



Month in a Minute: Developments in Anti-Corruption

Month in a Minute: December 2025 and January 2026

Hughes Hubbard's anti-corruption "Month in a Minute" offers a quick snapshot of the key foreign corruption-related developments from the prior month – although this edition covers developments from the end of 2025 and into the new year. We hope you find it a useful and perhaps enjoyable resource.

Highlights from December 2025 and January 2026 include a guilty verdict for a Texas businessman, a sentence and forfeiture agreement for a former oil trader and dropped charges in a case related to the Petrobras bribery scheme.

Texas Businessman Found Guilty

On Dec. 5, 2025, a federal jury in the U.S. District Court for the Southern District of Texas found Texas businessman Ramón Alejandro Rovirosa Martínez guilty of violating the Foreign Corrupt Practices Act (FCPA) and conspiring to violate the FCPA, for his role in a scheme to bribe officials at PEMEX, Mexico's state-owned oil company. Rovirosa and his co-conspirator, Mario Alberto Ávila Lizarraga, both Mexican citizens, were indicted in August 2025 on one count of conspiracy to violate the FCPA and three counts of violating the FCPA for allegedly bribing PEMEX officials. The indictment alleged that from June 2019 to October 2021, Rovirosa and Ávila paid approximately \$150,000 in cash and luxury items to PEMEX officials. The bribe payments helped Rovirosa and Ávila obtain \$2.5 million in PEMEX contracts for energy companies associated with Rovirosa.

Rovirosa was found guilty on two of the three counts of violating the FCPA and on one count of conspiracy to violate the FCPA. Rovirosa's defense counsel have already stated their intent to appeal the decision, arguing that the government's evidence was insufficient. Ávila remains at large and is wanted in connection with the scheme. For our prior coverage on the allegations against Rovirosa, please see

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our editions from July and August 2025 and September 2025.

Oztemel Sentenced to 15 Months and Agrees To Forfeit \$1.7M

On Dec. 9, 2025, U.S. District Judge Kari Dooley sentenced Glenn Oztemel, a former oil and gas trader for Freepoint Commodities LLC, to 15 months in prison for his role in a scheme to bribe officials at Petrobras, Brazil's state-owned oil company. On Sept. 26, 2024, a Connecticut federal jury found Oztemel guilty on seven counts, including violating the FCPA, money laundering and related conspiracy counts for his role in the scheme. From 2010 through 2018, Oztemel, along with his brother, Gary Oztemel, paid approximately \$1 million in bribes through an intermediary, Brazilian oil trader Eduardo Innecco, to Petrobras officials to obtain and retain lucrative contracts for two commodities trading companies — Freepoint and Arcadia Fuels Ltd.

In addition to 15 months' imprisonment, Judge Dooley ordered Oztemel to pay a fine of \$300,000. Oztemel also agreed to forfeit \$1.7 million over the course of 2026, a figure equal to the amount of the bribes paid to a former Petrobras oil trader, Rodrigo Berkowitz, in connection with the bribery scheme. Berkowitz is himself subject to a forfeiture order of \$2.3 million.

For additional information regarding Oztemel's case, see HHR's Month in a Minute updates for January 2025 and November 2025.

Co-Conspirator in Petrobras Scheme Dies — Charges Dropped

On Dec. 8, 2025, prosecutors moved to dismiss charges against Eduardo Innecco, a Brazilian national who participated in a scheme to bribe officials at Petrobras, on account of his death. Innecco, who fled France while pending extradition to the United States, died in October 2025 in Brazil from heart disease and pneumonia.

Innecco was charged in 2023 alongside Glenn Oztemel for helping the Oztemel brothers funnel bribes through a number of companies controlled by Innecco in Brazil, Liberia, Uruguay and the British Virgin Islands. Innecco allegedly sent bribe payments to several officials, including Rodrigo Berkowitz, a Petrobras trader who pled guilty to receiving bribes in 2019.

On Dec. 15, 2025, Judge Kari Dooley of the U.S. District Court of Connecticut granted prosecutors' motion to drop the charges against Innecco.

(!) FACT OF THE MONTH

On Jan. 5, 1933, construction began on the San Francisco Golden Gate Bridge. Built during the Great Depression, the Golden Gate Bridge cost \$35 million and took four years to complete. When finished, the bridge spanned 4,200 feet. It was the longest suspension bridge in the world until 1964. Its construction entailed not only feats of engineering but also significant developments in construction safety measures. Workers faced dangerous weather hazards and conditions, which claimed 20 lives during the bridge's construction and spurred the development of enormous safety nets and rigging.

These safety measures ultimately saved the lives of 19 additional workers through the completion of the project.

2025 FCPA and Antibribery Alert Update

The latest edition of Hughes Hubbard's comprehensive annual FCPA and Antibribery Alert is available for download! The alert discusses last year's anti-bribery developments in detail, and once again includes a deep dive into FCPA enforcement, as well as anti-bribery enforcement and developments in France, Brazil and the UK, and by multilateral development banks. [Access your copy.](#)

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