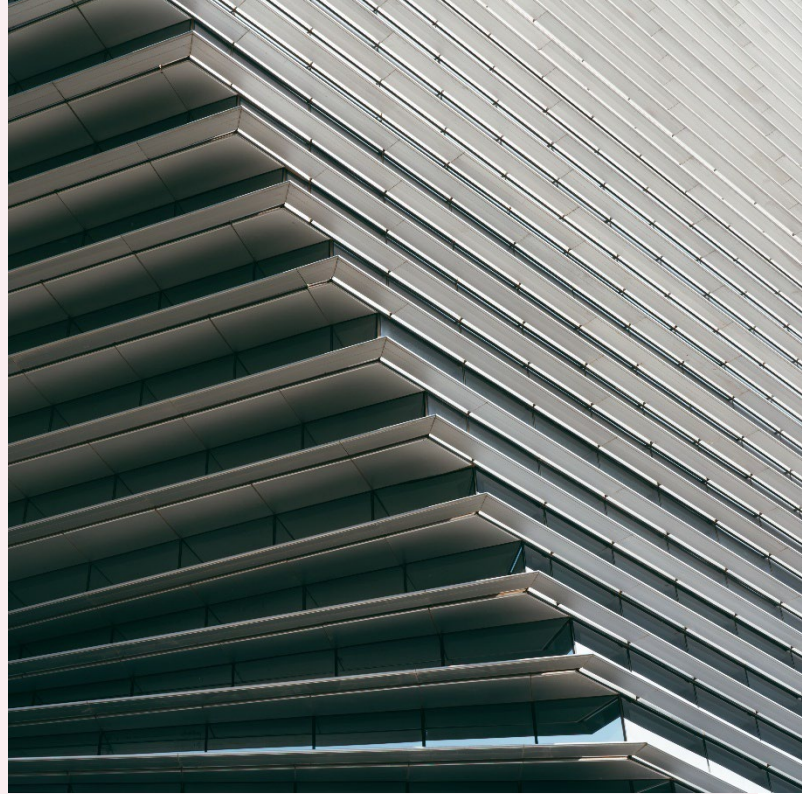


DOJ and USPS Issue First-Ever Whistleblower Award: Key Implications for Corporate Compliance

February 2, 2026



On January 29, 2026, the U.S. Department of Justice, Antitrust Division ("**DOJ**"), in partnership with the U.S. Postal Service ("**USPS**"), announced its first-ever whistleblower reward—marking a significant milestone in the implementation of last summer's new Antitrust Whistleblower Rewards Program.¹ The \$1 million award was granted to an individual whose report helped expose a multi-year antitrust and fraud scheme in the online used-car auction market.

This development is not only notable as the inaugural payout under the new program, but also a clear indication that the DOJ is actively operationalizing whistleblower incentives to detect and prosecute antitrust crimes. As such, companies across industries should take note: the whistleblower landscape has fundamentally shifted.

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DOJ Announcement

According to the DOJ's press release, the whistleblower's tip led DOJ prosecutors to bring criminal antitrust and fraud charges against EBlock

¹ We summarized the key elements of the whistleblower program when it was announced in July 2025.

<https://www.cliffordchance.com/briefings/2025/07/u-s--department-of-justice-s-antitrust-division-announces-whistl.html>.

Corporation, an online platform for used-vehicle auctions.² EBlock ultimately resolved the charges through a deferred prosecution agreement requiring payment of a \$3.8 million criminal fine and the implementation of enhanced compliance measures.

A. Background of Misconduct

According to the DOJ, EBlock acquired "Company A," another online auction platform for used vehicles, in November 2020 but did not immediately halt ongoing bid-rigging and fraudulent conduct at that entity. Between November 2020 and February 2022, employees at Company A continued to conspire with employees of "Company B" to suppress competition by sharing confidential bidding information and coordinating maximum bids for vehicles—conduct in violation of the Sherman Act Section 1. Further, the companies kept a joint inventory of vehicles acquired through the scheme, which they then relisted. They engaged in "shill bidding" to artificially increase vehicle prices, some of which involved fake bids generated using the names of real auto dealerships without consent.

Documents relevant to the scheme were transmitted via the U.S. Mail, triggering USPS jurisdiction and the involvement of the U.S. Postal Inspection Service. Investigators noted that the scheme ultimately raised used-car prices, harming consumers nationwide and generating approximately \$16 million in ill-gotten gains.

