U.S. Department of
JUSTICE

Criminal Referrals by the U.S. Trustee Program Fiscal Year 2025

June 2026

Executive Office for U.S. Trustees

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I. EXECUTIVE SUMMARY

The Director of the Executive Office for United States Trustees (EOUST) is required to submit an annual report to Congress under the provisions of Section 1175 of the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162). Section 1175 states:

> The Director of the Executive Office for United States Trustees shall prepare an annual report to the Congress detailing—(1) the number and types of criminal referrals made by the United States Trustee Program; (2) the outcomes of each criminal referral; (3) for any year in which the number of criminal referrals is less than for the prior year, an explanation of the decrease; and (4) the United States Trustee Program's efforts to prevent bankruptcy fraud and abuse, particularly with respect to the establishment of uniform internal controls to detect common, higher risk frauds, such as a debtor's failure to disclose all assets.

The United States Trustee Program (USTP or Program) made 2,263 bankruptcy and bankruptcy-related criminal referrals during Fiscal Year (FY) 2025.[1] This represents a 2.4 percent increase from the number of referrals made in FY 2024. The five most common allegations contained in the FY 2025 referrals involved tax fraud, false oaths or statements, a bankruptcy fraud scheme, mail or wire fraud, and concealment. Of the 2,263 criminal referrals, as of June 1, 2026, formal criminal charges had been filed in connection with 15 of the referrals, 993 of the referrals remained under review or investigation, 1,248 of the referrals were declined for prosecution, and seven of the referrals were administratively closed.

In FY 2025, the USTP continued to strengthen its partnerships with law enforcement through participation on bankruptcy fraud working groups; through the development and presentation of joint training programs; and by assisting in the investigation and prosecution of bankruptcy and bankruptcy-related crimes, including serving as Special Assistant United States Attorneys (SAUSAs), consulting on bankruptcy law, and testifying as expert, process, or fact witnesses. The Program also continued to receive valuable information through its Internet email "Hotline," which offers a convenient means for individuals to report suspected bankruptcy crimes.

[1] Fiscal Year 2025 encompassed the period from October 1, 2024, through September 30, 2025.

II. INTRODUCTION

The Program is the component of the Department of Justice whose mission is to promote the integrity and efficiency of the bankruptcy system for the benefit of all stakeholders—debtors, creditors, and the public. It consists of 21 regions with 82 field offices nationwide and an Executive Office in Washington, D.C. Each field office is responsible for carrying out numerous administrative, regulatory, and litigation responsibilities under title 11 (the Bankruptcy Code) and title 28 of the United States Code.[2]

The USTP refers matters that "relate to the occurrence of any action which may constitute a crime" to the United States Attorneys' offices (USAOs) for investigation and prosecution and assists the U.S. Attorneys in "carrying out prosecutions based on such action." 28 U.S.C. § 586(a)(3)(F). In addition, 18 U.S.C. § 158 requires designation of a prosecutor and a Federal Bureau of Investigation (FBI) agent in each district to address bankruptcy-related crimes, affirming the importance of the partnership between the USTP and law enforcement in protecting the integrity of the bankruptcy system.

III. NUMBER AND TYPES OF CRIMINAL REFERRALS

The Program tracks criminal referrals using its internal automated Criminal Enforcement Tracking System (CETS). Program personnel enter information into CETS as each case progresses and review the status of all referrals at least once every six months. The system is designed to provide an accurate measure of criminal enforcement actions, assist in trend identification, and facilitate management improvements.

In FY 2025, the USTP made 2,263 bankruptcy and bankruptcy-related criminal referrals. Each referral may be sent to multiple agencies, but it is counted only once in CETS. Similarly, each referral may contain multiple allegations. The breadth of allegations involved in criminal referrals is evident in Table 1, with referral allegations in more than 50 separate categories. The five most common allegations contained in the FY 2025 criminal referrals involved tax fraud (70.8

[2] The Program has jurisdiction in all federal judicial districts except those in Alabama and North Carolina.

percent), false oaths or statements (20.5 percent), a bankruptcy fraud scheme (16.1 percent), mail or wire fraud (14 percent), and concealment (12.9 percent).

