



U.S. Department of Justice

Office of Legislative Affairs

Office of the Assistant Attorney General

Washington, DC 20530

The Honorable Charles E. Grassley
Ranking Member
Committee on the Budget
United States Senate
Washington, DC 20510

Dear Senator Grassley:

This letter responds to your letter to the Department of Justice (Department), dated December 13, 2023, regarding the Department's Crime Victims Fund (CVF) and the Department's collection and deposit of criminal fines and penalties from deferred prosecution agreements (DPA) and non-prosecution agreements (NPA).

The Department is fully committed to ensuring the solvency of the CVF. Since 2007, the CVF has received over \$31 billion in deposits from fines, penalties, special assessments, and bond forfeitures from federal cases, not tax dollars. Through the CVF, the Department is able to support thousands of programs annually with millions of dollars awarded in services provided directly to crime victims who have been physically, emotionally, and financially harmed by criminal activity. In addition to the CVF, the Department supports crime victims by providing direct compensation through restitution, restoration, and remission. For example, since 2000, the Department has provided nearly \$12 billion in direct compensation to victims from forfeited funds through remission and restoration.

I. Criminal Division

The Criminal Division is a leader in white-collar and corporate enforcement and handles the most complex domestic and international white-collar matters. The Criminal Division also develops corporate enforcement policies that are a model for the Department as a whole and is a thought-leader in development of Department-wide corporate enforcement policies. These corporate enforcement policies are designed to deter misconduct, encourage companies to invest in effective corporate compliance programs, and to incentivize companies to voluntarily self-disclose misconduct. This allows the Department to investigate and prosecute corporate criminal cases, hold culpable individuals responsible, and ensure companies have taken steps to remedy underlying misconduct.

Our prosecutors are guided by the *Principles of Federal Prosecution* and the *Principles of Federal Prosecution of Business Organizations* when making charging and resolution

decisions.¹ These principles instruct prosecutors to recommend federal prosecution where the conduct at issue constitutes a federal offense and the admissible evidence will probably be sufficient to obtain and sustain a conviction, unless the prosecution would serve no substantial federal interest, the individual is subject to effective prosecution in another jurisdiction, or there is an adequate non-criminal alternative. Prosecutors generally apply the same factors to corporate prosecutions as they do to individuals, with additional factors, such as the collateral consequences to non-culpable shareholders, pension holders, employees, or others, set forth in the *Principles of Federal Prosecution of Business Organizations*. These principles ensure the reasoned exercise of prosecutorial authority and the fair and evenhanded administration of federal criminal law.

II. The Criminal Division's Role in the CVF

On December 12, 2023, Nicole M. Argentieri, then-Acting Assistant Attorney General for the Criminal Division, testified before the Senate Judiciary Committee regarding corporate criminal enforcement and addressed several questions on these topics and offered to respond further on others. The Department is pleased to provide additional information in response to your letter and your questions below.²

The proportion of deposits to the CVF from penalties received pursuant to the Criminal Division's corporate criminal resolutions, including guilty pleas, DPAs, and NPAs, is significant. The Criminal Division estimates that since 2019, over \$1.7 billion has been deposited into the CVF as a result of its corporate enforcement efforts. Additionally, the Department quickly implemented the Victims of Crime Act Fix passed by Congress in 2021. As a result, a total of over \$775 million has been deposited into the CVF from the Criminal Division's corporate non-guilty plea resolutions, including NPAs and DPAs.³

III. Specific Matters

You have asked for additional information regarding several specific matters that resulted in deposits to the CVF.

A. ABB Ltd.

With respect to ABB Ltd., as described in our prior correspondence and in then-Acting Assistant Attorney General Argentieri's testimony, in December 2022, the Department entered into a DPA with the Swiss multinational company to resolve violations of the Foreign Corrupt

¹ See generally *Justice Manual* §§ 9-27.000, 9-28.000.

² While the CVF includes deposits from penalties and other payments collected in federal criminal cases brought by the Department of Justice, including U.S. Attorney's Offices, in response to your questions directed to the Criminal Division, we have focused our response on cases brought by the Criminal Division.

³ As discussed in more detail below, under certain circumstances, the Criminal Division declines to prosecute companies for their criminal conduct but still requires them to pay all disgorgement, forfeiture, and restitution resulting from the misconduct at issue. The Criminal Division is depositing payments made by these companies that would otherwise be deposited in the general fund of the Treasury to the CVF. We believe Congress should update the law to clarify that payments that would otherwise be deposited in the general fund of the Treasury pursuant to declinations or other non-trial resolutions should also be deposited in the CVF.

Practices Act. This was a complex international investigation, involving evidence located around the world. The Department resolved its criminal investigation simultaneously with three other countries, as well as with the U.S. Securities and Exchange Commission (SEC). In multijurisdictional resolutions such as this, it is Department policy to take into account the total penalties the company has agreed to pay across all jurisdictions when fashioning its monetary penalties to ensure that the interests of justice are fully vindicated and to avoid the unnecessary imposition of duplicative fines, penalties, or forfeiture. Other countries often apply the same considerations when determining the amount of the penalty they will impose.

This consideration is particularly important in international corruption cases, where cooperation with foreign partners is critical. Coordinating across borders in the fight against international corruption amplifies the impact of our enforcement efforts, protects U.S. businesses and consumers who seek to play by the rules, and creates a free and fair international marketplace.

Under the DPA, ABB Ltd. agreed to pay \$315 million.⁴ The Department agreed to credit payments that ABB Ltd. made to the SEC, the United Kingdom, Switzerland, and South Africa. The Department's decision to credit the resolution in South Africa in the ABB Ltd. resolution was based on the assistance South Africa provided, as well as the harm caused by the misconduct in South Africa, and reflects the Department's long-standing policy to ensure that resolutions are just and appropriate and avoid the unnecessary duplication of monetary penalties.⁵ In this case, the criminal conduct occurred wholly in South Africa and was undertaken to help ABB Ltd. corruptly obtain and retain business from the South African state-owned and controlled energy company.

In addition to bearing the brunt of the harm in this case, South Africa also provided significant assistance in the investigation, sharing crucial documentary and testimonial evidence located in South Africa that was necessary to advance the Department's investigation. Even when a company fully cooperates with our investigation—like ABB Ltd. did in this case— independent cooperation from foreign authorities can be critical to our ability to prosecute criminal conduct. Foreign authorities can produce certified documentary records that can be introduced at a U.S. trial or develop cooperators who may testify.

According to the Criminal Division, after these credits, the Department collected \$85 million, of which \$83 million was deposited into the CVF.

This was the first corporate criminal investigation the Department worked in parallel with South Africa and was quickly followed by a second significant Foreign Corrupt Practices Act resolution with SAP SE, a publicly traded global software company, who agreed to pay \$220 million to resolve investigations from the Department and the Securities and Exchange Commission in January 2024.⁶ This close coordination with foreign authorities makes it more

⁴ Press Release, U.S. Dep't of Just., ABB Agrees to Pay Over \$315 Million to Resolve Coordinated Global Foreign Bribery Case (Dec. 2, 2022), <https://www.justice.gov/opa/pr/abb-agrees-pay-over-315-million-resolve-coordinated-global-foreign-bribery-case>.

