



Month in a Minute: June 2025

Hughes Hubbard's anti-corruption "Month in a Minute" offers a quick look-back at the biggest foreign corruption-related developments from the prior month. The "Month in a Minute" is intended to provide a quick snapshot of the latest news and developments. We hope you find it a useful and perhaps even enjoyable resource.

Highlights from June 2025 include a guilty plea stemming from a Honduran National Police bribery scheme, the U.S. Department of Justice's revised guidelines for Foreign Corrupt Practices Act (FCPA) enforcement, early dismissal of foreign bribery charges against ABB, and sentencing for an intermediary in the Tysers and H.W. Woods Ecuadorian bribery scheme.

Florida Resident Pleads Guilty in Honduran National Police Bribery Scheme

On June 5, Florida resident Aldo Nestor Marchena pleaded guilty for his role in a scheme to pay bribes to government officials in Honduras in exchange for contracts with the procurement agency for the Honduran National Police.

Between 2015 and 2019, Marchena and Carl Alan Zaglin, the owner of a Georgia-based manufacturer of police uniforms and accessories, allegedly paid over \$166,000 in bribes to Honduran government officials, including Francisco Roberto Cosenza Centeno, the former executive director of the Comité Técnico del Fideicomiso para la Administración del Fondo de Protección y Seguridad Poblacional (TASA). TASA is the Honduran government agency responsible for procuring goods for the Honduran National Police. Marchena and Zaglin allegedly paid the bribes in exchange for more than \$10 million in contracts with TASA.

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In December 2023, Marchena, Zaglin and Cosenza were indicted in a five-count indictment, which included charges of money laundering, engaging in transactions in criminally derived property and FCPA-related offenses. As part of the plea agreement, Marchena pleaded guilty to a superseding information charging him with one count of conspiracy to commit money laundering, and the parties agreed they would jointly recommend a sentence of 120 months. Marchena's sentencing hearing is scheduled for Oct. 28. Zaglin and Cosenza are scheduled for trial in September 2025.

DOJ Ends FCPA Enforcement Pause

On June 9, the DOJ issued new FCPA enforcement guidelines in a memorandum from Deputy Attorney General Todd Blanche. The updated guidelines come in response to President Donald Trump's Feb. 10 executive order temporarily pausing new FCPA investigations and calling for a reorientation of FCPA enforcement priorities to better align with U.S. economic and national security interests.

The new FCPA enforcement guidelines formally lift the enforcement pause and set certain FCPA enforcement priorities for prosecutors moving forward. These priorities include:

A. Targeting Cartels and TCOs

The DOJ will prioritize FCPA enforcement involving misconduct associated with the criminal operation of cartels and/or transnational criminal organizations (TCOs). This includes misconduct involving money laundering through shell companies linked to cartels and TCOs or involving foreign officials who have received bribes from these entities.

B. Protecting US Business Interests

The DOJ will also focus on misconduct that harms U.S. companies or individuals by depriving them of fair business competition. The revised guidelines also instruct prosecutors investigating misconduct under the Foreign Extortion Prevention Act, which criminalizes the "demand side" of foreign bribery, to consider whether the foreign official's demand for bribes harmed U.S. companies or individuals. The memo expressly states that this enforcement priority does not mean prosecutors should focus on the nationality of the company or individual involved, but rather on whether a U.S. company was harmed by the corrupt act.

C. Advancing National Security

Prosecutors will further prioritize investigations into foreign bribery where the misconduct relates to sectors critical to U.S. national security. This includes corruption related to the defense, intelligence and critical infrastructure sectors.

D. Prioritizing Serious Misconduct

The memo instructs prosecutors to focus on serious misconduct that involves substantial bribe payments, sophisticated efforts to conceal bribe payments, fraud and efforts to obstruct justice, and to focus less on misconduct involving routine business practices or de minimis or low-dollar, generally accepted business practices. Prosecutors must also consider the likelihood that foreign enforcement authorities will investigate and prosecute the misconduct.

For more detailed information and analysis, [read our client alert](#).

ABB Secures Early Dismissal of Charges

On June 20, Judge Michael S. Nachmanoff of the Eastern District of Virginia granted the DOJ's motion to dismiss foreign bribery charges against Swiss technology company ABB. The dismissal of the charges occurred six months before they were scheduled to expire as part of ABB's December 2022 three-year deferred prosecution agreement (DPA). The DOJ cited ABB's proactive and thorough compliance with the terms of the DPA, ABB's initiation of multiple comprehensive risk assessments, and ABB's certification of compliance with the terms of the DPA as grounds for the dismissal.

ABB entered into the three-year DPA as part of a joint resolution with U.S., Swiss and South African authorities. The resolution included two ABB subsidiaries pleading guilty to FCPA charges and ABB agreeing to pay a \$327 million penalty.

Former Intermediary GM Receives Time Served in Ecuadorian Bribery Scheme

On June 24, Judge Kathleen Williams of the U.S. District Court for the Southern District of Florida sentenced Cristian Patricio Pintado Garcia to time served and three years of supervised release for his involvement in a scheme to bribe officials at Ecuador's state insurance companies.

Between 2013 and 2018, Pintado served as the general manager at two intermediary companies that helped UK-based reinsurance brokers Tysers Insurance Brokers and H.W. Wood Limited launder bribe

payments to officials at two Ecuadorian state-owned insurance companies. In exchange for the bribe payments, Tysers and H.W. Wood received business advantages that allowed them to retain contracts with the state insurance companies. The bribes were paid using a network of bank accounts in Florida and elsewhere.

On July 15, 2022, Pintado and his co-conspirators were indicted on seven counts, including charges of conspiracy to violate the FCPA, violations of the FCPA, conspiracy to commit money laundering and engaging in transactions in criminally derived property. On April 24, 2025, Pintado pleaded guilty to one count of conspiracy to commit money laundering. In the plea agreement, the prosecutors agreed to a sentence of time served, which Pintado ultimately received, plus three years of supervised release.

FACT OF THE MONTH

Almost 12 million people were greeted with “Don’t Stop Believing” and a diner booth of complicated characters as HBO’s “The Sopranos” aired its final episode on June 10, 2007. To this day, fans debate what followed the infamous (notorious?) fade to black. Our take? The Soprano family plunged into a heated discussion of **the merits of the just-announced federal grand jury indictment** of U.S. Rep. William J. Jefferson for charges including violations of the FCPA in connection with business dealings in West Africa.