms usually should not exceed three years and should be regularly reviewed for the possibility of early termination.<sup>[63]</sup> Factors such as those described in the Enforcement Plan have always been considerations in setting resolution terms, and in 2025, perhaps beginning to reflect the Enforcement Plan’s prioritization of shorter resolution terms, it appears that prosecutors have reached slightly lower terms of agreement as were made in immediately preceding years. Indeed, the average term length of 2025 resolutions with set term lengths (approximately 28.2 months) is lower than the average for 2024’s resolutions (33.0 months) and 2023’s (32.0 months). DOJ has also leaned into early termination, notably bringing agreements with ABB Ltd., Albemarle Corp., Glencore, Honeywell, and Stericycle, to early conclusion, as described above.

### *Recognition of Compliance and Law-Abiding Companies*

In a May 12 speech, Mr. Galeotti stated that the Criminal Division recognizes “that law-abiding companies are key to a prosperous America [and] [e]conomic security is national security.”<sup>[64]</sup> He added: “[m]ost corporations and financial institutions want to play by the rules and provide value for their shareholders and their customers. And that is what we want them to remain focused on. Excessive enforcement and unfocused corporate investigations stymie innovation, limit[] prosperity, and reduce[] efficiency.”<sup>[65]</sup> The Enforcement Plan similarly recognized that “it is critical to American prosperity to promote policies that acknowledge law-abiding companies and companies that are willing to learn from their mistakes.”<sup>[66]</sup>

These messages underscored the importance of corporate compliance and appropriate remediation. In line with this message, the CEP was revised in May 2025 “[t]o ensure fairness and individualized assessments,” with a focus on benefits for companies that self-disclose and cooperate.<sup>[67]</sup> Mr. Galeotti stated that under the updated CEP, “[s]elf-disclosure is key to receiving the most generous benefits the Criminal Division can offer.”<sup>[68]</sup> The CEP updates notably preserved prior compliance components in the definition of appropriate remediation, again signaling the importance of compliance.<sup>[69]</sup>

### *More Certain Paths to Specific Results*

Mr. Galeotti also stated that the CEP was simplified to allow companies to better anticipate outcomes when self-reporting. Under the updated CEP, the Criminal Division will publicly decline to prosecute a company for criminal conduct when all of the following four criteria are met:[\[70\]](#)

1. The company voluntarily self-disclosed the misconduct to the Criminal Division. These disclosures qualify so long as “the company had no preexisting obligation to disclose the misconduct to the Department of Justice,” which seems to allow for self-disclosures that were undertaken out of obligation to agencies *other* than DOJ.
2. The company fully cooperates with the Criminal Division’s investigation.
3. The company timely and appropriately remediated the conduct.
4. There are no aggravating circumstances (which involve “the nature and seriousness of the offense, egregiousness or pervasiveness of the misconduct within the company, severity of harm caused by the misconduct, or criminal adjudication or resolution within the last five years based on similar misconduct by the entity engaged in the current misconduct.”). This definition suggests that only criminal resolutions by the same corporation for “similar misconduct” will be considered an aggravating factor, rather than any prior misconduct or by an affiliated entity.[\[71\]](#) Where there are aggravating circumstances, prosecutors can still recommend declination after weighing the severity of the circumstances. In the MGI International, LLC matter resolved in 2025, for example, DOJ issued a declination letter despite the involvement of a member of senior management in the alleged misconduct, noting that none of the aggravating factors outweighed MGI’s cooperation and remediation.[\[72\]](#)

In instances of “near miss self-disclosures” or where there are aggravating circumstances, the guidance requires the Criminal Division to provide an NPA (absent egregious or multiple aggravating factors) for a term of less than three years and without a monitorship, and a 75% reduction off of the low end of the U.S. Sentencing Guidelines fine range.[\[73\]](#) In a June 2025 speech, Mr. Galeotti notably stated that to receive a penalty more severe than a declination for a voluntarily self-disclosing company, the circumstances would have to be “truly aggravating” and “sufficient to outweigh the fact that the company voluntarily came forward.”[\[74\]](#)

For resolutions in other cases involving voluntary disclosure, there is a presumption that any sentencing reduction will be taken from the low end of the Guidelines.

### ***Efficiency***

#### *Streamlined Investigations*

In his May 12, 2025 remarks, Mr. Galeotti stated that businesses have been deterred from utilizing benefits of self-reporting misconduct to governmental authorities by the possibility of “lengthy drawn-out investigations that are ultimately detrimental to companies[.]”[\[75\]](#) He argued that this deterrence of self-reporting diverts Department resources away from “tackling the most significant threats facing our country.”[\[76\]](#) The Enforcement Plan instructed the Criminal Division to take all reasonable steps to minimize the length and collateral impact of its investigations and to ensure that “bad actors” are quickly brought to justice.[\[77\]](#) While framed as a shift in approach,

prior Administrations have included similar language in guidance documents; any meaningful change will depend on Criminal Division supervisors driving more efficient investigations.

In a June 2025 speech, Mr. Galeotti notably maintained that the Criminal Division is committed to making quick charging decisions, and that companies can do their part to promote efficiency by working closely with Criminal Division teams to narrow disagreements and exhaust discussions before reaching out to DOJ leadership.[\[78\]](#)

### *Limited Use of Monitors*

In addition to taking reasonable steps to minimize length and impact of investigations, the Enforcement Plan instructed the Criminal Division to utilize independent compliance monitors only when necessary and that use of those monitors should be narrowly tailored.[\[79\]](#)

The Criminal Division also released a memorandum on May 12, 2025, entitled “Memorandum on Selection of Monitors in Criminal Division Matters,” which requires prosecutors to consider four factors when weighing the possibility of imposing a monitorship:

1. Risk of recurrence of criminal conduct that significantly impacts U.S. interests.
2. Availability and efficacy of other independent government oversight.
3. Efficacy of the compliance program and culture of compliance at the time of the resolution.
4. Maturity of the company’s controls and its ability to independently test and update its compliance program.[\[80\]](#)

In subsequent remarks in June 2025, Mr. Galeotti referred to monitors as a “temporary bridge and accountability measure,” emphasizing the Criminal Division’s express intent to reduce its use of monitorships where alternatives can achieve compliance more efficiently.[\[81\]](#)

Even if a monitor is appropriate, the May memorandum requires that prosecutors tailor the monitorship to be cost efficient and effective. The company’s counsel must present three to five monitor candidates for consideration, which is an increase from previous guidance.[\[82\]](#) After a monitor is approved, the Criminal Division must ensure the costs are proportionate to the severity of the underlying conduct, the company’s profits, and the company’s size and risk profile.[\[83\]](#) There will be a cap on hourly rates, and the monitor will be required to submit a budget for the entire monitorship at the time it submits its first work plan to the Criminal Division and company for review.[\[84\]](#) The monitor will also attend at least two additional meetings a year with the company and the government to ensure alignment.[\[85\]](#)

Consistent with the Enforcement Plan’s stated policy of imposing fewer monitors, DOJ’s Criminal Division has not imposed a monitorship in any criminal corporate resolution in 2025. Additionally, DOJ dismissed two pre-existing monitorships: Glencore International AG / Glencore Ltd. on March 19, 2025,[\[86\]](#) and NatWest Markets Plc on September 4, 2025.[\[87\]](#) U.S. Attorneys’ Offices, which are not held to Criminal Division policies, also did not impose monitorships in 2025, although one “independent consultant” arrangement imposed by the U.S. Attorney’s Office

for the District of New Hampshire imposes similar requirements to a more traditional monitorship, as discussed in detail below.

Criminal Division Monitoring

The closest term to a monitorship imposed in a resolution with a Criminal Division component in 2025 was an “independent compliance consultant” required by DOJ’s renegotiated resolution in *United States v. The Boeing Co.*<sup>[88]</sup> By way of background, Boeing negotiated a DPA with DOJ in 2021, stemming from Boeing’s alleged concealment of software failures from the FAA.<sup>[89]</sup> The DPA did not impose a monitor and had a term of three years, to end in January 2024.<sup>[90]</sup> Before the expiration of the DPA’s term, DOJ alleged that Boeing had breached the DPA.<sup>[91]</sup> In 2025, DOJ agreed with withdrawing the charge and the parties entered into a negotiated NPA that required Boeing to retain an “independent compliance consultant.”<sup>[92]</sup>

Upon analysis of the terms applicable to the consultancy, the “independent compliance consultant” is not a monitor by another name; the consultant’s selection will not follow the same process required for monitor selection, and the terms of engagement are more deferential to the company.<sup>[93]</sup> In particular, we analyze below the terms of Boeing’s compliance obligations against recently imposed Criminal Division monitorships (Glencore (2022), Raytheon (2024), and TD Bank (2024)).

<b>Term</b>	<b>“Independent Compliance Consultant” (Boeing)</b>	<b>“Compliance Monitor” (Glencore, Raytheon, TD Bank)</b>
Selection	Company selects a consultant, subject to DOJ approval	Company proposes three candidates for a monitor, DOJ can either select a monitor from those three candidates or reject all of them and require the company to propose additional candidates
Duration	Two years	Three years
Workplan	Company and consultant jointly prepare and submit a work plan to DOJ	Monitor prepares and submits a work plan to DOJ, and Company has the ability to comment on the workplan
Scope	Assist Company in assessing its program, including by observing Company’s self-testing protocols	Wide-ranging mandate to assess and monitor compliance with terms of the settlement and relevant laws, and evaluate effectiveness of compliance program; monitor typically conducts its own testing
Reports	Consultant, with Company’s input, submits reports to DOJ	Monitor drafts and submits the reports to the company and DOJ at the same time; monitor may, but is not required to, share drafts with the company

Access	The agreement does not address scope of access to company resources and information	Comprehensive access to information, including Company's facilities, policies and procedures, processes, internal systems, employees, and records; generally likely to be more disruptive to Company's day-to-day operations
Recommendations	Consultant makes recommendations, but Company retains ultimate decision making over implementing any particular recommendation (subject to providing a reason)	Company must adopt all recommendations within a specified timeframe, unless successfully contested with DOJ; DOJ retains ultimate decision authority on implementation

Consistent with historical practice, self-reporting was by far the most common method of continued monitoring imposed in connection with corporate resolutions in 2025. For example, DOJ imposed ongoing compliance reporting requirements on both Paxful Holdings, Inc. ("Paxful") and Comunicaciones Celulares S.A., d/b/a TIGO Guatemala ("TIGO") in their respective plea agreement<sup>[94]</sup> and DPA.<sup>[95]</sup> Both resolution agreements require each company to prepare and submit to DOJ annual reports (two for Paxful and three for TIGO) detailing compliance and remediation efforts.<sup>[96]</sup> These reporting obligations appear similar to those imposed in agreements under the prior Administration, if perhaps slightly less burdensome in some cases. For example, we noted that while two 2024 DPAs and plea agreements included "at least quarterly" meetings between the company and DOJ to discuss the company's compliance efforts on top of annual reports,<sup>[97]</sup> no such requirement was included in the Paxful or TIGO resolutions, or any other resolutions, in 2025. By way of background, many of the earliest agreements had an annual reporting requirement.

#### U.S. Attorney's Office Monitoring Practices

As for U.S. Attorney's Office resolutions, we identified no resolutions imposing a "monitor," but at least two resolutions with U.S. Attorney's Offices that imposed independent consultants: *United States v. Aux Cayes Fintech Co. Ltd. d/b/a "OKEx," d/b/a "OKX"*<sup>[98]</sup> and *United States v. Old Dutch Mustard Co., Inc. d/b/a Pilgrim Foods, Inc.*<sup>[99]</sup> The "external compliance consultant" in the OKX agreement imposed by the U.S. Attorney for the Southern District of New York is similar in construction to that described in Boeing's NPA, but it is different in a few respects.<sup>[100]</sup> Like Boeing, OKX is only required to retain a compliance consultant for a term of two years.<sup>[101]</sup> Further, the plea agreement provides that the consultant will prepare the work plan for two annual assessments "with cooperation from OKX," suggesting OKX may have greater ability to shape the work plan than companies with traditional monitors.<sup>[102]</sup> On the other hand, OKX's plea agreement devotes more discussion to the scope of the consultant's work than does the Boeing NPA, including specific aspects of the OKX's compliance program that must be annually tested for reasonableness of design and implementation.<sup>[103]</sup>

The Old Dutch independent consultant imposed by the U.S. Attorney for the District of New Hampshire even more closely resembles a traditional monitorship. In particular, the selection process detailed by the Old Dutch DPA resembles the traditional selection process of monitors, with the company nominating three candidates from which the government can choose or, in the event there is no consensus on a candidate, reject and require new nominees.<sup>[104]</sup> Further, Old

Dutch's consultant, who will serve a five-year term, is entitled to "full access to all records, personnel, and other information," and provides binding recommendations that Old Dutch must implement.<sup>[105]</sup>

There are several possible explanations as to why these compliance consultants do not more closely mirror the one imposed by Boeing's NPA. First, these resolutions did not include a Criminal Division component. U.S. Attorney's Offices generally have more flexibility to impose terms of resolutions than Main Justice components, because Criminal Division policies do not typically bind U.S. Attorney's Offices. Second, the underlying facts of each resolution could reasonably warrant different treatment than Boeing. Specifically, each agreement provides specific goals for each consultant rather than broad compliance monitoring: OKX's external consultant is geared toward ensuring U.S. users cannot access the cryptocurrency exchange,<sup>[106]</sup> and Old Dutch's independent consultant must ensure that the company is implementing an Environmental Compliance Program to remediate and prevent Clean Water Act violations.<sup>[107]</sup> Third, with respect to Old Dutch, it is possible that EPA's involvement in the resolution resulted in a different formulation that is more specific to environmental resolutions. All said, we would expect that resolutions that do not include a Main Justice component to be more variable.

## **Other DOJ Enforcement Developments in 2025**

### *Criminal Division Crediting Policy*

As we previously reported in a [client alert on June 17, 2025](#), on June 5, 2025, Mr. Galeotti released guidance to Criminal Division prosecutors focusing on victim compensation when deciding whether and how to credit penalties in multi-agency and multi-jurisdiction resolutions.<sup>[108]</sup> The memorandum, titled *Guidance on Coordinating Corporate Resolution Penalties in Parallel Criminal, Civil, Regulatory, and Administrative Proceedings*, asserted that the goal of the Criminal Division was to "vindicate victims' rights when resolving such cases" and that "prosecutors must seek to maximize recoveries for and assistance to victims of crime."<sup>[109]</sup>

As an initial matter, the memorandum notes that "Criminal Division prosecutors will not credit payments to other authorities when a company does not meaningfully attempt to coordinate resolutions."<sup>[110]</sup> When such an effort is made, however, in making crediting decisions the memorandum instructs prosecutors to: (1) "not credit penalties imposed by other domestic authorities by forgoing either (a) restitution or (b) forfeiture that could be used for remission to compensate those victims, unless other authorities have an effective mechanism to compensate victims of the underlying crime"; and (2) "not credit penalties imposed by other domestic authorities from criminal penalties that would otherwise be used for general victim support through mechanisms such as the CVF, unless those other authorities use their penalties to similarly support victims."<sup>[111]</sup>

The calculus for determining whether to credit payments to foreign authorities is somewhat complex. In particular, the memorandum asserts that in situation where "the only payments available for crediting are criminal penalties that would otherwise be used to provide general victim assistance through deposit in the CVF," then "prosecutors must seek to balance" three key considerations: (1) "the interest in providing general assistance to victims of crime through such

deposits”; (2) “the interests of jurisdictions where the misconduct occurred, where the effects of the misconduct are most acutely felt, or who have other equities in the investigation”; and (3) “the advancement of other critical Department and Division goals.”[\[112\]](#) The memorandum further recommends that prosecutors also consider a number of additional factors in balancing those interests.[\[113\]](#)

As we reported [last June](#), it is unclear how significantly this guidance will impact future corporate resolutions, given that most past corporate resolutions have not involved identifiable victims, but also in light of the Criminal Division’s stated focus on prosecuting cases with individual victim losses, as described above. The memorandum at least implicitly suggests that the Department may be less inclined to credit payments to other agencies or regulators in individual victim cases, resulting in greater overall penalties and reduced flexibility in negotiating resolution payment offsets.[\[114\]](#)

### *Antitrust Division Signals Commitment to Robust Enforcement*

In remarks delivered to the Global Competition Review on March 11, 2025, the then-Director Emma Burnham of the Antitrust Division’s Criminal Enforcement Section confirmed that the Antitrust Division’s robust criminal enforcement would continue across a “wide array of sectors and all levels of the economy” despite transitions at the Division.[\[115\]](#) Emphasizing that the Antitrust Division was continuing to deploy resources aggressively and that cartel enforcement would be no exception, she noted that the Division had charged 15 defendants since the start of the calendar year (one company, 14 individuals) and that 24 guilty pleas had been entered (two companies, 22 individuals).[\[116\]](#) At the time of her remarks, recent guilty pleas included defendants charged with monopolization crimes, conspiracies targeting government procurement, bid rigging and fraud targeting sports equipment for schools, and bid rigging and collusion in construction and infrastructure industries.[\[117\]](#)

Ms. Burnham noted that the Antitrust Division remains “deeply committed” to individual accountability, and that its charges will “continue to expose individuals to real prison sentences.”[\[118\]](#) She also explained that, where warranted, the Antitrust Division will continue to follow its recent trend of charging using Section 2 of the Sherman Act for monopolization crimes.[\[119\]](#)

Ms. Burnham further noted that the Antitrust Division had more than twice as many open grand jury investigations as it had a decade prior.[\[120\]](#) In terms of concluded enforcement actions in 2025, the Antitrust Division was involved in three corporate resolutions (all guilty pleas), which is generally consistent with its corporate enforcement track record over the past several years.[\[121\]](#)

### *Antitrust Division Announces Whistleblower Rewards Program*

As we discussed in more detail in a [client alert on July 31, 2025](#), the Antitrust Division announced a new program to incentivize reporting of antitrust violations.[\[122\]](#) In partnership with the United States Postal Service, the program will allow individuals who provide information about price fixing or other antitrust violations to recover between 15% and 30% of any criminal fines secured by the Division.[\[123\]](#)

To be eligible for a reward, the anticompetitive conduct reported must “affect[] the Postal Service, its revenues, or property,” which requires there be an “identifiable”—but not necessarily a “material” or “substantial[ly] detriment[al]”—impact on the Postal Service.<sup>[124]</sup> The total fines recovered must also be over \$1,000,000, and the whistleblower must provide “original” information that is derived from their independent knowledge and not already known to the Antitrust Division, USPIA, or USPS OIG from other sources.<sup>[125]</sup> Individuals who benefited from or participated in the activity are eligible to recover the reward, provided they did not “coerce[] another party to participate in the illegal activity” and were not “clearly the leader or originator of that activity.”<sup>[126]</sup>

The program aims to “create a new pipeline of leads from individuals with firsthand knowledge of criminal antitrust and related offenses,”<sup>[127]</sup> and it has similarities with whistleblower systems available for the SEC, CFTC, and FinCEN, which have proven successful in increasing whistleblower activity.<sup>[128]</sup> The Antitrust Division announced its first reward on January 29, 2026, a \$1 million reward for a whistleblower who referred an alleged bid-rigging scheme in the used vehicle market. <sup>[129]</sup>

## **International Developments**

In 2025, the importance of negotiated corporate outcomes was clear across several key non-U.S. jurisdictions. Such outcomes were achieved through a variety of legal vehicles, including DPAs in Singapore, statutory settlement vehicles such as France’s *convention judiciaire d’intérêt public* (“CJIP”), and prosecutor-imposed penalty orders in the Netherlands. At the same time, several jurisdictions made meaningful efforts in 2025 to refine (and, in some cases, expand) the frameworks that govern corporate criminal exposure, self-reporting and cooperation expectations, and the availability or attractiveness of resolutions for companies. Below we discuss several example jurisdictions that exemplified these trends.

### ***United Kingdom***

In the United Kingdom, 2025 was notable less for the volume of newly announced corporate DPAs than for guidance and statutory developments that are likely to influence charging decisions and compliance expectations applied by prosecutors when assessing cooperation and remediation.

In April 2025, the Serious Fraud Office (“SFO”) issued new Corporate Co-Operation Guidance that is expressly designed to incentivize self-reporting and cooperation.<sup>[129a]</sup> Among other things, the guidance states that a company that promptly self-reports and cooperates will, in the ordinary course, be invited to enter into DPA negotiations absent exceptional circumstances, and it also outlines expected cooperation behaviors and indicative engagement timelines (including early responsiveness to incoming self-reports).<sup>[130]</sup> For instance, the guidance commits the SFO to responding to self-reports within 48 hours, deciding whether to open an investigation within six months, and endeavoring to conclude DPA negotiations within a further six months.<sup>[131]</sup>

In August 2025, the SFO and Crown Prosecution Service (“CPS”) published updated joint guidance on corporate prosecutions, replacing the 2021 guidance.<sup>[132]</sup> The update signals the

CPS's intent to sit alongside the SFO as a corporate crime enforcer and provides detailed guidance on charging strategy and other issues relevant to corporate prosecutions. UK corporate criminal exposure should therefore be assessed with an eye toward both agencies' enforcement footprints, rather than treating the SFO as the sole UK gatekeeper for complex corporate criminal matters.

On September 1, 2025, a new "failure to prevent fraud" offence came into force.<sup>[133]</sup> As a result, large organizations are now strictly liable where an associated person commits a specified fraud offence intended to benefit the organization, unless reasonable fraud prevention procedures were in place. Notably, the offence has been added to Schedule 17 of the Crime and Courts Act 2013, meaning that DPAs are available as a resolution mechanism for such offenses.

Finally, in November 2025, the SFO issued further guidance regarding how it evaluates corporate compliance programs, which provides a clearer view of the factors the SFO will consider when assessing the effectiveness of controls, remediation efforts, and (by extension) the credibility of future-looking compliance undertakings commonly seen in negotiated outcomes.<sup>[134]</sup>

### **Netherlands**

The Dutch Public Prosecution Service (*Openbaar Ministerie*, "OM") continued to use prosecutor-driven mechanisms—particularly penalty orders (*strafbeschikking*)—to resolve matters without full trials in 2025. Specifically, OM's enforcement focus was on complex tax-related misconduct such as dividend tax evasion. For example, in May 2025, OM imposed a €14 million penalty order on ABN AMRO in connection with alleged complicity in dividend tax evasion by another bank through incorrect tax filings.<sup>[135]</sup> In November 2025, the OM imposed penalty orders totaling €101 million on two Morgan Stanley entities (in London and Amsterdam) for alleged dividend tax evasion, with the OM describing the sanction as approaching the statutory maximum and separate from amounts paid to the Dutch tax authorities in late 2024.<sup>[136]</sup> These resolutions emphasize that Dutch prosecutors remain active with regards to dividend-tax matters and that negotiated, non-trial outcomes may still carry substantial financial consequences in this jurisdiction.

### **Brazil**

Brazil remained a significant jurisdiction for negotiated resolutions in 2025, with federal leniency agreements continuing to serve as a primary vehicle for resolving corporate exposure. Public announcements by the Controladoria-Geral da União ("CGU") and Advocacia-Geral da União ("AGU") reflect multiple sizeable leniency agreements in 2025, including agreements with Qualicorp (exceeding R\$ 44 million in fines and restitution), Trafigura (exceeding R\$ 435 million), and Minerva (exceeding R\$ 22 million) in the first half of 2025.<sup>[137]</sup> In July 2025, CGU and AGU announced a multi-entity leniency agreement involving Seatrium Limited, Jurong Shipyard Pte. Ltd., and Estaleiro Jurong Aracruz, described as exceeding R\$ 728 million and tied to conduct occurring between 2007 and 2014.<sup>[138]</sup>

In December 2025, CGU and AGU announced a new ordinance that reorganizes the rules for negotiation, signing, and monitoring of leniency agreements.<sup>[139]</sup> The key innovation is the introduction of a mechanism that allows a company to signal its intent to cooperate and reserve

leniency benefits while completing internal investigations, with protections if no agreement is finalized. The ordinance also establishes objective methodologies for calculating financial obligations, including assessment of unlawful gains, loss of those amounts, and structured payment options based on ability to pay.<sup>[140]</sup> The ordinance does not affect leniency agreements negotiated in the criminal context by the Ministério Público Federal, however.

### **Singapore**

2025 saw the first DPA entered by Singaporean law enforcement. On July 30, 2025, Singapore’s Public Prosecutor entered into a DPA with Seatrrium to resolve alleged corruption offenses arising from conduct in Brazil (see also discussion of Brazil enforcement above).<sup>[141]</sup> Singapore’s Attorney-General’s Chambers stated that the DPA includes a \$110 million financial penalty and compliance program improvement obligations.<sup>[142]</sup> The DPA is subject to High Court approval before it comes into force.<sup>[143]</sup>

### **Cross-Border Cooperation and Coordinated Enforcement**

Cross-border cooperation continued to be a defining feature of corporate enforcement in 2025. For example, in March 2025, the UK SFO, France’s Parquet national financier (“PNF”), and Switzerland’s Office of the Attorney General (“OAG”) announced the creation of an International Anti-Corruption Prosecutorial Taskforce aimed at strengthening cooperation through increased information-sharing, case collaboration, and best-practice exchange.<sup>[144]</sup> For multinational companies, this development underscores the need to manage investigation strategy, privilege, data, and settlement sequencing with the understanding that European authorities may pursue more structured and closely coordinated cooperation, particularly in international bribery and corruption cases.