Table 1: Criminal Referrals by Type of Allegation[1]		
Type of Allegation	**Referrals**	
	Number	**Percent**[2]
Tax Fraud [26 U.S.C. § 7201, et seq.]	1,602[3]	70.8%
False Oaths/Statements [18 U.S.C. § 152 (2) & (3)]	463	20.5%
Bankruptcy Fraud Scheme [18 U.S.C. § 157]	364	16.1%
Mail/Wire Fraud [18 U.S.C. §§ 1341 & 1343]	317	14.0%
Concealment [18 U.S.C. §§ 152 (1) & (7)]	293	12.9%
Perjury/False Statement	246	10.9%
ID Theft & Use of False/Multiple SSNs	208	9.2%
Bank Fraud [18 U.S.C. § 1344]	133	5.9%
Federal Program Fraud	118	5.2%
Concealment/Destruction/Withholding of Documents [18 U.S.C. § 152 (8) & (9)]	100	4.4%
Conspiracy [18 U.S.C. § 371]	94	4.2%
CARES ACT	93	4.1%
Sarbanes/Oxley [18 USC § 1519] (Destruction, alteration, or falsification of documents in federal investigations and bankruptcy)	72	3.2%
Money Laundering [18 U.S.C. §§ 1956 & 1957]	59	2.6%
Embezzlement [18 U.S.C. § 153]	50	2.2%
Obstruction of Justice	49	2.2%
Post-Petition Receipt of Property [18 U.S.C. § 152 (5)]	43	1.9%
Forged Documents	43	1.9%
State Law Violations	26	1.1%
Investor Fraud	25	1.1%
Mortgage/Real Estate Fraud	25	1.1%
False Claim [18 U.S.C. § 152 (4)]	23	1.0%
Crypto Assets	17	0.8%
Corporate Fraud	16	0.7%
Misuse of Seals of Courts; Seals of Departments or Agencies [18 U.S.C. §§ 505/506]	14	0.6%
Threats of Violence	11	0.5%
Corporate Bust-Outs/Bleed-Outs	10	0.4%
Disregard of Bankruptcy Law/Rule by BPP [18 U.S.C. § 156]	9	0.4%
Serial Filer	8	0.4%
Credit Card Fraud/Bust-Outs	7	0.3%

Criminal Contempt [18 U.S.C. § 402]	6	0.3%
Drug Offenses	6	0.3%
Insurance Fraud	5	0.2%
Extortion	4	0.2%
Health Care Fraud [18 U.S.C. § 1347]	3	0.1%
Racketeer Influenced and Corrupt Organizations (RICO)	3	0.1%
Ponzi Scheme	3	0.1%
Internet Fraud	3	0.1%
Terrorism	3	0.1%
Professional Fraud	3	0.1%
Immigration Offense	3	0.1%
Adverse Interest/Officer Conduct [18 U.S.C. § 154]	2	0.1%
Bribery [18 U.S.C. § 152 (6)]	2	0.1%
Impersonation of a Federal Employee	2	0.1%
Stolen Valor [18 U.S.C. § 704]	1	<0.1%
Assault	1	<0.1%
Larceny [10 U.S.C. § 921]	1	<0.1%
Theft of Mail [18 U.S.C. § 1708]	1	<0.1%
Sherman Antitrust Act	1	<0.1%
Restaurant Revitalization Fund & the Restaurant Relief Bill	1	<0.1%
18 U.S.C. § 1521 (False Lien/Encumbrance Against Public Officials)	1	<0.1%

[1] Percent based on 2,263 referrals. One referral often contains more than one allegation, so the sum of the percentages for referrals will exceed 100 percent.

[2] Allegation information can change over time. Table 1 reflects information contained within CETS as of June 1, 2026.