⁵ See generally *Justice Manual* 1-12.000.

⁶ Press Release, U.S. Dep't of Just., SAP to Pay Over \$220M to Resolve Foreign Bribery Investigations (Jan. 10, 2024), <https://www.justice.gov/opa/pr/sap-pay-over-220m-resolve-foreign-bribery-investigations>.

difficult for corrupt actors, including corporations, to conduct and hide their crimes and allows the Department to appropriately punish wrongdoers while strengthening enforcement regimes across the world.

B. JLT and Safran

You also asked about the disgorgement in the Department's resolutions with Jardine Lloyd Thompson Group Holdings Ltd. (JLT) and Safran S.A. (Safran). These investigations were not resolved via a DPA or NPA; instead, these matters were resolved by declinations under the Criminal Division's Corporate Enforcement and Voluntary Self-Disclosure Policy (CEP). Pursuant to the CEP, the Criminal Division declines to prosecute companies for their criminal conduct when they voluntarily self-disclose the misconduct, fully cooperate with the Criminal Division's investigation, timely and appropriately remediate, and agree to pay all disgorgement resulting from the misconduct at issue. Both JLT and Safran met these criteria. As a result, the Department declined to prosecute JLT and Safran but required both companies to disgorge any profit from the misconduct. According to Department records, Safran paid its disgorgement in December 2022 of \$17.2 million, and \$16.6 million was deposited in the CVF. The Department agreed to credit up to 100 percent of the JLT disgorgement against any payment made as part of a resolution with the Serious Fraud Office in the United Kingdom within one year. However, JLT did not make any payments within the required period. In July 2022, the company paid the full disgorgement of \$29 million pursuant to the Department's CEP agreement. Of that disgorgement, \$28 million was deposited in the CVF.

C. Binance

After a briefing in December 2023 by then-Acting Assistant Attorney General Argentieri, you raised questions about our recent resolution with Binance. In November 2023, Binance and its chief executive officer (CEO), Changpeng Zhao, pleaded guilty in a groundbreaking and sophisticated resolution. Binance, a money services business that served U.S. customers, admitted that it engaged in an extensive scheme to operate as a U.S. financial institution while disregarding U.S. law. In doing so, Binance put U.S. customers, the U.S. financial system, and U.S. national security at risk, all in the name of profits. Binance prioritized growth, market share, and profits over compliance with U.S. law, claiming to operate everywhere and nowhere and intentionally seeking out U.S. customers to grow its business, but deciding to ask for forgiveness—not permission—when it came to complying with U.S. law.⁷ Serving U.S. customers meant that Binance was a U.S. financial institution that was required to implement an effective anti-money laundering program, register with the Department of the Treasury's Financial Crime Enforcement Network, and not cause U.S. customers to transact with sanctioned customers. Binance admitted its criminal acts; it pleaded guilty to conspiracy to violate the Bank Secrecy Act and to fail to register as a money transmitting business, failure to register as a money transmitting business, and violating the International Emergency Economic Powers Act (IEEPA).⁸ Binance agreed to pay \$4.3 billion in fines and forfeiture. The scheme went all the way to the top, and Binance's CEO pleaded guilty to violating the Bank Secrecy Act. The

⁷ Press Release, U.S. Dep't of Just., Binance and CEO Plead Guilty to Federal Charges in \$4B Resolution (Nov. 21, 2023), <https://www.justice.gov/opa/pr/binance-and-ceo-plead-guilty-federal-charges-4b-resolution>.

⁸ *United States v. Binance Holdings Ltd.*, No. CR23-178RAJ (W.D. Wash. Feb. 13, 2024).

Financial Crime Enforcement Network, the Department of the Treasury's Office of Foreign Asset Control, and the Commodity Futures Trading Commission (CFTC) entered into simultaneous resolutions with Binance.

Binance was sentenced on February 23, 2024. Pursuant to its guilty plea with the Department, Binance will pay the required fines and forfeiture on a payment schedule. Binance agreed to forfeiture of \$898 million related to its IEEPA violation, forfeiture of \$1.6 billion related to its failure to register as a money transmitting business, and a criminal fine of \$1.8 billion.⁹

Binance was ordered to pay the \$898 million forfeiture related to the IEEPA violation within 30 days of sentencing. Binance has made this payment. The Department has not offset this payment and will assess whether it is eligible for deposit in the U.S. Victims of State Sponsored Terrorism Fund after the funds are finally forfeited. Of the \$1.6 billion forfeiture related to failing to register as a money transmitting business, the Department will credit \$950 million of the penalty that Binance or its CEO paid to the CFTC and \$550 million of the penalty that Binance paid to the Department of the Treasury against the \$1.6 billion forfeiture money judgment Binance agreed to as a result of its failure to register as a money transmitting business.

With respect to the \$1.8 billion criminal fine, the Department will credit \$300 million of the criminal fine against payments Binance makes to the Department of Treasury and Binance will pay \$1,505,475,575 of the criminal fine to the Department, which the Department expects to be deposited in the CVF pursuant to statute.¹⁰

As part of the guilty plea of Binance's CEO, the CEO agreed to a \$50 million criminal fine. The Department credited payments by Binance or its CEO to the CFTC and did not collect the \$50 million fine imposed on Binance's CEO. Because the Department did not collect this fine, it cannot be deposited into the CVF. Only fines collected from the Department's prosecutions, including convictions, DPAs and NPAs, are eligible for deposit to the CVF pursuant to the statute.¹¹

D. CVF Deposits Over the Past 5 Years

Finally, you asked the Department to provide information for the last five years regarding penalties, collection, and deposits to the CVF related to corporate guilty pleas, DPAs, and NPAs. Attached please find charts the Criminal Division is producing to summarize this information with respect to corporate DPAs, NPAs, and CEP declinations entered into by the Criminal Division.

⁹ Press Release, U.S. Dep't of Just., Binance and CEO Plead Guilty to Federal Charges in \$4B Resolution (Nov. 21, 2023), <https://www.justice.gov/opa/pr/binance-and-ceo-plead-guilty-federal-charges-4b-resolution>.

¹⁰ Binance will pay this fine pursuant to its guilty plea through the courts. When penalties are imposed on defendants are part of a guilty plea, the defendant pays those penalties to the court, which is responsible for depositing penalties paid into the CVF. As noted elsewhere in this letter, the courts do not specify which cases relate to which deposits when transferring the money to the CVF.

¹¹ *United States v. Binance Holdings Ltd.*, No. CR23-178RAJ (W.D. Wash. Feb. 13, 2024).

We have also provided a similar chart for corporate guilty pleas entered into by the Criminal Division. When any defendant, including corporate defendants, enter into guilty pleas with the Criminal Division, they pay their fines into the courts, not the Department. The Department relies on the courts to report to us when they receive these payments. The courts then deposit these fines into the CVF and provide the Department with a summary of those deposits. Therefore, while the Department can confirm whether any given defendant has paid their fine, we cannot confirm whether and when courts deposited that given fine into the CVF.

