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Competition and Corruption in Public Procurement – Note by the United States

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1. Introduction

1. This note is submitted in connection with the Competition Committee’s roundtable on “Competition and Corruption in Public Procurement.”
2. As discussed in our note for the OECD’s Global Forum for Competition on the same topic in February 2014, the most common intersection of corruption and anticompetitive conduct occurs in government procurement, when bid rigging can be combined with or facilitated by corruption through, for example, bribery of public officials or unlawful kickbacks.² At its essence, procurement collusion remains a priority because the harm is “direct and visible,”³ in the form of financial loss to U.S. taxpayers and threats to the public’s confidence in U.S. government institutions.⁴
3. DOJ has a long history of prosecuting this type of conduct.⁵ This conduct is prosecuted criminally in the United States, and both companies and individuals face severe penalties if convicted.⁶

2. Detecting Bid Rigging and Corruption in Public Procurement

4. DOJ criminal investigations originate from several sources. Frequent sources include law enforcement agents and prosecutors investigating other conduct, complainants, leniency applicants/whistleblowers, and proactive investigative methods by DOJ or other government agencies.⁷

¹ This contribution was prepared by the Department of Justice, Antitrust Division.

² OECD Global Forum on Competition, Session 1, Fighting Corruption and Promoting Competition: Contribution from the United States (Feb. 27-28, 2014), available at: <https://www.justice.gov/atr/file/788006/dl?inline>.

³ Speech, U.S. Dep’t of Justice, Acting Deputy Assistant Attorney General Daniel Glad Delivers Keynote at the Global Competition Review: Cartels: Live! Conference (Mar. 3, 2026), available at: <https://www.justice.gov/opa/speech/acting-deputy-assistant-attorney-general-daniel-glad-delivers-keynote-global-competition>.

⁴ Press Release, U.S. Dep’t of Justice, Former Member of the Air Force Pleads Guilty to Multi-Year Bid Rigging Schemes and Conspiracy to Defraud U.S. Air Force (Apr. 2, 2026), available at: <https://www.justice.gov/opa/pr/former-member-air-force-pleads-guilty-multi-year-bid-rigging-schemes-and-conspiracy-defraud>.

⁵ See e.g., U.S. Dep’t of Justice, Preventing and Detecting Bid Rigging, Price Fixing, and Market Allocation in Post-Disaster Rebuilding Projects (updated Oct. 10, 2023), available at: <https://www.justice.gov/atr/preventing-and-detecting-bid-rigging-price-fixing-and-market-allocation-post-disaster-rebuilding>.

⁶ For example, the maximum penalty for a conspiracy to rig bids is 10 years in prison and a \$1 million fine for individuals and a \$100 million fine for corporations. The fines may be increased to twice the gain derived from the crime or twice the loss suffered by the victims of the crime if either amount is greater than the statutory maximum fines. 15 U.S.C. § 1.

⁷ U.S. Dep’t of Justice, Federal Antitrust Crimes: A Primer for Law Enforcement Personnel, (updated Oct. 2023), available at: <https://www.justice.gov/atr/page/file/1091651/dl?inline>. The

5. Much of DOJ's success in investigating and prosecuting bid rigging and corruption in public procurement stems from its strong domestic partnerships. In November 2019, DOJ announced the Procurement Collusion Strike Force (PCSF) – an interagency partnership including U.S. Attorneys' Offices,⁸ the FBI, and multiple federal Inspectors General.⁹ This joint law enforcement effort focuses on detecting and deterring antitrust crimes and related fraudulent schemes that impact government procurement, grant and program funding at all levels of government — federal, state and local.¹⁰

6. The PCSF was built on “a simple operational insight: procurement systems are vulnerable to collusion.”¹¹ Since its founding, the PCSF has opened almost 200 investigations resulting in more than \$70 million in fines and over 75 guilty pleas and trial convictions.¹²

7. In July 2025, DOJ announced a partnership with the U.S. Postal Service to create a first-of-its-kind Whistleblower Rewards Program.¹³ The program offers monetary rewards to individuals who report antitrust crimes and related offenses affecting the Postal Service, its revenues, or its properties that result in a criminal monetary recovery of more than \$1 million.¹⁴ This program created a new pipeline of case generation resulting in a substantial number of credible leads.¹⁵

Federal Trade Commission (FTC) shares responsibility for enforcing the U.S. antitrust laws, but it cannot prosecute criminal violations. Therefore, the FTC regularly refers possible criminal violations, including antitrust crimes, to DOJ.

