

## Month in a Minute: September 2025

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 September include a conviction related to a bribery scheme in Honduras and developments in a case related to PEMEX.

## Carl Zaglin Convicted on FCPA Charges

On Sept. 15, Carl Alan Zaglin, the owner of a Georgia-based manufacturer of police uniforms and accessories, was found guilty of violating the Foreign Corrupt Practices Act (FCPA) for his role in a scheme to bribe Honduran government officials in exchange for more than \$10 million in contracts with the Honduran National Police.

In December 2023, Zaglin, along with his two co-conspirators, Aldo Nestor Marchena and Francisco Roberto Cosenza Centeno, were indicted on charges of money laundering, engaging in transactions in criminally derived property and FCPA-related offenses. The indictment alleged that between 2015 and 2019, Zaglin and Marchena paid over \$166,000 in bribes to Cosenza and other Honduran government officials in exchange for more than \$10 million in contracts with TASA, the Honduran government agency responsible for procuring goods for the Honduran National Police. Zaglin and Marchena allegedly worked with Cosenza to conceal the bribes by laundering the proceeds through bank accounts and shell companies.

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A federal jury in Miami convicted Zaglin of one count of conspiracy to violate the FCPA, one count of violating the FCPA and one count of conspiracy to commit money laundering, for which he faces up to 30 years in prison. Zaglin is scheduled to be sentenced on Dec. 3. Zaglin's conviction comes after both Marchena and Cosenza pleaded guilty in June and August, respectively. Marchena and Cosenza are scheduled to be sentenced in October.

## Developments in Case Against a Houston Businessman with Alleged Cartel Ties

On Sept. 8 and 11, Ramon Alexandro Rovirosa Martinez, facing FCPA charges in the U.S. District Court for the Southern District of Texas for allegedly bribing officials at PEMEX, Mexico's state-owned oil company, filed separate motions to dismiss in the case against him.

As discussed in more detail in Hughes Hubbard's **July and August "Month in a Minute,"** Rovirosa and Mario Alberto Avila Lizarraga, both Mexican citizens, were indicted in August on one count of conspiracy to violate the FCPA and three counts of violating the FCPA for allegedly bribing officials at PEMEX. The indictment alleges that from June 2019 to October 2021, Rovirosa and Avila paid approximately \$150,000 in cash and luxury items to PEMEX officials. The bribe payments allegedly helped Rovirosa and Avila obtain \$2.5 million in PEMEX contracts for energy companies associated with Rovirosa.

In addition to the indictment, prosecutors filed a motion to impose certain conditions of release, which alleged that Rovirosa has ties to Mexican drug cartel members. This detail was noteworthy as cartels are a central focus of the revised FCPA enforcement guidelines issued by Deputy Attorney General Todd Blanche in June. (To read more about the revised FCPA enforcement guidelines, see our **June 2025** "Month in a Minute.")

On Sept. 8, Rovirosa filed a motion to dismiss, arguing that prosecutors fabricated allegations that he had ties to Mexican cartels and that the motion to impose certain conditions of release was a false filing created to insert a "cartel narrative" into the case. The government's response, which argued that the motion to dismiss was untimely and noncompliant, appeared to also back off the cartel allegations, stating that the government did not intend to raise the allegations at trial. Prosecutors also deleted a line related to the cartel ties in the original press release regarding the indictment.

Rovirosa filed a second motion to dismiss on Sept. 11, arguing that the five-year statute of limitations had expired, as the last alleged act in the conspiracy took place in April 2020. Both motions remain pending.

## I FACT OF THE MONTH

Sept. 6 was the 30-year anniversary of the day Cal Ripken Jr. broke Lou Gehrig's record for the number of consecutive games played by an MLB player. Gehrig's record of 2,130 consecutive games had stood for 56 years. Ripken, who played shortstop and third base for the Baltimore Orioles, went on to play 2,632 consecutive games. To put that record in perspective, the current longest active streak for consecutive games played is held by Matt Olson of the Atlanta Braves at 782 games. Olson has impressively not missed a game since May 2021. In order to break Ripken's record, he'd need to continue that streak until at least the 2036 season.

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