B. Significance of the \$1 Million Whistleblower Award

The reward reflects the DOJ's new approach to criminal antitrust enforcement: encouraging individuals—particularly employees with direct knowledge of misconduct—to come forward before companies seek leniency. In the DOJ's press release, Deputy Assistant Attorney General Omeed A. Assefi emphasized that whistleblowers "serve as the Justice System's greatest disinfectant" and that the award underscores the indispensable role whistleblowers now play in detecting secretive, anticompetitive activity.

The whistleblower award follows the DOJ's July 8, 2025, announcement of its new Antitrust Whistleblower Rewards Program, developed in partnership with USPS and the USPS Office of Inspector General. Now, individuals may receive rewards if their information leads to criminal convictions and fines (or equivalent recoveries through deferred or non-prosecution agreements) of at least \$1 million. Payments can range from 15-30% of the fines collected (if multiple whistleblowers participate, the total award is capped at 30%).

The program represents a major strategic shift for the Antitrust Division, which historically relied largely on corporate self-disclosures through its Leniency Program. Instead, the Whistleblower Rewards Program explicitly aims to increase detection by providing significant financial incentives for insiders—not companies—to bring misconduct to the DOJ's attention. Assistant

² DOJ Press Release, "Antitrust Division and U.S. Postal Service Make First-Ever Whistleblower Payment: \$1M Awarded for Reporting Antitrust Crime," (Jan. 29, 2026), available at <https://www.justice.gov/opa/pr/antitrust-division-and-us-postal-service-award-first-ever-1m-payment-whistleblower-reporting>.

Attorney General Gail Slater of the Antitrust Division stated that the new program will, "create a new pipeline of leads from individuals with firsthand knowledge of criminal antitrust and related offenses that will help us break down those walls of secrecy and hold violators accountable."

Key Takeaways for Companies

The first payout under the Whistleblower Rewards Program sends a clear message: the DOJ is not only serious about detecting and eradicating cartels, but will reward whistleblowers and is prepared to act quickly on credible reports. This shift increases the likelihood that antitrust violations will be detected early—potentially even before companies themselves identify them.

Further, the involvement of USPS broadens the enforcement footprint. Companies engaged in industries that intersect with USPS (directly or indirectly) now face additional exposure from employees or third parties who may be incentivized to report wrongdoing. As a result, this first whistleblower award may signal that increased cartel enforcement is on the horizon.

One other major takeaway: the EBlock case underscores the critical need for robust, responsive internal compliance systems that can detect and remediate antitrust risks promptly. Companies should consider this a good time to revisit their compliance programs, including whistleblower hotlines and internal investigation procedures, and strengthen them, if necessary. In particular, we recommend that any company acquiring another company take steps to conduct thorough antitrust due diligence on the target prior to closing in order to assess whether any cartel conduct was committed (and, of course, end it promptly and report it to the DOJ or FTC, as appropriate, if any is found). EBlock's failure to promptly halt inherited misconduct after acquiring Company A resulted in criminal liability, highlighting the need for thorough post-acquisition compliance integration.



Joseph Ostoyich
Partner, Washington DC

Email: joseph.ostoyich@cliffordchance.com
Mobile: +1 202 912 5533

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Clifford Chance, 2001 K Street NW, Washington, DC 20006-1001, USA

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Clifford Chance US LLP



William Lavery
Partner, Washington DC

Email: william.lavery@cliffordchance.com
Mobile: +1 202 912 5018

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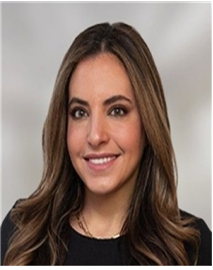
Peter Mucchetti
Partner, Washington DC

Email: Peter.Mucchetti@cliffordchance.com
Mobile: +1 202 912 5053



Danielle Morello
Counsel, Washington DC

Email: danielle.morello@cliffordchance.com
Mobile: +1 202 912 5088



Eva Kurban
Associate, Washington DC

Email: eva.kurban@cliffordchance.com
Mobile: +1 202 912 5074



Megan Hackett
Associate, Washington DC

Email: megan.hackett@cliffordchance.com
Mobile: +1 202 912 5503