



Month in a Minute: February 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. We hope you find it a useful and perhaps enjoyable resource.

Highlights from February 2026 include the closing of two Foreign Corrupt Practices Act (FCPA)-related investigations by the U.S. Securities & Exchange Commission and a guilty verdict for a former Corsa Coal executive. We also briefly summarize the announcement of a new corporate enforcement policy out of the U.S. Department of Justice (announced in early March).

SEC Closes FCPA Investigations

On Feb. 11, Stryker announced that the SEC had ended an FCPA probe into Stryker’s business activities. The SEC’s decision comes after the DOJ informed Stryker in April 2025 that it had closed its own parallel investigation.

On Feb. 24, Indian pharmaceutical company Dr. Reddy’s Laboratories announced in a public filing that the SEC had concluded its FCPA investigation related to Dr Reddy’s activities in Ukraine and did not intend to recommend any enforcement action at the time. Dr Reddy’s initially disclosed in November 2020 allegations regarding improper benefits paid to doctors in Ukraine to the SEC, DOJ and Exchange Board of India.

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Former Coal Executive Found Guilty on FCPA Charges

On Feb. 18, a federal jury found former Corsa Coal Corp. executive Charles Hobson guilty of conspiracy to violate the FCPA, violating the FCPA, conspiracy to commit money laundering, money laundering, and conspiracy to commit wire fraud. Hobson's trial was the first FCPA trial of 2026.

Hobson was first arrested in 2022, charged with bribing officials at the Egyptian state-owned Al Nasr Company for Coke and Chemicals between 2016 and 2020. The indictment alleged that Hobson and another Corsa Coal executive, Frederick Cushmore Jr., paid over \$4.8 million to an intermediary in Egypt – a portion of which was used to pay bribes to Egyptian officials at Al Nasr. The bribes were paid in exchange for sales contracts, nonpublic information about competing bids and other business advantages. In total, Corsa Coal earned approximately \$143 million in coal contracts from Al Nasr and \$32.7 million in profits from the scheme.

Hobson's defense posited that he did not direct his agent in Egypt to pay bribes and did not know it was occurring. The defense team also questioned whether it was clear that Al Nasr was a state-owned company or whether bribery was illegal in Egypt.

Hobson now awaits sentencing, scheduled for June 25. He faces the potential for up to five years in prison for each FCPA violation and FCPA conspiracy count and a maximum of 20 years in prison on the money laundering, money laundering conspiracy and wire fraud counts. Hobson's attorney indicated that they are considering appealing the verdict to the U.S. Court of Appeals for the Third Circuit. The now-defunct Corsa Coal received a declination from the DOJ in 2023 after self-disclosure.

Looking Ahead: DOJ Unveils New Department-Wide CEP

On March 10, the DOJ issued a new department-wide Corporate Enforcement Policy (CEP), which largely tracks the existing CEP – providing concrete benefits for companies that voluntarily self-disclose misconduct and limiting benefits for companies that do not – but extends to all criminal matters handled by the DOJ (with the exception of certain antitrust offenses, which are governed by a separate policy). The DOJ's announcement indicates the new CEP is meant to unify the DOJ's approach to voluntary self-disclosure and supersede all component-specific or U.S. Attorney's Office-specific corporate enforcement policies currently in effect, presumably including the new SDNY self-disclosure policy announced earlier in March.

FACT OF THE MONTH

Feb. 11 marked 36 years since Nelson Mandela walked out of Victor Verster Prison after South African President F.W. de Klerk legalized the African National Congress (ANC) party and all other formerly banned political parties. Mandela, who had been deputy president of the ANC despite being imprisoned by South Africa's apartheid regime since 1964, was unconditionally released. Upon his release, Mandela became president of the ANC and led negotiations for the end of South African apartheid and for free elections. On May 10, 1994, he became the first Black president of South Africa and led the coalition Government of National Unity until his retirement from politics in 1999.

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