### **TABLE: 2025 U.S. RESOLUTIONS**

The chart below summarizes the U.S. agreements concluded from January through December 2025. The complete text of each publicly available agreement is hyperlinked in the chart. It is notable that there are very few Fortune 1,000 companies charged in 2025.

The figures for “Monetary Recoveries” may include amounts not strictly limited to an NPA, DPA, or guilty plea, such as fines, penalties, forfeitures, and restitution requirements imposed by other regulators and enforcement agencies, as well as amounts from related settlement agreements, all of which may be part of a global resolution in connection with the NPA, DPA, or plea agreement paid by the named entity and/or subsidiaries. The term “Monitoring & Reporting” includes traditional compliance monitors, self-reporting arrangements, and other monitorship arrangements found in resolution agreements, but does not include probation.

<b>U.S. DPAs, NPAs, Declinations, and Plea Agreements January-December 2025</b>						
<b>Company</b>	<b>Agency</b>	<b>Alleged Violation</b>	<b>Type</b>	<b>Monetary Recoveries</b>	<b>Monitoring &amp; Reporting</b>	<b>Term of Agreement (Months)<sup>i</sup></b>

Abda Moving, LLC	D.N.J.	Conspiracy to commit wire fraud	Guilty Plea	\$1,908,486	None	60
Able Groupe, Inc.	DOJ Civil; DOJ CPB; N.D. Tex.	FDCA	Guilty Plea	\$304,640	None	36
Advanced Inventory Management, Inc.	N.D. Ill.	Misbranding of a medical device with intent to defraud	DPA	\$1,000,000	Self-reporting	36
Aesculap Implant Systems, LLC	E.D. Pa.	FDCA	NPA	\$38,500,000	None	0
Aghorn Operating Inc.	DOJ ENRD	Clean Air Act; OSHA	Guilty Plea	\$1,000,000	2-year self-reporting	24
Allwaste Onsite ("Onsite Environmental")	DOJ ENRD; M.D. Tenn.	Clean Water Act	Guilty Plea	\$948,592	Compliance with Facility Operating Plan	36
American Express Company	E.D.N.Y.	Wire fraud; Conspiracy to commit wire fraud	NPA	\$199,096,000	None	36
American Premium Water Corp.	N.D. Ohio	Conspiracy to Commit Securities Fraud	DPA	\$0	None	24
Anderson Pest Control, Inc.	S.D. Fla.	Federal Insecticide, Fungicide, and Rodenticide Act	Guilty Plea	\$345,250	None	60
Applied Partners, LLC	DOJ ENRD	Clean Air Act	Guilty Plea	\$500,000	None	24
Apprio, Inc.	DOJ Criminal Division; DOJ Fraud; D. Md.	Conspiracy to commit bribery of a public official; Securities fraud	DPA	\$500,000	Annual self-reporting	36
ASL Singapore Shipping LTD and Jia Feng Shipping LTD	E.D. La.	Act to Prevent Pollution from Ships violation; Obstruction of Justice	Guilty Plea	\$1,850,000	None	48
Aux Cayes Fintech Co. Ltd. ("OKX")	S.D.N.Y.	Unlicensed Money Transmitting Business	Guilty Plea	\$504,811,203	Independent compliance monitor	24

Barlow Herbal Specialties LLC	D. Utah	Lacey Act	DPA	\$58,064	Third-party auditor	6
BJS & T Enterprises, Inc.	S.D. Cal.	Hiring individuals unauthorized to work in the U.S.	Guilty Plea	\$251,000	None	24
The Boeing Company	N.D. Tex.; DOJ Fraud	Conspiracy to Defraud the United States	NPA	\$688,100,000	Independent compliance consultant	24
BofA Securities, Inc.	DOJ Criminal Division; DOJ Fraud	Market manipulation schemes	Declination with Disgorgement	\$5,570,142	None	0
Brew City Environmental & Restoration Services, LLC	E.D. Wis.	Clean Air Act	Guilty Plea	Pending	Pending	Pending
Brink's Global Services USA, Inc.	S.D. Cal.	Bank Secrecy Act	NPA	\$42,000,000	None	24
Burns Hunting Club LLC	S.D. Ill.	Lacey Act	Guilty Plea	\$35,500	None	24
Cadence Design Systems, Inc.	DOJ National Security; N.D. Cal.	Violation of export control laws	Guilty Plea	\$117,793,825	Annual self-reporting	36
Campbell Sales Group, Inc.	E.D.N.C.	Wire fraud (in connection with PPP loans)	DPA	\$1,499,165	None	36
Chamness Dirt Works Inc.	D. Or.	Clean Air Act violation	Guilty Plea	\$0	None	36
Clark & Garner, LLC	DOJ Antitrust	Sherman Act violation	Guilty Plea	\$80,000	None	0
CLS Global FZE LLC	D. Mass.	Wire fraud; Conspiracy to commit market manipulation; conspiracy to commit wire fraud	Guilty Plea	\$428,060	None	36

Comunicaciones Celulares S.A. ("TIGO Guatemala")	S.D. Fla.; DOJ Fraud	FCPA	DPA	\$118,198,343	Annual self-reporting	24
Credit Suisse Services AG	E.D. Va.; DOJ Tax	Tax law	NPA	\$138,700,000	None	36
Credit Suisse Services AG	E.D. Va.; DOJ Tax	Tax law	Guilty Plea	\$371,908,509	None	36
Dune Medical Supply, LLC	M.D.N.C.	Healthcare fraud	Guilty Plea	\$6,875,756	None	0
E&A Auto Cores, LLC	E.D. Mo.	Transportation of Stolen Goods	Guilty Plea	\$140,000	None	12
Eagle Ship Management, LLC	E.D. La.; DOJ ENRD	Act to Prevent Pollution from Ships violation	Guilty Plea	\$1,750,000	Court-appointed monitor	48
Elecsurf Trading Ltd.	N.D. Ill.	Copyright Infringement	Guilty Plea	\$1,700,000	None	0
Eleview International Inc.	E.D. Va.	Export Control Reform Act violation	Guilty Plea	\$125,000	None	36
Erie Coke Corporation	W.D. Pa.	Clean Air Act violations; Conspiracy to defraud the United States	Guilty Plea	\$700,000	None	0
Eurobulk Ltd.	S.D. Tex.; DOJ ENRD	Act to Prevent Pollution from Ships violation; Falsification of Records	Guilty Plea	\$1,500,000	Third-Party External Auditor and Court-Appointed Monitor	48
Exploring Together Therapy LLC	D.P.R.	Stealing federal funds	Guilty Plea	\$190,820	None	0
Fabcon Precast LLC	DOJ ENRD	OSHA violation	Guilty Plea	\$500,000	None	24
Gadsden, Gaillard and West LLC	S.D. Va.	Clean Water Act	Guilty Plea	Pending	Pending	Pending

Gotbit Consulting LLC	D. Miss	Wire fraud; Securities fraud	Guilty Plea	\$22,893,675	None	60
Hao Global LLC	S.D. Tex.	Smuggling; Unlawful Export Activities	Guilty Plea	Pending	Pending	Pending
Hino Motors, Ltd.	DOJ ENRD	Clean Air Act; Conspiracy to commit wire fraud; Conspiracy to smuggle goods; Conspiracy to defraud the United States	Guilty Plea	\$1,608,760,000	Self-Reporting; Independent Compliance Auditor	60
Horseshoe Grove LLC	D. Or.	Clean Air Act	Guilty Plea	\$0	None	36
Hytera Communications Corporation, Ltd.	N.D. Ill.	Conspiracy to steal trade secrets	Guilty Plea	Pending	Pending	Pending
J.H. Baxter & Co., Inc.	DOJ ENRD	Clean Air Act; Resource Conservation and Recovery Act	Guilty Plea	\$1,000,000	None	60
KBWB Operations LLC	DOJ CPB; W.D. Wis.	Healthcare Fraud; Tax Conspiracy	Guilty Plea	\$154,656,458	None	60
Kimberly-Clark Corporation	DOJ Fraud; DOJ CPB	Violation of FDCA	DPA	\$40,400,000	None	12
Kodiak Roustabout, Inc.	DOJ ENRD	Safe Drinking Water Act	Guilty Plea	\$400,000	Self-reporting subject to third-party testing requirements	12
Liberty Mutual Insurance Company	D. Mass; DOJ Fraud	FCPA	Declination with Disgorgement	\$4,699,088	None	0
Life Touch LLC	E.D.N.C.	Medicaid fraud	Guilty Plea	Pending	Pending	Pending
Mallad Trading, LLC	D.N.J.	Conspiracy to commit wire fraud	Guilty Plea	\$314,761	None	60
Mayhem Services, LLC	DOJ ENRD	Lacey Act	Guilty Plea	\$75,000	None	36

MGI International, LLC, Global Plastics LLC, Marco Polo International LLC	DOJ Fraud; D.N.H.	Trade fraud	Declination with Disgorgement	\$10,801,203	None	0
Millenia Productions, LLC	D. Kan.	Illegal storage of hazardous waste	Guilty Plea	\$285,000	Self-reporting; Independent Compliance Consultant and Auditor	36
Mudafort Xtreme Sports and Motorsports, Inc.	D.P.R.	Failure to Maintain Records as an Federal Firearms Dealer	Guilty Plea	\$6,000	None	12
Murex Management, Inc.	E.D. La.	Fraudulent Transactions; Aiding & Abetting	Guilty Plea	\$15,745,846	None	0
OHM Pharmacy Services, Inc.	D. Mass.	Healthcare fraud	Guilty Plea	\$1,100,000	None	12
Old Dutch Mustard Co., Inc.	D.N.H.; DOJ ENRD	Clean Water Act	Guilty Plea	\$1,500,000	Independent Compliance Consultant	60
PT Services, Inc.	W.D. Tenn.	Clean Air Act	Guilty Plea	\$150,000	None	36
Paxful Holdings, Inc.	E.D. Cal.; DOJ Criminal Division MNF	Bank Secrecy Act; Travel Act	Guilty Plea	Pending	Self-reporting	24
Peken Global Limited (KuCoin)	S.D.N.Y.	Bank Secrecy Act; Unlicensed Money Transmitting Business	Guilty Plea	\$297,414,000	None	0
PM Consulting Group LLC (Vistant)	D. Md.	Conspiracy to commit bribery of a public official; Securities fraud	DPA	\$100,000	Annual self-reporting	36
Prospect Health Solutions, Inc.	M.D.N.C.	Healthcare fraud	Guilty Plea	\$9,503,246	None	0

Quadrant Magnetics LLC	W.D. Ky.; DOJ National Security Division	Arms Export Control Act; International Traffic In Arms Regulations	Guilty Plea	\$2,332,515	None	24
Rossey Sport Bar Panoramico, LLC	D.P.R.	Bank Fraud	Guilty Plea	\$71,464	None	60
Royal Sovereign International, Inc.	D.N.J.; DOJ CPB	Failure to report consumer product safety defect	Guilty Plea	\$495,786	None	0
Servismed, LLC	N.D. Fla.	Conspiracy to violate FIFRA	Guilty Plea	\$53,330	None	0
ShotStop Ballistics, LLC	N.D. Ohio	Conspiracy to smuggle goods into the U.S.; Conspiracy to Traffic in Counterfeit Goods; Conspiracy to Commit Mail and Wire Fraud	Guilty Plea	\$5,883,896	None	0
Trans World Services, Inc. ("SSAS, Inc.," "Trans World Services of Texas, Inc.," "Genuine Parts Planet")	S.D. Tex.	Trafficking in Counterfeit Goods or Services	Guilty Plea	\$102,250	None	12
TranscendBS, LLC	DOJ Antitrust	Bid rigging	Guilty Plea	\$141,511	None	24
Troy Health, Inc.	W.D.N.C.; DOJ Fraud	Health Care fraud; Identity theft scheme	NPA	\$1,430,008	Self-reporting	18
Universities Space Research Association (USRA)	DOJ NSD; N.D. Cal.	Violation of export control laws	Declination	\$0	None	0

V. Ships Norway A.S.	DOJ ENRD; E.D. Tex.	Act to Prevent Pollution from Ships	Guilty Plea	\$2,000,000	Third-party auditor	48
Vallmar Studios, LLC	N.D. Ohio	Conspiracy to smuggle goods into the U.S.; Conspiracy to traffic counterfeit goods; Conspiracy to commit mail fraud; Conspiracy to commit wire fraud	Guilty Plea	\$0	None	0
Virginia Pump and Motor Company, Inc.	E.D. Va.	Clean Water Act	Guilty Plea	\$376,000	None	36

## **APPENDIX: 2025 Resolutions**

This portion of the alert summarizes publicly available corporate resolutions from January 1, 2025 through December 31, 2025. The appendix provides key facts and figures regarding all 74 resolutions,[\[145\]](#) along with links to the resolution documents themselves (where available).

### **Abda Moving, LLC & Mallad Trading, LLC (Guilty Pleas)**

On May 21, 2025, Abda Moving, LLC, d/b/a 11Even Movers & Storage (“11Even Movers”), and Mallad Trading, LLC (“Mallad Trading”) entered into plea agreements with the U.S. Attorney’s Office for the District of New Jersey to resolve charges of conspiracy to commit wire fraud.[\[146a\]](#) According to the plea agreements, these moving companies defrauded customers seeking moving services by securing contracts for moving services via a broker and then demanding significantly higher fees after taking possession of the customers’ goods.[\[147\]](#) The companies allegedly refused to release customers’ goods until they were paid the inflated prices.[\[148\]](#) In October 2025, 11Even Movers and Mallad Trading were each sentenced to five years of probation. The companies were ordered to pay full restitution to victims of the scheme, with 11Even Movers ordered to pay restitution in the amount of \$1,908,485.67 and Mallad Trading ordered to pay restitution in the amount of \$314,761.06.[\[149\]](#)

### **Able Groupe, Inc. (Guilty Plea)**

On August 15, 2025, Able Groupe, Inc. (“Able”), a Nevada corporation that sold European infant formula to U.S. consumers through LittleBundle.com and related brands, pleaded guilty in the Northern District of Texas to two felony counts arising from its importation and distribution of non-compliant infant formula between 2019 and 2021. The plea agreement states that Able admitted to violating 21 U.S.C. § 331(ee) and 21 U.S.C. § 333(a)(2) of the Federal Food, Drug and Cosmetic Act (“FDCA”) by importing food in violation of the FDA’s Prior Notice requirements with the intent to defraud or mislead, and to smuggling in violation of 18 U.S.C. § 545, by smuggling goods into the United States.[\[150\]](#) DOJ announced that several of Able’s infant formulas failed to meet FDA nutrient or labeling requirements, and that Able attempted to avoid detection by using false commodity descriptions.[\[151\]](#) After an FDA inspection in 2021, Able ceased operations and recalled approximately 76,000 units of formula.[\[152\]](#)

Under the plea agreement, the parties agreed to a binding sentence of three years of corporate probation and forfeiture of \$304,640.[\[153\]](#) DOJ stated that this is the first time a defendant has pleaded guilty to a felony violation for failing to provide such notices to the FDA.[\[154\]](#)

### **Advanced Inventory Management, Inc. (DPA)**

On February 14, 2025, Advanced Inventory Management, Inc. (“AIM”), an Illinois-based medical device distributor, entered into a three-year DPA with the U.S. Attorney’s Office for the Northern District of Illinois to resolve a one-count criminal Information charging misbranding of a medical device with intent to defraud in violation of the FDCA, 21 U.S.C. §§ 331(k) and 333(a)(2).[\[155\]](#) According to the Statement of Facts, from 2016 to 2023 AIM purchased medical devices abroad at reduced prices, removed labeling indicating that the products were not authorized for resale outside designated foreign markets, and submitted false statements of intended use to customs authorities to conceal that the products would be resold domestically.[\[156\]](#) The company’s conduct rendered the products misbranded under the FDCA.[\[157\]](#) DOJ stated that AIM resold the imported devices in the U.S. at substantial markups, generating approximately \$500,000 in profit margins of 35% to 50%.[\[158\]](#)

Under the DPA, AIM agreed to pay a \$1,000,000 criminal penalty.[\[159\]](#) Additional obligations include maintaining and enhancing compliance measures and reporting to the U.S. Attorney’s Office annually on remediation and compliance.[\[160\]](#)

### **Aesculap Implant Systems (NPA)**

On November 19, 2025, DOJ announced that Aesculap Implant Systems, LLC (“Aesculap”), a medical device company, had entered into a non-prosecution agreement with the U.S. Attorney’s Office for the Eastern District of Pennsylvania to resolve a criminal investigation involving alleged violations of the False Claims Act.[\[161\]](#) While the agreement is not available publicly, according to a DOJ press release, the agreement resolved allegations that an Aesculap employee forged documents to suggest that two medical devices were cleared by the FDA to be sold in the United States when they were not, causing the devices to be sold in violation of the FDCA.[\[162\]](#) DOJ’s Enforcement and Affirmative Litigation Branch and the FDA’s Office of Criminal Investigations

also participated in the criminal investigation. Additionally, Aesculap entered into a parallel civil settlement of \$38.5 million to resolve claims under the False Claims Act.[\[163\]](#)

### **Aghorn Operating Inc. & Kodiak Roustabout, Inc. (Guilty Pleas)**

On April 9, 2025, Aghorn Operating Inc. (“Aghorn”), a Texas-based oilfield company, its vice president, and a support services firm, Kodiak Roustabout, Inc., entered into plea agreements with DOJ’s Environment & Natural Resources Division Environmental Crimes Section.[\[164\]](#) The plea agreements involved criminal violations arising from the 2019 deaths of an employee and his spouse due to exposure to hydrogen sulfide gas at an Aghorn facility.[\[165\]](#) The government alleged that Aghorn willfully violated Occupational Safety and Health Administration (“OSHA”) under 29 U.S.C. § 666(e), and negligently released hydrogen sulfide gas in violation of the Clean Air Act (“CAA”), 42 U.S.C. § 7413(c)(4).[\[166\]](#) Aghorn pleaded guilty to a CAA negligent endangerment charge and an OSHA willful violation charge.[\[167\]](#) Aghorn’s vice president pleaded guilty to one count of negligent endangerment under the CAA, and Kodiak pleaded guilty to falsifying well-integrity test records which are required under the Safe Drinking Water Act, in violation of 18 U.S.C. § 1001.[\[168\]](#) The Environmental Protection Agency’s Criminal Investigation Division also investigated this case.[\[169\]](#)

Pursuant to the plea agreement, Aghorn was sentenced to pay a \$1 million criminal fine and implement safety and compliance measures during a two-year probationary period.[\[170\]](#) Kodiak agreed to pay a \$400,000 fine without probation, and Aghorn’s vice president was sentenced to five months in prison.[\[171\]](#)

### **Allwaste Onsite d.b.a. Onsite Environmental (Guilty Plea)**

On August 5, 2025, Allwaste Onsite LLC, doing business as Onsite Environmental (“Onsite”), entered into a plea agreement with the U.S. Attorney’s Office for the Middle District of Tennessee and with DOJ’s Environmental and Natural Resources Division’s Environmental Crimes Section for violating the Clean Water Act (“CWA”).[\[172\]](#) Onsite operated a waste treatment facility in Nashville, Tennessee that treated aqueous non-hazardous liquid waste before discharging it into the sewer system.[\[173\]](#) The company had a pretreatment permit issued under a CWA program requiring it to remove pollutants from the wastewater prior to discharging it into the sewer.[\[174\]](#) However, Onsite employees allegedly violated this pretreatment permit by knowingly discharging untreated or partially untreated wastewater into the sewer.[\[175\]](#)

Pursuant to the plea agreement, Onsite will pay a fine of \$512,000 and serve a three-year term of probation requiring the company to properly treat industrial waste according to an operating plan.[\[176\]](#)

### **American Express Company (NPA)**

On January 16, 2025, American Express Company (“AMEX”), entered into a three-year NPA with the U.S. Attorney’s Office for the Eastern District of New York.[\[177\]](#) The agreement resolved allegations that, from approximately April 2018 through November 2021, AMEX engaged in fraudulent sales and marketing practices related to two wire products, Payroll Rewards and Premium Wire, by providing inaccurate tax advice to customers and potential

customers.[\[178\]](#) The government alleged that AMEX marketed these products as a means to generate tax savings, advising customers that fees were fully deductible and that Membership Rewards points were tax-free, despite these claims being based on incorrect tax advice. The products were primarily marketed to small and mid-size businesses, and AMEX was accused of failing to consult tax professionals to verify the advice.[\[179\]](#)

In connection with the NPA, AMEX agreed to pay a criminal fine of \$77,696,000 and forfeit \$60,700,000, representing net revenue from the products.[\[180\]](#) The government cited AMEX's substantial remedial measures, including terminating numerous employees, discontinuing the products, enhancing compliance processes, and improving internal audit and product approval procedures, along with the company's lack of prior criminal history, as factors supporting the resolution.[\[181\]](#) Separately, AMEX agreed to pay a \$60,700,000 civil penalty to resolve related claims with the Fraud Section of DOJ's Civil Division.[\[182\]](#) Each of the Eastern District of New York and the Civil Division credited \$30,350,000 in payments toward each-others' agreements with AMEX.[\[183\]](#)

### **American Premium Water Corporation (DPA)**

On May 13, 2025, American Premium Water Corporation, trading under the name HIPH ("HIPH"), entered into a two-year DPA with the U.S. Attorney's Office for the Northern District of Ohio.[\[184\]](#) HIPH was charged with a single-count indictment charging conspiracy to commit securities fraud, in violation of 18 U.S.C. § 371.[\[185\]](#) The indictment alleged misconduct by former HIPH officers and agents between at least October 2013 and October 2019.[\[186\]](#) According to the DPA, former HIPH executives conspired to manipulate HIPH's stock through fraudulent promotional activity, undisclosed payments to stock promoters, matched trading, and other deceptive practices in violation of federal securities laws.[\[187\]](#)

The DPA imposed no monetary penalty but required cooperation with ongoing investigations, implementation of a corporate compliance and ethics program, advance notice to the USAO of any reverse merger or reverse stock split, and a prohibition on the use of any foreign transfer agent during the DPA term.[\[188\]](#) Under the DPA, prosecution is deferred for a period of 24 months, subject to a potential extension of up to twelve months.[\[189\]](#)

### **Anderson Pest Control, Inc. (Guilty Plea)**

On December 4, 2025, Anderson Pest Control, Inc. ("APC") and Chris Anderson entered into a plea agreement with the U.S. Attorney's Office for the Southern District of Florida for violating the Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA").[\[190\]](#) According to the joint factual statement, in conducting a fumigation of a furniture warehouse, APC used Zythor, a registered and restricted use pesticide, in a manner inconsistent with labeling, resulting in the deaths of two employees during a leak.[\[191\]](#)

As part of the agreement, APC will be placed on probation for five years and will establish, implement, and enforce an Environmental Compliance Plan if APC continues to handle pesticides covered by FIFRA.[\[192\]](#) APC is required by the agreement to not engage in fumigations until its Florida Certified Operator in Charge Certificate JF835 is reinstated and a Florida administrative

fine of \$345,250 is paid.[\[193\]](#) APC and Cris Anderson will be sentenced on February 24, 2026.[\[194\]](#)

### **Applied Partners, LLC (Guilty Plea)**

On December 17, 2025, Applied Partners, LLC (“Applied Partners”) pleaded guilty in the U.S. District Court for the Eastern District of Michigan to one count of knowingly violating asbestos work practice standards under the Clean Air Act, in violation of 42 U.S.C. §§ 7412(h) and 7413(c)(1), and 18 U.S.C. § 2.[\[195\]](#) The charge arose from demolition activities conducted at a former integrated chassis systems facility in Saginaw, Michigan.[\[196\]](#) According to the plea agreement, Applied Partners undertook demolition and scrapping activities despite knowing that multiple structures contained significant quantities of regulated asbestos-containing material.[\[197\]](#) This resulted in the disturbance and dispersal of asbestos-containing material.[\[198\]](#)

Under the plea agreement, the parties agreed to a total criminal fine of \$500,000 and a term of two years of organizational probation, subject to court approval.[\[199\]](#) The agreement further provides that the court must order restitution to identifiable victims in amounts to be determined at sentencing, with restitution due immediately upon entry of judgment and subject to immediate enforcement.[\[200\]](#) Sentencing in this case is set for April 9, 2026.[\[201\]](#)

### **Apprio, Inc. & PM Consulting Group LLC (DPAs)**

On June 12, 2025, Apprio, Inc. (“Apprio”) and PM Consulting Group, d/b/a Vistant (“Vistant”), entered into three-year DPAs with the U.S. Attorney’s Office for the District of Maryland.[\[202\]](#) Both Apprio and Vistant admitted to engaging in a conspiracy to commit bribery of a public official and securities fraud.[\[203\]](#) The companies allegedly engaged in a scheme by which they paid bribes to a U.S. Agency for International Development (“USAID”) contracting officer, and in turn, the contracting officer influenced the award of contracts to Apprio and Vistant. Specifically, the officer manipulated the agency’s procurement process by recommending the companies to other USAID decisionmakers for non-competitive contract awards, disclosing sensitive procurement information and source-selection information during the competitive bidding process, and approving decisions on the contracts, such as increased funding. This scheme resulted in the companies winning at least 14 contracts worth over \$550 million.[\[204\]](#)