You also asked for the same information for non-corporate defendants. Similar to corporate defendants, these fines are paid to the court and the court provides a general summary of deposits into the CVF.

We hope you find this information helpful. Please do not hesitate to contact this office if we may provide additional assistance regarding this or any other matter.

Sincerely,

Carlos Felipe Uriarte
Assistant Attorney General

Enclosures

Criminal Division Corporate Investigations Resolved Through Deferred Prosecution Agreements

(2019-present)

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
2/22/2019	Mobile TeleSystems PJSC	<ul style="list-style-type: none"> • \$850,000,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$709,500,000 after \$40,500,000 credit for subsidiary guilty plea payment and \$100,000,000 credit to SEC 	<ul style="list-style-type: none"> • \$709,500,000 to US Treasury <ul style="list-style-type: none"> ○ \$688,215,000 to Treasury's Miscellaneous Receipts ○ \$21,285,000 to the Department of Justice Working Capital Fund • \$100,000,000 to SEC 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
3/12/2019	Lumber Liquidators Holdings, Inc.	<ul style="list-style-type: none"> • \$19,095,648 total monetary penalty • \$13,904,352 total forfeiture <ul style="list-style-type: none"> ○ Reduced to \$7,807,053.58 after \$6,097,298.42 credit to SEC 	<ul style="list-style-type: none"> • \$19,095,648 to US Treasury <ul style="list-style-type: none"> ○ \$18,522,778.56 to Treasury's Miscellaneous Receipts ○ \$572,869.44 to the Department of Justice Working Capital Fund • \$7,807,053.58 to Treasury Forfeiture Fund • \$6,097,298.42 to SEC 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
4/9/2019	Standard Chartered Bank	<ul style="list-style-type: none"> • \$480,000,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$52,210,160 after \$292,210,160 credit to New York County District Attorney's Office, \$163,687,500 credit to Board of Governors of the Federal Reserve System, \$180,000,000 credit to New York Department of Financial Services, and GBP102,163,200 credit to United Kingdom • \$240,000,000 total forfeiture 	<ul style="list-style-type: none"> • \$52,210,160 to U.S. Treasury <ul style="list-style-type: none"> ○ \$25,321,927.60 to the Treasury Miscellaneous Receipts ○ \$26,105,080 to the U.S. Victims of State Sponsored Terrorism Fund ○ \$783,152.40 to the Department of Justice Working Capital Fund • \$240,000,000 in forfeiture <ul style="list-style-type: none"> ○ \$120,000,000 to the U.S. Victims of State Sponsored Terrorism Fund ○ \$60,823,489.21 to the Assets Forfeiture Fund ○ \$58,351,818.23 to the Treasury Forfeiture Fund • \$292,210,160 to New York County District Attorney's Office • \$163,687,500 to Board of Governors of the Federal Reserve System • \$180,000,000 to New York Department of Financial Services • GBP 102,163,200 to United Kingdom Financial Conduct Authority 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
4/23/2019	Hydro Extrusion USA, LLC (FKA: Sapa Extrusions, Inc.) ¹	<ul style="list-style-type: none"> • No monetary penalty imposed in light of subsidiary guilty plea payments of \$1,837,099 in forfeiture and \$34,108,001.11 in restitution 	N/A	\$0
4/25/2019	Celadon Group Inc.	<ul style="list-style-type: none"> • \$42,245,302 individual compensation 	<ul style="list-style-type: none"> • \$42,245,302 to individual compensation 	\$0
6/25/2019	TechnipFMC plc ²	<ul style="list-style-type: none"> • \$296,184,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$81,352,966.83 after \$500,000 credit for subsidiary guilty plea payment and \$214,331,033.17 credit to Brazil 	<ul style="list-style-type: none"> • \$81,352,966.83 to US Treasury <ul style="list-style-type: none"> ○ \$78,912,377.83 to Treasury's Miscellaneous Receipts ○ \$2,440,589.00 to the Department of Justice Working Capital Fund • \$214,331,033.17 to Brazil 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
11/6/2019	Tower Research Capital LLC	<ul style="list-style-type: none"> • \$24,400,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$0 after \$24,400,000 credit to CFTC • \$10,500,000 total disgorgement • \$32,593,849 total victim compensation 	<ul style="list-style-type: none"> • \$10,500,000 to US Treasury <ul style="list-style-type: none"> ○ \$10,185,000 to Treasury's Miscellaneous Receipts ○ \$315,000 to the Department of Justice Working Capital Fund • \$24,400,000 to CFTC • \$32,593,849 to victims 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>

¹ One of the company's subsidiaries (Hydro Extrusion Portland, Inc.) also pled guilty as part of a single resolution. *See* Corporate Guilty Plea Chart.

² One of the company's subsidiaries (Technip USA, Inc.) also pled guilty as part of a single resolution. *See* Corporate Guilty Plea Chart.

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
11/22/2019	Samsung Heavy Industries Company Limited	<ul style="list-style-type: none"> • \$75,481,600 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$37,740,800 after \$37,740,800 credit to Brazil 	<ul style="list-style-type: none"> • \$37,740,800 to US Treasury <ul style="list-style-type: none"> ○ \$36,608,576 to Treasury's Miscellaneous Receipts ○ \$1,132,224 to the Department of Justice Working Capital Fund • \$37,740,800 to Brazil 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
12/6/2019	Telefonaktiebolaget LM Ericsson ³	<ul style="list-style-type: none"> • \$520,650,432 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$511,130,432 after \$9,520,000 credit for subsidiary guilty plea payment 	<ul style="list-style-type: none"> • \$511,130,432 to US Treasury <ul style="list-style-type: none"> ○ \$495,796,519.04 to Treasury's Miscellaneous Receipts ○ \$15,333,912.96 to the Department of Justice Working Capital Fund 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
1/21/2020	Propex Derivatives Pty Ltd	<ul style="list-style-type: none"> • \$462,271 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$0 after \$462,271 credit to the CFTC • \$73,429 total disgorgement • \$464,300 total victim compensation 	<ul style="list-style-type: none"> • \$73,429.00 to US Treasury <ul style="list-style-type: none"> ○ \$23,741.72 to the Treasury's Miscellaneous Receipts ○ \$47,484.41 to the Crime Victims Fund ○ \$2,202.87 to the Department of Justice Working Capital Fund • \$464,300 to victims 	<p>\$47,484.41⁴</p> <p>*This resolution occurred before the VOCA Fix Act.</p>

³ One of the company's subsidiaries (Ericsson Egypt Ltd.) also pled guilty as part of a single resolution. *See* Corporate Guilty Plea Chart.

⁴ While these resolutions were entered into before the passage of the VOCA Fix, these funds were collected after its passage and deposited into the CVF.