⁸ In addition to its specialized litigating components, such as the Antitrust Division, the U.S. Department of Justice is also comprised of U.S Attorneys Offices across 94 districts across the United States, which work to enforce federal laws in their district.

⁹ Press Release, U.S. Dep't of Justice, Justice Department Announces Procurement Collusion Strike Force: A Coordinated National Response to Combat Antitrust Crimes and Related Schemes in Government Procurement, Grant and Program Funding (Nov. 5, 2019), available at: <https://www.justice.gov/usao-dc/pr/justice-department-announces-procurement-collusion-strike-force-coordinated-national>.

¹⁰ *Id.*

¹¹ Speech, U.S. Dep't of Justice, Acting Deputy Assistant Attorney General Daniel Glad Delivers Keynote at the Global Competition Review: Cartels: Live! Conference (Mar. 3, 2026), available at: <https://www.justice.gov/opa/speech/acting-deputy-assistant-attorney-general-daniel-glad-delivers-keynote-global-competition>.

¹² U.S. Dep't of Justice, Procurement Collusion Strike Force, available at: <https://www.justice.gov/atr/procurement-collusion-strike-force>.

¹³ Press Release, U.S. Dep't of Justice, Justice Department's Antitrust Division Announces Whistleblower Rewards Program, (Jul. 8, 2025), available at: <https://www.justice.gov/opa/pr/justice-departments-antitrust-division-announces-whistleblower-rewards-program>.

¹⁴ *Id.*; see also, U.S. Dep't of Justice, Whistleblower Rewards Program: Reporting Antitrust Crimes and Qualifying for Whistleblower Rewards, available at: <https://www.justice.gov/atr/whistleblower-rewards>.

¹⁵ Speech, U.S. Dep't of Justice, Acting Deputy Assistant Attorney General Daniel Glad Delivers Keynote at the Global Competition Review: Cartels: Live! Conference (Mar. 3, 2026), available at: <https://www.justice.gov/opa/speech/acting-deputy-assistant-attorney-general-daniel-glad-delivers-keynote-global-competition>.

8. Just six months after the program's inception, DOJ announced its first-ever whistleblower reward.¹⁶ The whistleblower's information led to criminal antitrust charges pertaining to a scheme involving bid rigging and "shill bidding" in online used-vehicle auctions – conduct that affected used-car prices throughout the United States.¹⁷ The company agreed to pay a \$3.28 million criminal fine and the whistleblower was provided with a \$1 million reward.¹⁸ The Whistleblower Rewards Program is becoming another powerful tool the DOJ has for detecting bid rigging and corruption in public procurement.

9. Because of the interplay between the Whistleblower Rewards Program and another key DOJ detection tool – the Leniency Policy,¹⁹ which remains reserved for the first corporation to report and meet the program's requirements – the race to report criminal antitrust conduct, including bid rigging and corruption in public procurement, is faster now.²⁰

10. Guidance on the interplay between DOJ's Leniency Program and the Whistleblower Rewards program is forthcoming.

3. DOJ's Training Efforts

11. The DOJ commits substantial resources to training focused on preventing and detecting bid rigging and corruption in public procurement. DOJ conducts training for both domestic and international partners (*see* paragraph 18). On the domestic front, DOJ is committed to working with the Inspectors General of U.S. agencies receiving federal funds, as well as government procurement officials, to train individuals at all levels of the funding process to better deter and detect antitrust crimes affecting government procurement, grant, and program funding.²¹

12. Training focuses on identifying the red flags of collusion (*e.g.*, identifying bid patterns and suspicious behaviors amongst competitors).²² Training programs typically involve lectures on investigative techniques, interactive practical exercises, and discussions of recent case studies.