Each DPA requires the respective company to, among other things, engage in ongoing cooperation with and disclosures to DOJ, implement a compliance and ethics program, and periodically report to DOJ regarding remediation and implementation of its compliance measures for the duration of the DPA.[\[205\]](#) Although Apprio agreed in the DPA that the appropriate criminal penalty based on the law and facts was \$51,673,185, based on the company’s inability to pay, Apprio was permitted to instead pay a civil penalty of \$500,000.[\[206\]](#) Likewise, Vistant agreed in the DPA that the appropriate criminal penalty based on the law and facts was \$86,407,740.20, but based on Vistant’s inability to pay, the company was permitted to instead pay a civil penalty of \$100,000.[\[207\]](#) Both companies also received credit for cooperating in the Department’s investigation and engaging in timely remedial measures.[\[208\]](#) Apprio and Vistant also agreed to

resolve concurrently DOJ's separate civil False Claims Act investigations relating to the alleged bribery scheme.[\[209\]](#)

### **ASL Singapore Shipping Limited and Jia Feng Shipping (Fuzhou) Limited (Guilty Plea)**

On February 24, 2025, ASL Singapore Shipping Limited and Jia Feng Shipping (Fuzhou) Limited (together, "the Companies") entered into a plea agreement with the U.S. Attorney's Office for the Eastern District of Louisiana.[\[210\]](#) The Companies, which owned and operated the bulk carrier M/V ASL Singapore, were charged with violating the Act to Prevent Pollution from Ships (APPS), 33 U.S.C. § 1908(a), and obstruction of justice related to the falsification of required vessel logs, 18 U.S.C. § 1505.[\[211\]](#) During a routine U.S. Coast Guard inspection, investigators discovered that the crew was using a pump to dispose of oily bilge water.[\[212\]](#) This, combined with the crew's failure to take appropriate pollution prevention measures, constituted a violation of the International Convention for the Prevention of Pollution from Ships ("MARPOL").[\[213\]](#) Additionally, the crew presented the Coast Guard with fraudulent and falsified records concealing the discharge of the oily bilge water.[\[214\]](#) This case was investigated by the Coast Guard Investigative Service and the Environmental Protection Agency Criminal Investigations Division.[\[215\]](#)

Pursuant to the plea agreement, the Companies were required to pay a total fine of \$1.85 million and are banned from operating in the United States.[\[216\]](#) They have also been placed on a four-year probation.[\[217\]](#) The Companies were sentenced during the same proceeding on February 20, 2025.[\[218\]](#) The ship's Chief Engineer, Fei Wang, also pleaded guilty to related charges.[\[219\]](#)

### **Aux Cayes Fintech Co. Ltd. d/b/a OKX (Guilty Plea)**

On February 24, 2025, Aux Cayes Fintech Co. Ltd., d/b/a OKX ("OKX"), a Seychelles-based cryptocurrency exchange, entered into a two-year plea agreement with the U.S. Attorney's Office for the Southern District of New York.[\[220\]](#) OKX pleaded guilty to a single count of operating an unlicensed money transmitting business, in violation of 18 U.S.C. § 1960. The information alleged misconduct by OKX and its agents from at least 2018 through early 2024.[\[221\]](#) According to the plea agreement, OKX allowed U.S.-based customers to access its cryptocurrency platform using virtual private networks despite purportedly banning IP addresses from the United States, and U.S.-based institutions conducted transactions worth trillions of dollars on the platform.[\[222\]](#) Per the agreement, OKX also failed to maintain adequate Know Your Customer (KYC) programs.[\[223\]](#)

The agreement imposes a total monetary penalty of approximately \$504 million, composed of a \$420,353,574 million criminal forfeiture and an \$84,457,629 million criminal fine.[\[224\]](#) Under the terms of the plea agreement, OKX is required to retain an independent compliance consultant until at least February 2027 to review its anti-money laundering and KYC programs and must continue to cooperate fully with the government's ongoing investigations.[\[225\]](#)

### **Barlow Herbal Specialties LLC (DPA)**

Barlow Herbal Specialties LLC ("Barlow"), a Utah-based herbal products company, entered into a six-month deferred prosecution agreement ("DPA") with the United States Attorney's Office for

the District of Utah to resolve a misdemeanor charge under the Lacey Act.[\[226\]](#) The criminal information appended to the DPA charged Barlow with one misdemeanor count of 16 U.S.C. § 3372(a)(1), with allegations that in or about September 2023, Barlow knowingly received, acquired, and purchased *Lomatium dissectum* roots that, in the exercise of due care, Barlow should have known were harvested and transported in violation of federal regulations governing plant collection on U.S. Forest Service Lands.[\[227\]](#)

Under the DPA, the United States agreed to defer prosecution for six months for the conduct set forth in the DPA, with the option to extend the term by up to one additional year if Barlow fails to fully perform its obligations.[\[228\]](#) In turn, Barlow admitted and accepted responsibility for the conduct described in the information and the incorporated Statement of Facts.[\[229\]](#) The DPA requires Barlow to pay \$30,000 in restitution and \$28,064 in remediation within six months, and to forfeit all *Lomatium* roots and related products.[\[230\]](#) In addition, Barlow must implement and maintain extensive corporate compliance obligations focused on Lacey Act compliance, including: (i) adoption of a Lacey Act Compliance Plan; (ii) policies and procedures to ensure that employees, agents, and third-party suppliers do not source plants or plant parts from federal lands without required permits; (iii) industry and customer communication to promote an industry understanding of the Lacey Act requirements, and applicable permit requirements on federal lands; and (iv) engagement of a third-party consultant to audit compliance with the certain corporate compliance obligations on an annual basis (notwithstanding the agreement's term of six months), and to provide the audit report to the government.[\[231\]](#)

The DPA notes that this resolution reflects several considerations, including the nature of the offense, Barlow's cooperation (such as ceasing sales of *Lomatium* products, quarantining inventory, voluntarily agreeing to forfeiture of unverified product, and providing extensive information to the government), its remedial and compliance enhancements, and the absence of prior criminal or civil resolutions.[\[232\]](#) The District court granted DOJ's motion for deferral of prosecution on November 5, 2025.[\[233\]](#)

### **BJS & T Enterprises, Inc. d/b/a San Diego Powder & Protective Coating (Guilty Plea)**

On November 17, 2025, BJS & T Enterprises, Inc. d/b/a San Diego Powder & Protective Coating ("BJS") entered into a plea agreement with the U.S. Attorney's Office for the Southern District of California.[\[234\]](#) BJS pleaded guilty to engaging in a pattern and practice of hiring, recruiting, and referring for a fee, for employment in the U.S., unauthorized immigrants in violation of 8 U.S.C. § 1324a(a)(1)(A) and (f).[\[235\]](#) DOJ alleged that this included the company's knowledge that some of its employees were using fraudulent work authorization documents and also that BJS allowed such employees to work in proximity to U.S. military equipment.[\[236\]](#)

As part of the agreement, BJS agreed to participate in the U.S. Immigration and Customs Enforcement's Mutual Agreement between Government and Employers program, a program designed to ensure employment verification practices.[\[237\]](#) BJS also agreed to a \$21,000 criminal penalty and \$230,000 in forfeiture.[\[238\]](#)

## **The Boeing Company (NPA)**

On May 29, 2025, the DOJ Fraud Section and the U.S. Attorney's Office for the Northern District of Texas entered into a two-year NPA with The Boeing Company ("Boeing") and moved to dismiss, without prejudice, pending criminal charges against Boeing alleging conspiracy to defraud the United States in violation of 18 U.S.C. § 371.[\[239\]](#) DOJ stated that it agreed to dismiss the charges in light of the certainty and immediacy of the financial, compliance, and remedial commitments secured by the NPA, Boeing's post-breach compliance improvements, enhanced FAA oversight, and the litigation risks associated with proceeding to trial.[\[240\]](#) The court granted the motion to dismiss on November 6, 2025.[\[241\]](#)

Under the NPA's Statement of Facts, Boeing conspired to obstruct and impede the lawful functions of the FAA Aircraft Evaluation Group (the same charge cited in the original DPA) and to accept responsibility for the conduct underlying the charged offense.[\[242\]](#) The resolution requires Boeing to pay a total criminal penalty of \$487.2 million, with credit for the \$243.6 million penalty Boeing previously paid under the DPA.[\[243\]](#) Boeing also agreed to allocate an additional \$444.5 million to a Crash-Victim Beneficiaries Fund.[\[244\]](#) Boeing also agreed to invest \$455 million into its compliance, safety, and quality improvement programs, and to continue enhancing its anti-fraud compliance and ethics program.[\[245\]](#) The NPA further requires Boeing to retain an independent compliance consultant.[\[246\]](#)

## **BofA Securities, Inc. (Declination with Disgorgement)**

On September 17, 2025, DOJ declined to prosecute BofA Securities, Inc. ("BSI") for market manipulation activity allegedly committed by two former traders on BSI's U.S. Treasuries desk between November 2014 and April 2020.[\[247\]](#) The declination followed DOJ's consideration of the factors set forth in the updated Corporate Enforcement Policy.[\[248\]](#) As part of the resolution, BSI agreed to disgorge approximately \$1.97 million and to contribute approximately \$3.6 million to a victim compensation fund.[\[249\]](#) In exchange, DOJ declined to prosecute, underscoring the value of early self-disclosure and cooperation.[\[250\]](#)

## **Brew City Environmental & Restoration Services, LLC (Guilty Plea)**

On June 20, 2025, Brew City Environmental & Restoration Services, LLC ("Brew City"), a Wisconsin asbestos abatement and demolition contractor, pleaded guilty to one count of making false material statements related to hazardous materials in violation of Clean Air Act provisions 42 U.S.C. § 7413(c)(2)(A) and related Environmental Protection Agency ("EPA") asbestos regulations at 40 C.F.R. §§ 61.145(b) and 61.150(d).[\[251\]](#) According to the plea agreement, from February 2020 through February 2021 Brew City submitted asbestos waste manifests to the Wisconsin Department of Natural Resources ("WDNR") that falsely listed the landfill at which regulated asbestos-containing material ("RACM") was disposed and failed to update those records as required.[\[252\]](#)

Under the plea agreement, Brew City faces a statutory maximum fine of \$250,000.[\[253\]](#) The parties jointly recommended a \$5,000 fine contingent on Brew City completing cleanup and remediation of an asbestos debris site in Oak Creek, Wisconsin pursuant to a written plan, with a \$100,000 fine to be recommended if remediation is not completed before sentencing.[\[254\]](#) Brew

City further agreed to bear remediation costs, dissolve following cleanup, and refrain from resuming asbestos abatement or demolition operations.[\[255\]](#) Sentencing is scheduled for March 3, 2026.[\[256\]](#) The EPA Criminal Investigation Division conducted the investigation.[\[257\]](#)

### **Burns Hunting Club, LLC (Guilty Plea)**

On March 27, 2025, Burns Hunting Club, LLC (“Burns”), an Illinois-based waterfowl hunting club, pleaded guilty to one misdemeanor count of unlawful sale of wildlife in violation of the Lacey Act, 16 U.S.C. §§ 3372(a)(1) and 3373(d)(2), and 18 U.S.C. § 2.[\[258\]](#) The offense involved Burns’s involvement in alleged illegal baiting practices and the sale of wildlife taken in violation of federal law.[\[259\]](#) As part of the plea agreement, Burns admitted that it knowingly participated in a conspiracy to take, possess, transport, or sell wildlife in violation of state or federal regulations.[\[260\]](#)

The plea agreement recommended that Burns be sentenced to a 24-month term of probation and pay a \$5,500 fine to the Lacey Act Reward Account.[\[261\]](#) Burns also agreed to pay \$30,000 in restitution to the Illinois Department of Natural Resources.[\[262\]](#) Additional conditions include a prohibition on operating or guiding hunts at its property for 24 months, surrender of any related licenses or permits, and restrictions on leasing property to individuals previously convicted of wildlife violations.[\[263\]](#) DOJ stated that the penalties imposed—including a \$71,500 joint fine for Burns and its owner—reflect the seriousness of illegal baiting and its impact on lawful hunting.[\[264\]](#) On May 19, 2025, Burns was sentenced consistent with the terms of the plea agreement.[\[265\]](#) The U.S. Fish and Wildlife Service and the Illinois Department of Natural Resources conducted this investigation.[\[266\]](#)

### **Cadence Design Systems, Inc. (Guilty Plea)**

On July 28, 2025, Cadence Design Systems, Inc. (“Cadence”), a multinational electronic design automation (“EDA”) technology company, entered into a plea agreement with the Counterintelligence and Export Control Section of DOJ’s National Security Division and the U.S. Attorney’s Office for the Northern District of California.[\[267\]](#) The agreement resolved the government’s allegations regarding export control violations relating to the sale of certain technology to a university in the People’s Republic of China.[\[268\]](#)

Cadence agreed to pay a criminal fine of \$72,488,507.86, reflecting a discount for cooperation and remediation, of which DOJ agreed to credit \$24,832,507.86 paid to the U.S. Department of Commerce, Bureau of Industry and Security in a parallel civil settlement.[\[269\]](#) Cadence also agreed to a forfeiture of \$45,305,317.41[\[270\]](#) and a three-year organizational probation term.[\[271\]](#)

### **Campbell Sales Group, Inc. (DPA)**

On February 25, 2025, Campbell Sales Group, Inc. d/b/a LeatherItaliaUSA (“CSG”), a leather furniture supplier, entered into a three-year DPA with the U.S. Attorney’s Office for the Eastern District of North Carolina to resolve allegations involving a fraudulent Paycheck Protection Program (“PPP”) loan scheme.[\[272\]](#) Specifically, the government alleged that, in April 2020, CSG applied for and received a \$257,700 PPP loan and that, in order to meet eligibility

requirements for loan forgiveness, CSG artificially inflated its payroll costs by adding fake employees to its payroll and fraudulently manipulating wages of actual employees, thus committing two counts of wire fraud in violation of 18 U.S.C. § 1343.[\[273\]](#) The government alleged that CSG requested and was granted forgiveness of the loan, due to its falsely certifying its payroll figures and provision of false and fraudulent supporting documentation.[\[274\]](#) In March 2021, CSG applied for an additional \$213,006 PPP loan, incorporating the same false payroll data that it had used to obtain forgiveness of its first PPP loan.[\[275\]](#) In connection with the DPA, CSG agreed to pay a monetary penalty of \$1,000,000 and restitution of \$499,164.[\[276\]](#)

### **Clark & Garner, LLC and TranscendBS, LLC (Guilty Pleas)**

On February 24, 2025, Clark & Garner, LLC (“Clark & Garner”), a company providing educational programming to schools and non-profit organizations, entered into a plea agreement with the DOJ Antitrust Division.[\[277\]](#) On March 19, 2025, TranscendBS, LLC, also entered into a plea agreement for alleged bid-rigging as part of the same scheme.[\[278\]](#) The agreements resolved allegations of bid rigging in violation of the Sherman Act.[\[279\]](#) According to its agreement, Clark & Garner rigged bids to win contracts for its consulting services to the New York City Department of Education, between approximately November 2020 and January 2023.[\[280\]](#) Clark & Garner allegedly conspired with TranscendBS, LLC and its owner Victor Garrido, and others, in a scheme whereby Clark & Garner would submit artificially high bids on contracts for services it did not provide to help TranscendBS win the contracts.[\[281\]](#) Likewise, TranscendBS’s plea agreement alleged that its owner, Victor Garrido, and co-conspirator Clark & Garner conspired that Clark & Garner would submit artificially high “competitor” bids to help TranscendBS win contracts for business consulting services to New York City public schools.[\[282\]](#) Through the alleged scheme, TranscendBS won at least \$707,555 in contracts from numerous New York City public schools, resulting in estimated losses of \$141,511 to NYC DOE.[\[283\]](#)

The agreement states that Clark & Garner’s stipulated Guidelines fine range is \$80,000 to \$160,000 and recommends that the Court impose a criminal fine recommended by the United States Probation Office that is within the defendant’s ability to pay.[\[284\]](#) On July 31, 2025, the Court sentenced Clark & Garner to pay an \$80,000 criminal fine.[\[285\]](#) Clark & Garner’s sole owner, Donald Clark Garner II, also entered into a plea agreement for bid rigging and agreed to pay \$35,216.70 as restitution for unemployment benefits he received from the New York State Department of Labor and a \$4,538.70 monetary penalty.[\[286\]](#) On August 19, 2025, TranscendBS and its owner Victor Garrido were ordered to pay \$141,511 in restitution to NYC DOE.[\[287\]](#) In addition, Garrido was sentenced to six months in prison and was ordered to pay \$23,100 in restitution to the New York State Department of Labor in connection with his unemployment benefit fraud.[\[288\]](#)

### **CLS Global FZE LLC (Guilty Plea)**

On January 21, 2025, CLS Global FZE (“CLS Global”), a cryptocurrency market making firm, entered into a plea agreement for one count of conspiracy to commit market manipulation and wire fraud and one count of wire fraud with the United States Attorney’s Office for the District of Massachusetts.[\[289\]](#) As part of the plea agreement, CLS Global admitted that it agreed to provide market making services for a cryptocurrency company called NexFundAI that included “wash trading” to attract investors to its token.[\[290\]](#) The government considered as mitigating

factors that, upon learning of the charges brought by DOJ and a related civil enforcement action brought by the SEC, CLS Global promptly retained counsel to accept responsibility, make voluntary disclosures, and augment compliance controls.[\[291\]](#) On April 2, 2025, CLS Global was sentenced and agreed to pay a total of \$428,060, which included both a fine and seized cryptocurrency, and a three-year term of probation during which it is prohibited from participating in U.S. cryptocurrency markets.[\[292\]](#) CLS Global entered into a separate resolution with the SEC for violations of securities laws related to the same conduct.[\[293\]](#)

### **Comunicaciones Celulares S.A. d/b/a TIGO Guatemala (DPA)**

On November 10, 2025, Comunicaciones Celulares S.A., d/b/a TIGO Guatemala (“TIGO”), a Guatemalan Subsidiary of Millicom, a Luxembourg-based telecommunications company, entered into a two-year DPA with the DOJ Criminal Division, Fraud Section and the U.S. Attorney’s Office for the Southern District of Florida to resolve allegations of bribes paid to Guatemalan officials.[\[294\]](#) Under the DPA, TIGO agreed to pay \$118.2 million, consisting of a \$60 million criminal fine and forfeiture of \$58,198,343 million.[\[295\]](#) TIGO’s criminal fine reflects a 50 percent discount off the low end of the Sentencing Guidelines fine range, the highest penalty discount received under the Criminal Division’s Corporate Enforcement and Voluntary Self-Disclosure Policy, JM § 9-47.120 (“CEP”) in an FCPA resolution to date.[\[296\]](#) Among other things, TIGO and Millicom also were required to engage in annual testing and formal reporting to DOJ regarding the state and sustainability of the companies’ compliance program.[\[297\]](#)

Although Millicom first voluntarily disclosed the relevant conduct to DOJ in 2015, it did not meet the requirements for a Part II resolution under the CEP because it allegedly did not fully cooperate with DOJ’s investigation.[\[298\]](#) TIGO was initially a joint venture, and the DPA states that Millicom’s partner blocked efforts to cooperate with DOJ’s investigation, and DOJ consequently closed its investigation in 2018.[\[299\]](#) However, DOJ independently learned of new information in 2020 that caused it to reopen its investigation, including that the alleged misconduct at issue involved narcotrafficking proceeds that were used to make cash payments for some of the alleged bribes.[\[300\]](#)

### **Credit Suisse Services AG (Guilty Plea and NPA)**

On May 5, 2025, Credit Suisse Services AG (“CSS”) entered into a plea agreement with the DOJ’s Tax Division and the U.S. Attorney’s Office for the Eastern District of Virginia in connection with certain legacy Credit Suisse U.S. taxpayer accounts in Switzerland.[\[301\]](#) CSS entered into a separate NPA relating to accounts opened at the former Credit Suisse AG Singapore.[\[302\]](#) During the 2023 merger with UBS, UBS became aware of these accounts, froze some of them, and voluntarily disclosed information to DOJ within six months of the acquisition.[\[303\]](#) The NPA specifically credited UBS’s extensive cooperation and remedial steps.[\[304\]](#)

CSS was sentenced on May 5, 2025, to pay a criminal fine of \$217,261,890 consistent with the plea agreement.[\[305\]](#) CSS also agreed to pay \$46,015,674 in restitution to the IRS and a forfeiture amount of \$108,630,945.[\[306\]](#) Additionally, CSS separately agreed to pay a penalty of \$138,700,000 under the NPA.[\[307\]](#)

### **Dune Medical Supply, LLC and Prospect Health Solutions, Inc. (Guilty Pleas)**

On October 1, 2025, Dune Medical Supply, LLC (“Dune Medical”) and Prospect Health Solutions, Inc. (“Prospect Health”), two durable medical equipment companies under common ownership, entered into plea agreements with the United States Attorney’s Office for the Middle District of North Carolina to resolve allegations of widespread Medicare fraud in violation of 18 U.S.C. § 1347.[\[308\]](#) Specifically, Dune Medical and Prospect Health admitted to having submitted fraudulent claims to Medicare between April and August 2024, for durable medical equipment that beneficiaries never requested, received, or needed, or for equipment that had never been ordered by a medical provider.[\[309\]](#) During this period, the companies collectively submitted more than \$100 million in claims to Medicare.[\[310\]](#)

Pursuant to their respective plea agreements, Dune Medical agreed to forfeit \$6,875,755.56, and Prospect Health agreed to forfeit \$9,503,246.37.[\[311\]](#) A sentencing hearing for both companies was held on January 22, 2026, but as of the time of writing, the court had not yet issued its judgment in either case.[\[312\]](#)

### **E&A Auto Cores, LLC (Guilty Plea)**

On October 24, 2025, E&A Auto Cores, LLC (“E&A”), a Missouri-based company engaged in the purchase and resale of catalytic converters, entered into a plea agreement with the U.S. Attorney’s Office for the Eastern District of Missouri and agreed to one count of interstate transportation of stolen property in violation of 18 U.S.C. § 2314.[\[313\]](#) The plea agreement states that between May 17, 2018, and May 28, 2021, E&A purchased and transported catalytic converters that it knew were stolen, including acquisitions from individuals in Tennessee and Iowa who explicitly advised that the converters were stolen.[\[314\]](#) E&A then allegedly moved those converters across state lines for resale.[\[315\]](#) The agreement further states that approximately five percent of the catalytic converters E&A purchased and later sold to a major recycler were stolen, and that at least \$50,000 in proceeds deposited into E&A’s bank account were traceable to the alleged misconduct.[\[316\]](#)

Under the plea agreement, E&A agreed to pay a \$90,000 fine, a \$50,000 forfeiture money judgment, and to the forfeiture of 269 catalytic converters seized during the government’s investigation.[\[317\]](#) E&A also agreed to a one-year term of organizational probation.[\[318\]](#) Sentencing is scheduled for February 5, 2026.[\[319\]](#)

### **Eagle Ship Management, LLC (Guilty Plea)**

On July 15, 2025, Eagle Ship Management, LLC (“ESM”), a Connecticut-based operator of foreign-flagged bulk carriers, entered into a plea agreement with the U.S. Attorney’s Office for the Eastern District of Louisiana and agreed to plead guilty to one count of violating the Act to Prevent Pollution from Ships (“APPS”), 33 U.S.C. § 1908(a).[\[320\]](#) The charge arose from ESM’s alleged knowing discharge of oil-contaminated bilge water from the *M/V Gannet Bulker* without required pollution-prevention equipment, and failure to maintain an accurate Oil Record Book while in U.S. waters.[\[321\]](#)

Under the plea agreement, ESM agreed to pay a \$1,750,000 criminal fine.[\[322\]](#) ESM will also serve a four-year term of probation, during which it must implement a government-approved Environmental Compliance Plan (“ECP”), undergo external audits by a court-appointed monitor, and ensure that eight covered vessels and associated shore-side operations adopt enhanced environmental training, reporting, and recordkeeping requirements.[\[323\]](#) On October 16, 2025, ESM was sentenced consistent with the plea agreement.[\[324\]](#)

### **Elecsurf Trading, LTD (Guilty Plea)**

On August 1, 2025, Elecsurf Trading Ltd. (“Elecsurf”), an Illinois-based distributor of computer software, entered into a plea agreement with the U.S. Attorney’s Office for the Northern District of Illinois in connection with one count of criminal copyright infringement in violation of 17 U.S.C. § 506(a)(1)(A) and 18 U.S.C. § 2319(b)(1).[\[325\]](#) According to the plea agreement, from at least August 2010 through at least October 2011, Elecsurf and its co-defendants copied, distributed, and sold unauthorized software through multiple websites and email accounts operated by the defendants.[\[326\]](#) Elecsurf fulfilled customer purchases by sending stolen product keys electronically or by shipping unauthorized discs duplicated from originals at defendants’ direction, resulting in over \$1.5 million in lost sales to a major software company.[\[327\]](#) Under the plea agreement, the Elecsurf agreed to a \$1.7 million criminal fine.[\[328\]](#) On October 1, 2025, Elecsurf was sentenced consistent with its plea agreement.[\[329\]](#)