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
1/31/2020	Airbus SE	<ul style="list-style-type: none"> • \$2,329,715,271 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$527,224,475 after \$1,797,490,796 credit to France, \$5,000,000 credit to U.S. Department of State's Directorate of Defense Trade Controls • €50,000,000 total forfeiture 	<ul style="list-style-type: none"> • \$527,224,475 to US Treasury <ul style="list-style-type: none"> ○ \$285,653,442.45 to the Treasury's Miscellaneous Receipts ○ \$15,816,734.15 to the Department of Justice Working Capital Fund ○ \$225,754,298.30 to the Crime Victims Fund • \$1,797,490,796 to France • \$5,000,000 to DDTC • €50,000,000 transferred for U.S. civil forfeiture, to Treasury Forfeiture Fund 	<p>\$225,754,298.30</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
6/25/2020	Novartis Hellas S.A.C.I	<ul style="list-style-type: none"> • \$225,000,000 total monetary penalty 	<ul style="list-style-type: none"> • \$225,000,000 to US Treasury <ul style="list-style-type: none"> ○ \$218,250,000 to the Treasury's Miscellaneous Receipt ○ \$6,750,000 to the Department of Justice Working Capital Fund 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
6/25/2020	Alcon Pte Ltd	<ul style="list-style-type: none"> • \$8,925,000 total monetary penalty 	<ul style="list-style-type: none"> • \$8,925,000 to US Treasury <ul style="list-style-type: none"> ○ \$8,657,250.00 to the Treasury's Miscellaneous Receipts ○ \$267,750.00 to the Department of Justice Working Capital Fund 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
8/19/2020	The Bank of Nova Scotia	<ul style="list-style-type: none"> • \$42,000,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$21,000,000 after \$21,000,000 credit to CFTC • \$11,828,912 total disgorgement <ul style="list-style-type: none"> ○ Reduced to \$0 after \$11,828,912 credit to USPIS CFF • \$6,622,190 total victim compensation 	<ul style="list-style-type: none"> • \$21,000,000 to US Treasury <ul style="list-style-type: none"> ○ \$20,370,000 to the Treasury's Miscellaneous Receipts ○ \$630,000.00 to the Department of Justice Working Capital Fund • \$6,622,190 to victims • \$11,828,912 to USPIS CFF • \$21,000,000 to CFTC 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
8/28/2020	Herbalife Nutrition Ltd.	<ul style="list-style-type: none"> • \$55,743,093 total monetary penalty 	<ul style="list-style-type: none"> • \$55,743,093 to US Treasury <ul style="list-style-type: none"> ○ \$54,070,800.21 to the Treasury's Miscellaneous Receipts Fund ○ \$1,672,292.79 to the Department of Justice Working Capital Fund 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
9/28/2020	JP Morgan Chase & Co.	<ul style="list-style-type: none"> • \$436,431,811 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$0 for credit to CFTC • \$172,034,790 total disgorgement <ul style="list-style-type: none"> ○ Reduced to \$162,034,790 after credit to SEC • \$311,737,008 total victim compensation 	<ul style="list-style-type: none"> • \$162,035, to US Treasury <ul style="list-style-type: none"> ○ \$157,173,746 to the Treasury's Miscellaneous Receipts ○ \$4,861,680 to the Department of Justice Working Capital Fund • \$311,737,009 008 to victims 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
10/22/2020	Goldman Sachs Group, Inc. ⁵	<ul style="list-style-type: none"> • \$2,315,088,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$1,262,588,000 after \$500,000 credit for subsidiary guilty plea payment, \$704,012,000 credit to SEC, Fed, DFS, and \$247,988,000 to UK, Singapore, and \$100,000,000 credit to Hong Kong • \$606,000,000 total disgorgement <ul style="list-style-type: none"> ○ Reduced to \$0 after \$606,000,000 credit to Malaysia 	<ul style="list-style-type: none"> • \$1,262,588,000 to US Treasury <ul style="list-style-type: none"> ○ \$1,224,710,360 to the Treasury's Miscellaneous Receipts ○ \$37,877,640 to the Department of Justice Working Capital Fund • \$606,000,000 to Malaysia • \$400,000,000 to SEC • \$154,000,000 to FED • \$150,000,000 to DFS • \$126,000,000 to UK • \$122,000,000 to Singapore • \$100,000,000 to Hong Kong 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
10/27/2020	Beam Suntory Inc	<ul style="list-style-type: none"> • \$19,572,885 total monetary penalty 	<ul style="list-style-type: none"> • \$19,572,885 to US Treasury <ul style="list-style-type: none"> ○ \$18,985,698.45 to the Treasury's Miscellaneous Receipts ○ \$587,186.55 to the Department of Justice Working Capital Fund 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>

⁵ One of the company's subsidiaries (Goldman Sachs Malaysia) also pled guilty as part of a single resolution. See Corporate Guilty Plea Chart.

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
12/3/2020	Vitol Inc.	<ul style="list-style-type: none"> • \$135,000,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$90,000,000 after \$45,000,000 credit to Brazil 	<ul style="list-style-type: none"> • \$90,000,000 to US Treasury <ul style="list-style-type: none"> ○ \$87,300,000 was to the Treasury's Miscellaneous Receipts ○ \$2,700,000 to the Department of Justice Working Capital Fund • \$45,000,000 to Brazil 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
1/7/2021	The Boeing Company	<ul style="list-style-type: none"> • \$243,600,000 total monetary penalty • \$1,770,000,000 total airline customer compensation • \$500,000,000 total crash victim beneficiary compensation 	<ul style="list-style-type: none"> • \$243,600,000 to US Treasury <ul style="list-style-type: none"> ○ \$236,292,000 to the Treasury's Miscellaneous Receipts ○ \$7,308,000 to the Department of Justice Working Capital Fund • \$1,770,000,000 to airline customers • \$500,000,000 to crash victims' beneficiaries 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
1/8/2021	Deutsche Bank Aktiengesellschaft	<ul style="list-style-type: none"> • \$85,186,206 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$59,561,206 after \$5,625,000 credit to CFTC and \$20,000,000 payment to USPIS CFF • \$681,480 total disgorgement • \$1,223,738 total victim compensation 	<ul style="list-style-type: none"> • \$59,561,206 (monetary penalty) to US Treasury <ul style="list-style-type: none"> ○ \$58,924,078 to the Crime Victims Fund ○ \$1,822,394 to the Department of Justice Working Capital Fund • \$681,480 (disgorgement) to US Treasury <ul style="list-style-type: none"> ○ \$661,035.60 to Treasury's Miscellaneous Receipts ○ \$20,444.40 to the Department of Justice Working Capital Fund • \$5,625,000 to CFTC • \$20,000,000 to USPIS CFF • \$1,223,738 to victims or US Treasury 	<p>\$58,924,078</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
5/27/2021	Bank Julius Baer & Company Ltd	<ul style="list-style-type: none"> • \$43,320,000 total monetary penalty • \$36,368,400 total forfeiture 	<ul style="list-style-type: none"> • \$43,320,000 to US Treasury <ul style="list-style-type: none"> ○ \$42,020,400 to the Crime Victims Fund ○ \$1,299,600 to the Department of Justice Working Capital Fund • \$36,368,400 to Assets Forfeiture Fund 	<p>\$42,020,400</p> <p>*This resolution occurred before the VOCA Fix Act.</p>

