



Enforcement Insights

DOJ Policy Updates

October 13, 2025

1. Revamped DOJ Criminal Fraud Section and New Cross-Agency Task Force Signal Aggressive Trade and Customs Fraud Enforcement

In July, the U.S. Department of Justice (DOJ) **announced** major changes to its Criminal Division's Fraud Section, reflecting a heightened focus on tariff fraud. The Market Integrity and Major Frauds Unit (MIMF Unit)—initially created to investigate financial fraud—received additional personnel and a new name: the Market, Government, and Consumer Fraud Unit (MGC Unit). In addition to its historic focus on market-based fraud and manipulation and procurement and program fraud offenses, MGC is now also tasked with prosecuting “individuals and companies who orchestrate criminal schemes to circumvent tariff and trade rules and regulations designed to protect American consumers and businesses.” As such, MGC is part of the recently announced **Trade Fraud Task Force**, comprising attorneys from DOJ's Criminal and Civil Divisions and the Department of Homeland Security.

Both the revamped MGC Unit and the Task Force are consistent with the Trump administration's broader enforcement shifts, and align with DOJ's White Collar Enforcement Plan that **specifically outlined** “trade and customs fraud, including tariff evasion” as a high-priority area for enforcement.

2. DOJ and HHS Announce False Claims Act Working Group

On July 2, DOJ and the Department of Health and Human Services (HHS) **announced** the relaunch of a DOJ-HHS False Claims Act (FCA) Working Group, initially formed in 2020 under the first Trump administration. The announcement comes amidst heightened enforcement of the FCA as detailed in the **Civil Rights Fraud Initiative** and the **Civil Division Enforcement Priorities**.

The announcement highlights six enforcement priorities: (i) Medicare Advantage fraud; (ii) drug, device, or biologic pricing; (iii) kickbacks; (iv) unsafe, defective medical devices; (v) the manipulation of health records to defraud Medicare; and (vi) barriers to patient access. As part of the Working Group, HHS will make recommendations to DOJ regarding potential fraud risk and the two agencies will aim to collaborate to make ongoing investigations more efficient. Notably, the two agencies emphasized that they will more strongly rely on HHS resources and data mining tools to identify potential fraud, rather than depending primarily on *qui tam* cases, signaling a goal to source even more FCA investigations.

3. Antitrust Division Introduces First Ever Whistleblower Rewards Program

DOJ's Antitrust Division **announced** a new Whistleblower Rewards Program in partnership with the U.S. Postal Service (USPS) and USPS Office of Inspector General (USPS OIG), encouraging individuals to report “antitrust crimes and related offenses that harm consumers, taxpayers, and free market competition across industries from healthcare to agriculture.” The program, which DOJ describes as “expand[ing] upon the Division's long-standing efforts to detect and prosecute cartels and criminal collusion,” is currently limited to violations affecting USPS, though it remains to be seen how broadly DOJ and USPS will define the terms of the program.

Unlike other DOJ divisions that have existing whistleblower programs, the Antitrust Division has historically relied on its **Leniency Program**. The Leniency Program was created in 1993 and provides protections to organizations and individuals who self-report involvement in antitrust violations. In contrast to the Leniency Program, this new whistleblower program will allow individuals who come forward to potentially receive “substantial monetary rewards of up to 30% of any criminal fines recovered.”