### **Eleview International Inc. (Guilty Plea)**

On October 22, 2025, Eleview International Inc. (“Eleview”), a Virginia-based freight consolidation and forwarding business, entered into a plea agreement with the United States Attorney’s Office for the Eastern District of Virginia and the Counterintelligence and Export Control Section of DOJ’s National Security Division to resolve allegations of a conspiracy to violate the Export Control Reform Act.[\[330\]](#) According to the statement of facts accompanying the plea agreement, from approximately February 2022 to June 2023, Eleview conspired to illegally export goods and technology from the United States to Russia by transshipping those items through Turkey, Finland, and Kazakhstan to evade U.S. export restrictions imposed after Russia’s invasion of Ukraine.[\[331\]](#) During this period, Eleview allegedly exported 23 shipments through Turkey valued at approximately \$1,317,432; 82 shipments through Finland valued at over \$3.4 million; and at least 52 shipments through Kazakhstan valued at approximately \$1,468,816.[\[332\]](#)

Pursuant to the plea agreement, Eleview agreed to pay a criminal fine of \$125,000, forfeit “all interests in any export control-related asset” that it owns or “exercises control over, directly or indirectly,” and serve a three-year term of probation.[\[333\]](#) Sentencing is scheduled for February 13, 2026.[\[334\]](#) Eleview also entered into a parallel settlement agreement with the Bureau of Industry and Security on October 28, 2025.[\[335\]](#)

### **Erie Coke Corporation (Guilty Plea)**

On June 17, 2025, Erie Coke Corporation (“Erie Coke”), a now-defunct company that owned and operated a coke manufacturing plant in Erie, Pennsylvania, entered into a plea agreement with the U.S. Attorney’s Office for the Western District of Pennsylvania regarding two counts of criminal air emissions violations under the Clean Air Act, 18 U.S.C. § 371 and 42 U.S.C. §

7413(c)(1).[\[336\]](#) Specifically, the government alleged that, between October 2015 and December 2019, Erie Coke conspired with its employees to violate the Clean Air Act by removing caps on heating flues to allow combustion gases to vent directly into the air and bypass the plant's environmental monitoring system.[\[337\]](#) These actions allegedly resulted in emissions that exceeded the limits set forth in Erie Coke's Title V permit.[\[338\]](#) The government also alleged that Erie Coke knowingly submitted misleading emissions data to regulators.[\[339\]](#) Erie Coke was sentenced to pay a \$700,000 criminal monetary fine.[\[340\]](#)

### **Exploring Together Therapy LLC (Guilty Plea)**

On November 24, 2025, Exploring Together Therapy LLC ("Exploring Together"), a Puerto Rico-based provider of therapeutic services for children, entered into a plea agreement with the United States Attorney's Office for the District of Puerto Rico,[\[341\]](#) regarding one count of theft of federal funds in violation of 18 U.S.C. § 641.[\[342\]](#) The charge stems from an alleged fraudulent invoicing scheme conducted between January 2021 and July 2024, through which Exploring Together knowingly submitted invoices to the U.S. Department of Education for services that it had not rendered.[\[343\]](#)

Under the terms of the plea agreement, Exploring Together agreed to pay \$190,820 in restitution to the Puerto Rico Department of Education ("PRDOE").[\[344\]](#) The plea agreement also requires Exploring Together to obtain written approval from the United States before selling, transferring, loaning, assigning, disposing, removing, concealing, wasting, encumbering, destroying, or otherwise devaluing any property or asset worth more than \$5,000.[\[345\]](#) The parties agreed to request a sentence of probation between one to five years.[\[346\]](#) Sentencing is scheduled for March 9, 2026.[\[347\]](#)

### **Eurobulk Ltd. (Guilty Plea)**

On January 8, 2025, Eurobulk Ltd. ("Eurobulk"), a Greece-based operator of bulk carriers, entered into a plea agreement with the U.S. Attorney's Office for the Southern District of Texas and the DOJ Environmental Crimes Section relating to one count of failing to maintain an accurate Oil Record Book in violation of the Act to Prevent Pollution from Ships ("APPS"), 33 U.S.C. § 1908(a), and one count of falsification of records in violation of 18 U.S.C. § 1519.[\[348\]](#) According to the plea agreement, the charges stem from conduct aboard the *Good Heart* during an April 2023 port call in Corpus Christi, Texas, where Eurobulk admitted that its crew concealed discharges of oil-contaminated waste and falsified related records.[\[349\]](#)

At sentencing, the court ordered Eurobulk to pay a total monetary penalty of \$1,500,000, consisting of a \$1,125,000 criminal fine and a \$375,000 organizational community service payment directed to the National Fish and Wildlife Foundation to support maritime ecological restoration projects.[\[350\]](#) Eurobulk will also serve a four-year term of organizational probation, during which it must implement and fund an Environmental Compliance Plan ("ECP"), including external audits by an independent Third-Party Auditor and oversight by a Court Appointed Monitor.[\[351\]](#) The Plea Agreement also requires Eurobulk to report environmental violations, adopt system-wide engineering and operational controls to prevent improper discharges, and undertake expanded training across all covered vessels.[\[352\]](#) The court notably granted the

government's motion for a whistleblower award in the amount of \$281,250 in connection with this case.[\[353\]](#)

### **Fabcon Precast LLC (Guilty Plea)**

On February 26, 2025, Fabcon Precast LLC ("Fabcon"), a Minnesota-based manufacturer of precast concrete panels, entered into a plea agreement with the U.S. Attorney's Office for the Southern District of Ohio and the NRD Environmental Crimes Section regarding one count of willfully violating an Occupational Safety and Health Administration ("OSHA") standard causing death, in violation of 29 U.S.C. § 666(e).[\[354\]](#) The charge arose from a June 6, 2020 incident at Fabcon's Grove City, Ohio facility, where a batch operator was fatally injured by a pneumatic discharge door with a broken valve handle.[\[355\]](#)

Fabcon was sentenced to a \$500,000 criminal fine and two years of organizational probation.[\[356\]](#) As a condition of probation, Fabcon must comply with all terms of a Safety Compliance Plan incorporated into the plea agreement.[\[357\]](#)

### **Gotbit Consulting LLC (Guilty Plea)**

On March 19, 2025, Gotbit Consulting LLC ("Gotbit"), a financial services firm known as a market maker in the cryptocurrency industry, and its founder and Chief Executive Officer ("CEO") entered into plea agreements with the U.S. Attorney's Office for the District of Massachusetts to resolve charges that the company engaged in manipulative trades to artificially increase the trading price and volume of crypto tokens for clients.[\[358\]](#) Specifically, Gotbit pleaded guilty to one count of conspiracy to commit market manipulation and wire fraud in violation of 18 U.S.C. § 371 and two counts of wire fraud in violation of 18 U.S.C. § 1343.[\[359\]](#) The government alleged that, from 2018 to 2024, Gotbit provided market manipulation services to create artificial trading volume for multiple cryptocurrency companies located in the United States and companies whose cryptocurrencies traded on platforms available to investors located in the United States.[\[360\]](#) The government also charged two of Gotbit's directors for their alleged participation in the scheme.[\[361\]](#)

Gotbit agreed to forfeit nearly \$23 million in cryptocurrency and agreed to a probation period of five years, during which time Gotbit is required to cease all operations.[\[362\]](#) In light of the forfeiture and the monetary relief agreed upon between Gotbit and the SEC in a related case, the government did not impose a fine.[\[363\]](#) Gotbit's CEO, who also pleaded guilty in March 2025, was sentenced to eight months in prison to be followed by one year of supervised release.[\[364\]](#)

### **Gadsden, Gaillard and West LLC (Guilty Plea)**

On October 9, 2025, Dennis Eugene West, on behalf of himself and his trucking business Gadsden, Gaillard and West LLC ("Gadsden"), entered into a plea agreement with the U.S. Attorney's Office for the Southern District of West Virginia for the negligent discharge of pollutants into United States waters in violation of 33 U.S.C. §§ 1311(a) and 1319(c)(1)(A).[\[365\]](#) West allegedly crashed a tractor trailer spilling alkyl dimethylamine into a tributary of the Kanawha river.[\[366\]](#) West and Gadsden are scheduled to be sentenced on February 26, 2026.[\[367\]](#) Gadsden faces a maximum penalty of up to five years of federal probation and a

\$200,000 fine and may owe restitution of up to \$1,654,654.01, to the extent financially feasible.[\[368\]](#)

### **Hao Global LLC (Guilty Plea)**

On October 10, 2025, Hao Global LLC (“Hao Global”), a Houston-area company, and its owner and corporate representative, Alan Hao Hsu, entered into plea agreements with the U.S. Attorney’s Office for the Southern District of Texas, pleading guilty in the U.S. District Court for the Southern District of Texas to federal export control and smuggling offenses.[\[369\]](#) Specifically, Hao Global pleaded guilty to one count of smuggling goods from the United States, in violation of 18 U.S.C. § 554(a), and one count of unlawful export activity, in violation of 13 U.S.C. § 305 and 18 U.S.C. § 2.[\[370\]](#)

The charges arose from an alleged scheme to unlawfully export advanced Nvidia graphics processing units (“GPUs”) to the People’s Republic of China (“PRC”).[\[371\]](#) According to DOJ, from at least October 2024 through approximately May 2025, Hao Global and Hsu conspired with others to procure, misclassify, and export U.S.-origin Nvidia H100 and H200 Tensor Core GPUs without the required U.S. government export licenses.[\[372\]](#) These GPUs are items controlled under the Export Administration Regulations (“EAR”) for national security reasons and are integral to building AI technologies and capabilities.[\[373\]](#) Hsu and Hao Global allegedly received more than \$50 million in wire transfers originating from the PRC to help fund the scheme, and transferred at least \$160 million in GPUs to PRC.[\[374\]](#)

Hao Global faces a criminal fine of not more than \$250,000, or twice the gross gain from the offense, a term of probation of up to five years, and mandatory forfeiture of offense proceeds.[\[375\]](#) Sentencing in this case is scheduled for February 18, 2026.[\[376\]](#)

### **Hino Motors, Ltd. (Guilty Plea)**

On March 19, 2025, Hino Motors, Ltd. (“Hino”), a Japanese manufacturer of heavy-duty vehicles, pleaded guilty in the Eastern District of Michigan to one count of conspiracy to violate 18 U.S.C. § 371.[\[377\]](#) Under the plea agreement, Hino will pay a \$521,760,000 criminal fine.[\[378\]](#) Hino must also forfeit \$1,087,000,000 in proceeds, which will be deemed satisfied if Hino pays the same amount under parallel civil settlements with multiple other state and federal agencies.[\[379\]](#) Hino will serve five years of probation, during which it may not import or sell Hino-manufactured diesel engines in the United States except for replacement engines expressly permitted by the EPA.[\[380\]](#) The plea agreement also imposes compliance and self-reporting obligations, including engagement of an external compliance consultant to test program effectiveness.[\[381\]](#)

### **Horseshoe Grove LLC and Chamness Dirt Works Inc. (Guilty Plea)**

On February 7, 2025, Horseshoe Grove LLC (“Horseshoe”) and Chamness Dirt Works Inc. (“Chamness”) entered into plea agreements with the U.S. Attorney’s Office for the District of Oregon to resolve an investigation relating to alleged asbestos work practice standards in violation of the Clean Air Act.[\[382\]](#) Horseshoe, a real estate company, allegedly contracted with Chamness, a demolition company, to destroy structures on Horseshoe’s property without properly disposing of previously identified asbestos.[\[383\]](#) Horseshoe and Chamness were both

sentenced to a three-year term of probation, but neither was required to pay a criminal fine or restitution.[\[384\]](#)

### **Hytera Communications Corporation, Ltd. (Guilty Plea)**

On January 13, 2025, Hytera Communications Corporation, Ltd. (“Hytera”), a China-based telecommunications company, entered into a plea agreement with the U.S. Attorney’s Office for the Northern District of Illinois in relation to a charge of conspiracy to commit theft of trade secrets in violation of 18 U.S.C. § 1832(a)(5).[\[385\]](#) According to the plea agreement, beginning in 2008, Hytera and individuals acting on its behalf conspired to steal at least one trade secret related to Motorola Solutions’ digital mobile radio technology. Hytera allegedly took proprietary documents and source code and used that information to develop competing Hytera products later sold in the United States.[\[386\]](#)

Under the plea agreement, Hytera faces a criminal fine of up to \$60 million, the amount to be determined by the court at sentencing.[\[387\]](#) The agreement also requires Hytera to pay full restitution to Motorola Solutions in an amount to be determined at sentencing.[\[388\]](#) Sentencing in this case is set for January 29, 2026.[\[389\]](#)

### **J.H. Baxter & Co., Inc. and J.H. Baxter & Co. (Guilty Plea)**

On January 3, 2025, J.H. Baxter & Co., Inc. and J.H. Baxter & Co., a California Limited Partnership (together “J.H. Baxter”) entered into a plea agreement with the U.S. Attorney’s Office for the District of Oregon relating to charges of treating hazardous waste without a permit, in violation of the Resource Conservation and Recovery Act (“RCRA”), and of violation of the Clean Air Act’s (“CAA”) regulations for hazardous air pollutants.[\[390\]](#) Specifically, DOJ alleged that J.H. Baxter illegally treated hazardous wastewater by boiling it off in wood-treatment “retorts” and venting hazardous emissions into the air without the requisite permits required by RCRA.[\[391\]](#)

In connection with the agreement, J.H. Baxter was ordered to collectively pay a total of \$1 million in criminal fines.[\[392\]](#) The companies were sentenced to serve five years of probation and the companies’ president was sentenced to serve 90 days in prison and one year of supervised release.[\[393\]](#)

### **KBWB Operations LLC (Guilty Plea)**

On January 17, 2025, KBWB Operations LLC (“KBWB”), a company that operated skilled nursing facilities (“SNFs”), entered into a plea agreement with the U.S. Attorney’s Office for the Western District of Wisconsin and the Consumer Protection Bureau of DOJ in connection with one count of health care fraud in violation of 18 U.S.C. § 1347 and one count of conspiracy to defraud the United States in violation of 18 U.S.C. § 371.[\[394\]](#) According to the plea agreement, from January 2015 through September 2018, KBWB diverted Medicare and Medicaid funds intended for the operation and care of residents in its Wisconsin SNFs and used those funds instead for unauthorized distributions to owners, personal expenses, and other non-resident purposes.[\[395\]](#)

DOJ alleged that KBWB and its former CEO continued to certify compliance with federal requirements despite chronic vendor non-payment, failure to maintain adequate staffing and

services, and the diversion of resident trust funds and payroll withholdings.[\[396\]](#) From October 2016 through August 2018, KBWB also allegedly conspired to defraud the IRS by failing to remit employee income-tax withholdings and employment taxes, while filing Forms 941 and W-2s falsely indicating those taxes had been paid.[\[397\]](#)

On November 20, 2025, KBWB was sentenced to pay forfeiture of \$8,462,572 as well as restitution in the amount of \$146,193,885.96.[\[398\]](#)

### **KuCoin / Peken Global Limited (Guilty Plea)**

On January 27, 2025, Peken Global Limited – the Seychelles-based entity that operates KuCoin – pleaded guilty to one count of operating an unlicensed money transmitting business. Per the transcript and press release describing the agreement, KuCoin and its affiliates failed to implement effective anti-money laundering and Know Your Customer (“KYC”) programs and failed to report suspicious transactions in violation of the Bank Secrecy Act, and also operated an unlicensed money transmitting business and conspired to do the same.[\[399\]](#) KuCoin allegedly had approximately 1.5 million registered users based in the United States and earned approximately \$184.5 million in fees from those users.[\[400\]](#) KuCoin agreed to forfeit \$184.5 million and pay a criminal fine of \$112,914,000.[\[401\]](#) KuCoin also agreed to cease operations in the United States for two years.[\[402\]](#)

### **Liberty Mutual Insurance Company (Declination with Disgorgement)**

On August 7, 2025, the Fraud Section of DOJ’s Criminal Division and the U.S. Attorney’s Office for the District of Massachusetts issued a declination letter to Liberty Mutual Insurance Company declining to prosecute Liberty Mutual despite alleged evidence of bribery committed by certain employees of the Company’s subsidiary in India between 2017 and 2022.[\[403\]](#)

As is required, Liberty Mutual disgorged \$4.7 million in profits from its affected business with the state-owned banks. DOJ praised the company for its voluntary disclosure, cooperation, “thorough and systematic root-cause analysis,” and “separation from personnel involved in the misconduct.”[\[404\]](#)

### **Life Touch LLC (Guilty Plea)**

On July 14, 2025, Life Touch LLC (“Life Touch”), a substance abuse treatment company, entered into a plea agreement with the U.S. Attorney’s Office for the Eastern District of North Carolina in connection with a Medicaid fraud scheme.[\[405\]](#) As of the date of this publication, the plea agreement remains unavailable, even though it was not filed under seal. However, according to the Information filed by the government, Life Touch allegedly participated in a kickback scheme by providing gift cards to Medicaid recipients who attended substance abuse treatment sessions to order to induce patient attendance and generate reimbursable Medicaid claims.[\[406\]](#) The Information further alleges that, even after federal authorities informed Life Touch that providing incentives to Medicaid recipients violates federal law, Life Touch continued to dispense gift cards and falsely represented that the gift cards were provided by third parties rather than by Life Touch itself. Sentencing for Life Touch is scheduled for February 3, 2026.[\[407\]](#)

### **Mayhem Services, LLC (Guilty Plea)**

On July 21, 2025, Branden Trager and his hunting and fishing guide company, Mayhem Services, LLC, entered into a plea agreement with the U.S. Attorney's Office for the Western District of Washington, which was then amended and supplemented on September 8, 2025.[\[408\]](#) The government alleged that Trager and Mayhem Services violated the Migratory Bird Treaty Act ("MBTA") during a January 2023 hunting trip in western Washington and then transported the taken birds in violation of the Lacey Act.[\[409\]](#) On December 3, 2025, the court accepted the plea agreement, sentencing Mayhem Services to three years of probation and assessing a fine of \$75,000.[\[410\]](#) The U.S. Fish and Wildlife Service and Homeland Security Investigations participated in the investigation.[\[411\]](#)

### **MGI International, LLC (Declination)**

On November 19, 2025, the Fraud Section of DOJ's Criminal Division and the U.S. Attorney's Office for the District of New Hampshire issued a declination letter to MGI International, LLC ("MGI") and its subsidiaries Global Plastics LLC and Marco Polo International LLC (collectively the "Companies") relating to alleged violations of Conspiracy (18 U.S.C. § 371), Smuggling (18 U.S.C. § 545), Entry of Goods by Means of False Statements (18 U.S.C. § 542), and Entry of Goods Falsely Classified (18 U.S.C. § 541).[\[412\]](#) According to the letter, from approximately March 2021 through April 2024, a senior executive at the Companies engaged in a scheme, directing subordinates to falsify country of origin declarations of Chinese imports to evade Section 301 duties owed on products of Chinese origin.[\[413\]](#)

The letter states that the Fraud Section's decision to decline prosecution was based on an assessment of factors including: (1) the Companies' timely and voluntary self-disclosure of the misconduct; (2) the Companies' full and proactive cooperation in this matter (*e.g.*, providing all known relevant facts about the misconduct, including information about the individuals involved and substantial factual and data analysis of the import records) and its agreement to continue to cooperate with any ongoing government investigations and prosecutions that have resulted or might result in the future; (3) the nature and seriousness of the offense; (4) the Companies' timely and appropriate remediation, including termination and disciplinary actions against the employees involved in the scheme, an internal review of the misconduct, an internal review of its compliance program and internal controls, a thorough and systematic root-cause analysis, and enhancements to its broader compliance program; and (5) the absence of aggravating factors that, when weighed against MGI's cooperation and remediation, warrant a disposition other than a resolution under Part I of the CEP.[\[414\]](#) The Companies agreed to disgorge \$3,905,108.77, but no additional payment was required, as the letter credited \$6,896,094 paid pursuant to an earlier civil settlement with DOJ in July 2025.[\[415\]](#)

### **Millenia Productions, LLC (Guilty Plea)**

On August 13, 2025, Millenia Productions, LLC ("Millenia Productions"), a cosmetics manufacturer, entered into a plea agreement with the U.S. Attorney's Office for the District of Kansas for Illegal Storage of Hazardous Waste.[\[416\]](#) The government alleged that Millenia Productions transported over 600 containers of hazardous waste paint and solvents from its own facility in Wichita, Kansas to a property owned by Millenia's owner near a burn

pit.[\[417\]](#) According to DOJ, neither of these properties were legally permitted for the storage, treatment, or disposal of hazardous waste, and a fire near the burn pit led to an explosion that injured an employee.[\[418\]](#) Pursuant to the plea agreement, Millenia agreed to pay a \$285,000 fine and engage an independent consultant as well as an independent auditor to create and audit an Environmental Compliance Plan to be submitted to the court.[\[419\]](#) On November 3, 2025, the court sentenced Millenia Productions consistent with the agreement and imposed a three-year probation term, during which Millenia Productions must self-report to the court or probation office.[\[420\]](#)

### **Mudafort Xtreme Sports & Motorsports, Inc. (Guilty Plea)**

On January 10, 2025, Mudafort Xtreme Sports & Motorsports, Inc. (“Mudafort”), a licensed firearms dealer, entered into a plea agreement for one count of failing to properly maintain forms and firearms acquisition and disposition book records with the U.S. Attorney’s Office for the District of Puerto Rico.[\[421\]](#) The government alleged that, from 2016 to 2021, Mudafort was a federally licensed dealer of firearms and knowingly failed to make appropriate entries and properly maintain ATF 4473 Forms and Firearms Acquisition Disposition Book records that it was required to keep in violation of 18 U.S.C. §§ 922(m) and 924(a)(3)(B).[\[422\]](#) Pursuant to the plea agreement, Mudafort was sentenced to a \$6,000 fine and one year of probation.[\[423\]](#)

### **Murex Management, Inc. (Guilty Plea)**

On July 10, 2025, Murex Management, Inc. (“Murex”), a Texas-based management company affiliated with an ethanol marketing and logistics firm, entered into a plea agreement with the United States Attorney’s Office for the Eastern District of Louisiana to plead guilty in to aiding and abetting a violation of 18 U.S.C. § 1005 for its alleged role in fraudulent transactions involving false ethanol sales.[\[424\]](#) According to the agreement, beginning in 2013, a related company and its parent entities experienced financial strain and engaged in transactions that artificially boosted revenue by falsely reporting ethanol sales to financial institutions.[\[425\]](#) Murex’s actions contributed to millions of dollars of losses to the financial institutions.[\[426\]](#)

Under the plea agreement, Murex agreed to pay a \$6,073,049.24 criminal fine and \$9,672,796.86 in restitution.[\[427\]](#) The agreement requires that the full fine and restitution amounts be paid on or before sentencing and provides that restitution will be non-dischargeable in bankruptcy.[\[428\]](#) The parties also agreed that no forfeiture will be sought if Murex pays the agreed monetary amounts by the time of sentencing.[\[429\]](#) On the same day, the court sentenced Murex consistent with the plea agreement.[\[430\]](#)

### **OHM Pharmacy Services, Inc. (Guilty Plea)**

On April 8, 2025, OHM Pharmacy Services, Inc. (“OHM”), a pharmacy, entered a plea agreement to resolve allegations of health care fraud with the United States Attorney’s Office for the District of Massachusetts.[\[431\]](#) The government alleged that OHM employed prior authorization specialists who improperly completed prior authorization forms with false clinical information for Evzio in place of prescribing physicians and submitted the forms to insurers as if OHM were the physician.[\[432\]](#) Pursuant to the plea agreement, OHM agreed to pay \$82,000 and to a one-year

term of probation.[\[433\]](#) Under a separate civil settlement agreement resolving False Claims Act allegations, OHM agreed to civil forfeiture of \$1,018,000.[\[434\]](#)

### **Old Dutch Mustard Co., Inc. (Guilty Plea)**

On January 16, 2025, Old Dutch Mustard Co., Inc., d/b/a Pilgrim Foods Company (“Old Dutch”), a mustard and vinegar manufacturing company, and the company’s president, entered into a plea agreement with the U.S. Attorney’s Office for the District of New Hampshire and DOJ’s Environmental and Natural Resources Division for three counts of knowingly discharging a pollutant without a permit in violation of the Clean Water Act (“CWA”), 33 U.S.C. §§ 1311(a) and 1319(c)(2)(A).[\[435\]](#) Specifically, Old Dutch pleaded guilty to knowingly discharging acidic water into the Souhegan River between around April 2015 to August 2023.[\[436\]](#)

In connection with the agreement, Old Dutch agreed to a criminal fine of \$1.5 million, an independent compliance consultant, five years of probation, and an order by the court requiring the company to establish an effective environmental compliance program and environmental ethics program.[\[437\]](#) Old Dutch’s president and owner, Charles Santich, also pleaded guilty. Sentencing is currently scheduled to occur on March 10, 2026.