[3] The majority of these referrals involve allegations of improper filing status (*e.g.*, Head of Household) and misuse of exemptions (*see, e.g.*, 26 U.S.C. § 7201).

IV. OUTCOMES OF CRIMINAL REFERRALS

Table 2 shows the collective outcome/disposition of the 2,263 criminal referrals made by the Program during FY 2025 as of June 1, 2026.[3] Of those referrals, 993 are under review by the USAOs (26.3 percent) or with an investigative agency (17.6 percent), 15 referrals (0.7 percent) resulted in formal charges, 1,248 referrals (55.1 percent) were declined for prosecution, and seven referrals (0.3 percent) were administratively closed.

Table 2: Outcome/Disposition of FY 2025 Referrals[1]

Outcome/Disposition	Referrals	
	Number	Percent[2]
Under Review in U.S. Attorney's Office	594	26.3%
With Investigative Agency	399	17.6%
Formal Charges Filed (Case Active)	7	0.3%
Formal Charges Filed (Case Closed)	8	0.4%
- At Least One Conviction or Guilty Plea	8	
- At Least One Pre-trial Diversion	0	
- At Least One Dismissal	0	
- At Least One Acquittal	0	
Prosecution Declined by U.S. Attorney and/or Investigative Agency	1,248	55.1%
Administratively Closed	7	0.3%

[1] Outcome and disposition information will change over time. The information contained within Table 2 reflects information contained within CETS as of June 1, 2026.

[2] Rounded percent based on 2,263 referrals.

The 15 cases referenced in Table 2 in which formal charges were filed between October 1, 2024, and June 1, 2026, are prosecutions that originated from a FY 2025 referral as derived from

[3] The Program is not the source of official disposition information. CETS is designed primarily to track referrals made by the USTP to U.S. Attorneys. While Program staff work with local USAOs to update disposition information semi-annually, delays in reporting, as well as differences in tracking systems, may result in reporting variances between the agencies.

CETS.[4] It is important to note that white-collar criminal referrals like those made by the Program often require significant time and resources to investigate. As a result, it generally takes more than two years before there is a reportable action in CETS. Therefore, it is reasonable that a high percentage of cases referred in FY 2025 are still under investigation or review.

V. COMPARISON WITH CRIMINAL REFERRALS MADE IN PREVIOUS YEAR

As shown in Table 3, the number of criminal referrals made during FY 2025 represents a 2.4 percent increase from the number of referrals made in FY 2024. In FY 2025, the Program experienced growth in the number of bankruptcy and bankruptcy-related criminal referrals it made.

Table 3: Comparison Between Criminal Referrals in FY 2024 and FY 2025

FY 2024	FY 2025	Percent Change
2,211	2,263	+2.4%

VI. USTP EFFORTS TO PREVENT BANKRUPTCY FRAUD AND ABUSE

The USTP is committed to identifying and referring for investigation and prosecution bankruptcy fraud and bankruptcy-related crimes. The EOUST's Office of Criminal Enforcement oversees and coordinates the Program's enforcement efforts and has strengthened its ability to detect, refer, and assist in the prosecution of criminal violations. By issuing resource materials, participating in working groups, collaborating with its law enforcement partners, and providing training to law enforcement personnel, private trustees, and others, the USTP has established robust systems to detect fraud schemes and to combat fraud and abuse that threaten the integrity of the bankruptcy system.

The following are some highlights of the Program's criminal enforcement efforts in FY 2025.

[4] Table 2 reflects only disposition information related to referrals the USTP made in FY 2025. It does not reflect the entirety of prosecutions with bankruptcy charges brought by the Department of Justice in FY 2025, which may relate to referrals in prior years.

