

DOJ Antitrust Whistleblower Rewards Program: First \$1 Million Award Signals an Expanding Enforcement Tool, Especially for Procurement and Government Contractors

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The U.S. Department of Justice (DOJ) Antitrust Division and the U.S. Postal Service (USPS) have announced the first payment under the Antitrust Division's Whistleblower Rewards Program: a \$1 million award to an individual whose information contributed to criminal antitrust and fraud charges, a deferred prosecution agreement (DPA), and a \$3.28 million criminal fine.

Key Takeaways

- The first award demonstrates that the program is operational, that the USPS 'nexus' can be satisfied by routine mailings connected to a scheme, and that DOJ will publicize awards to encourage additional reporting.
- The program is particularly relevant to government contractors and other businesses competing in bid-driven markets: DOJ expressly ties the initiative to procurement integrity and cartel detection, and the alleged conduct in the first case mirrors common bid-rigging patterns.
- Robust compliance programs, credible internal reporting, and appropriate responses to red flags are now more important than ever – employees and third parties have a financial incentive to report directly to DOJ before a company can assess leniency or remediate.

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The DOJ Antitrust Whistleblower Rewards Program

On July 8, 2025, the DOJ Antitrust Division announced a partnership with the USPS to create a Whistleblower Rewards Program aimed at generating new leads on cartel conduct and related offenses that are difficult to detect because they occur in secret.

The DOJ designed the program to incentivize individuals with firsthand knowledge 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 the competitive process.

Rewards are funded under existing authority and administered with support from the U.S. Postal Inspection Service and the USPS Office of Inspector General (USPS OIG), which is also a member of DOJ’s Procurement Collusion Strike Force – underscoring the initiative’s relevance to procurement and government-adjacent markets.

How the Program Works

Eligibility hinges on an individual voluntarily providing original information about antitrust or related offenses with a connection to the U.S. Mail. If the information results in criminal fines or other recoveries of at least \$1 million, the whistleblower may be eligible for an award.

Awards can range from 15% to 30% of the money collected. DOJ has emphasized that it will take reasonable steps to protect whistleblowers and minimize risks of public identification, and that federal law protects employees from retaliation for reporting criminal antitrust violations.

For companies, the key operational reality is speed: This program sits alongside the Antitrust Division’s long-standing corporate leniency framework for self-disclosures, raising the risk that an individual employee, former employee, vendor, competitor, or other third party may reach DOJ first.

DOJ Announces the First Award Under the Whistleblower Program

On January 29, 2026, DOJ announced its first-ever reward: \$1 million paid to a whistleblower whose information led to EBLOCK Corporation resolving criminal antitrust and fraud charges through a DPA and agreeing to pay a \$3.28 million criminal fine.

According to DOJ, the charged conduct involved a bid-rigging conspiracy and “shill bidding” on an online used-vehicle auction platform: individuals allegedly shared confidential bidding information and agreed on maximum bid amounts, granted special access that allowed a co-conspirator to view other parties’ confidential bidding data, coordinated relisting of vehicles, and placed fake bids designed to inflate prices. Although the misconduct was carried out by legacy employees of a company EBLOCK acquired in 2020, the DPA noted that EBLOCK ultimately took steps to halt the conduct once it became aware of it.

DOJ also highlighted the 'mail' connection: Scheme-related documents were sent via U.S. Mail – an important data point for companies assessing whether the USPS element will meaningfully limit the program.

Lessons for Remediation and Compliance

The DPA's terms illustrate what DOJ may demand when resolving matters triggered by whistleblower tips. Beyond the monetary penalty, the agreement requires ongoing cooperation in the related investigation and remedial measures – including implementing an appropriate compliance program. The DPA also expressly notes potential collateral consequences: EBLOCK acknowledged it may be subject to suspension or debarment proceedings at the discretion of other state or federal agencies.

The DPA also requires EBLOCK to "enhance its compliance program and internal controls" and lays out minimum elements DOJ expects in an antitrust compliance program – useful benchmarks for contractors and bid-driven businesses. These include (among other elements) tailored policies and controls, leadership-driven culture of compliance, clear program ownership by a senior leader with antitrust competence, periodic risk-based reviews, targeted training and communications, and a confidential reporting system that permits anonymous reporting without fear of retaliation.

Considerations for Government Contractors and Procurement

The DOJ has explicitly linked the program to protecting taxpayer dollars in procurements through the USPS OIG's role and its Procurement Collusion Strike Force partnership. Companies competing for public contracts should assume procurement-collusion leads are a core use case.

The EBLOCK fact pattern contains several bid-rigging red flags that also arise in procurement settings: sharing bid information, agreeing on bid ceilings, coordinating who will win, manipulating the bidding process through access privileges, and profit-sharing arrangements.

Because whistleblowers can be rewarded even where the conduct has ended, companies cannot assume that 'historical' issues are dormant and should emphasize the importance of post-acquisition due diligence. And because DOJ announced the award roughly six months after the program launch, organizations should anticipate accelerated reporting and faster investigative timelines.

Practical Recommendations

- Pressure-test your antitrust compliance program against DOJ's stated expectations: focus on bidding/procurement controls, competitor interaction rules, and training for sales, BD, procurement, and program teams.
- Enhance internal reporting and escalation: ensure hotlines are well-publicized, confidential, and trusted; route procurement-related allegations to legal/compliance quickly; and document prompt responses.
- Prepare a rapid-response playbook: Align legal, compliance, internal audit, and HR on how to preserve data, investigate quickly, and evaluate whether leniency or other self-disclosure options are

appropriate – before an employee reaches DOJ.

- Treat M&A integration as a compliance ‘risk moment’: The EBLOCK matter highlights DOJ’s focus on how companies identify and stop misconduct after an acquisition, particularly when problematic conduct continues to be driven by acquired employees or systems.
- For government contractors, integrate antitrust risk with procurement integrity controls: Reinforce restrictions on bid coordination and information exchange, and consider periodic audits around teaming, subcontracting, and bidding strategies.

Looking Ahead

DOJ’s first award can be viewed as a ‘proof of concept’ designed to generate additional tips. The program creates a direct financial incentive for insiders to report cartel conduct quickly – potentially changing the calculus for companies that historically relied on internal reporting to surface problems.

Companies should assume that whistleblower tips will increasingly drive investigations (including in procurement and bid-driven markets), and that DOJ will expect disciplined compliance programs and prompt remediation when issues surface.