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
6/25/2021	Amec Foster Wheeler Energy Limited	<ul style="list-style-type: none"> • \$18,375,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$7,656,250 after \$6,125,000 credit to Brazil and \$4,593,750 credit to UK 	<ul style="list-style-type: none"> • \$7,656,250 to US Treasury <ul style="list-style-type: none"> ○ \$7,426,562.50 to the Treasury's Miscellaneous Receipts ○ \$229,687.50 to the Department of Justice Working Capital Fund • \$6,125,000 to Brazil • \$4,593,750 to UK 	\$0 *This resolution occurred before the VOCA Fix Act.
7/7/2021	Avanos Medical, Inc.	<ul style="list-style-type: none"> • \$12,600,000 total monetary penalty • \$689,000 total disgorgement • \$8,939,000 total victim compensation 	<ul style="list-style-type: none"> • \$13,289,000 to US Treasury <ul style="list-style-type: none"> ○ \$12,890,330 to the Crime Victims Fund ○ \$398,670 to the Department of Justice Working Capital Fund • \$8,939,000 to victims 	\$12,890,330
10/19/2021	Credit Suisse Group AG	<ul style="list-style-type: none"> • \$247,520,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$175,068,000 after \$500,000 credit for subsidiary guilty plea payment, \$47,200,000 credit to SEC, and \$24,752,000 credit to United Kingdom • \$10,344,865 total forfeiture <ul style="list-style-type: none"> ○ Reduced to \$0 after \$10,344,865 credit to SEC 	<ul style="list-style-type: none"> • \$175,068,000 to US Treasury <ul style="list-style-type: none"> ○ \$169,815,960 to the Crime Victims Fund ○ \$5,252,040 to the Department of Justice Working Capital Fund • \$57,544,865 to SEC • \$24,752,000 to United Kingdom 	\$169,815,960

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
4/18/2022	Stericycle, Inc.	<ul style="list-style-type: none"> • \$52,500,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$40,834,995 after credit of \$11,665,005 credit to Brazil 	<ul style="list-style-type: none"> • \$40,834,995 to US Treasury <ul style="list-style-type: none"> ○ \$39,609,945.15 to the Crime Victims Fund ○ \$1,225,049.85 to the Department of Justice Working Capital Fund • \$11,665,005 to Brazil 	\$39,609,945.15
9/16/2022	GOL Linhas Aereas Inteligentes S.A.	<ul style="list-style-type: none"> • \$87,000,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$15,830,352.90 due to inability to pay and after \$1,700,000 credit to Brazil 	<ul style="list-style-type: none"> • \$15,830,352.90 to US Treasury <ul style="list-style-type: none"> ○ \$15,355,442.31 to the Crime Victims Fund ○ \$474,910.59 to the Department of Justice Working Capital Fund • \$1,700,000 to Brazil 	\$15,355,442.31

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
12/2/2022	ABB Ltd ⁶	<ul style="list-style-type: none"> • \$315,000,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$85,760,113.30 with additional payments potentially forthcoming, after \$1,000,000 credit for subsidiary guilty plea payment, and credits up to the following amounts in other jurisdictions: \$148,812,717 credit to South Africa, \$4,309,200 credit to Switzerland, \$11,000,000 credit to Germany, and \$63,000,000 credit to SEC. 	<ul style="list-style-type: none"> • \$85,760,113.30 to US Treasury <ul style="list-style-type: none"> ○ \$83,187,309.90 to the Crime Victims Fund ○ \$2,572,803.40 to the Department of Justice Working Capital Fund • \$148,812,717 to South Africa • \$4,309,200 to Switzerland • \$11,000,000 to Germany • \$63,000,000 to SEC 	\$83,187,309.90
12/19/2022	UOP LLC, d/b/a Honeywell UOP	<ul style="list-style-type: none"> • \$79,242,750 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$39,621,375 after \$39,621,375 credit to Brazil • \$105,657,000 total forfeiture <ul style="list-style-type: none"> ○ Reduced to \$0 after \$61,554,213 credit to SEC and \$44,102,787 credit to Brazil 	<ul style="list-style-type: none"> • \$39,621,375 to US Treasury <ul style="list-style-type: none"> ○ \$38,432,733.75 to the Crime Victims Fund ○ \$1,188,641.25 to the Department of Justice Working Capital Fund • \$83,724,162 to Brazil • \$61,554,213 to SEC 	\$38,432,733.75

⁶ Two of the company's subsidiaries (ABB South Africa and ABB Management Services) also pled guilty as part of a single resolution. *See* Corporate Guilty Plea Chart.

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
8/10/2023	Corporacion Financiera Colombiana S.A.	<ul style="list-style-type: none"> • \$40,600,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$20,300,000 after \$20,300,000 credit to Colombia • \$28,630,000 total forfeiture <ul style="list-style-type: none"> ○ Reduced to \$0 after \$28,630,000 credit to SEC 	<ul style="list-style-type: none"> • \$20,300,000 to US Treasury <ul style="list-style-type: none"> ○ \$19,691,000 to the Crime Victims Fund ○ \$609,000 to the Department of Justice Working Capital Fund • \$20,300,000 to Colombia • \$28,630,000 to SEC 	\$19,691,000
11/20/2023	Tysers Insurance Brokers Limited	<ul style="list-style-type: none"> • \$36,000,000 total monetary penalty • \$10,589,275 total forfeiture 	<ul style="list-style-type: none"> • \$36,000,000 to US Treasury <ul style="list-style-type: none"> ○ \$34,920,000 to the Crime Victims Fund ○ \$1,080,000 to the Department of Justice Working Capital Fund • \$10,589,275 to Assets Forfeiture Fund 	\$34,920,000
11/20/2023	H.W. Wood Limited	<ul style="list-style-type: none"> • \$22,500,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$508,000 due to inability to pay • \$2,338,735 total forfeiture <ul style="list-style-type: none"> ○ Reduced to \$0 due to inability to pay 	<ul style="list-style-type: none"> • \$508,000 to US Treasury <ul style="list-style-type: none"> ○ \$492,760.00 to the Crime Victims Fund ○ \$15,240 to the Department of Justice Working Capital Fund 	\$492,760.00