13. Training is particularly useful when the United States is engaged in large procurement programs, such as post-disaster rebuilding projects, or on the precipice of

¹⁶ Press Release, U.S. Dep't of Justice, Antitrust Division and U.S. Postal Service Make First-Ever Whistleblower Payment: \$1M Awarded for Reporting Antitrust Crime (Jan. 29, 2026), available at: <https://www.justice.gov/opa/pr/antitrust-division-and-us-postal-service-award-first-ever-1m-payment-whistleblower-reporting>.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ U.S. Dep't of Justice, Leniency Policy, available at: <https://www.justice.gov/atr/leniency-policy>.

²⁰ Speech, U.S. Dep't of Justice, Acting Deputy Assistant Attorney General Daniel Glad Delivers Keynote at the Global Competition Review: Cartels: Live! Conference (Mar. 3, 2026), available at: <https://www.justice.gov/opa/speech/acting-deputy-assistant-attorney-general-daniel-glad-delivers-keynote-global-competition>.

²¹ U.S. Dep't of Justice, Procurement Collusion Strike Force, available at: <https://www.justice.gov/atr/procurement-collusion-strike-force>.

²² *Id.*

major infrastructure projects (*see, e.g.*, discussion of DOJ's World Cup initiative in paragraph 21).²³

14. As of September 2025, the PCSF has trained more than 46,000 agents and procurement officials.²⁴ In addition to training, DOJ has also published several useful resources on its website.²⁵

4. DOJ's International Reach

15. DOJ's long history of holding individuals accountable for their involvement in collusion and corruption in public procurement extends internationally. For example, in 2014, DOJ extradited a Canadian national (John Bennett), for his involvement in a conspiracy to pay kickbacks and commit fraud at a U.S. Environmental Protection Agency (EPA)-designated Superfund site.²⁶ Bennett provided kickbacks to Gordon McDonald, the project manager at the Federal Creosote site, in order to influence the award of sub-contracts at the site and inflate the prices charged to the EPA by the prime contractor (McDonald).²⁷ The kickbacks were in the form of money transferred by wire to a co-conspirator's shell company, lavish cruises for senior officials of the prime contractor, and various entertainment tickets.²⁸

16. Following a three-week trial, Bennett was convicted and subsequently sentenced to over five years in prison and ordered to pay a \$12,500 criminal fine and almost \$4 million in restitution.²⁹ Following a two-week trial, McDonald was convicted and subsequently sentenced to 14 years in prison and ordered to pay a \$50,000 criminal fine and almost

²³ *See e.g.*, U.S. Dep't of Justice, Preventing and Detecting Bid Rigging, Price Fixing, and Market Allocation in Post-Disaster Rebuilding Projects (updated Oct. 10, 2023), available at: <https://www.justice.gov/atr/preventing-and-detecting-bid-rigging-price-fixing-and-market-allocation-post-disaster-rebuilding>.

²⁴ U.S. Dep't of Justice, Procurement Collusion Strike Force, available at: <https://www.justice.gov/atr/procurement-collusion-strike-force>.

²⁵ *See, e.g.*, U.S. Dep't of Justice, Red Flags of Collusion (updated June 2015), available at: <https://www.justice.gov/atr/red-flags-collusion> (detailing a simple four-part MAPS analysis for preventing and detecting collusion in procurement and grant awards); U.S. Dep't of Justice, Federal Antitrust Crime: A Primer for Law Enforcement Personnel (updated Oct. 2023), available at: <https://www.justice.gov/atr/page/file/1091651/dl?inline>.

²⁶ Thousands of contaminated sites exist in the United States due to hazardous waste being dumped, left out in the open, or otherwise improperly managed. These sites include manufacturing facilities, processing plants, landfills and mining sites. *See* U.S. Environmental Protection Agency, What is Superfund (updated Sept. 17, 2025), available at: <https://www.epa.gov/superfund/what-superfund>. *See also* Press Release, U.S. Dep't of Justice, Canadian Executive Extradited on Major Fraud Charges Involving a New Jersey Environmental Protection Agency Superfund Site, (Nov. 17, 2014), available at: <https://www.justice.gov/archives/opa/pr/canadian-executive-extradited-major-fraud-charges-involving-new-jersey-environmental>.