Bankruptcy Fraud Working Groups. During FY 2025, the Program participated in nearly 50 local bankruptcy fraud working groups and other specialized task forces throughout the country. Members of these working groups and task forces include representatives from the USAOs, FBI, United States Postal Inspection Service, Internal Revenue Service-Criminal Investigation, and offices of the Inspector General for the Social Security Administration, the Department of Housing and Urban Development, the United States Secret Service, and the Federal Housing Finance Agency. Working groups and task forces provide an effective forum for consultation between the USTP and its law enforcement partners and allow the Program to draw on the collective experience and expertise of the groups to investigate and effectively address fraud and abuse in the bankruptcy system.

One example of successful collaboration was in the Western District of Wisconsin. In June 2025, a former chapter 11 debtor was sentenced to 84 months in prison followed by three years of supervised release, ordered to pay a $500,000 fine, and ordered to reimburse the government for the cost of his public defender. A federal jury convicted the defendant of making a false declaration in relation to his bankruptcy case, bankruptcy fraud, and criminal contempt of court. The defendant filed for bankruptcy in 2022. In his bankruptcy schedules, he falsely stated that he had no real estate, retirement accounts, trusts, partnerships, or business-related property, and that he had only one bank account with a balance of $195. In reality, he had about $20 million in assets hidden behind dozens of sham trusts and partnerships. His bankruptcy documents also stated he had not sold real estate in the past two years, when in fact he had sold a waterfront home in Key West, Florida, for more than $3 million. The defendant also violated a bankruptcy court order that prohibited him from transferring assets held by businesses he owned and any other business he was associated with while the bankruptcy proceeded. The defendant violated the order by transferring real estate and draining bank accounts. He also hid more than $1 million in cash in a crawl space under his house and used an unwitting individual to transfer a parcel of real estate. The USTP's Madison office successfully moved to convert the chapter 11 case to chapter 7 and obtained a waiver of the debtor's discharge. The Madison office was part of a bankruptcy fraud working group that included the FBI. The office discussed the matter at a working group meeting and also referred the matter to the U.S. Attorney and provided information to the FBI and state and local law enforcement.

Special Assistant United States Attorneys (SAUSAs). During FY 2025, more than a dozen Program attorneys in field offices across the country were designated as SAUSAs to assist USAOs in the investigation and prosecution of bankruptcy and bankruptcy-related crimes. Some examples follow.

In April 2025, in the Western District of Missouri, the owner of a health care company was sentenced to 21 months in prison followed by three years of supervised release and ordered to pay $85,000 in restitution for bankruptcy fraud. The defendant pleaded guilty to knowingly and fraudulently transferring and concealing property in the company's bankruptcy case. In July 2021, the company filed a voluntary chapter 11 reorganization case. In October 2021, the bankruptcy court granted the USTP's Kansas City office's motion to convert the case to a chapter 7 liquidation and found there was mismanagement of assets, self-dealing, and inadequate corporate controls, among other issues. Minutes after the conversion hearing, which by operation of law displaced the defendant as the bankruptcy estate's fiduciary, he initiated several wire transfers of money from a bankruptcy estate account to himself and to a shareholder of the debtor. Additionally, the defendant engaged in a fraudulent scheme by promising to sell equipment that he knew the debtor leased and did not own. To further the fraud and obtain a down payment on the equipment sale, the defendant altered serial numbers on the equipment and corresponding invoices. The USTP's Kansas City office referred the matter to the U.S. Attorney's office, and a trial attorney from the Kansas City office served as a SAUSA during the prosecution.

In August 2025, in the District of Puerto Rico, a former chapter 13 debtor was sentenced to 18 months in prison followed by three years of supervised release after pleading guilty to bankruptcy fraud and making a false loan application. According to his plea agreement, during his bankruptcy case, the defendant concealed his interests in various companies and made false declarations in his bankruptcy documents regarding those interests, his income, and an account. According to the indictment, one of the companies produced and sold baked goods, food, beverages, and convenience products. Another company performed and provided construction-related services to private and government clients and had been awarded contracts exceeding $800,000 with municipalities in Puerto Rico. The defendant submitted a Paycheck Protection Program loan application for one of his businesses through a third party, and the loan was approved and disbursed. The defendant made false statements in connection with the loan application by, among other things, stating that the business owner was not involved in a bankruptcy. The USTP's San Juan office provided information to the FBI in response to its request. Two attorneys from the San Juan office prosecuted the criminal case as SAUSAs.