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
12/14/2023	Freepoint Commodities LLC	<ul style="list-style-type: none"> • \$68,000,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$45,560,000 after \$22,440,000 credit to Brazil • \$30,551,150 total forfeiture <ul style="list-style-type: none"> ○ Reduced to \$22,913,362 after \$7,637,788 credit to CFTC 	<ul style="list-style-type: none"> • \$45,560,000 to US Treasury <ul style="list-style-type: none"> ○ \$44,193,200 to the Crime Victims Fund ○ \$1,366,800 to the Department of Justice Working Capital Fund • \$22,913,362 to Assets Forfeiture Fund • \$22,440,000 to Brazil • \$7,637,788 to CFTC 	\$44,193,200
1/10/2024	SAP SE	<ul style="list-style-type: none"> • \$118,800,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$63,590,859 due to \$109,141 Clawback Pilot Program credit and \$55,100,000 credit to South Africa • \$103,396,765 total forfeiture <ul style="list-style-type: none"> ○ Reduced to \$0 after \$85,046,035 credit to SEC and \$18,350,730 credit to South Africa 	<ul style="list-style-type: none"> • \$63,590,859 to US Treasury <ul style="list-style-type: none"> ○ \$61,683,133.23 to the Crime Victims Fund ○ \$1,907,725.77 to the Department of Justice Working Capital Fund • \$73,450,730 to South Africa • \$85,046,035 to SEC 	\$61,683,133.23

Criminal Division Corporate Investigations Resolved Through Non-Prosecution Agreements

(2019-present)

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
2/25/2019	Fresenius Medical Care AG & Co. KGaA	<ul style="list-style-type: none"> • \$84,715,273 total monetary penalty • \$147,000,000 total disgorgement • Reduced to \$0 after \$147,000,000 credit to SEC 	<ul style="list-style-type: none"> • \$84,715,273 to US Treasury <ul style="list-style-type: none"> ○ \$82,173,814.81 to Treasury's Miscellaneous Receipts ○ \$2,541,458.19 to the Department of Justice Working Capital Fund • \$147,000,000 to SEC 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
3/5/2019	Baton Holdings, LCC, the successor in interest of Bankrate, Inc.	<ul style="list-style-type: none"> • \$15,540,000 total monetary penalty • \$13,000,000 total compensation to individuals 	<ul style="list-style-type: none"> • \$15,540,000 to USPIS Consumer Fraud Fund • \$13,000,000 individual compensation 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
6/20/2019	Walmart Inc. ¹	<ul style="list-style-type: none"> • \$137,955,249 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$133,605,861 after credit for subsidiary's \$724,898 criminal fine and \$3,624,490 forfeiture payment 	<ul style="list-style-type: none"> • \$133,605,861 to US Treasury <ul style="list-style-type: none"> ○ \$129,597,685.17 to Treasury's Miscellaneous Receipts ○ \$4,008,175.83 to the Department of Justice Working Capital Fund 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>

¹ One of the company's subsidiaries (Walmart Brasilia) also plead guilty as part of a single resolution. *See* Corporate Guilty Plea Chart.

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
6/25/2019	Merrill Lynch Commodities, Inc.	<ul style="list-style-type: none"> • \$11,535,415 total monetary penalty • \$11,100,000 total disgorgement • \$2,364,585 total restitution 	<ul style="list-style-type: none"> • \$22,635,415 to US Treasury <ul style="list-style-type: none"> ○ \$21,956,352.55 to Treasury's Miscellaneous Receipts ○ \$679,062.45 to the Department of Justice Working Capital Fund • \$2,364,585 in restitution 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
7/22/2019	Microsoft Magyarorszag Szamitastechnikai Szolgaltat6 es Kereskedelmi Kft.	<ul style="list-style-type: none"> • \$8,751,795 total monetary penalty 	<ul style="list-style-type: none"> • \$8,751,795 to US Treasury <ul style="list-style-type: none"> ○ \$8,489,241.15 to Treasury's Miscellaneous Receipts ○ \$262,553.85 to the Department of Justice Working Capital Fund 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
10/17/2019	ContextMedia Health, LLC, dba Outcome Health	<ul style="list-style-type: none"> • Up to \$70,000,000 total individual compensation 	<ul style="list-style-type: none"> • Up to \$70,000,000 individual compensation 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
12/2/2019	UniTrans International, Inc.	<ul style="list-style-type: none"> • \$18,000,000 total monetary penalty <ul style="list-style-type: none"> ○ Reduced to \$4,500,000 after credit for parallel civil settlement payment • \$13,500,000 total individual compensation 	<ul style="list-style-type: none"> • \$4,500,000.00 to US Treasury <ul style="list-style-type: none"> ○ 4,365,000 was sent to Treasury's Miscellaneous Receipts ○ \$135,000 to the Department of Justice Working Capital Fund • \$13,500,000 to the USVSST Fund 	<p>\$0</p> <p>*This resolution occurred before the VOCA Fix Act.</p>

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
4/15/2019	UniCredit Bank Austria AG ²	<ul style="list-style-type: none"> • \$20,000,000 forfeiture <ul style="list-style-type: none"> ○ Reduced to \$0 after credit for payment to New York Department of Financial Services 	<ul style="list-style-type: none"> • \$20,000,000 to New York DFS 	\$0
4/30/2020	Bank Hapoalim B.M. and Hapoalim (Switzerland) Ltd.	<ul style="list-style-type: none"> • \$9,329,955 total monetary penalty • \$20,733,322 total forfeiture 	<ul style="list-style-type: none"> • \$9,329,955 to U.S. Treasury <ul style="list-style-type: none"> ○ \$9,050,095.15 to Crime Victims Fund ○ \$279,899.85 to the Department of Justice Working Capital Fund ○ \$50 overpayment to the Treasury's General Fund (redirected to CVF) • \$20,733,322 to Assets Forfeiture Fund 	\$9,050,095.15 ³
6/8/2020	Alutiiq International Solutions, LLC	<ul style="list-style-type: none"> • \$1,259,444 total compensation 	<ul style="list-style-type: none"> • \$1,259,444 compensation to the General Services Administration 	\$0

² Another bank subsidiary (UniCredit Bank AG) also plead guilty as part of this resolution. *See* Corporate Guilty Plea Chart.

³ JMD reports that this payment was processed after the VOCA Fix though the resolution occurred before the VOCA Fix.

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
2/25/2021	United Airlines, Inc.	<ul style="list-style-type: none"> • \$8,215,592 total monetary penalty • \$9,055,823 total disgorgement 	<ul style="list-style-type: none"> • 8,215,592 to US Treasury <ul style="list-style-type: none"> ○ \$7,697,449.55 to Treasury's Miscellaneous Receipts ○ \$518,142.45 to the Department of Justice Working Capital Fund • \$9,055,823.00 was sent to USPS 	<p>With the exception of \$100,000, all of the disbursements to the Miscellaneous Receipts occurred before the VOCA Fix Act.</p> <p>\$100,000 is in the process of being reversed and deposited to the CVF.</p>
4/20/2023	IRB Brasil Resseguros SA	<ul style="list-style-type: none"> • \$5,000,000 total shareholder compensation 	<ul style="list-style-type: none"> • \$5,000,000 to shareholder escrow account 	\$0
9/28/2023	Albemarle Corporation	<ul style="list-style-type: none"> • \$98,236,547 total monetary penalty • \$98,511,669 total forfeiture <ul style="list-style-type: none"> ○ Reduced to \$16,654,806 after \$81,856,863 credit to SEC 	<ul style="list-style-type: none"> • \$98,236,547 to US Treasury <ul style="list-style-type: none"> ○ \$95,289,450.59 to the Crime Victims Fund ○ \$2,947,096.41 to the Department of Justice Working Capital Fund • \$16,654,806 to Treasury Forfeiture Fund • \$81,856,863 to SEC 	\$95,289,450.59