²⁷ *Id.*

²⁸ *Id.*

²⁹ Press Release, U.S. Dep't of Justice, Former CEO of Canadian Hazardous Waste Treatment Company Sentenced to Serve 63 Months in Prison for Role in Kickback and Fraud Schemes Against the United States (Aug. 9, 2016), available at: <https://www.justice.gov/archives/opa/pr/former-ceo-canadian-hazardous-waste-treatment-company-sentenced-serve-63-months-prison-role>

\$200,000 in restitution for participating in multiple bid-rigging, fraud and kickback schemes, including the scheme involving Bennett.³⁰

17. The outcome of this investigation was the result of the efforts conducted by DOJ (the Antitrust Division and Criminal Division), the EPA Office of Inspector General, and the Internal Revenue Service.³¹

18. Led by its International Section, DOJ has also trained dozens of international partners. For example, in May 2026, DOJ trained judges, prosecutors, investigators, and procurement officials from the Balkan region on combatting collusion in public procurement through the U.S. Department of State's International Law Enforcement Academy in Hungary. The program included a mix of substantive lectures and numerous practical exercises stemming from a hypothetical bid-rigging and corruption case. DOJ partnered with colleagues from Austria to assist with one of the training sessions. DOJ conducted similar programs in Hungary and Botswana in 2024.

19. Similarly, DOJ recently partnered with a coalition of approximately 75 NATO staff members across the many NATO bodies to advance the twin goals of deterring and detecting procurement collusion. This coalition—made up of lawyers, internal investigators, ethics personnel, auditors, and executive staff members—is committed to safeguarding NATO spending. This team planned a comprehensive and intensive training program on how best to deter and detect collusion, corruption, and fraud. DOJ partnered with colleagues from Canada, the UK, and Denmark to assist with some of the training sessions. The capstone to this training program was an all-day, multi-disciplinary simulation of a fraud and collusion investigation, during which the team reviewed a matter from initial complaint through charging.

20. DOJ also maintains strong relationships with agencies around the world to detect and deter this conduct. In 2020, the PCSF expanded its footprint with the launch of PCSF: Global.³² PCSF: Global furthers three closely related goals: to deter misconduct impacting U.S. taxpayer dollars spent overseas, to generate and prosecute international cartel cases impacting U.S. government interests overseas, and to continue to strengthen relationships with key competition agencies around the world.³³

21. Further, in anticipation of the 2026 FIFA World Cup hosted by the United States, Canada and Mexico, the DOJ, alongside its competition agency partners in those

³⁰ Press Release, U.S. Dep't of Justice, Former Project Manager Sentenced to Serve Time in Prison for Role in Bid Rigging and Other Fraudulent Schemes Involving Two EPA Superfund Sites in New Jersey (Mar. 4, 2014), available at: <https://www.justice.gov/archives/opa/pr/former-project-manager-sentenced-serve-time-prison-role-bid-rigging-and-other-fraudulent>. A third defendant (Haas) pleaded guilty and was subsequently sentenced to 33 months imprisonment and ordered to pay a \$30,000 criminal fine and \$53,000 in restitution. See Press Release, U.S. Dep't of Justice, Former Representative of Backfill Subcontractor Sentenced to 33 Months in Jail for Kickback and Fraud Scheme (Feb. 23, 2010), available at: <https://www.justice.gov/archives/opa/pr/former-representative-backfill-subcontractor-sentenced-33-months-jail-kickback-and-fraud>.

³¹ Press Release, U.S. Dep't of Justice, Canadian Executive Extradited on Major Fraud Charges Involving a New Jersey Environmental Protection Agency Superfund Site (Nov. 17, 2014), available at: <https://www.justice.gov/archives/opa/pr/canadian-executive-extradited-major-fraud-charges-involving-new-jersey-environmental>.

³² Press Release, U.S. Dep't of Justice, Construction Company Owner Pleads Guilty to Bid Rigging and Bribery (Nov. 18, 2022), available at: <https://www.justice.gov/archives/opa/pr/construction-company-owner-pleads-guilty-bid-rigging-and-bribery>.

