

SEC Announces FY2025 Enforcement Results, Emphasizing Focus on Fraud

April 14, 2026

On April 7, 2026, the US Securities and Exchange Commission (SEC) [announced its enforcement results for fiscal year 2025](#), which ran from October 2024 to September 2025. In FY2025, the SEC filed 456 enforcement actions, including 303 “standalone” actions, representing a decrease of 22% and 30%, respectively, [from FY2024](#). In addition, the SEC returned \$262 million to investors, down 24% from the prior year. For the first time, the SEC disclosed the number of matters it closed without bringing an enforcement action: a total of 1,095 matters in FY2025.

The SEC obtained orders for monetary relief totaling \$17.9 billion in FY2025 – a new record – but \$14.9 billion of that amount stemmed from a single matter: the judgment in the Robert Allen Stanford Ponzi scheme case, which was initiated in 2009. Excluding the Stanford judgment, as well as disgorgement amounts that were “deemed satisfied” by court orders in non-SEC actions, monetary relief orders obtained in FY2025 totaled \$2.7 billion – \$1.3 billion in penalties and \$1.4 billion in disgorgement. In FY2024, by comparison, the SEC obtained \$8.2 billion in financial remedies.

The SEC acknowledged that FY2025 was a “unique period of transition,” with 58% of the enforcement actions having been filed before the US presidential inauguration on January 20, 2025. In the April 7 press release, SEC Chairman Paul Atkins stated that the current SEC administration is prioritizing cases involving “fraud, market manipulation, and abuses of trust” and emphasizing “holding individual wrongdoers accountable.”

Retail investor protection

The FY2025 enforcement results demonstrate the current SEC administration’s focus on securities fraud targeting retail investors, such as Ponzi schemes, offering frauds and disclosure failures. Notably, the press release highlighted [an enforcement action against a publicly traded biopharmaceutical company](#) that allegedly concealed a “harsh critique levied by the Food and Drug Administration” (FDA) about the approval prospect of the company’s drug candidate. The company allegedly made false and misleading statements about the drug’s efficacy and likelihood of approval in its initial public offering documents. The company agreed to pay \$2.5 million in civil penalties to settle the action.

Individual accountability

The current SEC administration has focused more heavily on individual accountability, with nearly 90% of the stand-alone actions filed since the presidential inauguration involving individual charges. The press release linked to multiple individual enforcement actions, such as actions against [three individuals](#) for allegedly creating false documents in municipal bond offerings that raised \$284 million, and against the [founder of a beverage company](#) for allegedly misrepresenting the company’s business operations and use of investor funds. The SEC also obtained orders barring 119 individuals from serving as officers and directors of public companies, comparable to the 124 individuals barred in FY2024.

Investment advisers

In FY2025, the SEC brought 72 enforcement actions against investment advisers and investment companies, a decline of 26% from FY2024. However, the SEC has stated that “breaches of fiduciary duty by investment advisers” remain a top priority for the agency. The press release highlighted a few notable actions and wins against investment advisers, including a [jury verdict](#) against a Massachusetts-based investment adviser for alleged failure to disclose financial incentives for selling certain products, as well as a [\\$150,000 settlement](#) with a New York-based investment adviser for alleged failure to disclose advisory fees in connection with the conversion of certain client accounts.

Cross-border fraud

As discussed in our [September 18](#) and [October 28](#) blog posts, the SEC has formed a Cross-Border Task Force to investigate transnational fraud, such as “pump-and-dump” schemes involving foreign-based companies. Along those same lines, the SEC has also charged individuals in foreign jurisdictions for alleged involvement in [insider trading](#) or

[market manipulation](#).

Insider trading and market manipulation

“Abusive trading” continues to be a focus of this SEC administration, and in FY2025, the SEC brought 31 insider trading and 15 market manipulation cases, on par with FY2024’s totals of 34 and 17, respectively. As discussed in our [December 23 blog post](#), the SEC is particularly focused on insider trading in biotech stocks, which could be subject to significant volatility in response to clinical trial results, FDA decisions and merger activities.

Misuse of emerging technologies

While the SEC has changed its approach to crypto enforcement, it “remains committed to detecting, deterring, and bringing actions against those seeking to take advantage of investors by misusing new technologies.” In FY2025, such actions included charges against [digital asset promoters](#) for allegedly making false statements in connection with crypto asset offerings, [the founder of a crypto and foreign exchange trading company](#) for alleged misappropriation of investor funds, and [the founder of an AI startup](#) for allegedly misrepresenting the company’s use of AI. In the AI startup case, the SEC alleged that the founder told investors that the company used AI to process transactions, when in fact, the company relied largely on contract employees to manually input orders.

Benefit of self-report and cooperation

The current SEC administration has reiterated the value of self-reporting, cooperation and remediation as tools for mitigating enforcement outcomes. As discussed in our [February 27 blog post](#), the recently updated Enforcement Manual has expanded the cooperation framework and emphasizes the “timeliness” of cooperation.

The press release noted that in FY2025, the SEC imposed reduced civil penalties or declined to recommend enforcement actions against several companies that self-reported, cooperated and remediated securities law violations. One example cited by the SEC involved [an investment adviser](#) that allegedly violated Rule 105 of Regulation M by purchasing certain securities after selling short the same securities during Rule 105’s restricted period. The SEC credited the company’s cooperation, including voluntarily gathering documents, conducting a review for prior violations and presenting to the staff on the company’s compliance efforts. The SEC also credited the company’s remediation efforts, such as updating its compliance policies and procedures.

Takeaways

The FY2025 enforcement results reflect the current administration’s much-publicized change of priorities. As it said it would, the SEC appears to have concentrated its resources on fraud and has prioritized charging individuals for securities violations. At the same time, the SEC’s continued emphasis on self-reporting, cooperation and remediation presents a meaningful opportunity for market participants to mitigate potential exposure.

In the Matter of Allarity Therapeutics, Securities Act of 1933 Release No. 11367, Securities Exchange Act of 1934 Release No. 102646 (Mar. 12, 2025).

SEC v. Miller et al., No. 1:25-cv-02702 (S.D.N.Y. Apr. 1, 2025).

SEC v. Scalise et al., No. 2:25-cv-03088 (E.D. Pa. June 17, 2025).

SEC v. Cutter Financial Group, No: 1:23-cv-10589 (D. Mass. Apr. 23, 2025).

In the Matter of One Oak Capital Management, LLC and Michael DeRosa, Securities Exchange Act of 1934 Release No. 102425, Investment Advisers Act of 1940 Release No. 6855 (Feb. 14, 2025).

SEC v. Safi et al., No. 1:25-cv-10516 (D. Mass. Mar. 4, 2025).

SEC v. Kushnarev, No. 1:25-cv-05412 (N.D. Ga. Sept. 22, 2025).

SEC v. Unicoïn, et al., No. 1:25-cv-04245 (S.D.N.Y. May 20, 2025).

SEC v. Palafox, et al., No. 1:25-cv-00681 (E.D. Va. Apr. 22, 2025).

SEC v. Saniger, No. 1:25-cv-02937 (S.D.N.Y. Apr. 9, 2025).

In the Matter of Sourcerock Group, LLC, Securities Exchange Act of 1934 Release No. 103629 (Aug. 4, 2025).

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