**Criminal Division Corporate Investigations Resolved Through
Corporate Enforcement Policy Declinations with Disgorgement**

(2019-present)

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
2/13/2019	Cognizant Technology Solutions Corporation	<ul style="list-style-type: none"> • \$19,370,561 total disgorgement <ul style="list-style-type: none"> ○ Reduced to \$2,976,210 after \$16,394,351 credit to SEC 	<ul style="list-style-type: none"> • \$2,976,210 to US Treasury <ul style="list-style-type: none"> ○ \$2,886,923.70 to Treasury's Miscellaneous Receipts ○ \$89,286.30 to the Department of Justice Working Capital Fund • \$16,394,351 to SEC 	<p>\$0.</p> <p>*This resolution occurred before the VOCA Fix Act.</p>
9/19/2019	Quad/Graphics Inc.	<ul style="list-style-type: none"> • \$6,936,174 total disgorgement <ul style="list-style-type: none"> ○ Reduced to \$0 after \$6,936,174 credit to SEC 	<ul style="list-style-type: none"> • \$6,936,174 to SEC 	\$0
8/5/2020	World Acceptance Corporation	<ul style="list-style-type: none"> • \$17,826,000 total disgorgement <ul style="list-style-type: none"> ○ Reduced to \$0 after \$17,826,000 credit to SEC 	<ul style="list-style-type: none"> • \$17,826,000 to SEC 	\$0

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
3/18/2022	Jardine Lloyd Thompson Group Holdings Ltd.	<ul style="list-style-type: none"> • \$29,081,951 total disgorgement 	<ul style="list-style-type: none"> • \$29,081,951 to US Treasury <ul style="list-style-type: none"> ○ \$28,209,492.47 to the Crime Victims Fund ○ \$872,458.53 to the Department of Justice Working Capital Fund 	\$28,209,492.47
12/21/2022	Safran S.A.	<ul style="list-style-type: none"> • \$17,159,753 total disgorgement 	<ul style="list-style-type: none"> • \$17,159,753 to US Treasury <ul style="list-style-type: none"> ○ \$16,644,960.41 to the Crime Victims Fund ○ \$514,792.59 to the Department of Justice Working Capital Fund 	\$16,644,960.41
3/8/2023	Corsa Coal Corporation	<ul style="list-style-type: none"> • \$32,695,881 total disgorgement <ul style="list-style-type: none"> ○ Reduced to \$1,200,000 due to inability to pay 	<ul style="list-style-type: none"> • \$1,200,000 to US Treasury <ul style="list-style-type: none"> ○ \$1,164,000 to the Crime Victims Fund ○ \$36,000 to the Department of Justice Working Capital Fund 	\$1,164,000
10/25/2023	HealthSun Health Plans, Inc.	<ul style="list-style-type: none"> • \$53,170,114.60 in repayments to the U.S. Department of Health and Human Services (“HHS”) Centers for Medicare & Medicaid Services (“CMS”) 	<ul style="list-style-type: none"> • \$53,170,114.60 to HHS CMS 	\$0

Date	Case	U.S. Criminal Monetary Penalties	Recipient(s)	Amount to the Crime Victims Fund
11/16/2023	Lifecore Biomedical, Inc. (f/k/a Landec Corporation)	<ul style="list-style-type: none"> • \$406,505 total disgorgement 	<ul style="list-style-type: none"> • \$406,505 to US Treasury <ul style="list-style-type: none"> ○ \$394,309.85 to the Crime Victims Fund ○ \$12,195.15 to the Department of Justice Working Capital Fund 	\$394,309.85

Criminal Division Corporate Guilty Pleas

(2019 – Present)

Date	Name	U.S. Criminal Monetary Penalties	Recipient(s)
2/22/2019	Kolorit	<ul style="list-style-type: none">• \$500,000 total criminal fine¹• \$40,000,000 total criminal forfeiture	<ul style="list-style-type: none">• \$500,000 fine paid to court• \$40,000,000 to Treasury Forfeiture Fund
4/15/2019	UniCredit Bank AG	<ul style="list-style-type: none">• 468,350,000 total criminal fine<ul style="list-style-type: none">○ Reduced to \$0 after credit of up to \$468,350,000 for payments made to the Board of Governors of the Federal Reserve System (\$157,770,000), the New York State Department of Financial Services (\$405,000,000)• \$316,545,816 criminal forfeiture	<ul style="list-style-type: none">• \$316,545,816 criminal forfeiture<ul style="list-style-type: none">○ \$316,514,161 to the U.S. Victims of State Sponsored Terrorism Fund○ \$31,655 to Assets Forfeiture Fund
5/13/2019	Hydro Extrusion Portland, Inc. (FKA: Sapa Profiles, Inc.) ²	<ul style="list-style-type: none">• \$1,837,099 total criminal forfeiture• \$34,108,001.11 total restitution	<ul style="list-style-type: none">• \$1,837,099 to Assets Forfeiture Fund• \$34,108,001.11 to court for restitution

¹ Criminal fines are made through the court and as a result the Department does not have visibility and is unable to confirm precise deposits to the Crime Victims Fund. Pursuant to 34 U.S.C. 20101, the Department believes that the majority of these fines—not forfeiture, restitution, or payments to victims or others—should be deposited to the CVF.

² The company's parent company (Hydro Extrusion USA, LLC) also entered into a DPA with the Fraud Section as part of a single resolution. *See* Corporate DPA Chart.

Date	Name	U.S. Criminal Monetary Penalties	Recipient(s)
6/20/2019	Walmart Brasilia ³	<ul style="list-style-type: none"> • \$724,898 total criminal fine • \$3,624,490 total criminal forfeiture 	<ul style="list-style-type: none"> • \$724,898 fine paid to court • \$3,624,490 to Assets Forfeiture Fund
6/25/2019	Technip USA, Inc. (Technip USA) ⁴	<ul style="list-style-type: none"> • \$500,000 total criminal fine 	<ul style="list-style-type: none"> • \$500,000 paid to court
12/6/2019	Ericsson Egypt Ltd. ⁵	<ul style="list-style-type: none"> • \$9,520,000 total criminal fine 	<ul style="list-style-type: none"> • \$9,520,000 paid to court
6/10/2020	SK Engineering & Construction Co., Ltd	<ul style="list-style-type: none"> • \$65,778,847.08 total criminal fine <ul style="list-style-type: none"> ○ Reduced to 60,578,847.08 after \$5,200,000 credit for civil settlement • \$2,601,883.86 total restitution 	<ul style="list-style-type: none"> • \$60,578,847.08 paid to court • \$5,200,000 for civil settlement • \$2,601,883.86 to court in restitution
9/22/2020	Sargeant Marine Inc.	<ul style="list-style-type: none"> • \$90,000,000 total criminal fine <ul style="list-style-type: none"> ○ Reduced to \$16,600,000 due to inability to pay 	<ul style="list-style-type: none"> • \$16,600,000 paid to court
10/14/2020	J&F Investimentos S.A.	<ul style="list-style-type: none"> • \$256,497,026 total criminal fine <ul style="list-style-type: none"> ○ Reduced to \$128,248,513 after \$128,248,513 credit to Brazil 	<ul style="list-style-type: none"> • \$128,248,513 paid to court • \$128,248,513 to Brazil

³ The company's parent company (Walmart Inc.) also entered into an NPA with the Fraud Section as part of a single resolution. *See* Corporate NPA Chart.