³³ *Id.*

jurisdictions, launched a joint initiative to deter, detect and prosecute collusive schemes related to the provision of goods and services.³⁴ Through this initiative, the agencies collaborated on outreach to the public and business community about anticompetitive conduct, as well as on investigations, using intelligence sharing and existing international cooperation tools.³⁵

5. Recent Examples of DOJ Enforcement Involving Bid Rigging and Corruption

22. As noted above, since the inception of the PCSF, DOJ has opened nearly 200 investigations. Below is a sample of recent DOJ cases involving bid rigging in public procurement, particularly cases involving corruption.

5.1. U.S. v. Butler

23. Most recently, in *U.S. v. Butler*, a fuel contractor was convicted at trial of 34 counts of wire fraud, forgery, and money laundering.³⁶ The Court sentenced him to five years' imprisonment.³⁷ Butler had submitted falsified invoices to multiple U.S. warships that were attempting to purchase fuel, claiming expenses he had never actually incurred.³⁸

24. After Butler came under scrutiny by U.S. Navy officials, he continued his scheme under a false identity: he adopted a false name and feigned employment by a fictitious fuel division of a different company.³⁹ Butler used the proceeds of his crimes to personally enrich himself and purchase multi-million-dollar properties in Florida and Colorado.⁴⁰ The Court overseeing Butler's trial has preliminarily ordered that these two properties be forfeited to the United States.⁴¹

25. As a result of Butler's fraudulent scheme, the U.S. military paid Butler \$4.5 million dollars for phony expenses Butler had not incurred.⁴²

³⁴ Press Release, U.S. Dep't of Justice, United States, Mexico and Canada Launch Joint Initiative to Detect Collusive Schemes Seeking to Exploit the 2026 FIFA World Cup (Sept. 22, 2023), available at: <https://www.justice.gov/archives/opa/pr/united-states-mexico-and-canada-launch-joint-initiative-detect-collusive-schemes-seeking>.

³⁵ *Id.*

³⁶ Press Release, U.S. Dep't of Justice, Jury Convicts Florida Fuel Supplier of 34 Felonies at Trial in Multimillion-Dollar Scheme to Defraud U.S. Department of War and Other Federal Agencies (Jan. 16, 2026), available at: <https://www.justice.gov/opa/pr/jury-convicts-florida-fuel-supplier-34-felonies-trial-multimillion-dollar-scheme-defraud-us>.

³⁷ Press Release, U.S. Dep't of Justice, Fuel Executive Gets Five Year Prison Sentence for Defrauding U.S. Military in Contract Bid Scam (Apr. 8, 2026), available at: <https://www.justice.gov/opa/pr/fuel-executive-gets-five-year-prison-sentence-defrauding-us-military-contract-bid-scam>

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² *Id.*

26. The investigation demonstrated the collaboration between DOJ (Antitrust Division and U.S. Attorney's Office for the Southern District of Florida), the Coast Guard Investigative Service, the Defense Criminal Investigative Service, and the Naval Criminal Investigative Service.⁴³

5.2. U.S. v. Tomlinson and Bird

27. In another recent example involving government contracts, *U.S. v. Tomlinson and Bird*, two individuals pleaded guilty for their role in a scheme to monopolize, rig bids, allocate territories, and defraud the government in connection with the provision of wildfire-fighting fuel truck services to the U.S. Forest Service.⁴⁴ The Court sentenced Tomlinson to 12 months in prison⁴⁵ and Bird to 3 months in prison.⁴⁶

28. From at least as early as March 2015 until about March 2023, Bird and Tomlinson conspired to rig bids and allocate territories in the market for wildfire-fighting fuel truck services for certain dispatch centers of the U.S. Forest Service's Great Basin wildfire dispatch region, in violation of Section 1 of the Sherman Act.⁴⁷ In addition, Tomlinson pleaded guilty to conspiring with Bird to monopolize the same market, in violation of