### **Paxful Holdings, Inc. (Guilty Plea)**

On December 9, 2025, Paxful Holdings, Inc. (“Paxful”), an online virtual currency trading platform, pleaded guilty in the U.S. District Court for the Eastern District of California to charges that included conspiracy to willfully fail to maintain an effective AML program, in violation of the Bank Secrecy Act, and conspiracy to operate an unlicensed money transmitting business, in violation of 18 U.S.C. § 1960, pursuant to an October 16, 2025 plea agreement with the U.S. Attorney’s Office for that district and the Money Laundering, Narcotics and Forfeiture Section (“MNF”) of DOJ’s Criminal Division.[\[438\]](#) The platform and its founders allegedly marketed the platform as not requiring know-your-customer (“KYC”) information, allowed customers to use the platform without gathering appropriate KYC information, presented fake AML policies to third parties, and failed to file suspicious activity reports where appropriate. According to the plea agreement, as a result of these alleged failings, the platform was used as a vehicle for money laundering, sanctions violations, and other criminal activity, including fraud, romance scams, extortion schemes, and in particular prostitution.[\[439\]](#)

Under the plea agreement, the platform agreed to pay a criminal penalty of \$4 million. This amount reflects a reduction based on inability to pay from an agreed-upon fine of \$112.5 million, which, in turn, represented a 25% reduction from the bottom of the applicable sentencing guidelines because of the platform’s cooperation.[\[440\]](#) In addition, Paxful and PXF Global Corp., which acquired Paxful’s assets outside the United States in December 2024, agreed to adopt and enhance their anti-money laundering and terrorist financing compliance programs in the jurisdictions in which they operate. PXF Global further agreed that it will make two self-reports to MLARS regarding its compliance program during the two-year term of the plea agreement. Sentencing is scheduled for February 10, 2026.

In 2024, one of the platform’s co-founders, who acted as chief technology officer, pleaded guilty to conspiracy to willfully fail to maintain an effective AML program, and agreed to pay a \$5 million

fine over the course of two years, resign, and refrain from future management at the platform.[\[441\]](#) Immigration and Customs Enforcement Homeland Security Investigations and IRS-CI also participated in the investigation.[\[442\]](#) FinCEN also entered into a parallel resolution with Paxful.[\[443\]](#)

### **PT Services, Inc. (Judgment)**

On November 25, 2025, PT Services, Inc. (“PT Services”), a Memphis-based diesel repair and trucking company, was sentenced in the Western District of Tennessee after pleading guilty to six counts of violating the Clean Air Act’s criminal tampering provision, 42 U.S.C.

§ 7413(c)(2)(C).[\[444\]](#) pursuant to a September 15, 2025 plea agreement with the United States Attorney’s Office for that district.[\[445\]](#) According to DOJ, between June 2023 and August 2024, PT Services modified and deleted emissions-control monitoring devices from diesel engines, conduct that constitutes falsification, tampering, and rendering inaccurate required monitoring components under the Clean Air Act.[\[446\]](#)

The court imposed a \$150,000 criminal fine and a three-year term of organizational probation.[\[447\]](#) PT Services must also implement and maintain a comprehensive compliance program that prohibits the manufacture, sale, installation, or transfer of defeat devices; bars the company from engaging in or causing any conduct that modifies or disables emissions-control hardware or onboard diagnostic systems; and requires immediate cessation of operation of any tampered vehicles owned or operated by the company or its affiliates.[\[448\]](#) PT Services must restore tampered vehicles to their certified configuration or scrap or recycle them in accordance with detailed disposal requirements, all within six months of court approval of the plea agreement.[\[449\]](#) The company must also permit federal, state, and local officials to conduct unannounced inspections of its premises and records for potential Clean Air Act violations.[\[450\]](#)

### **Quadrant Magnetics LLC**

On August 12, 2025, Quadrant Magnetics LLC (“Quadrant”), a Kentucky-based manufacturer of rare-earth magnets, entered into a plea agreement with the United States Attorney’s Office for the Western District of Kentucky and the Counterintelligence and Export Control Section of DOJ’s National Security Division (“NSD”), agreeing to plead guilty to one count of conspiracy to violate the Arms Export Control Act (“AECA”) and the International Traffic in Arms Regulations (“ITAR”) and to one count of conspiracy to commit visa fraud.[\[451\]](#) The charges arose from alleged conduct from approximately January 2012 through December 2018 for the export control violations, and September 2014 through November 2021 for the immigration-related misconduct.[\[452\]](#)

According to the plea agreement, Quadrant allegedly conspired to willfully transmit ITAR-controlled technical data drawings related to magnets used in military applications from the United States to China without obtaining required licenses from the U.S. Department of State.[\[453\]](#) Quadrant also pleaded guilty to knowingly causing false statements and documentation to be submitted to U.S. Citizenship and Immigration Services in connection with an L-1 nonimmigrant visa.[\[454\]](#)

Quadrant agreed to pay a total of \$2,332,515.25, consisting of a \$500,000 criminal penalty and a forfeiture money judgment of \$1,332,515.25 for the ITAR conspiracy, as well as a \$500,000 criminal fine for the visa fraud conspiracy.[\[455\]](#) Quadrant will be placed on two years of supervised release, during which it is prohibited from knowingly performing services or providing products, including rare-earth magnets, under any contract or subcontract with or for the U.S. Department of Defense.[\[456\]](#) This restriction excludes commercial off-the-shelf sales.[\[457\]](#) The company also agreed to destroy export-controlled technical drawings located in China, implement and certify an export controls and procurement compliance program, and submit annual compliance reports to the government for two years following sentencing.[\[458\]](#) Sentencing in this case is scheduled for March 18, 2026.[\[459\]](#)

### **Rossy Sport Bar Panoramico, LLC (Guilty Plea)**

On September 25, 2025, Rossy Sport Bar Panoramico, LLC (“Rossy”) entered into a plea agreement with the U.S. Attorney’s Office for the District of Puerto Rico for alleged bank fraud in violation of 18 U.S.C. § 1344.[\[460\]](#) The government alleged that Rossy requested fraudulent refunds to a debit card associated with FirstBank Puerto Rico.[\[461\]](#) Pursuant to the plea agreement, Rossy pleaded guilty to ten counts of bank fraud and agreed to five years of probation and to pay \$71,463.62 in restitution to FirstBank.[\[462\]](#) Sentencing was scheduled for January 15, 2026, but as of the time of writing, the judgment has not been filed on the docket.

### **Royal Sovereign International, Inc. (Guilty Plea)**

On June 13, 2025, DOJ’s Consumer Protection Branch and the U.S. Attorney’s Office for the District of New Jersey entered into a plea agreement with Royal Sovereign International, Inc. (“Royal Sovereign”), a New Jersey corporation that sold office and home appliances, entered into a plea agreement to resolve alleged violations of Consumer Product Safety Act (“CPSA”) reporting requirements.[\[463\]](#) Specifically, the plea agreement resolved one count alleging that Royal Sovereign knowingly and willfully failed to immediately report defects to the U.S. Consumer Product Safety Commission related to its distribution of portable air conditioners that had been linked to multiple fires and one death.[\[464\]](#) In connection with the agreement, Royal Sovereign agreed to pay \$395,786.48 in restitution to victims.[\[465\]](#) Royal Sovereign also agreed to a civil settlement with the United States on June 16, 2025, that included a bar on the manufacture, distribution, or sale of similar products and a \$16,025,000 civil penalty judgment, of which DOJ agreed to suspend all but \$100,000 due to Royal Sovereign’s inability to pay.[\[466\]](#) Sentencing is scheduled for March 4, 2026.

### **Servismed, LLC (Guilty Plea)**

On August 14, 2025, Servismed, LLC (“Servismed”), a pesticide distribution company, entered into a plea agreement with the U.S. Attorney’s Office for the Northern District of Florida for alleged conspiracy to violate the Federal Insecticide, Fungicide and Rodenticide Act (“FIFRA”).[\[467\]](#) The government alleged that Servismed conspired with others to distribute a pesticide product to combat COVID-19 without registering the product with the EPA.[\[468\]](#) Pursuant to the plea agreement, Servismed agreed to pay \$13,330 in restitution and a \$40,000 fine, forfeit three shipping containers, and dissolve.[\[469\]](#) The judgment was entered the

same day and imposed a sentence consistent with the plea agreement, including that Servismed be dissolved within thirty days of the date the judgment was entered.[\[470\]](#)

### **ShotStop Ballistics, LLC & Vallmar Studios, LLC (Guilty Plea)**

On July 9, 2025, the U.S. District Court for the Northern District of Ohio entered judgment against ShotStop Ballistics, LLC (“ShotStop”), an Ohio-based body-armor company, and co-defendant Vallmar Studios, LLC (“Vallmar”). According to publicly available documents, ShotStop and Vallmar previously pleaded guilty to three counts, of conspiracy to smuggle goods into the United States, conspiracy to traffic in counterfeit goods, and conspiracy to commit mail and wire fraud, in violation of 18 U.S.C. §§ 371, 2320(a)(1), and 1349, respectively.[\[471\]](#) According to DOJ, from approximately 2017 through October 2023 ShotStop and Vallmar imported body-armor plates manufactured in the People’s Republic of China and falsely marketed them as domestically made and certified for law-enforcement use.[\[472\]](#) The plea agreements remain under seal.

The court imposed \$5,883,896 in restitution, for which ShotStop is jointly and severally liable with Vallmar and a third, individual co-defendant, Vail Iliev.[\[473\]](#)

### **Trans World Services, Inc. (Guilty Plea)**

On September 5, 2025, Trans World Services, Inc., also known as SSAS, Inc., Trans World Services of Texas, Inc., and Genuine Parts Planet (collectively, “TWS”), entered into a plea agreement in the Southern District of Texas to resolve two counts of trafficking in counterfeit goods or services, in violation of 18 U.S.C. § 2320.[\[474\]](#) TWS admitted that, from on or about April 1, 2018, through July 31, 2022, it knowingly and intentionally trafficked counterfeit automobile parts, including spark plugs, gaskets, coolant tanks, ignition coils, and clips.[\[475\]](#) Homeland Security Investigations seized approximately 12,109 parts later determined to be counterfeit and valued at roughly \$200,000, as well as materials used to create counterfeit labels, from TWS’s Houston warehouse.[\[476\]](#) The government also alleged that TWS sold approximately 5,000 counterfeit Toyota gaskets to a Maryland dealership in June 2022.[\[477\]](#)

Under the plea agreement, TWS agreed to plead guilty to both counts, pay a \$100,000 criminal fine, forfeit the seized property, and accept a one-year term of corporate probation.[\[478\]](#) Special conditions of probation require TWS and its authorized representative, Mohammad H. Samana, to permanently retire from any business involving the buying or selling of automobile parts.[\[479\]](#) The agreement also requires TWS to pay restitution, including at least \$2,250 in losses incurred by Bayside Toyota in Frederick, Maryland.[\[480\]](#) On September 24, 2025, the court sentenced TWS consistent with the plea agreement.[\[481\]](#)

### **Troy Health, Inc. (NPA)**

On August 14, 2025, Troy Health, Inc. d/b/a Troy Medicare (“Troy”), a North Carolina-based Medicare Advantage organization, entered into an 18-month NPA with the Fraud Section of DOJ’s Criminal Division and the U.S. Attorney’s Office for the Western District of North Carolina.[\[482\]](#) The agreement resolved allegations that, from approximately October 2020 through December 2022, Troy defrauded the United States Centers for Medicare & Medicaid Services (“CMS”) by unlawfully enrolling Medicare beneficiaries in its Medicare Advantage plans

without their knowledge or consent.[\[483\]](#) The government alleged that Troy, facilitated in part by its proprietary software and artificial intelligence tools, unlawfully accessed beneficiaries' personal identifying and health information without authorization, conducted misleading and deceptive sales calls, and used automated and batch enrollments to fraudulently enroll large numbers of Medicare beneficiaries in Troy's Medicare Advantage plans without their consent.[\[484\]](#)

In connection with the NPA, Troy agreed to pay a criminal monetary penalty of \$1,430,008, adjusted based on Troy demonstrating its inability to pay the total criminal penalty and forfeiture.[\[485\]](#) DOJ cited Troy's acceptance of responsibility, provision of relevant facts (including information about individuals involved), self-reporting to CMS of its batch enrollment issues, extensive remedial measures, compliance enhancements, lack of prior criminal or regulatory history, and commitment to cooperation as factors supporting the resolution, while noting that Troy did not receive voluntary self-disclosure credit and that, particularly in the early stages of the investigation, the company failed to timely preserve and produce certain documents and at times acted inconsistently with full cooperation.[\[486\]](#)

### **Universities Space Research Association (Declination)**

On April 23, 2025, the Counterintelligence and Export Control Section ("CES") of DOJ's National Security Division ("NSD") and the U.S. Attorney's Office for the Northern District of California issued a declination letter to the Universities Space Research Association ("USRA") after it self-reported violations of U.S. export control laws by former employee Jonathan Soong.[\[487\]](#) Soong allegedly illegally exported aviation software to a Chinese university on the Commerce Department's Entity List and was sentenced to 20 months in prison.[\[488\]](#) DOJ declined to prosecute USRA for violations of the International Emergency Economic Powers Act ("IEEPA"), 50 U.S.C. §§ 1701-1707, the Export Control Reform Act of 2018 ("ECRA"), 50 U.S.C. §§ 4801-4852, the Export Administration Regulations ("EAR"), 15 C.F.R. Parts 730-774, the False Claims Act, 18 U.S.C. § 287, false statements, 18 U.S.C. § 1001, wire fraud, 18 U.S.C. § 1343, and obstruction of justice, 18 U.S.C. § 1512.[\[489\]](#)

According to the declination letter, DOJ declined to prosecute USRA due to several factors, including USRA's timely and voluntary self-disclosure of the misconduct; its exceptional and proactive cooperation with the government's investigation, which materially assisted the prosecution of Mr. Soong; and its timely and appropriate remediation, including terminating Mr. Soong and disciplining a supervisory employee who allegedly failed appropriately to supervise Mr. Soong.[\[490\]](#) The declination letter acknowledged DOJ's determination that USRA had no unlawful gains from the offenses and had already paid restitution by re-paying \$94,000 of Mr. Soong's salary to NASA and \$161,000 in sales embezzled by Mr. Soong to the U.S. Treasury.[\[491\]](#)

### **Virginia Pump and Motor Company, Inc. (Guilty Plea)**

On November 17, 2025, Virginia Pump and Motor Company, Inc., a corporation providing grease pumping services to residential and commercial customers in Virginia, entered into a plea agreement with the United States Attorney's Office for the Eastern District of Virginia for violating the Clean Water Act and conditions of its industrial user permit under the Hampton Roads Sanitation District's ("HRSD") approved local pretreatment program.[\[492\]](#) According to the

government, between 2022 and 2024, Virginia Pump and Motor Company serviced grease traps from customers using company trucks and illegally discharged grease waste into the HRSD's system at unauthorized locations instead of transporting the waste to HRSD-designated disposal sites, as required by pretreatment regulations.<sup>[493]</sup> During this period, Virginia Pump and Motor Company allegedly submitted 18 monthly reports to HRSD containing false statements that underreported the volume of grease pumped from clients and improperly disposed of at non-HRSD-designated locations.<sup>[494]</sup>

Pursuant to the plea agreement, Virginia Pump and Motor Company agreed to pay a fine of \$150,000 and restitution in the amount of \$126,000, as well as a three-year probation period.<sup>[495]</sup> The company also agreed to pay \$100,000 to the Hampton Roads Sanitation District to fund community service projects that remedy the harmful effects of the crime and to implement an effective ethics and compliance program, to be monitored by the U.S. Probation Office.<sup>[496]</sup> Sentencing is scheduled for February 18, 2026.<sup>[497]</sup>

## **V. Ships Norway A.S. (Guilty Plea)**

On August 27, 2025, V. Ships Norway A.S., a maritime management company, pleaded guilty to violating the Act to Prevent Pollution from Ships ("APPS") in connection with illegal discharges from the vessel, *M/T Swift Winchester*.<sup>[498]</sup> The government alleged that V. Ships Norway A.S. knowingly discharged oily bilge water and oily waste overboard from the *M/T Swift Winchester* and deliberately omitted these charges from the vessel's oil record book.<sup>[499]</sup>

Pursuant to the plea agreement, V. Ships Norway A.S. was ordered to pay a \$2 million criminal fine.<sup>[500]</sup> The company was also sentenced to a four-year probationary period during which it must adopt and implement environmental compliance plans, retain the services of an independent third-party auditor to perform external audits, and fund a court-appointed monitor.<sup>[501]</sup> The plea agreement included a provision expressly requiring V. Ships Norway A.S. not to take any position on any motion the government may file for payment of fine money to the whistleblower who provided information that ultimately led to the resolution,<sup>[502]</sup> which, under the relevant maritime statute, could be up to half the fine amount.<sup>[503]</sup> On September 8, 2025, the court imposed \$2 million in criminal fines and four years of probation.<sup>[504]</sup>

<sup>[1]</sup> Gibson Dunn began tracking corporate guilty pleas in 2022. Our data generally capture information publicly available at the time of the agreement; if sentencing has not occurred by year-end, monetary recoveries may not be included in our data. Following publication of our prior updates, we identified additional plea agreements not originally included in those prior updates. We have adjusted the data here to reflect those additional plea agreements.

<sup>[2]</sup> DOJ, *Reinstating the Prohibition on Improper Guidance Documents* (Feb. 5, 2025), <https://www.justice.gov/ag/media/1388511/dl?inline>.

<sup>[3]</sup> DOJ, *Total Elimination of Cartels and Transnational Criminal Organizations* (Feb. 5, 2025), <https://www.justice.gov/ag/media/1388546/dl?inline>.

[4] See DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

[5] See DOJ, *Criminal Division Corporate Enforcement and Voluntary Self-Disclosure Policy* (May 12, 2025), [https://www.justice.gov/d9/2025-05/revised\\_corporate\\_enforcement\\_policy\\_-\\_2025.05.11\\_-\\_final\\_with\\_flowchart\\_0.pdf](https://www.justice.gov/d9/2025-05/revised_corporate_enforcement_policy_-_2025.05.11_-_final_with_flowchart_0.pdf).

[6] See DOJ, *Department of Justice Corporate Whistleblower Awards Pilot Program* (May 12, 2025), <https://www.justice.gov/criminal/media/1400041/dl?inline>.

[7] See DOJ, *Memorandum on Selection of Monitors in Criminal Division Matters* (May 12, 2025), <https://www.justice.gov/criminal/media/1400036/dl?inline>.

[8] DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

The ten high-impact areas are:

“1. Waste, fraud, and abuse, including health care fraud and federal program and procurement fraud that harm the public fisc;

2. Trade and customs fraud, including tariff evasion;
3. Fraud perpetrated through [variable interest entities], including, but not limited to, offering fraud, “ramp and dumps,” elder fraud, securities fraud, and other market manipulation schemes;
4. Fraud that victimizes U.S. investors, individuals, and markets including, but not limited to, Ponzi schemes, investment fraud, elder fraud, servicemember fraud, and fraud that threatens the health and safety of consumers;
5. Conduct that threatens the country’s national security, including threats to the U.S. financial system by gatekeepers, such as financial institutions and their insiders that commit sanctions violations or enable transactions by Cartels, TCOs, hostile nation-states, and/or foreign terrorist organizations;
6. Material support by corporations to foreign terrorist organizations, including recently designated Cartels and TCOs;
7. Complex money laundering, including Chinese Money Laundering Organizations, and other organizations involved in laundering funds used in the manufacturing of illegal drugs;
8. Violations of the Controlled Substances Act and the Federal Food, Drug, and Cosmetic Act (FDCA), including the unlawful manufacture and distribution of chemicals and equipment used to create counterfeit pills laced with fentanyl and unlawful distribution of opioids by medical professionals and companies;
9. Bribery and associated money laundering that impact U.S. national interests, undermine U.S. national security, harm the competitiveness of U.S. businesses, and enrich foreign corrupt officials; and
10. As provided by the Digital Assets DAG Memorandum: crimes (1) involving digital assets that victimize investors and consumers; (2) that use digital assets in furtherance of other criminal conduct; and (3) willful violations that facilitate significant criminal activity. Cases

impacting victims, involving cartels, TCOs, or terrorist groups, or facilitating drug money laundering or sanctions evasion shall receive highest priority.” *Id.* at 4–5.

[9] *See id.*

[10] *Id.* at 2.

[11] *See, e.g.*, Exec. Order 14249, 90 Fed. Reg. 14011 (Mar. 28, 2025); Exec. Order 14275, 90 Fed. Reg. 16447 (Apr. 18, 2025).

[12] *See infra* Dune Medical Supply, LLC and Prospect Health Solutions, Inc. (Guilty Pleas); KBWB Operations, LLC (Guilty Plea); OHM Pharmacy Services, Inc. (Guilty Plea); Troy Health Inc. (NPA); Kimberly Clark (DPA); Life Touch LLC (Guilty Plea); Aesculap Implant Systems, LLC (NPA) updates.

[13] *See infra* KBWB Operations LLC (“KBWB”) update.

[14] *See* Press Release, DOJ, Justice Department Expands Health Care Fraud Unit to Target Health Care Fraud in Massachusetts (Sept. 23, 2025), <https://www.justice.gov/opa/pr/justice-department-expands-health-care-fraud-unit-target-health-care-fraud-massachusetts>.

[15] *See id.*

[16] *See id.*

[17] *See id.*

[18] Fact Sheet: President Donald J. Trump Establishes New Department of Justice Division for National Fraud Enforcement, White House (Jan. 8, 2026), <https://www.whitehouse.gov/fact-sheets/2026/01/fact-sheet-president-donald-j-trump-establishes-new-department-of-justice-division-for-national-fraud-enforcement/>.

[19] Exec. Order 14209, 90 Fed. Reg. 9587 (Feb. 10, 2025).

[20] Gibson Dunn’s analysis of that Executive Order can be found at <https://www.gibsondunn.com/president-trump-pauses-new-fcpa-enforcement-initiates-enforcement-review-and-directs-preparation-of-new-guidance/>.

[21] *See* DOJ, *Guidelines for Investigations and Enforcement of the Foreign Corrupt Practices Act (FCPA)* (June 9, 2025), <https://www.justice.gov/dag/media/1403031/dl>.

[22] DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* at 4 (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

[23] DOJ, *Guidelines for Investigations and Enforcement of the Foreign Corrupt Practices Act (FCPA)* at 2 (June 9, 2025), <https://www.justice.gov/dag/media/1403031/dl>.

[24] *Id.* at 2–4.

[25] See DOJ, *Total Elimination of Cartels and Transnational Criminal Organizations* (Feb. 5, 2025), <https://www.justice.gov/ag/media/1388546/dl?inline>.

[26] *Id.* at 3. Gibson Dunn’s analysis of this and other memoranda issued by Attorney General Bondi can be found at <https://www.gibsondunn.com/new-memoranda-from-attorney-general-bondi-topics-to-watch-in-corporate-enforcement/>.

[27] See DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>; DOJ, *Criminal Division Corporate Enforcement and Voluntary Self-Disclosure Policy* (May 12, 2025), [https://www.justice.gov/d9/2025-05/revised\\_corporate\\_enforcement\\_policy\\_-\\_2025.05.11\\_-\\_final\\_with\\_flowchart\\_0.pdf](https://www.justice.gov/d9/2025-05/revised_corporate_enforcement_policy_-_2025.05.11_-_final_with_flowchart_0.pdf); DOJ, *Department of Justice Corporate Whistleblower Awards Pilot Program* (May 12, 2025), <https://www.justice.gov/criminal/media/1400041/dl?inline>; DOJ, *Memorandum on Selection of Monitors in Criminal Division Matters* (May 12, 2025), <https://www.justice.gov/criminal/media/1400036/dl?inline>.

[28] DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* at 4 (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

[29] Matthew R. Galeotti, Acting Assistant Att’y Gen., DOJ, Remarks at Association of Certified Anti-Money Laundering Specialists (ACAMS) Conference (Sept. 17, 2025) <https://www.justice.gov/opa/speech/acting-assistant-attorney-general-matthew-r-galeotti-delivers-remarks-association>.

[30] *Id.*

[31] Press Release, DOJ, TIGO Guatemala Paid Over \$118M To Resolve Foreign Bribery Investigation (Dec. 12, 2025), <https://www.justice.gov/opa/pr/tigo-guatemala-paid-over-118m-resolve-foreign-bribery-investigation>.

[32] See DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>; DOJ, *Criminal Division Corporate Enforcement and Voluntary Self-Disclosure Policy* (May 12, 2025), [https://www.justice.gov/d9/2025-05/revised\\_corporate\\_enforcement\\_policy\\_-\\_2025.05.11\\_-\\_final\\_with\\_flowchart\\_0.pdf](https://www.justice.gov/d9/2025-05/revised_corporate_enforcement_policy_-_2025.05.11_-_final_with_flowchart_0.pdf); DOJ, *Department of Justice Corporate Whistleblower Awards Pilot Program* (May 12, 2025), <https://www.justice.gov/criminal/media/1400041/dl?inline>; DOJ, *Memorandum on Selection of Monitors in Criminal Division Matters* (May 12, 2025), <https://www.justice.gov/criminal/media/1400036/dl?inline>.

[33] See DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* at 4 (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>; DOJ, *Department of Justice Corporate Whistleblower Awards Pilot Program* at 6 (May 12, 2025), <https://www.justice.gov/criminal/media/1400041/dl?inline>.

xxxiv See DOJ, *Departments of Justice and Homeland Security Partnering on Cross-Agency Trade Fraud Task Force*, (Aug. 29, 2025) <https://www.justice.gov/opa/pr/departments-justice-and-homeland-security-partnering-cross-agency-trade-fraud-task-force>.

xxxv *Id.*

xxxvi *Id.*

xxxvii See *id.*

[38] See DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>; DOJ, *Criminal Division Corporate Enforcement and Voluntary Self-Disclosure Policy* (May 12, 2025), [https://www.justice.gov/d9/2025-05/revised\\_corporate\\_enforcement\\_policy\\_-\\_2025.05.11\\_-\\_final\\_with\\_flowchart\\_0.pdf](https://www.justice.gov/d9/2025-05/revised_corporate_enforcement_policy_-_2025.05.11_-_final_with_flowchart_0.pdf); DOJ, *Department of Justice Corporate Whistleblower Awards Pilot Program* (May 12, 2025), <https://www.justice.gov/criminal/media/1400041/dl?inline>; DOJ, *Memorandum on Selection of Monitors in Criminal Division Matters* (May 12, 2025), <https://www.justice.gov/criminal/media/1400036/dl?inline>.