Other Staff Support. Nationally, the EOUST's Office of Criminal Enforcement regularly coordinates with USAOs and other members of law enforcement on cases referred by the Program. Staff at the field-office level also are frequently relied on to provide substantial post-referral assistance. The following examples illustrate the types of support the Program provides to its law enforcement partners.

In January 2026, in the Middle District of Tennessee, a chapter 11 debtor's former CEO was sentenced to 42 months of prison followed by one year of supervised release and ordered to pay $11,272,521 in restitution. Its former CFO was sentenced to 12 months in prison followed by one year of supervised release and ordered to pay $11,272,521 in restitution. In August 2025, a federal jury convicted the former CEO of conspiracy to commit bank fraud, bank fraud, bankruptcy fraud, making a false statement under oath in relation to a bankruptcy case, and making false statements to a financial institution. In June 2025, the business's former CFO pleaded guilty to conspiracy to commit bank fraud, bank fraud, filing false federal income tax returns, making a false statement under oath in relation to a bankruptcy case, and making false statements to a financial institution. The CEO, who was the majority owner of a business with several used-car dealerships and related finance companies, conspired to submit false documents to banks inflating the value of its loan portfolio, which enabled it to fraudulently obtain about $26.4 million that it otherwise was not entitled to draw from its lines of credit. When the business filed a chapter 11 bankruptcy case, the former CEO gave false testimony about the scheme. The USTP's Nashville office referred the conduct to the U.S. Attorney and provided assistance. A USTP trial attorney testified on behalf of the government at the trial.

In October 2024, in the Northern District of Iowa, a former chapter 11 debtor was sentenced to 188 months of prison followed by three years of supervised release and ordered to pay over $5.7 million in restitution. The defendant pleaded guilty to livestock theft, false declaration in relation to a bankruptcy case, and wire fraud. The defendant, who operated a large farming and cattle-feeding operation in which employees would raise and care for cattle owned by others, converted over $2.5 million of proceeds of cattle sales to his own use. He defrauded the USDA of more than $1.2 million in COVID-19 emergency assistance funds by falsely representing that he and some of his associates owned certain cattle. He also received about $1.5 million from an Economic Injury Disaster Loan based on an application to the Small Business Administration. In the application, he made false representations about his financial condition and the intended use of the funds. Within a month of receiving the funds, he used some of them to hire bankruptcy counsel. During the bankruptcy case, the defendant made a series of false and fraudulent statements about his financial condition. The government also alleged that he exploited the H-2A visa program, through which he recruited agricultural workers from the Republic of South Africa, in order to enrich himself at the workers' expense. Once the workers were in the United States, the defendant allegedly used threats of force, serious harm, and physical restraint to compel them to work for him. In 2020, three migrant workers obtained a $247,000 federal civil judgment against the defendant for violations of the Fair Labor Standards Act and the Trafficking Victims Protective Reauthorization Act. Prosecutors noted that the defendant used his bankruptcy proceeding to convince the workers to settle their judgment for $75,000. The USTP's Cedar Rapids office referred the bankruptcy crimes to the U.S. Attorney. The office also provided prosecutors with documents and other information about the bankruptcy case.

In March 2025, in the Middle District of Florida, a former chapter 7 debtor and personal banker was sentenced to 15 months in prison followed by five years of supervised release, ordered to pay $407,398 in restitution, and ordered to forfeit $303,093 in proceeds of criminal activity. The defendant pleaded guilty to bank fraud. The defendant engaged in a scheme to defraud financial institutions by obtaining credit cards and lines of credit, making purchases or taking cash advances up to the credit limit, and then purportedly paying off the balances by sending worthless checks from accounts he controlled. Between the time that the financial institutions credited his account balances and the time that the worthless checks were returned for insufficient funds, the defendant would again max out his credit cards and personal lines of credit, resulting in higher negative balances. He then filed for bankruptcy to avoid paying the institutions he defrauded. The USTP's Tampa office referred the matter to the U.S. Attorney and provided substantial investigative assistance.