⁴³ *Id.*

⁴⁴ Press Release, U.S. Dep't of Justice, Executive Pleads Guilty to a Seven-Count Indictment Two Weeks Before Trial, Admits to Longstanding Antitrust and Wire Fraud Conspiracies Affecting Wildfire Services (Mar. 26, 2025), available at: <https://www.justice.gov/opa/pr/executive-pleads-guilty-seven-count-indictment-two-weeks-trial-admits-longstanding-antitrust>; Press Release, U.S. Dep't of Justice, Executive Pleads Guilty to Conspiring to Monopolize, Rig Bids and Allocate Territories for Wildfire Services (May 8, 2024), available at: <https://www.justice.gov/archives/opa/pr/executive-pleads-guilty-conspiring-monopolize-rig-bids-and-allocate-territories-wildfire>.

⁴⁵ Press Release, U.S. Dep't of Justice, Former Owner of Fuel Truck Supply Company Sentenced to Prison for Bid Rigging and Conspiracy to Monopolize (June 6, 2025), available at: <https://www.justice.gov/opa/pr/former-owner-fuel-truck-supply-company-sentenced-prison-bid-rigging-and-conspiracy>.

⁴⁶ Press Release, U.S. Dep't of Justice, Second Owner of Fuel Truck Supply Company Incarcerated for Bid Rigging, Market Allocation, and Wire Fraud Conspiracies (June 26, 2025), available at: <https://www.justice.gov/opa/pr/second-owner-fuel-truck-supply-company-incarcerated-bid-rigging-market-allocation-and-wire>.

⁴⁷ Press Release, U.S. Dep't of Justice, Executive Pleads Guilty to a Seven-Count Indictment Two Weeks Before Trial, Admits to Longstanding Antitrust and Wire Fraud Conspiracies Affecting Wildfire Services (Mar. 26, 2025), available at: <https://www.justice.gov/opa/pr/executive-pleads-guilty-seven-count-indictment-two-weeks-trial-admits-longstanding-antitrust>; Press Release, U.S. Dep't of Justice, Executive Pleads Guilty to Conspiring to Monopolize, Rig Bids and Allocate Territories for Wildfire Services (May 8, 2024), available at: <https://www.justice.gov/archives/opa/pr/executive-pleads-guilty-conspiring-monopolize-rig-bids-and-allocate-territories-wildfire>.

Section 2 of the Sherman Act.⁴⁸ Bird further admitted to conspiring to commit wire fraud during the same period, and to committing five acts of wire fraud.⁴⁹

29. In addition to the criminal sentences, the United States entered related civil settlements with the defendants, pursuant to which Tomlinson paid the United States \$1.1 million dollars⁵⁰ and Bird paid the United States over \$780,000.⁵¹

30. The investigation demonstrated the collaboration between DOJ (Antitrust Division and the U.S. Attorney's Office for the District of Idaho), the FBI, the U.S. General Services Administration Office of Inspector General, and the U.S. Department of Agriculture Office of Inspector General.⁵²

5.3. U.S. v. Yong et al.

31. In *U.S. v. Yong*, a former contract manager for the California Department of Transportation (Caltrans) pleaded guilty for his role in a bid-rigging and bribery scheme. Yong and his co-conspirators engaged in a scheme to thwart the competitive bidding process for Caltrans contracts to ensure that companies controlled by Yong's co-conspirators submitted the winning bid and would be awarded the contract. Yong was also charged with accepting bribes while working for Caltrans, a California state agency that receives significant federal funding. The bribes included cash payments, wine, furniture, and remodeling services on his home totaling \$980,000.⁵³ Yong was sentenced to 49 months' imprisonment and ordered to pay almost \$1 million in restitution.⁵⁴

⁴⁸ Press Release, U.S. Dep't of Justice, Executive Pleads Guilty to Conspiring to Monopolize, Rig Bids and Allocate Territories for Wildfire Services (May 8, 2024), available at: <https://www.justice.gov/archives/opa/pr/executive-pleads-guilty-conspiring-monopolize-rig-bids-and-allocate-territories-wildfire>.