[39] DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* at 3 (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

[40] See DOJ, *Department of Justice Corporate Whistleblower Awards Pilot Program* at 5 (May 12, 2025), <https://www.justice.gov/criminal/media/1400041/dl?inline>.

[41] See *infra* Aux Cayes Fintech Co. Ltd. d/b/a OKX, Brink's Global Services USA, Inc., Brink's Global Services USA, Inc., Paxful Holdings, Inc., and Peken Global Limited / KuCoin updates.

[42] See *infra* Paxful Holdings, Inc. update.

[43] See DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* at 5 (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

[44] *Id.*

[45] *Id.* at 4.

[46] See *infra* Gotbit Consulting LLC and CLS Global FZC LLC updates.

[47] Letter from DOJ on BofA Securities, Inc. (Sept. 17, 2025), <https://www.justice.gov/criminal/media/1414486/dl?inline>.

[48] See *infra* Able Groupe, Inc. (Guilty Plea); Advanced Inventory Management, Inc. (DPA); Aesculap Implant System (NPA); Kimberly-Clark Corporation (DPA).

[49] See, e.g., Press Release, DOJ, Digital Health Company and Medical Practice Indicted in \$100M Adderall Distribution Scheme, (Dec. 17, 2025), <https://www.justice.gov/opa/pr/digital-health-company-and-medical-practice-indicted-100m-adderall-distribution-scheme>.

[50] See DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

[51] Speech, DOJ, Acting Assistant Attorney General Matthew R. Galeotti Delivers Remarks at Association of Certified Anti-Money Laundering Specialists (ACAMS) Conference (Sept. 17, 2025), <https://www.justice.gov/opa/speech/acting-assistant-attorney-general-matthew-r-galeotti-delivers-remarks-association>.

[52] See Plea Agreement, *United States v. Cadence Design Sys, Inc.*, 25-00217-EJD (N.D. Cal. Jul 28, 2025); DOJ, Nat'l Sec. Div., USRA Declination Letter (Apr. 23, 2025), <https://www.justice.gov/nsd/case-document/usra-declination-letter>; Plea Agreement, *U.S. v. Hao Global LLC*, No. 4:25-cr-00510 (S.D. Tex. Oct 10, 2025); Press Release, DOJ, U.S. Authorities Shut Down Major China-Linked AI Tech Smuggling Network (Dec 8, 2025), <https://www.justice.gov/opa/pr/us-authorities-shut-down-major-china-linked-ai-tech-smuggling-network>.

[53] See DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

[54] Deputy Attorney General Todd Blanche, Ending Regulation by Prosecution (Apr. 7, 2025), <https://www.justice.gov/dag/media/1395781/dl?inline>.

[55] *Id.*

[56] DOJ, Acting Assistant Attorney General Matthew R. Galeotti Delivers Remarks at the American Innovation Project Summit in Jackson, Wyoming (Aug. 21, 2025), <https://www.justice.gov/opa/speech/acting-assistant-attorney-general-matthew-r-galeotti-delivers-remarks-american>.

[57] See DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

[58] See *id.*

[59] See *id.*

[60] See Government's Unopposed Motion to Dismiss Information, *United States v. ABB Ltd.*, No. 1:22-cr-00220-MSN, ECF 23 (E.D. Va. June 18, 2025); Unopposed Motion to Dismiss Information, *United States v. UOP, LLC, d/b/a Honeywell UOP*, No. 4:22-cr-00624, ECF 24 (S.D. Tex. July 2, 2025); Government's Unopposed Motion to Dismiss Information, *United States v. Stericycle, Inc.*, No. 1:22-cr-20156-KMM, ECF 21 (S.D. Fla. Apr. 21, 2025).

[61] See Albemarle Corp., Quarterly Report (Form 10-Q) (Apr. 30, 2025); Consent Motion to Modify Conditions of Probation, *United States v. Glencore International A.G.*, No. 1:22-cr-00297-LGS, ECF 62 (S.D.N.Y. Mar. 19, 2025).

[62] DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

[63] See *id.*

[64] Speech, DOJ, Head of the Criminal Division, Matthew R. Galeotti Delivers Remarks at SIFMA's Anti-Money Laundering and Financial Crimes Conference (May 12, 2025), <https://www.justice.gov/opa/speech/head-criminal-division-matthew-r-galeotti-delivers-remarks-sifmas-anti-money-laundering>.

[65] *Id.*

[66] DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

[67] DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

[68] Speech, DOJ, Head of the Criminal Division, Matthew R. Galeotti Delivers Remarks at SIFMA's Anti-Money Laundering and Financial Crimes Conference (May 12, 2025), <https://www.justice.gov/opa/speech/head-criminal-division-matthew-r-galeotti-delivers-remarks-sifmas-anti-money-laundering>.

[69] See *id.*

[70] See DOJ, Criminal Division Corporate Enforcement and Voluntary Self-Disclosure Policy (May 12, 2025), [https://www.justice.gov/d9/2025-05/revised\\_corporate\\_enforcement\\_policy\\_-\\_2025.05.11\\_-\\_final\\_with\\_flowchart\\_0.pdf](https://www.justice.gov/d9/2025-05/revised_corporate_enforcement_policy_-_2025.05.11_-_final_with_flowchart_0.pdf).

[71] In contrast, DOJ policy under the Biden Administration directed prosecutors considering non-prosecution to give the “greatest significance” to “recent U.S. criminal resolutions, and to prior misconduct involving the same personnel or management.” This policy de-emphasized conduct addressed by criminal resolution more than ten years prior, or civil / regulatory resolutions finalized more than five years prior. However, conduct that fell outside of this timeframe could still be considered if it was part of a pattern of behavior indicative of deficient corporate “compliance culture or institutional safeguards.” See Memorandum from Deputy Attorney General Lisa O. Monaco, *Further Revisions to Corporate Criminal Enforcement Policies Following Discussions with Corporate Crime Advisory Group* (Sept. 15, 2022). See also Speech, DOJ, Deputy Attorney General Lisa O. Monaco Delivers Remarks on Corporate Criminal Enforcement (Sept. 15, 2022), <https://www.justice.gov/archives/opa/speech/deputy-attorney-general-lisa-o-monaco-delivers-remarks-corporate-criminal-enforcement>.

[72] See DOJ, Crim. Div., MGI International, LLC Declination Letter (Nov. 19, 2025).

[73] See DOJ, Nat'l Sec. Div., White Deer Management LLC Declination Letter (Dec. 19, 2024); DOJ, Nat'l Sec. Div., Unicat Catalyst Technologies, LLC Declination Letter (Dec. 19, 2024).

[74] Speech, DOJ, Head of Justice Department's Criminal Division Matthew R. Galeotti Delivers Remarks at American Conference Institute Conference (June 10, 2025), <https://www.justice.gov/opa/speech/head-justice-departments-criminal-division-matthew-r-galeotti-delivers-remarks-american>.

[75] Speech, DOJ, Head of the Criminal Division, Matthew R. Galeotti Delivers Remarks at SIFMA's Anti-Money Laundering and Financial Crimes Conference (May 12, 2025), <https://www.justice.gov/opa/speech/head-criminal-division-matthew-r-galeotti-delivers-remarks-sifmas-anti-money-laundering>.

[76] *Id.*

[77] DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>

[78] Galeotti, Speech (June 10, 2025), *supra* note 74.

[79] DOJ, *Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime* (May 12, 2025), <https://www.justice.gov/criminal/media/1400046/dl?inline>.

[80] Memorandum, DOJ, Matthew R. Galeotti, *Selection of Monitors in Criminal Division Matters* (May 12, 2025), at 2-3, <https://www.justice.gov/criminal/media/1400036/dl?inline>.

[81] Galeotti, *Speech* (June 10, 2025), *supra* note 74.

[82] Galeotti, *Memorandum*, *supra* note 80, at 6.

[83] *Id.* at 4.

[84] *Id.*

[85] *Id.*

[86] Consent Motion to Modify Conditions of Probation, *United States v. Glencore International A.G.*, No. 1:22-cr-00297-LGS, ECF No. 62 (S.D.N.Y. Mar. 19, 2025).

[87] Order Granting Joint Motion to Amend Plea Agreement, *United States v. NatWest Markets PLC*, No. 3:21-cr-00187-OAW, ECF 36 (D. Conn. Sept. 4, 2025).

[88] Non-Prosecution Agreement, *United States v. The Boeing Co.*, No. 4:21-cr-00005-O, ECF No. 312-1 (N.D. Tex. May 29, 2025).

[89] Deferred Prosecution Agreement, *United States v. The Boeing Co.*, No. 4:21-cr-00005-O, ECF No. 4 (N.D. Tex. Jan. 7, 2021).

[90] *Id.* at 3.

[91] See DOJ Letter, *United States v. The Boeing Co.*, No. 4:21-cr-00005, Dkt. No. 199 (N.D. Tex. Dec. 5, 2024).

[92] *Id.* at 3.

[93] *Id.* at 3–10.

[94] Plea Agreement, *United States v. Paxful Holdings, Inc.*, No. 2:25-CR-235 (E.D. Cal. Dec. 9, 2025), ECF No. 18 (“Paxful Plea Agreement”).

[95] Deferred Prosecution Agreement, *United States v. Comunicaciones Celulares S.A., d/b/a Tigo Guatemala*, No. 1:25-CR-20476, (S.D. Fla. Nov. 12, 2025), ECF 17 (“TIGO DPA”).

[96] Paxful Plea Agreement at D-1; TIGO DPA at D-1.

[97] Deferred Prosecution Agreement, *United States v. TD Sec. (USA) LLC*, No. 2:24-cr-00623, at D-4 (D.N.J. Sept. 30, 2024) (“TD Securities DPA”); Plea Agreement, *United States v. Gunvor S.A.*, No. 1:24-cr-00085-ENV, at D-4 (E.D.N.Y. Mar. 1, 2024) (“Gunvor Plea Agreement”).

[98] Plea Agreement, *United States v. Aux Cayes FinTech Co. Ltd., d/b/a “OKEx,” d/b/a/ “OKX,”* No. 1:25-cr-00069 (S.D.N.Y. Feb. 24, 2025) (“OKX Plea Agreement”).

[99] Plea Agreement, *United States v. Old Dutch Mustard Co., Inc., d/b/a Pilgrim Foods, Inc.*, No. 1:25-cr-00002-LM-TSM, ECF No. 3 (D.N.H. Jan. 24, 2025) (“Old Dutch Mustard Plea Agreement”).

[100] We note that Attachment C to OKX’s Plea Agreement, which discusses the external compliance consultant framework, appears incomplete, with the attachment missing page “C-5.” Consequently, we were able to conduct only limited analysis of this framework.

[101] OKX Plea Agreement, *supra* note 98 at C-1.

[102] *Id.* at C-4.

[103] *Id.* at C-1–C-4.

[104] Old Dutch Mustard Plea Agreement, *supra* note 99, at A-2.

[105] *Id.* at 2–5.

[106] OKX Plea Agreement, *supra* note 98 at C-1.

[107] Old Dutch Plea Agreement, *supra* note 99, at A-1.

[108] Memorandum, DOJ, Matthew R. Galeotti, *Guidance on Coordinating Corporate Resolution Penalties in Parallel Criminal, Civil, Regulatory, and Administrative Proceedings* (June 5, 2025), <https://www.justice.gov/criminal/media/1402751/dl?inline>.

[109] *Id.* at 1-2.

[110] *Id.* at 6.

[111] *Id.* at 5.

[112] *Id.* at 5–6.

[113] *Id.* at 6.

[114] *See id.*

[115] Speech, DOJ, Director Emma Burnham of the Antitrust Division's Criminal Enforcement Section Delivers Remarks to Global Competition Review (Mar. 11, 2025), <https://www.justice.gov/opa/speech/director-emma-burnham-antitrust-divisions-criminal-enforcement-section-delivers-remarks>.

[116] *Id.*

[117] *See id.*

[118] *Id.*

[119] *See id.*

[120] *Id.*

[121] We counted four corporate enforcement agreements in 2024, nine in 2023, and four in each of 2022, 2021, and 2020.

[122] Press Release, DOJ, Justice Department's Antitrust Division Announces Whistleblower Rewards Program (July 8, 2025), <https://www.justice.gov/opa/pr/justice-departments-antitrust-division-announces-whistleblower-rewards-program>.

[123] DOJ, Antitrust Div., Memorandum of Understanding Regarding the Whistleblower Rewards Program and Procedures (May 7, 2025), at 3, <https://www.justice.gov/atr/media/1407261/dl?inline>.

[124] *Id.* at 8.

[125] *Id.* at 2, 7.

[126] *Id.* at 4.

[127] Press Release, DOJ, Justice Department's Antitrust Division Announces Whistleblower Rewards Program (July 8, 2025), <https://www.justice.gov/opa/pr/justice-departments-antitrust-division-announces-whistleblower-rewards-program>.

[128] Gibson Dunn, DOJ Antitrust Division Announces New Whistleblower Reward Program (July 31, 2025), <https://www.gibsondunn.com/doj-antitrust-division-announces-new-whistleblower-reward-program/> (collecting sources).

[129] Press Release, DOJ, Whistleblower Report Led to Charges a Deferred Prosecution Agreement, and \$3.28 million fine against an International Corporation (Jan. 29, 2026), <https://www.justice.gov/opa/pr/antitrust-division-and-us-postal-service-award-first-ever-1m-payment-whistleblower-reporting>.

[129a] Serious Fraud Office, SFO Cooperation Guidance (Apr. 24, 2025), <https://www.gov.uk/government/publications/sfo-corporate-guidance>; see also Serious Fraud Office, SFO sets out route for businesses to avoid prosecution (Apr. 24, 2025), <https://www.gov.uk/government/news/sfo-sets-out-route-for-businesses-to-avoid-prosecution>.

[130] See Guidance, *supra* note 129.

[131] See *id.*

[132] Crown Prosecution Service & Serious Fraud Office, Corporate Prosecutions: Guidance on Corporate Prosecutions (Aug. 18, 2025), <https://www.cps.gov.uk/legal-guidance/corporate-prosecutions>.

[133] Crown Prosecution Service, Organisations must prepare now for new fraud prevention law (Aug. 18, 2025), <https://www.cps.gov.uk/cps/news/organisations-must-prepare-now-new-fraud-prevention-law>.

[134] Serious Fraud Office, SFO Guidance on Evaluating a Corporate Compliance Programme (Nov. 26, 2025), <https://www.gov.uk/government/publications/sfo-guidance-on-evaluating-a-corporate-compliance-programme>.

[135] Openbaar Ministerie, Boete van 14 miljoen euro voor ABN AMRO voor medeplichtigheid aan dividendbelastingontduiking door een andere bank (May 28, 2025), <https://www.om.nl/actueel/nieuws/2025/05/28/boete-van-14-miljoen-euro-voor-abn-amro-voor-medeplichtigheid-aan-dividendbelastingontduiking-door-een-andere-bank>.

[136] Openbaar Ministerie, Geldboete 101 miljoen voor Morgan Stanley wegens dividendbelastingontduiking (Nov. 27, 2025),

<https://www.om.nl/actueel/nieuws/2025/11/27/geldboete-101-miljoen-voor-morgan-stanley-wegens-dividendbelastingontduiking>.

[137] Controladoria-Geral da União & Advocacia-Geral da União, CGU e AGU Assinam Acordo de Leniência com a Qualicorp (Mar. 17, 2025), <https://www.gov.br/agu/pt-br/comunicacao/noticias/agu-e-cgu-assinam-acordo-de-leniencia-com-a-qualicorp>; Controladoria-Geral da União & Advocacia-Geral da União, CGU e AGU assinam acordo de leniência com a empresa Trafigura Beheer B.V. (Mar. 31, 2025), <https://www.gov.br/cgu/pt-br/assuntos/noticias/2025/03/cgu-e-agu-assinam-acordo-de-leniencia-com-a-empresa-trafigura-beheer-b-v>; Controladoria-Geral da União & Advocacia-Geral da União, CGU e AGU assinam acordo de leniência com empresa de processamento de alimentos (May 9, 2025), <https://www.gov.br/cgu/pt-br/assuntos/noticias/2025/05/cgu-e-agu-assinam-acordo-de-leniencia-com-empresa-de-processamento-de-alimentos>.

[138] Controladoria-Geral da União & Advocacia-Geral da União, CGU e AGU assinam acordo de leniência com empresas que atuam na indústria naval e de energia (July 30, 2025), <https://www.gov.br/cgu/pt-br/assuntos/noticias/2025/07/cgu-e-agu-assinam-acordo-de-leniencia-com-empresas-que-atuam-na-industria-naval-e-de-energia>.

[139] Controladoria-Geral da União, CGU e AGU mudam regras dos acordos de leniência e ampliam incentivos à autodenúncia (Dec. 2025), <https://www.gov.br/cgu/pt-br/assuntos/noticias/2025/12/cgu-e-agu-mudam-regras-dos-acordos-de-leniencia-e-ampliam-incentivos-a-autodenuncia>.

[140] *See id.*

[141] Media Release, Attorney-General's Chambers Singapore, Seatrium Limited to Pay Financial Penalty of US\$110m Under Deferred Prosecution Agreement for Corruption Offences in Brazil (July 30, 2025), <https://www.agc.gov.sg/newsroom/seatrium-limited-to-pay-financial-penalty-of-us-110m-under-deferred-prosecution-agreement-for-corruption-offences-in-brazil/>.

[142] *See id.*

[143] *See id.*

[144] Press Release, Serious Fraud Office, UK, France and Switzerland Announce New Anti-Corruption Alliance (Mar. 20, 2025), <https://www.gov.uk/government/news/uk-france-and-switzerland-announce-new-anti-corruption-alliance>.

[145] On September 9, 2025, the U.S. District Court for the District of Arizona accepted plea agreements from Backpage.com LLC and several related companies. *See* Plea Agreements, *United States v. Backpage.com LLC et. al*, No. 2:18-cr-00465-DJH, (D. Ariz. Sep. 9, 2025), ECF Nos. 180-185. Because the companies entered into the agreements in 2018, these resolutions are not included in this update.

[146] Term of Agreement refers to duration of probation or the agreed upon term.

[146a] Plea Agreement, *United States v. Abda Moving, LLC*, No. 3:25-cr-00325 (D.N.J. May 21, 2025) (“11Even Movers Plea Agreement”); Plea Agreement, *United States v. Mallad Trading, LLC*, No. 3:25-cr-00326 (D.N.J. May 21, 2025) (“Mallad Trading Plea Agreement”).

[147] 11Even Plea Agreement at 7–8; Mallad Trading Plea Agreement at 7.

[148] 11Even Plea Agreement at 7–8; Mallad Trading Plea Agreement at 7.

[149] Judgment at 5, *United States v. Abda Moving, LLC*, No. 3:25-cr-00325 (D.N.J. Oct. 7, 2025); Judgment at 5, *United States v. Mallad Trading, LLC*, No. 3:25-cr-00326 (D.N.J. Oct. 8, 2025).

[150] Plea Agreement, *United States v. Able Groupe Inc.*, No. 3:25-cr-00373-N (N.D. Tex. Aug. 15, 2025), ECF No. 2.

[151] Press Release, DOJ, Online Seller of Infant Formula Pleads Guilty to Smuggling and Violating FDA Prior Notice Requirements (November 21, 2025), <https://www.justice.gov/opa/pr/online-seller-infant-formula-pleads-guilty-smuggling-and-violating-fda-prior-notice> (“Able Groupe Inc. Press Release”).

[152] *Id.*

[153] Plea Agreement, *United States v. Able Groupe Inc.*, No. 3:25-cr-00373-N, at 2–3.

[154] Able Groupe Press Release.

[155] Deferred Prosecution Agreement, *United States v. Advanced Inventory Management, Inc.*, No. 25-CR-18-1 (N.D. Ill. 2025), at 1.

[156] Deferred Prosecution Agreement, *Advanced Inventory Management, Inc.*, Attachment A Statement of Facts at 21–24.

[157] Press Release, U.S. Atty’s Off. N.D. Ill., Suburban Chicago Medical Device Company to Pay \$1 Million To Resolve Federal Fraud Investigation (February 14, 2025), <https://www.justice.gov/usao-ndil/pr/suburban-chicago-medical-device-company-pay-1-million-resolve-federal-fraud>.

[158] *Id.*

[159] Deferred Prosecution Agreement, *Advanced Inventory Management, Inc.*, at 7–8.

[160] *Id.* at 31.

[161] Press Release, DOJ Atty’s Off. E.D. Va., Aesculap Implant Systems Agrees to Pay \$38.5 Million to Resolve False Claims Act Allegations Related to Knee Implant Failures (Nov. 17, 2025),

<https://www.justice.gov/opa/pr/aesculap-implant-systems-agrees-pay-385m-resolve-false-claims-act-allegations-related-knee>.

[162] *Id.*

[163] *Id.*

[164] Plea Agreement, *United States v. Aghorn Operating Inc.*, No. 7:22-CR-00049-DC (W.D. Tex., Apr. 10, 2025) (“Aghorn Plea Agreement”); Press Release, DOJ, Oilfield Company, Its Executive, and a Support Services Company Plead Guilty and Are Sentenced for Worker Safety, Clean Air Act, and Safe Drinking Water Act Violations Resulting in the Death of an Employee and His Spouse (Apr. 16, 2025), <https://www.justice.gov/opa/pr/oilfield-company-its-executive-and-support-services-company-plead-guilty-and-are-sentenced> (“Aghorn & Kodiak Press Release”).

[165] Aghorn Plea Agreement at 2–5.

[166] *Id.* at 1-2.

[167] Aghorn Plea Agreement at 2.

[168] Aghorn & Kodiak Press Release; Plea Agreement at 1, *United States v. Aghorn Operating Inc.*, No. 7:22-CR-00049-DC (W.D. Tex., Apr. 10, 2025) (“Kodiak Plea Agreement”).

[169] Aghorn & Kodiak Press Release.

[170] Aghorn Plea Agreement at 8-9.

[171] Aghorn & Kodiak Press Release; Kodiak Plea Agreement at 6.

[172] Plea Agreement, *United States v. Allwaste Onsite LLC*, No. 3:25-cr-00138 (M.D. Tenn. Aug. 5, 2025) (“Onsite Plea Agreement”); Press Release, DOJ, Tennessee Company Pleads Guilty to Illegally Bypassing Waste Treatment and Discharging Industrial Wastes into Nashville Sewer System (Aug. 5, 2025), <https://www.justice.gov/opa/pr/tennessee-company-pleads-guilty-illegally-bypassing-waste-treatment-and-discharging> (“Onsite Press Release”).

[173] Onsite Press Release; Onsite Plea Agreement at 4.

[174] Onsite Plea Agreement at 4-5.

[175] *Id.* at 5–7.

[176] *Id.* at 9.

[177] Non-Prosecution Agreement, American Express Company (E.D.N.Y. Jan. 16, 2025) (“American Express NPA”).

[178] Statement of Facts, American Express Company (E.D.N.Y Jan. 16, 2025), <https://www.justice.gov/usao-edny/media/1384826/dl?inline>.

[179] *Id.* at 2, 7–8.

[180] American Express NPA at 3.

[181] *Id.* at 1–2.

[182] Press Release, DOJ, American Express Agrees to Pay More Than \$138 Million to Resolve Wire Fraud Investigation in Connection with the Sales and Marketing of Wire Products (Jan. 16, 2025), <https://www.justice.gov/usao-edny/pr/american-express-agrees-pay-more-138-million-resolve-wire-fraud-investigation>.

[183] *Id.*

[184] Deferred Prosecution Agreement at 1, 5, *United States v. American Premium Water Corporation*, No. 1:23-cr-00144-JPC (N.D. Ohio May 13, 2025).

[185] *Id.* at 1.

[186] *Id.* at 3.

[187] *Id.* at 3–5.

[188] *Id.* at 7, 9.

[189] *Id.* at 2.

[190] Plea Agreement, *United States v. Anderson Pest Control, Inc.*, No. 25-cr-60122 (S.D. Fla. Dec. 4, 2025) (“APC Plea Agreement”); Plea Agreement, *United States v. Cris Anderson*, No. 25-cr-60122 (S.D. Fla. Dec. 4, 2025).

[191] Joint Factual Statement, *United States v. Anderson Pest Control, Inc.*, No. 25-cr-60122 (S.D. Fla. Dec. 4, 2025).

[192] APC Plea Agreement at 5.

[193] *Id.*

[194] Order Setting Date, Time, and Procedures for Sentencing Hearing, *United States v. Anderson Pest Control, Inc.*, No. 25-cr-60122 (S.D. Fla. Dec. 4, 2025).

[195] Plea Agreement at 1, *United States v. Applied Partners, LLC*, No. 1:25-cr-20850 (E.D. Mich. Dec. 17, 2025), ECF No. 7.

[196] *Id.* at 3.

[197] *Id.* at 4–9.