⁴ The company's parent company (TechnipFMC plc) also entered into a DPA with the Fraud Section as part of a single resolution. *See* Corporate DPA Chart.

⁵ The company's parent company (Telefonaktiebolaget LM Ericsson) also entered into a DPA with the Fraud Section as part of a single resolution. *See* Corporate DPA Chart.

Date	Name	U.S. Criminal Monetary Penalties	Recipient(s)
10/22/2020	Goldman Sachs Malaysia ⁶	<ul style="list-style-type: none"> • \$500,000 total criminal fine 	<ul style="list-style-type: none"> • \$500,000 paid to court
12/21/2021	NatWest Markets Plc	<ul style="list-style-type: none"> • \$25,200,000 total criminal fine • \$2,841,368 total criminal forfeiture • \$6,761,967 total restitution 	<ul style="list-style-type: none"> • \$28,041,368 to US Treasury • \$6,761,967 to court for restitution
12/22/2021	Balfour Beatty Communities	<ul style="list-style-type: none"> • \$33,660,000 total criminal fine <ul style="list-style-type: none"> ○ Reduced to \$11,346,786 after \$22,313,214 credit for civil settlement with DOJ 	<ul style="list-style-type: none"> • \$11,346,786 paid to court • \$22,313,214 for civil settlement with the Civil Division of the Department of Justice
5/24/2022	Glencore International AG	<ul style="list-style-type: none"> • \$428,521,173 total criminal fine <ul style="list-style-type: none"> ○ Reduced to \$262,590,214 after \$136,236,140 credit to United Kingdom and \$29,694,819 credit to Switzerland • \$272,185,792 total criminal forfeiture <ul style="list-style-type: none"> ○ Reduced to \$181,457,195 after \$90,728,597 credit to CFTC 	<ul style="list-style-type: none"> • \$262,590,214 paid to court • \$136,236,140 to United Kingdom • \$29,694,819 to Switzerland • \$90,728,597 to CFTC • \$181,457,195 to Assets Forfeiture Fund
5/24/2022	Glencore Ltd	<ul style="list-style-type: none"> • \$341,221,682 total criminal fine <ul style="list-style-type: none"> ○ Reduced to \$170,610,841 after \$170,610,841 credit to CFTC • \$144,417,203 total criminal forfeiture 	<ul style="list-style-type: none"> • \$170,610,841 paid to court • \$242,819,442 to CFTC • \$37,208,602 to Assets Forfeiture Fund • 35,000,000 to USPIS Consumer Fraud Fund

⁶ The company's parent company (Goldman Sachs Group, Inc.) also entered into a DPA with the Fraud Section as part of a single resolution. *See* Corporate DPA Chart.

Date	Name	U.S. Criminal Monetary Penalties	Recipient(s)
		<ul style="list-style-type: none"> ○ Reduced to \$37,208,602 after \$72,208,601 credit to CFTC and \$35,000,000 credit to USPIS Consumer Fraud Fund 	
6/3/2022	FCA US LLC	<ul style="list-style-type: none"> • \$407,145,784 total criminal fine <ul style="list-style-type: none"> ○ Reduced to \$96,145,784 after \$311,000,000 credit for civil settlement • \$203,572,892 total criminal forfeiture 	<ul style="list-style-type: none"> • \$96,145,784 paid to court • \$203,572,892 to Assets Forfeiture Fund • \$311,000,000 for civil settlement
12/2/2022	ABB South Africa ⁷	<ul style="list-style-type: none"> • \$500,000 total criminal fine 	<ul style="list-style-type: none"> • \$500,000 paid to court
12/2/2022	ABB Management Services	<ul style="list-style-type: none"> • \$500,000 total criminal fine 	<ul style="list-style-type: none"> • \$500,000 paid to court
12/13/2022	Danske Bank A/S	<ul style="list-style-type: none"> • \$2,059,979,050 total criminal forfeiture <ul style="list-style-type: none"> ○ Reduced to \$1,209,062,646 for credit of \$178,600,000 to SEC and credit of \$672,316,404 to Danish Authorities 	<ul style="list-style-type: none"> • 1,209,062,646 to Assets Forfeiture Fund • \$178,600,000 to the SEC • \$672,316,404 to Danish Authorities
3/2/2023	Ericsson	<ul style="list-style-type: none"> • \$727,379,280 total criminal fine <ul style="list-style-type: none"> ○ Reduced to \$206,728,848 for credit of \$520,650,432 for prior DPA payment 	<ul style="list-style-type: none"> • \$206,728,848 paid to court
3/15/2023	Sterling Bancorp, Inc.	<ul style="list-style-type: none"> • \$62,168,142.60 total criminal fine <ul style="list-style-type: none"> ○ Reduced to \$0 due to inability to pay 	<ul style="list-style-type: none"> • \$27,239,000 restitution to court

⁷ The company's parent company (ABB Ltd) also entered into a DPA with the Fraud Section as part of a single resolution. *See* Corporate DPA Chart.

Date	Name	U.S. Criminal Monetary Penalties	Recipient(s)
		<ul style="list-style-type: none"> • \$69,075,714 total restitution <ul style="list-style-type: none"> ○ Reduced to \$27,239,000 due to inability to pay 	
11/21/2023	Binance Holdings Limited ⁸	<ul style="list-style-type: none"> • \$1,805,475,575 total criminal fine <ul style="list-style-type: none"> ○ Reduced to \$1,505,475,575 due to credit of \$300,000,000 against payment to Department of Treasury agencies • \$898,618,825 total criminal forfeiture related to violation of International Emergency Economic Powers Act • \$1,612,031,763 total criminal forfeiture related to violation of 18 U.S.C. 1960 <ul style="list-style-type: none"> ○ Reduced to \$112,031,763 after credit of \$550,000,000 to Department of Treasury agencies and \$950,000,000 to CFTC 	<ul style="list-style-type: none"> • \$1,505,475,575 to be paid to court • \$898,618,825 to be paid to Treasury Forfeiture Fund • \$112,031,763 to be paid to Treasury Forfeiture Fund • \$850,000,000 to be paid to Treasury Agencies • \$950,000,000 to be paid to CFTC

⁸ Binance's payments are due beginning in March 2024 through the end of 2025 pursuant to the plea agreement. The Department through the Money Laundering and Asset Recovery Section, will assess the amounts when forfeited or applied to other penalties for eligibility for deposit to the U.S. Victims of State Sponsored Terrorism Fund.