⁴⁹ Press Release, U.S. Dep't of Justice, Executive Pleads Guilty to a Seven-Count Indictment Two Weeks Before Trial, Admits to Longstanding Antitrust and Wire Fraud Conspiracies Affecting Wildfire Services (Mar. 26, 2025), available at: <https://www.justice.gov/opa/pr/executive-pleads-guilty-seven-count-indictment-two-weeks-trial-admits-longstanding-antitrust>.

⁵⁰ Press Release, U.S. Dep't of Justice, Former Owner of Fuel Truck Supply Company Sentenced to Prison for Bid Rigging and Conspiracy to Monopolize (June 6, 2025), available at: <https://www.justice.gov/opa/pr/former-owner-fuel-truck-supply-company-sentenced-prison-bid-rigging-and-conspiracy>.

⁵¹ Press Release, U.S. Dep't of Justice, Second Owner of Fuel Truck Supply Company Incarcerated for Bid Rigging, Market Allocation, and Wire Fraud Conspiracies (June 26, 2025), available at: <https://www.justice.gov/opa/pr/second-owner-fuel-truck-supply-company-incarcerated-bid-rigging-market-allocation-and-wire>.

⁵² Press Release, U.S. Dep't of Justice, Former Owner of Fuel Truck Supply Company Sentenced to Prison for Bid Rigging and Conspiracy to Monopolize (June 6, 2025), available at: <https://www.justice.gov/opa/pr/former-owner-fuel-truck-supply-company-sentenced-prison-bid-rigging-and-conspiracy>; Press Release, U.S. Dep't of Justice, Second Owner of Fuel Truck Supply Company Incarcerated for Bid Rigging, Market Allocation, and Wire Fraud Conspiracies (June 26, 2025), available at: <https://www.justice.gov/opa/pr/second-owner-fuel-truck-supply-company-incarcerated-bid-rigging-market-allocation-and-wire>.

⁵³ Press Release, U.S. Dep't of Justice, Former Caltrans Contract Manager Pleads Guilty to Bid Rigging and Bribery (Apr. 11, 2022), available at: <https://www.justice.gov/archives/opa/pr/former-caltrans-contract-manager-pleads-guilty-bid-rigging-and-bribery>.

⁵⁴ Press Release, U.S. Dep't of Justice, Former Public Official and California Contractor Sentenced for Bid Rigging and Bribery (Apr. 24, 2023), available at

32. A construction company owner (Opp) and his former business partner (Miller) also pleaded guilty for their roles in this scheme.⁵⁵ As part of the conspiracy, Opp and Miller paid the above-mentioned bribes to Yong. Miller recruited others to submit sham bids on Caltrans contracts. Opp, for example, formed a separate construction company, with his wife as the nominal president, to do so. Opp was sentenced to 45 months' imprisonment and ordered to pay almost \$800,000 in restitution and Miller was sentenced to 78 months' imprisonment and ordered to pay \$980,000 in restitution (joint and severable with Yong and Opp).⁵⁶

33. The outcome of this investigation demonstrates the collaboration between the DOJ (Antitrust Division and the U.S. Attorney's Office for the Eastern District of California) and the FBI.⁵⁷

<https://www.justice.gov/archives/opa/pr/former-public-official-and-california-contractor-sentenced-bid-rigging-and-bribery>.

⁵⁵ Press Release, U.S. Dep't of Justice, Former Contractor Pleads Guilty to Bid Rigging and Bribery (Oct. 3, 2022), available at: <https://www.justice.gov/archives/opa/pr/former-contractor-pleads-guilty-bid-rigging-and-bribery>; Press Release, U.S. Dep't of Justice, Construction Company Owner Pleads Guilty to Bid Rigging and Bribery (Nov. 14, 2022), available at: <https://www.justice.gov/archives/opa/pr/construction-company-owner-pleads-guilty-bid-rigging-and-bribery>.

⁵⁶ Press Release, U.S. Dep't of Justice, Former Public Official and California Contractor Sentenced for Bid Rigging and Bribery (Apr. 24, 2023), available at <https://www.justice.gov/archives/opa/pr/former-public-official-and-california-contractor-sentenced-bid-rigging-and-bribery>.

⁵⁷ *Id.*