[198] *Id.*

[199] *Id.* at 12–13.

[200] *Id.* at 14–15.

[201] *United States v. Applied Partners, LLC*, No. 1:25-cr-20850 (E.D. Mich. Dec. 18, 2025), ECF No. 9.

[202] Deferred Prosecution Agreement, *United States v. Apprio, Inc.*, No. 8:25-cr-00174-PX (D. Md. June 12, 2025) (“Apprio DPA”); Deferred Prosecution Agreement, *United States v. PM Consulting Group LLC d/b/a Vistant*, No. 8:25-cr-00173-PX (D. Md. June 12, 2025) (“Vistant DPA”).

[203] Apprio DPA at 1; Vistant DPA at 1.

[204] Press Release, DOJ, USAID Official and Three Corporate Executives Plead Guilty to Decade-Long Bribery Scheme Involving Over \$550 Million in Contracts; Two Companies Admit Criminal Liability for Bribery Scheme and Securities Fraud (June 12, 2025), <https://www.justice.gov/opa/pr/usaid-official-and-three-corporate-executives-plead-guilty-decade-long-bribery-scheme> (“Apprio & Vistant Press Release”).

[205] Apprio DPA at 5, 12–13; Vistant DPA at 6, 12–13; *see also* Apprio & Vistant Press Release.

[206] Apprio DPA at 10–11.

[207] Vistant DPA at 10–11.

[208] Apprio DPA at 4; Vistant DPA at 4.

[209] Apprio & Vistant Press Release.

[210] Plea Agreement, *United States v. ASL Singapore Shipping Limited and Jia Feng Shipping (Fuzhou) Limited*, No. 2:25-cr-00027-JCZ-EJD (E.D. La. Feb. 20, 2025) (“ASL Singapore and Jia Feng Plea Agreement”).

[211] *Id.* at 1–2.

[212] Press Release, U.S. Atty’s Off. E. La., Companies That Own and Operate Bulk Carrier Guilty, Sentenced for Environmental Crimes (Feb. 24, 2025), <https://www.justice.gov/usao-edla/pr/companies-own-and-operate-bulk-carrier-guilty-sentenced-environmental-crimes> (“ASL Singapore and Jia Feng Press Release”).

[213] ASL Singapore and Jia Feng Press Release.

[214] *Id.*

[215] *Id.*

[216] ASL Singapore and Jia Feng Plea Agreement at 3–4.

[217] *Id.* at 3.

[218] ASL Singapore and Jia Feng Press Release.

[219] Plea Agreement, *United States v. Fei Wang*, No. 25-CR-007 “M” (Jan. 13, 2025).

[220] Plea Agreement, *United States v. Aux Cayes FinTech Co. Ltd., d/b/a “OKEx,” d/b/a/ “OKX,”* No. 25 Cr. \_\_\_\_ (KPF) (S.D.N.Y. Feb. 24, 2025) (“OKX Plea Agreement”).

[221] *Id.* at 2.

[222] *Id.* at A-7–A-9.

[223] *Id.* at A-6.

[224] *Id.* at 17–19.

[225] *Id.* at C-1.

[226] Deferred Prosecution Agreement, *United States v. Barlow Herbal Specialties LLC*, No. 2:25-cr-00405-DAO (D. Utah Nov. 5, 2025), ECF No. 5. (“Barlow DPA”).

[227] *Id.* at Appendix B.

[228] *Id.* at 6.

[229] *Id.* at 2.

[230] *Id.* at 3.

[231] *Id.* at 4; see *also* Appendix D.

[232] Barlow DPA at 5.

[233] Order, *United States v. Barlow Herbal Specialties LLC*, No. 2:25-cr-00405-DAO (D. Utah Nov. 5, 2025), ECF No. 8.

[234] Plea Agreement, *United States v. BJS & T Enterprises, Inc., d/b/a San Diego Powder & Protective Coatings*, No. 25-cr-04519-CAB (S.D. Cal. Nov. 26, 2025) (“BJS Plea Agreement”).

[235] *Id.* at 2, 7–8.

[236] Press Release, DOJ, El Cajon Company and its and Human Resources Manager Plead Guilty to Engaging in Practice of Employing Aliens; Company to Forfeit More than \$200,000 (Nov. 26, 2025), <https://www.justice.gov/usao-sdca/pr/el-cajon-company-and-its-and-human-resources-manager-plead-guilty-engaging-practice> (“BJS Press Release”).

[237] BJS Press Release.

[238] BJS Plea Agreement at 13.

[239] Government’s Rule 48(a) Motion to Dismiss the Information and Motion to Terminate Pretrial Deadlines and Vacate the Trial Date, *United States v. The Boeing Company*, No. 4:21-cr-00005-O (N.D. Tex. May 29, 2025), ECF No. 312, at 1, 19 (“Government’s Rule 48(a) Boeing Motion”); Criminal Information, *United States v. The Boeing Company*, No. 4:21-cr-00005-O (N.D. Tex. Jan. 7, 2021), ECF No. 1, at 1–2.

[240] Government’s Rule 48(a) Boeing Motion at 13–19.

[241] Memorandum Opinion and Order, *United States v. The Boeing Company*, No. 4:21-cr-00005-O (N.D. Tex. Nov. 6, 2025), ECF No. 358.

[242] NPA, *United States v. The Boeing Company*, No. 4:21-cr-00005-O (N.D. Tex. May 29, 2025), at A-2-4–A-2-5.

[243] *Id.* at 3.

[244] *Id.*

[245] *Id.*

[246] *Id.* at 6.

[247] See Press Release, DOJ, BofA Securities Inc. Resolves Criminal Investigation with Justice Department Pursuant to Part I of the Criminal Division’s Corporate Enforcement and Voluntary Self-Disclosure Policy (Sept. 18, 2025), <https://www.justice.gov/opa/pr/bofa-securities-inc-resolves-criminal-investigation-justice-department-pursuant-part-i>.

[248] Letter from DOJ re BofA, (Sep. 17, 2025), <https://www.justice.gov/criminal/media/1414486/dl?inline>.

[249] *Id.* at 2.

[250] See *id.*

[251] Plea Agreement, *United States v. Brew City Eenvt'l & Restoration Servs., LLC*, No. 25-cr-00121 (E.D. Wis. June 20, 2025), at 1–3 (“Brew City Plea Agreement”).

[252] *Id.* at 3.

[253] *Id.* at 3.

[254] *Id.* at 6.

[255] *Id.* at 9, Exhibit B.

[256] Minutes of Proceedings, *United States v. Brew City Eenvt'l & Restoration Servs., LLC*, No. 25-cr-00121 (E.D. Wis. Aug. 29, 2025).

[257] *Environmental Crimes Bulletin – August 2025*, U.S. Dep’t of Justice, Eenvtl. & Natural Resources Div. (Sept. 12, 2025), <https://www.justice.gov/enrd/blog/environmental-crimes-bulletin-august-2025>.

[258] Plea Agreement, *United States v. Burns Hunting Club, LLC*, No. 24-cr-40040-RJD (S.D. Ill. Mar. 27, 2025), at 1 (“Burns Hunting Plea Agreement”).

[259] Press Release, DOJ, Williamson County Waterfowl Hunting Club Shut Down for Illegal Baiting (June 24, 2025), <https://www.justice.gov/usao-sdil/pr/williamson-county-waterfowl-hunting-club-shut-down-illegal-baiting> (“Burns Hunting Press Release”).

[260] Burns Hunting Plea Agreement at 1.

[261] *Id.* at 4.

[262] *Id.* at 5.

[263] *Id.* at 5–6.

[264] See Burns Hunting Press Release.

[265] Judgment, *United States v. Burns Hunting Club, LLC*, No. 24-cr-40040-RJD (S.D. Ill. May 19, 2025).

[266] See Burns Hunting Press Release.

[267] Press Release, DOJ, Cadence Design Systems Agrees to Plead Guilty and Pay Over \$140 Million for Unlawfully Exporting Semiconductor Design Tools to a Restricted PRC Military University (July 28, 2025), <https://www.justice.gov/opa/pr/cadence-design-systems-agrees-plead->

*guilty-and-pay-over-140-million-unlawfully-exporting; Plea Agreement, United States v. Cadence Design Systems, Inc., CR 25-00217 at 2 (N.D. Cal. July 28, 2025) (“Cadence Plea Agreement”).*

[268] Cadence Plea Agreement at 23–25.

[269] *Id.* at 7.

[270] *Id.*

[271] *Id.* at 9.

[272] Deferred Prosecution Agreement, *United States v. Campbell Sales Group, Inc.*, No. 7:25-cr-00014 (E.D.N.C. Feb. 25, 2025) (“Campbell DPA”).

[273] Criminal Information, *United States v. Campbell Sales Group, Inc.*, No. 7:25-cr-00014 (E.D.N.C. Feb. 25, 2025), at 4.

[274] *Id.* at 4–5.

[275] *Id.*

[276] Campbell DPA at 4.

[277] Plea Agreement, *United States v. Donald Clark Garner II and Clark Garner, LLC*, No. 1:25-cr-00117-JLR (S.D.N.Y. Mar. 20, 2025) (“Clark Plea Agreement”).

[278] Plea Agreement, *United States v. TranscendBS, LLC*, No. 1:25-cr-00112-JLR (S.D.N.Y. Mar. 19, 2025) (“Transcend Plea Agreement”); Press Release, DOJ, Former New York City Department of Education Business Manager Sentenced in Bid Rigging Scheme (Aug. 19, 2025), <https://www.justice.gov/opa/pr/former-new-york-city-department-education-business-manager-sentenced-bid-rigging-scheme> (“TranscendBS Press Release”).

[279] Clark Plea Agreement; TranscendBS Plea Agreement.

[280] Clark Plea Agreement at 1.

[281] Information, *United States v. Donald Clark Garner II and Clark Garner, LLC.*, No. 1:25-cr-00117-JLR (S.D.N.Y. Mar. 20, 2025); TranscendBS Press Release.

[282] Information, *United States v. TranscendBS, LLC*, No. 1:25-cr-00112-JLR (S.D.N.Y. Mar. 19, 2025).

[283] TranscendBS Press Release.

[284] Clark Plea Agreement at 3.

[285] Judgment, *United States v. Donald Clark Garner II and Clark Garner, LLC.*, No. 1:25-cr-00117-JLR (S.D.N.Y. July 31, 2025).

[286] Clark Plea Agreement.

[287] Judgment, *United States v. TranscendBS, LLC*, No. 1:25-cr-00112-002-JLR (Aug. 19, 2025).

[288] TranscendBS Press Release.

[289] Plea Agreement, *United States v. CLS Global FZE LLC et al.*, 24-cr-10293, at 1 (D. Mass. Jan. 21, 2025) (“CLS Global Plea Agreement”).

[290] See *id.* at Exhibit B.

[291] *Id.*

[292] Press Release, DOJ, Cryptocurrency Financial Services Firm Sentenced for Cryptocurrency “Wash Trading” (Apr. 2, 2025), <https://www.justice.gov/usao-ma/pr/cryptocurrency-financial-services-firm-sentenced-cryptocurrency-wash-trading> (“CLS Press Release”); Minute Order, *United States v. CLS Global FZE LLC et al.*, 24-cr-10293 (D. Mass. Jan. 21, 2025).

[293] CLS Press Release.

[294] Deferred Prosecution Agreement, *United States v. Comunicaciones Celulares S.A., d/b/a Tigo Guatemala*, No. 25-cr-20476-JB (S.D. Fla. Nov. 12, 2025) (“TIGO DPA”).

[295] *Id.* at 7.

[296] *Id.* at 11.

[297] *Id.* at 15, C-8.

[298] *Id.* at 4.

[299] *Id.*

[300] *Id.*

[301] Plea Agreement, *United States v. Credit Suisse Services AG*, 1:25-cr-00123 (E.D. Va. May 5, 2025) (“Credit Suisse Plea Agreement”).

[302] Letter from DOJ regarding Credit Suisse Services AG (May 5, 2025), <https://www.justice.gov/opa/media/1411011/dl?inline>.

[303] *Id.*

[304] *Id.* at 3.

[305] Judgment, *United States v. Credit Suisse Services AG*, No. 1:25-cr-00123 (E.D. Va. May 5, 2025), ECF No. 7.

[306] *Id.*; Credit Suisse Plea Agreement at 9–10.

[307] Letter from DOJ regarding Credit Suisse Services AG at 2 (May 5, 2025), <https://www.justice.gov/opa/media/1411011/dl?inline>.

[308] Plea Agreement, *United States v. Dune Med. Supply, LLC*, No. 1:25-cr-00347 (M.D.N.C. Oct. 1, 2025), ECF No. 2 (“Dune Medical Plea Agreement”); Plea Agreement, *United States v. Prospect Health Sols, Inc.*, No. 1:25-cr-00348-1 (M.D.N.C. Oct. 1, 2025), ECF No. 2 (“Prospect Health Plea Agreement”).

[309] Information, *United States v. Dune Med. Supply, LLC*, No. 1:25-cr-00347 (M.D.N.C. Oct. 1, 2025) at 5 (“Dune Medical Information”); Information, *United States v. Prospect Health Sols, Inc.*, No. 1:25-cr-00348-1 (M.D.N.C. Oct. 1, 2025) (“Prospect Health Information”).

[310] Dune Medical Information at 4–5; Prospect Health Information at 4–5.

[311] Dune Medical Plea Agreement at 6; Prospect Health Plea Agreement at 6.

[312] Minute Entry, *United States v. Dune Med. Supply, LLC*, No. 1:25-cr-00347 (M.D.N.C. Jan. 22, 2026); Minute Entry, *United States v. Prospect Health Sols, Inc.*, No. 1:25-cr-00348 (M.D.N.C. Jan. 22, 2026).

[313] Plea Agreement, *United States v. E&A Auto Cores, LLC*, No. 4:25-cr-00545-HEA (E.D. Mo. Oct. 24, 2025), at 1–3.

[314] *Id.* at 3–5.

[315] *Id.* at 5.

[316] *Id.* at 5–6.

[317] *Id.* at 2.

[318] *Id.* at 7.

[319] Minute Order, *United States v. E&A Auto Cores, LLC*, No. 4:25-cr-00545-HEA (E.D. Mo. Oct. 24, 2025).

[320] Plea Agreement, *United States v. Eagle Ship Mgmt., LLC*, No. 2:25-cr-00138 (E.D. La. July 15, 2025), at 1–2 (“ESM Plea Agreement”).

[321] Information, *United States v. Eagle Ship Mgmt., LLC*, No. 2:25-cr-00138 (E.D. La. May 29, 2025), at 4.

[322] ESM Plea Agreement at 3.

[323] *Id.* at 4–6; *id.* at Attachment B (Environmental Compliance Plan).

[324] Judgment, *United States v. Eagle Ship Management LLC*, No. 2:25-cr-00138-SM-JVM (E.D. La Oct. 16, 2025).

[325] Plea Agreement, *United States v. Elecsurf Trading Ltd.*, No. 1:14-cr-00319 (N.D. Ill. Aug. 1, 2025), at 1.

[326] *Id.* at 2–4.

[327] *Id.* at 4.

[328] *Id.* at 9.

[329] Judgment, *United States v. Elecsurf Trading, LTD*, No. 1:14-cr-00319 (N.D. Ill. Oct. 1, 2025).

[330] Plea Agreement, *United States v. Eleview International, Inc.*, No. 1:25-cr-00046-LMB (E.D. Va. Oct. 28, 2025).

[331] Statement of the Facts, *United States v. Eleview International, Inc.*, No. 1:25-cr-00046-LMB (E.D. Va. Oct. 28, 2025), at 1–9.

[332] *Id.* at 5, 7, 9.

[333] Plea Agreement, *United States v. Eleview International, Inc.*, No. 1:25-cr-00046-LMB (E.D. Va. Oct. 28, 2025), at 5–6, 10.

[334] Minute Order, *United States v. Eleview International Inc.*, No. 1:25-cr-00046 (E.D. Va. Oct. 28, 2025).

[335] Settlement Agreement, *In the Matter of Eleview International Inc.*, No. 1:25-cr-00046-LMB (E.D. Va. Oct. 28, 2025).

[336] Plea Agreement, *United States v. Erie Coke Corp.*, No. 1:22-cr-00023 (W.D. Pa. June 17, 2025).

[337] Indictment, *United States v. Erie Coke Corp.*, No. 1:22-cr-00023 (W.D. Pa. Nov. 15, 2022), at 10–11.

[338] *Id.*

[339] *Id.* at 13.

[340] Judgment, *United States v. Erie Coke Corp.*, No. 1:22-cr-00023 (W.D. Pa. Oct. 7, 2025).

[341] Plea Agreement, *United States v. Exploring Together Therapy LLC*, No. 3:25-cr-00494-CVR (D.P.R. Nov. 24, 2025), ECF No. 6 (“Exploring Together Plea Agreement”).

[342] *Id.* at 1.

[343] *Id.* at 13.

[344] *Id.* at 3.

[345] *Id.* at 3.

[346] *Id.* at 4.

[347] Minute Order, *United States v. Exploring Together Therapy LLC*, No. 25-cr-00494-CVR (D.P.R. Nov. 24, 2025), ECF No. 8.

[348] Plea Agreement, *United States v. Eurobulk Ltd.*, No. 2:24-cr-00655 (S.D. Tex. Jan. 8, 2025), at 1 (“Eurobulk Plea Agreement”).

[349] Press Release, DOJ, Foreign Operator of Bulk Carrier Convicted for Concealment of Pollution and Falsification of Records (Jan. 29, 2025), <https://www.justice.gov/usao-sdtx/pr/foreign-operator-bulk-carrier-convicted-concealment-pollution-and-falsification>.

[350] Judgment, *United States v. Eurobulk Ltd.*, No. 2:24-cr-00655 (S.D. Tex. Feb. 6, 2025), at 3–4 (“Eurobulk Judgment”).

[351] Eurobulk Plea Agreement at 5–7, Attachment A (Environmental Compliance Plan); Eurobulk Judgment at 2.

[352] Eurobulk Plea Agreement at 6–7, Attachment A (Environmental Compliance Plan).

[353] Order on Whistleblower Award, *United States v. Eurobulk Ltd.*, No. 2:24-cr-00655 (S.D. Tex. Feb. 13, 2025), at 1.

[354] Judgment, *United States v. Fabcon Precast LLC*, No. 2:25-cr-00020 (S.D. Ohio June 10, 2025), at 1 (“Fabcon Judgment”).

[355] Press Release, DOJ, Ohio Company Sentenced for Violating OSHA Rule Leading to Worker’s Death (June 9, 2025), <https://www.justice.gov/opa/pr/ohio-company-sentenced-violating-osha-rule-leading-workers-death> (“Fabcon Press Release”).

[356] Fabcon Judgment at 3.

[357] *Id.* at 2.

[358] Plea Agreement, *United States v. Gotbit Consulting LLC*, No. 24-cr-10190-AK (D. Mass. Mar. 19, 2025) (“Gotbit Plea Agreement”); Press Release, DOJ, Cryptocurrency Financial Services Firm “Gotbit” and Founder Sentenced for Market Manipulation and Fraud Conspiracy (June 13, 2025), <https://www.justice.gov/usao-ma/pr/cryptocurrency-financial-services-firm-gotbit-and-founder-sentenced-market-manipulation> (“Gotbit Press Release”).

[359] Gotbit Plea Agreement at 1.

[360] *Id.*

[361] Gotbit Press Release.

[362] Gotbit Plea Agreement at 3–6.

[363] *Id.* at 3.

[364] Gotbit Press Release.

[365] Plea Agreement, *United States v. Gadsden, Gaillard & West LLC*, No. 2:25-cr-00175 (S.D.W.V. Oct. 9, 2025) (“Gadsden Plea Agreement”); Press Release, DOJ, South Carolina Man and Trucking Business Plead Guilty to Contamination of Paint Creek Resulting from 2022 West Virginia Turnpike Crash (Nov. 20, 2025), <https://www.justice.gov/usao-sdvw/pr/south-carolina-man-and-trucking-business-plead-guilty-contamination-paint-creek> (“Gadsden Press Release”).

[366] Gadsden Plea Agreement at 12–16.

[367] Order, *United States v. Gadsden, Gaillard & West LLC*, No. 2:25-cr-00175 (S.D.W. Va. Dec. 15, 2025)

[368] Gadsden Plea Agreement at 3.

[369] Press Release, DOJ, U.S. Authorities Shut Down Major China-Linked AI Tech Smuggling Network (Dec. 8, 2025), <https://www.justice.gov/opa/pr/us-authorities-shut-down-major-china-linked-ai-tech-smuggling-network><https://www.justice.gov/opa/pr/us-authorities-shut-down-major-china-linked-ai-tech-smuggling-network> (“Hao Press Release”).

[370] Plea Agreement, *United States v. Hao Global LLC*, No. 4:25-cr-00510 (S.D. Tex. Oct. 10, 2025), ECF No. 32, at 1 (“Hao Plea Agreement”).

[371] Hao Press Release.

[372] Hao Plea Agreement at 6–7

[373] *Id.* at 8.

[374] Hao Press Release.

[375] Hao Plea Agreement at 2, 18

[376] Minute Order, *United States v. Hao Global LLC*, No. 4:25-cr-00510 (S.D. Tex. Dec. 1, 2025), ECF No. 41.

[377] Plea Agreement at 1–6, *United States v. Hino Motors, Ltd.*, No. 2:25-cr-20016 (E.D. Mich. Mar. 19, 2025) (“Hino Plea Agreement”), ECF No. 16.

[378] Hino Plea Agreement at 15.

[379] *Id.* at 17–19.

[380] *Id.* at 13, 16.

[381] *Id.* at 23–24; Ex. 3, Corporate Compliance Program.

[382] Plea Agreement, *United States v. Horseshoe Grove, LLC*, No. 3:24-cr-00430-HZ (D. Or. Feb. 7, 2025) (“Horseshoe Plea Agreement”), ECF No. 23; Plea Agreement, *United States v. Chamness Dirt Works Inc.*, No. 3:24-cr-00430-HZ (D. Or. Feb. 7, 2025) (“Chamness Plea Agreement”), ECF No. 30.

[383] Chamness Plea Agreement at 2–3.

[384] Judgment, *United States v. Horseshoe Grove, LLC*, No. 3:24-cr-00430-HZ (D. Or. Apr. 8, 2025), ECF No. 45; Judgment, *United States v. Chamness Dirt Works Inc.*, No. 3:24-cr-00430-HZ (D. Or. Apr. 8, 2025), ECF No. 30.

[385] Plea Agreement, *United States v. Hytera Commc’ns Corp., Ltd.*, No. 1:20-cr-00688 (N.D. Ill. Jan. 13, 2025) (“Hytera Plea Agreement”), ECF No. 353 at 1.

[386] Press Release, DOJ, Northern District of Illinois, Chinese Telecommunications Company Pleads Guilty to Conspiring to Steal Technology From Illinois-Based Motorola Solutions (Jan. 14, 2025), <https://www.justice.gov/usao-ndill/pr/chinese-telecommunications-company-pleads-guilty-conspiring-steal-technology-illinois>.

[387] *Id.*

[388] *Id.*

[389] Notification of Docket Entry, *United States v. Hytera Commc’ns Corp., Ltd.*, No. 1:20-cr-00688 (N.D. Ill. Jan. 13, 2025), ECF No. 413.

[390] Plea Agreement, *United States v. J.H. Baxter & Co.*, No. 6:24-CR-00441-MC-2 (D. Or., Jan. 22, 2025) (“J.H. Baxter Plea Agreement”); Press Release, DOJ, Companies and President Operating Oregon Wood Treatment Facility to Pay \$1.5M in Criminal Fines for Hazardous Waste

and Air Pollution Charges (Apr. 23, 2025), <https://www.justice.gov/opa/pr/companies-and-president-operating-oregon-wood-treatment-facility-pay-15m-criminal-fines> (“J.H. Baxter Press Release”).

[391] J.H. Baxter Plea Agreement at 2–4.

[392] J.H. Baxter Plea Agreement at 5; Judgment, *United States v. J.H. Baxter & Co., Inc.*, No. 6:24-cr-00441-MC (May 1, 2025), ECF No. 48; Judgment, *United States v. J.H. Baxter & Co., Inc.*, No. 6:24-cr-00441-MC (May 1, 2025), ECF No. 50.

[393] J.H. Baxter Press Release.

[394] Plea Agreement, *United States v. KBWB Operations LLC*, No. 3:23-cr-00010-wmc (W.D. Wis. Jan. 17, 2025) (“KBWB Plea Agreement”), at 1–2; Press Release, DOJ, *Corporation and Former Chief Executive Officer Plead Guilty to Health Care Fraud and Tax Conspiracy* (Nov. 18, 2025), <https://www.justice.gov/opa/pr/corporation-and-former-chief-executive-officer-sentenced-health-care-fraud-and-tax> (“KBWB Press Release”).

[395] KBWB Plea Agreement at 2–4.

[396] KBWB Press Release.

[397] KBWB Plea Agreement at 4.

[398] Judgment, *United States v. KBWB Operations LLC*, No. 3:23-cr-00010-wmc (W.D. Wis. Nov. 20, 2025), ECF No. 355.

