IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	)	**22-cr-0325-BAH**
v.	)	
GOL LINHAS AÉREAS INTELEGENTES.	)	
Defendant	)	

GOVERNMENT'S UNOPPOSED MOTION TO DISMISS INFORMATION

Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure and Paragraph 3 of the Deferred Prosecution Agreement between the United States of America and the defendant GOL Linhas Aéreas Inteligentes S.A. ("GOL"), the United States of America, by and through undersigned counsel, hereby moves to dismiss with prejudice the Information filed in the above-captioned case against defendant GOL. In support of this motion, the Government states as follows:

1. On September 9, 2022, the Government filed a criminal Information charging GOL with one count of conspiracy to commit an offense against the United States in violation of Title 18, United States Code, Section 371, that is, to violate the anti-bribery provisions of the Foreign Corrupt Practices Act of 1977 ("FCPA"), as amended, Title 15, United States Code, Section 78dd-1, and to violate the books and records provisions of the FCPA, as amended, Title 15 United States Code, Sections 78(b)(2)(A), 78m(b)(5), and 78ff(a). *See* ECF 1 (the "Information").

2. On September 15, 2022, the Government entered into a deferred

prosecution agreement with GOL, in which the Government deferred prosecution of GOL for a period of three years from the day the deferred prosecution agreement was fully executed. *See* ECF 12 (the "DPA") ¶3. Among other obligations, the DPA required GOL to cooperate with the Government's investigation and to pay a total criminal penalty of $17,000,000, a maximum of $1,700,000 of which could be credited against payments made to authorities in Brazil in connection with a resolution involving related underlying conduct. *See* DPA ¶10.

3. The DPA provided that the Government would not continue the criminal prosecution against GOL and would move to dismiss the Information within six months of the expiration of the DPA if GOL fully complied with all of its obligations under the DPA. *See* DPA at ¶17.

4. The term of the DPA is scheduled to expire on or about September 15, 2025.

5. On or about July 23, 2025, the Chief Executive Officer ("CEO") and Chief Financial Officer of GOL certified to the United States that GOL had met its disclosure obligations pursuant to paragraph 22 of the DPA.

6. On or about July 23, 2025, the CEO and Chief Compliance Officer of GOL each certified to the United States that GOL had met its compliance obligations pursuant to paragraphs 12 and 13 of the DPA.

7. Paragraph 3 of the DPA provides that, "in the event the Fraud Section and the Office find, in their sole discretion, that there exists a change in circumstances sufficient to eliminate the need for the reporting requirement in Attachment D, and that the other provisions of this Agreement have been satisfied, the Agreement may be terminated early."

8. Based on the information known to the United States, GOL has fully met

the obligations under the DPA, including full cooperation with the Government, implementation of an enhanced compliance program and procedures, and satisfaction of the terms of the provisions regarding self-reports. In addition, on or about September 22, 2022, GOL made a timely payment to Brazilian authorities of approximately $1,169,647, which was credited toward the Total Criminal Penalty. On September 29, 2022, December 14, 2022, and September 14, 2023, GOL made timely payments to the United States totaling approximately $15,830,353 in fulfilment of the Total Criminal Penalty.

9. Because GOL has fully complied with all of its obligations under the DPA, the Government has determined that early dismissal with prejudice of the Information is appropriate.

For the foregoing reasons, the Government requests that this Motion to Dismiss the Information be granted.

Respectfully submitted,

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