In January 2026, in the Southern District of West Virginia, a former chapter 13 debtor was sentenced to 36 months of probation for falsifying recorded information in his bankruptcy case. While his bankruptcy case was pending, the defendant sought to obtain financing to purchase a car. He knew he needed permission from the bankruptcy court. In February 2025, the defendant emailed a lender a fake bankruptcy court order that purported to approve the financing. As part of his September 2025 guilty plea, the defendant admitted that he knew the order was fake because he created it and that the court had not given him permission to obtain a loan. The USTP's Charleston office referred the matter to the U.S. Attorney and provided information about the bankruptcy process to the prosecutor.

In May 2025, in the District of Kansas, a former principal of two chapter 11 debtors was sentenced to 120 months in prison followed by two years of supervised release and ordered to pay $3,778,695 in restitution. A federal jury found him guilty of making false statements in loan applications, wire fraud, and aggravated identity theft. Among other things, the defendant made false statements in Paycheck Protection Program loan applications submitted on the debtors' behalf. The false information included omitting the fact that the debtors were in bankruptcy and that the defendant had filed his own individual bankruptcy. He also forged the names of two of his business partners and directed his employees to pretend to be those partners to obtain business funding. The USTP's Wichita office referred the matter to the U.S. Attorney and provided additional information about the bankruptcy process and the bankruptcy case to law enforcement.

In addition to the support provided on matters that it refers, in FY 2025, Program staff also responded to more than 140 requests for assistance from USAOs, the FBI, and other law enforcement agencies on matters not originating from a Program referral. For example, in February 2025, in the Northern District of Mississippi, the owner and operator of a grain elevator and warehouse was sentenced to 120 months in prison followed by five years of supervised release and ordered to pay restitution of $69,841,797. In February 2024, the defendant pleaded guilty to wire fraud. The grain elevator operation purchased, processed, and stored grain harvested by local farmers. The defendant altered the operation's audited financial statements to receive a state warehouse license, made false statements about the amount of debt owed on grain held at the facility, and told farmers the operation was financially healthy when, in fact, it was on the brink of bankruptcy. The operation eventually filed bankruptcy in 2021, causing widespread financial hardship to affected farmers. The USAO reached out to the USTP's Jackson office, which provided prosecutors with information to help them identify victims for purposes of sentencing.

Training. During FY 2025, the Program sponsored 25 bankruptcy and bankruptcy-related fraud training programs that reached about 1,250 federal law enforcement personnel; private bankruptcy trustees; USTP staff; and members of the bar throughout the country. Each program is customized to maximize impact, and a variety of educational formats are utilized, including in-person presentations, online meeting technology, and video teleconferences. For example, remote bankruptcy fraud-related training was provided nationwide to the FBI.

Bankruptcy Fraud Internet "Hotline" and Information from the Public. In FY 2025, the USTP documented more than 700 submissions from the public, the vast majority of which were via its National Bankruptcy Fraud Hotline email box (USTP.Bankruptcy.Fraud@usdoj.gov). The Hotline offers a convenient means for individuals to report suspected bankruptcy fraud and provide supporting documentation and factual information that may be useful in pursuing allegations. In FY 2025, more than 120 referrals were based on a Hotline submission or other tip made in either FY 2025 or a prior fiscal year. While not all submissions rise to the level of a criminal referral, they may lead to a civil enforcement action.

VII. SUMMARY

The United States Trustee Program's criminal enforcement program remained robust in FY 2025 through the actions described in this report. By detecting and referring fraud schemes, collaborating with its law enforcement partners, and providing specialized training, the USTP continues to prioritize its enforcement efforts to combat fraud and abuse and to protect the integrity of the bankruptcy system.