[399] Press Release, DOJ, *Kucoin Pleads Guilty to Unlicensed Money Transmission Charge and Agrees to Pay Penalties Totaling Nearly \$300 Million* (Jan. 27, 2025), <https://www.justice.gov/usao-sdny/pr/kucoin-pleads-guilty-unlicensed-money-transmission-charge-and-agrees-pay-penalties> (“KuCoin Press Release”); Transcript, Plea and Sentence, *United States v. Peken Glob. Ltd.*, No. 2-cr-168 (S.D.N.Y. Jan. 30, 2025), ECF No. 15; Consent Preliminary Order of Forfeiture/Money Judgment, *United States v. Peken Glob. Ltd.*, No. 2-cr-168 (S.D.N.Y. Jan. 30, 2025) (“KuCoin Order”).

[400] KuCoin Press Release.

[401] Judgment, *United States v. Peken Glob. Ltd.*, No. 1:24-cr-168 (S.D.N.Y. Feb. 11, 2025).

[402] KuCoin Press Release.

[403] Letter from DOJ re Liberty Mutual Insurance Company (Aug. 7, 2025), <https://www.justice.gov/criminal/media/1410761/dl?inline>.

[404] *Id.* at 2.

[405] Min. Entry, *United States v. Life Touch LLC*, No. 4:25-cr-00025 (E.D.N.C. July 14, 2025), ECF No. 20; Information ¶¶ 20, 52, *United States v. Life Touch LLC*, No. 4:25-cr-00025 (E.D.N.C. May 28, 2025), ECF No. 1 (“Life Touch Information”).

[406] Life Touch Information ¶¶ 25–27, 30.

[407] Text Order, *United States v. Life Touch LLC*, No. 4:25-cr-00025 (E.D.N.C. Nov. 25, 2025).

[408] Plea Agreement, *United States v. Mayhem Servs., LLC*, No. 2:25-CR-00005-LK (W.D. Wash., July 21, 2025), ECF No. 27; Plea Agreement, *United States v. Mayhem Servs., LLC*, No. 2:25-CR-00005-LK (W.D. Wash., Sep. 8, 2025), ECF No. 52.

[409] *Id.* at 2.

[410] Judgment, *United States v. Mayhem Servs., LLC*, No. 2:25-CR-00005-LK (W.D. Wash., July 21, 2025), ECF No. 69 at 2, 4.

[411] Press Release, DOJ, Washington Hunting Guide and Outfitting Company Enter Guilty Pleas to Lacey Act Crime (July 22, 2025), <https://www.justice.gov/opa/pr/washington-hunting-guide-and-outfitting-company-enter-guilty-pleas-lacey-act-crime>.

[412] Letter from DOJ regarding MGI International, LLC (Nov. 19, 2025), <https://www.justice.gov/criminal/media/1421291/dl?inline>.

[413] *Id.* at 1.

[414] *Id.* at 1–2.

[415] *Id.* at 2.

[416] Plea Agreement, *United States v. Millenia Prods., LLC*, 25-cr-10075, (D. Kan. Aug. 13, 2025), ECF No. 18 at 1.

[417] *Id.* at 2.

[418] *Id.*

[419] *Id.* at 3.

[420] Judgment, *United States v. Millenia Prods., LLC*, No. 6:25-cr-10075-EFM (D. Kan. Nov. 3, 2025), ECF No. 31.

[421] Plea Agreement, *United States v. Mudafort Xtreme Sports & Motorsports, Inc.*, 22-cr-00553, (D.P.R. Jan. 13, 2025), ECF No. 123 at 1.

[422] *Id.* at 12.

[423] Judgement, *United States v. Mudafort Xtreme Sports & Motorsports, Inc.*, 22-cr-00553, (D.P.R. Jan. 13, 2025), ECF No. 151 at 2, 6.

[424] Plea Agreement Letter, *United States v. Murex Mgmt., Inc.*, No. 2:25-CR-134 (E.D. La. June 25, 2025) (“Murex Plea Agreement”), ECF No. 20 at 1; Press Release, DOJ, Texas Company Guilty of Aiding and Abetting Fraudulent Transactions Related to False Ethanol Sales, Pays Over \$15,000,000 in Fines, Restitution (July 11, 2025), <https://www.justice.gov/usao-edla/pr/texas-company-guilty-aiding-and-abetting-fraudulent-transactions-related-false-ethanol> (“Murex Press Release”).

[425] Murex Press Release.

[426] *Id.*

[427] Murex Plea Agreement at 2.

[428] *Id.*

[429] *Id.*

[430] Judgment, *United States v. Murex Mgmt., Inc.*, No. 2:25-CR-134 (E.D. La. July 10, 2025), ECF No. 23.

[431] Plea Agreement, *United States v. OHM Pharm. Servs., Inc.*, 25-cr-10128 (D. Mass. April 10, 2025) (“OHM Pharmacy Plea Agreement”) ECF No. 3 at 1.

[432] OHM Pharmacy Plea Agreement at 8–9.

[433] Judgement, *United States v. OHM Pharm. Servs., Inc.*, 25-cr-10128 (D. Mass. April 10, 2025), ECF No. 10 at 2, 3; OHM Pharmacy Plea Agreement at 3.

[434] Press Release, DOJ, Florida Pharmacy Pleads Guilty to Health Care Fraud and Agrees to Pay More Than \$1 Million Settlement (May 16, 2025), <https://www.justice.gov/usao-ma/pr/florida-pharmacy-pleads-guilty-health-care-fraud-and-agrees-pay-more-1-million-settlement>.

[435] Plea Agreement, *United States v. Old Dutch Mustard Co., Inc.*, No. 1L25-cr-00002-LM-TSM (D.N.H. Jan. 24, 2025) (“Old Dutch Mustard Plea Agreement”), ECF No. 3.

[436] *Id.* at 5–8.

[437] *Id.* at 10–11.

[438] Plea Agreement, *United States v. Paxful Holdings, Inc.*, No. 2:25-CR-235 (E.D. Cal. Dec. 8, 2025) (“Paxful Plea Agreement”), ECF No. 18.

[439] Press Release, DOJ, Virtual Asset Trading Platform Pleads Guilty to Violating the Travel Act and Other Federal Criminal Charges (Dec. 10, 2025), <https://www.justice.gov/opa/pr/virtual->

asset-trading-platform-pleads-guilty-violating-travel-act-and-other-federal-criminal (“Paxful Press Release”).

[440] Paxful Plea Agreement at 18.

[441] *United States v. Schaback*, No. 24-cr-0072 (E.D. Cal Jul. 8, 2024) (“Schaback Plea Agreement”), ECF No. 14 at 3,4.

[442] Paxful Press Release.

[443] Press Release, FinCEN, FinCEN Assesses \$3.5 Million Penalty Against Paxful for Facilitating Suspicious Activity Involving Illicit Actors (Dec. 9, 2025), <https://www.fincen.gov/news/news-releases/fincen-assesses-35-million-penalty-against-paxful-facilitating-suspicious>.

[444] Judgment, *United States v. PT Servs., Inc.*, No. 2:25-cr-20223-MSN (W.D. Tenn. Nov. 25, 2025), ECF No. 21 at 1–2; Press Release, DOJ, Western District of Tennessee, Memphis Company Sentenced for Violations of the Clean Air Act (Nov. 26, 2025) (“PT Services Judgement”), <https://www.justice.gov/usao-wdtn/pr/memphis-company-sentenced-violations-clean-air-act> (“PT Services Press Release”).

[445] Plea Agreement, *United States v. PT Servs., Inc.*, No. 2:25-cr-20223-MSN (W.D. Tenn. Nov. 25, 2025), ECF No. 5.

[446] PT Services Press Release.

[447] PT Services Judgment at 3, 5.

[448] Judgment at 3–4.

[449] *Id.*

[450] *Id.*

[451] Plea Agreement, *United States v. Quadrant Magnetics LLC*, No. 3:22-cr-00088 (W.D. Ky. Dec. 1, 2025), ECF No. 452, at 1–2.

[452] *Id.* at 2, 3.

[453] *Id.* at 2–3.

[454] *Id.* at 3.

[455] *Id.* at 5–6.

[456] *Id.* at 6.

[457] *Id.*

[458] *Id.* at 5–7.

[459] Order Following Entry of Guilty Plea, *United States v. Quadrant Magnetics LLC*, No. 3:22-cr-00088 (W.D. Ky. Dec. 1, 2025), ECF No. 453 at 2.

[460] Plea Agreement, *United States v. Rossy Sport Bar Paroramico, LLC*, No. 3:25-cr-00142-MAJ (D.P.R. Oct. 14, 2025), ECF No. 52.

[461] *Id.* at 14.

[462] *Id.* at 5.

[463] Plea Agreement, *United States v. Royal Sovereign Int'l, Inc.*, No. 2:25-cr-00498 (D.N.J. Aug. 6, 2025) (“Royal Sovereign Plea Agreement”), ECF No. 5; Press Release, DOJ, New Jersey Company Pleads Guilty and Agrees to Restitution and Civil Penalty for Failing to Report Dangerous Air Conditioners (Aug. 5, 2025), <https://www.justice.gov/opa/pr/new-jersey-company-pleads-guilty-and-agrees-restitution-and-civil-penalty-failing-report>.

[464] Royal Sovereign Plea Agreement at 1; Information, *United States v. Royal Sovereign Int'l, Inc.*, No. 2:25-cr-00498 (D.N.J. Aug. 5, 2025), ECF No. 1, at 2–4.

[465] Royal Sovereign Plea Agreement at 2.

[466] Consent Decree, *United States v. Royal Sovereign Int'l, Inc.*, No. 2:25-cv-11114 (D.N.J. June 20, 2025), ECF No. 4 at 3–4.

[467] Plea Agreement, *United States v. Servismed, LLC*, No. 3:25-mj-00243 (N.D. Fla. Aug. 14, 2025) (“Servismed Plea Agreement”), ECF No. 5 at 1.

[468] Information, *United States v. Servismed, LLC*, No. 3:25-mj-00243 (N.D. Fla. July 28, 2025), ECF No. 1 at 4.

[469] Servismed Plea Agreement at 2; Judgment, *United States v. Servismed, LLC*, No. 3:25-mj-00243 (N.D. Fla. Aug. 15, 2025) (“Servismed Judgment”), ECF No. 10 at 2.

[470] Servismed Judgment at 3.

[471] Judgment, *United States v. ShotStop Ballistics, LLC*, No. 5:25-CR-00070-DCN(3) (N.D. Ohio Aug. 20, 2025) (“ShotShop Ballistics Judgment”), ECF No. 42 at 1; Judgment, *United States v. Vallmar Studios, LLC*, No. 5:25-cr-00070-DCN(2) (N.D. Ohio Aug. 20, 2025) (“Vallmar Judgment”), ECF No. 40 at 1; Press Release, DOJ, Ohio Man Charged with Smuggling Body Armor from China to Sell to Law Enforcement Customers as American Made (Feb. 26, 2025), <https://www.justice.gov/usao-ndoh/pr/ohio-man-charged-smuggling-body-armor-china-sell-law-enforcement-customers-american> (“Vallmar Press Release”).

[472] Vallmar Press Release.

[473] ShotStop Ballistics Judgment at 2–3; Vallmar Judgment at 2.

[474] Plea Agreement, *United States v. Trans World Servs., Inc.*, No. 4:25-cr-00442 (S.D. Tex. Sept. 9, 2025), ECF No. 12 at 1.

[475] *Id.* at 7–8.

[476] *Id.*

[477] *Id.* at 8.

[478] *Id.* at 2.

[479] *Id.*

[480] *Id.* at 10.

[481] Judgment, *United States v. Trans World Servs., Inc.*, No. 4:25-cr-00442 (S.D. Tex. Sept. 24, 2025), ECF No. 13.

[482] Non-Prosecution Agreement, Troy Health, Inc. (Aug. 14, 2025), available at <https://www.justice.gov/criminal/media/1411396/dl?inline>.

[483] *Id.*, Attachment A at A-5.

[484] *Id.*, Attachment A at A-5–A-8.

[485] *Id.* at 3. Troy Health also acknowledged the government’s ability to file a forfeiture action for at least \$1,887,193.90, representing the proceeds traceable to the commission of the offense.

[486] *Id.* at 1–5.

[487] Press Release, DOJ, Justice Department Declines Prosecution of Company That Self-Disclosed Export Control Offenses Committed by Employee (Apr. 30, 2025), <https://www.justice.gov/opa/pr/justice-department-declines-prosecution-company-self-disclosed-export-control-offenses>.

[488] *Id.*

[489] Letter from DOJ regarding Universities Space Research Association (Apr. 23, 2025), <https://www.justice.gov/opa/media/1398471/dl?inline>.

[490] *Id.*

[491] *Id.*

[492] Plea Agreement, *United States v. Virginia Pump and Motor Co., Inc.*, No. 2:25-cr-00129 (E.D. Va. Nov. 17, 2025); Statement of the Facts, *United States v. Virginia Pump and Motor Co., Inc.*, No. 2:25-cr-00129 (E.D. Va. Nov. 17, 2025), at 3.

[493] Statement of the Facts, *United States v. Virginia Pump and Motor Co., Inc.*, No. 2:25-cr-00129 (E.D. Va. Nov. 17, 2025), at 3–5.

[494] *Id.* at 5.

[495] *Id.*

[496] *Id.* at 4–5.

[497] Sentencing Procedures Order, *United States v. Virginia Pump and Motor Co., Inc.*, No. 2:25-cr-00129 (E.D. Va. Nov. 17, 2025).

[498] Plea Agreement, *United States v. V. Ships Norway, A.S.*, No. 1:25-CR-39 & 1:25-CR-45 (E.D. Tex., Aug. 27, 2025) (“V. Ships Norway Plea Agreement”); Press Release, DOJ, Shipping Company Fined \$2M for Maritime Pollution Offense (Aug. 27, 2025), <https://www.justice.gov/opa/pr/shipping-company-fined-2m-maritime-pollution-offense> (“V. Ships Norway Press Release”).

[499] V. Ships Norway Press Release.

[500] V. Ships Norway Plea Agreement at 4.

[501] *Id.* at 4–5.

[502] *Id.* at 8.

[503] 18 U.S.C. § 1908(a).

[504] Amended Judgment, *United States v. V. Ships Norway, A.S.*, No. 1:25-cr-00039-MAC-ZJH (E.D. Tex. Sept. 8, 2025), ECF No. 24; Amended Judgment, *United States v. V. Ships Norway, A.S.*, No. 1:25-cr-00045-MAC-CLS (E.D. Tex. Sept. 8, 2025), ECF No. 19.

**The following Gibson Dunn lawyers prepared this client alert: F. Joseph Warin, Stephanie Brooker, Winston Chan, Nicola Hanna, M. Kendall Day, Melissa Farrar, Bryan Parr, Douglas Colby, Justin Accomando, Cordelia Achen, Teia Anderson, John Turquet Bravard, Kio Bell, Alex Buettner, Sarah Burns, Claire Carter, Daniel Carvalho, Anthony Cruz, Tim Dragonette, Michael Dziuban, Mary Aline Fertin, Alison Frison, Betsy Goodwin,**

[Sarah Hafeez](#), [Erika Suh Holmberg](#), [Wynne Leahy](#), [Allison Lewis](#), [Lafayette Matthews](#), [Dorkas Medina](#), [Alex Ogren](#), [David Reck](#), [Shreya Sarin](#), [Psi Simon](#), [Nimrita Singh](#), [Kelly Skowera](#), [Shannon Summer](#), [Yixian Sun](#), [Eric Thompson](#), [Lorena Toussaint](#), [Todd Truesdale](#), [Alyse Ullery-Glod](#), and [Jinhua Zhang](#).

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#### **Washington, D.C.**

[F. Joseph Warin](#) (+1 202.887.3609, [fwarin@gibsondunn.com](mailto:fwarin@gibsondunn.com))

[Stephanie Brooker](#) (+1 202.887.3502, [sbrooker@gibsondunn.com](mailto:sbrooker@gibsondunn.com))

[Matthew S. Axelrod](#) – Washington, D.C. (+1 202.955.8517, [maxelrod@gibsondunn.com](mailto:maxelrod@gibsondunn.com))

[Courtney M. Brown](#) (+1 202.955.8685, [cmbrown@gibsondunn.com](mailto:cmbrown@gibsondunn.com))

[David P. Burns](#) (+1 202.887.3786, [dburns@gibsondunn.com](mailto:dburns@gibsondunn.com))

[John W.F. Chesley](#) (+1 202.887.3788, [jchesley@gibsondunn.com](mailto:jchesley@gibsondunn.com))

[Daniel P. Chung](#) (+1 202.887.3729, [dchung@gibsondunn.com](mailto:dchung@gibsondunn.com))

[M. Kendall Day](#) (+1 202.955.8220, [kday@gibsondunn.com](mailto:kday@gibsondunn.com))

[Stuart F. Delery](#) (+1 202.955.8515, [sdelery@gibsondunn.com](mailto:sdelery@gibsondunn.com))

[Michael S. Diamant](#) (+1 202.887.3604, [mdiamant@gibsondunn.com](mailto:mdiamant@gibsondunn.com))

[Gustav W. Eyer](#) (+1 202.955.8610, [geyer@gibsondunn.com](mailto:geyer@gibsondunn.com))

[Melissa Farrar](#) (+1 202.887.3579, [mfarrar@gibsondunn.com](mailto:mfarrar@gibsondunn.com))

[Amy Feagles](#) (+1 202.887.3699, [afeagles@gibsondunn.com](mailto:afeagles@gibsondunn.com))

[Scott D. Hammond](#) (+1 202.887.3684, [shammond@gibsondunn.com](mailto:shammond@gibsondunn.com))

[George J. Hazel](#) (+1 202.887.3674, [ghazel@gibsondunn.com](mailto:ghazel@gibsondunn.com))

[Jake M. Shields](#) (+1 202.955.8201, [jmshields@gibsondunn.com](mailto:jmshields@gibsondunn.com))

[Adam M. Smith](#) (+1 202.887.3547, [asmith@gibsondunn.com](mailto:asmith@gibsondunn.com))

[Patrick F. Stokes](#) (+1 202.955.8504, [pstokes@gibsondunn.com](mailto:pstokes@gibsondunn.com))

[Oleh Vretsona](#) (+1 202.887.3779, [ovretsona@gibsondunn.com](mailto:ovretsona@gibsondunn.com))

[David C. Ware](#) (+1 202.887.3652, [dware@gibsondunn.com](mailto:dware@gibsondunn.com))

[Ella Alves Capone](#) (+1 202.887.3511, [ecapone@gibsondunn.com](mailto:ecapone@gibsondunn.com))

[Lora Elizabeth MacDonald](#) (+1 202.887.3738, [lmacdonald@gibsondunn.com](mailto:lmacdonald@gibsondunn.com))

[Bryan Parr](#) (+1 202.777.9560, [bparr@gibsondunn.com](mailto:bparr@gibsondunn.com))

[Pedro G. Soto](#) (+1 202.955.8661, [psoto@gibsondunn.com](mailto:psoto@gibsondunn.com))

## **New York**

Zainab N. Ahmad (+1 212.351.2609, [zahmad@gibsondunn.com](mailto:zahmad@gibsondunn.com))  
Barry H. Berke (+1 212.351.3860, [bberke@gibsondunn.com](mailto:bberke@gibsondunn.com))  
Reed Brodsky (+1 212.351.5334, [rbrodsky@gibsondunn.com](mailto:rbrodsky@gibsondunn.com))  
Mylan L. Denerstein (+1 212.351.3850, [mdenerstein@gibsondunn.com](mailto:mdenerstein@gibsondunn.com))  
Jordan Estes (+1 212.351.3906, [jestes@gibsondunn.com](mailto:jestes@gibsondunn.com))  
Dani R. James (+1 212.351.3880, [djames@gibsondunn.com](mailto:djames@gibsondunn.com))  
Darren LaVerne (+1 212.351.3936, [dlaverne@gibsondunn.com](mailto:dlaverne@gibsondunn.com))  
Michael Martinez (+1 212.351.4076, [mmartinez2@gibsondunn.com](mailto:mmartinez2@gibsondunn.com))  
Osman Nawaz (+1 212.351.3940, [onawaz@gibsondunn.com](mailto:onawaz@gibsondunn.com))  
Karin Portlock (+1 212.351.2666, [kportlock@gibsondunn.com](mailto:kportlock@gibsondunn.com))  
Mark K. Schonfeld (+1 212.351.2433, [mschonfeld@gibsondunn.com](mailto:mschonfeld@gibsondunn.com))  
Orin Snyder (+1 212.351.2400, [osnyder@gibsondunn.com](mailto:osnyder@gibsondunn.com))

## **Dallas**

David Woodcock (+1 214.698.3211, [dwoodcock@gibsondunn.com](mailto:dwoodcock@gibsondunn.com))

## **Denver**

Ryan T. Bergsieker (+1 303.298.5774, [rbergsieker@gibsondunn.com](mailto:rbergsieker@gibsondunn.com))  
Robert C. Blume (+1 303.298.5758, [rblume@gibsondunn.com](mailto:rblume@gibsondunn.com))  
John D.W. Partridge (+1 303.298.5931, [jpartridge@gibsondunn.com](mailto:jpartridge@gibsondunn.com))  
Laura J. Plack (+1 303.298.5749, [lplack@gibsondunn.com](mailto:lplack@gibsondunn.com))  
Laura M. Sturges (+1 303.298.5929, [lsturges@gibsondunn.com](mailto:lsturges@gibsondunn.com))

## **Houston**

Gregg J. Costa (+1 346.718.6649, [gcosta@gibsondunn.com](mailto:gcosta@gibsondunn.com))

## **Los Angeles**

Michael H. Dore (+1 213.229.7652, [mdore@gibsondunn.com](mailto:mdore@gibsondunn.com))  
Michael M. Farhang (+1 213.229.7005, [mfarhang@gibsondunn.com](mailto:mfarhang@gibsondunn.com))  
Diana M. Feinstein (+1 213.229.7351, [dfeinstein@gibsondunn.com](mailto:dfeinstein@gibsondunn.com))  
Douglas Fuchs (+1 213.229.7605, [dfuchs@gibsondunn.com](mailto:dfuchs@gibsondunn.com))  
Nicola T. Hanna (+1 213.229.7269, [nhanna@gibsondunn.com](mailto:nhanna@gibsondunn.com))  
Poonam G. Kumar (+1 213.229.7554, [pkumar@gibsondunn.com](mailto:pkumar@gibsondunn.com))  
Marcellus McRae (+1 213.229.7675, [mmcrae@gibsondunn.com](mailto:mmcrae@gibsondunn.com))  
Eric D. Vandavelde (+1 213.229.7186, [evandavelde@gibsondunn.com](mailto:evandavelde@gibsondunn.com))  
Debra Wong Yang (+1 213.229.7472, [dwongyang@gibsondunn.com](mailto:dwongyang@gibsondunn.com))

## **San Francisco**

Winston Y. Chan (+1 415.393.8362, [wchan@gibsondunn.com](mailto:wchan@gibsondunn.com))

## **London**

Patrick Doris (+44 20 7071 4276, [pdoris@gibsondunn.com](mailto:pdoris@gibsondunn.com))  
Sacha Harber-Kelly (+44 20 7071 4205, [sharber-kelly@gibsondunn.com](mailto:sharber-kelly@gibsondunn.com))  
Michelle Kirschner (+44 20 7071 4212, [mkirschner@gibsondunn.com](mailto:mkirschner@gibsondunn.com))  
Allan Neil (+44 20 7071 4296, [aneil@gibsondunn.com](mailto:aneil@gibsondunn.com))  
Philip Rocher (+44 20 7071 4202, [procher@gibsondunn.com](mailto:procher@gibsondunn.com))

**Paris**

[Benoît Fleury](mailto:bfleury@gibsondunn.com) (+33 1 56 43 13 00, [bfleury@gibsondunn.com](mailto:bfleury@gibsondunn.com))

[Bernard Grinspan](mailto:bgrinspan@gibsondunn.com) (+33 1 56 43 13 00, [bgrinspan@gibsondunn.com](mailto:bgrinspan@gibsondunn.com))

**Frankfurt**

[Finn Zeidler](mailto:fzeidler@gibsondunn.com) (+49 69 247 411 530, [fzeidler@gibsondunn.com](mailto:fzeidler@gibsondunn.com))

**Munich**

[Kai Gesing](mailto:kgesing@gibsondunn.com) (+49 89 189 33 285, [kgesing@gibsondunn.com](mailto:kgesing@gibsondunn.com))

[Katharina Humphrey](mailto:khumphrey@gibsondunn.com) (+49 89 189 33 155, [khumphrey@gibsondunn.com](mailto:khumphrey@gibsondunn.com))

[Benno Schwarz](mailto:bschwarz@gibsondunn.com) (+49 89 189 33 110, [bschwarz@gibsondunn.com](mailto:bschwarz@gibsondunn.com))

**Hong Kong**

[Oliver D. Welch](mailto:owelch@gibsondunn.com) (+852 2214 3716, [owelch@gibsondunn.com](mailto:owelch@gibsondunn.com))

[Ning Ning](mailto:nning@gibsondunn.com) (+852 2214 3763, [nning@gibsondunn.com](mailto:nning@gibsondunn.com))

**Singapore**

[Oliver D. Welch](mailto:owelch@gibsondunn.com) (+852 2214 3716, [owelch@gibsondunn.com](mailto:owelch@gibsondunn.com))

[Karthik Ashwin Thiagarajan](mailto:kthiagarajan@gibsondunn.com) (+65 6507 3636, [kthiagarajan@gibsondunn.com](mailto:kthiagarajan@gibsondunn.com))

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