

DOJ Antitrust Division launches antitrust whistleblower rewards program

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The Department of Justice's Antitrust Division, together with the U.S. Postal Service, has announced a whistleblower rewards program, its first ever for criminal antitrust cases.

On July 8, 2025, the Antitrust Division of the Department of Justice (DOJ) announced a whistleblower rewards program for criminal antitrust cases affecting the U.S. Postal Service. Individuals who provide original, nonpublic information that leads to at least \$1 million in criminal antitrust fines or related recoveries may qualify to receive up to 30% of the criminal fines recovered.¹ DOJ's goal is to "create a new pipeline of leads" by incentivizing "individuals to report specific, credible, and timely information about illegal agreements to fix prices, rig bids, and allocate markets, as well as other federal criminal violations that impact, distort, or undermine the competitive process or market competition."²

Building upon its existing partnership in the Procurement Collusion Strike Force, the Antitrust Division has partnered with the U.S. Postal Service and the Office of Inspector General for the U.S. Postal Service to pay out rewards under the program. The program's requirements are set out in [a memorandum of understanding](#) between the agencies and include the following:

1. The information must be original, nonpublic, and not already known to the Division or U.S. Postal Service. It is also not original if obtained through a communication protected by the attorney-client privilege or obtained as part of a company's compliance, internal audit, or investigation processes.
2. The following alleged violations of law presumptively qualify under the program: a criminal violation of sections 1, 2, or 3 of the Sherman Act; a federal criminal violation committed to effectuate, facilitate, or conceal violations of the Sherman Act; a federal criminal violation targeting or affecting federal, state, or local public procurement; or a federal criminal violation targeting or affecting the conduct of federal competition investigations or proceedings.
3. Although the alleged violation must affect the "Postal Service, its revenues, or property," the identifiable harm need not be material or otherwise pose any substantial detriment to the Postal Service.
4. To be eligible for an award, the individual reporting the alleged violation must not have "coerced another party to participate in the illegal activity" and cannot be "clearly the leader or originator of that activity."
5. The individual must provide the information voluntarily (i.e., not pursuant to a preexisting obligation in connection with a criminal investigation or prosecution, a civil enforcement action, a formal demand, or an employer's application to the Antitrust Division's corporate leniency program).

This initiative arrives less than a year after the Criminal Division's Corporate Whistleblower Awards Pilot Program began offering similar rewards on forfeiture-based recoveries for corruption, financial institution, and private-payer healthcare crimes.³ During the prior administration, former Deputy Attorney General Lisa Monaco previewed DOJ's approach to corporate compliance, signaling the issuance of a mix of carrots and sticks to incentivize compliance and proactive reporting of wrongdoing at the corporate and individual levels. She noted that these changes would include an expanded use of monetary incentives to ensure that violations are reported to DOJ.⁴ The new program furthers that objective in the criminal antitrust space and underscores DOJ's continued commitment to enforce the antitrust laws.

Key takeaways

There are a number of key considerations for companies in light of the Antitrust Division's whistleblower rewards program.

- The new program is the latest example of DOJ's wider strategy to identify conduct that violates the criminal antitrust laws.⁵
- The new program likely will lead to an increase in whistleblower reports of potential antitrust violations.
- It remains to be seen how the program will interact with, and whether it will impact, the Division's Leniency Program.
- The new program encourages whistleblowers to report internally to the company's compliance program before reporting to DOJ. Companies should therefore continue to evaluate their internal reporting functions and monitor how reports are documented and escalated.

If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

D. Jarrett Arp

+1 202 962 7150
jarrett.arp@davispolk.com

Nathaniel L. Asker

+1 212 450 4113
nate.asker@davispolk.com

Arthur J. Burke

+1 212 450 4352
+1 650 752 2005
arthur.burke@davispolk.com

Ronan P. Harty

+1 212 450 4870
ronan.harty@davispolk.com

Tatiana R. Martins

+1 212 450 4085
tatiana.martins@davispolk.com

Paul J. Nathanson

+1 202 962 7055
+1 212 450 3133
paul.nathanson@davispolk.com

Howard Shelanski

+1 202 962 7060
howard.shelanski@davispolk.com

Caroline Ziser Smith

+1 650 752 2009
caroline.zisersmith@davispolk.com

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¹ Press Release, "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>.

² *Id.*

³ Client Update, "DOJ's newly announced Whistleblower Awards Pilot Program includes some surprises" (August 12, 2024),

In May 2025, the Criminal Division reaffirmed and updated its Criminal Enforcement Policy to include various other categories for which a whistleblower may receive an award, including crimes that implicate national security, transnational criminal organizations, and trade and customs fraud. See Client Update, "DOJ announces guidance on corporate enforcement" (May 16, 2025), <https://www.davispolk.com/insights/client-update/doj-announces-guidance-corporate-enforcement>. <https://www.davispolk.com/insights/client-update/dojs-newly-announced-whistleblower-awards-pilot-program-includes-some>

⁴ Speech, "Deputy Attorney General Lisa Monaco Delivers Keynote Remarks at the American Bar Association's 39th National Institute on White Collar Crime" (March 7, 2024), <https://www.justice.gov/archives/opa/speech/deputy-attorney-general-lisa-monaco-delivers-keynote-remarks-american-bar-associations>.

⁵ See, for example, the launch of an online portal by DOJ, the FTC, and U.S. Department of Health and Human Services inviting reports from the public about health care practices that may harm competition, including conduct that may be prosecuted criminally. <https://www.justice.gov/atr/HealthyCompetition>.