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DOJ and DHS Launch Cross-Agency Trade Fraud Task Force

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Summary

On August 29, 2025, the U.S. Department of Justice (DOJ) [announced](#) the formation of a cross-agency Trade Fraud Task Force in partnership with the Department of Homeland Security (DHS). This initiative is designed to strengthen enforcement against importers and other parties who seek to defraud the U.S. by evading tariffs, duties, and other trade regulations. The Trade Fraud Task Force is focused on ensuring compliance with trade laws, including all applicable tariffs and duties, such as antidumping and countervailing duties, as well as Section 301 tariffs on Chinese-origin goods. The task force will leverage resources and expertise from both DOJ's Civil and Criminal Divisions, and DHS agencies, including U.S. Customs and Border Protection (CBP), and Homeland Security Investigations (HSI).

The task force will pursue aggressive enforcement action, including civil and criminal penalties against parties engaged in trade fraud. The task force stated it welcomes referrals and cooperation from both the domestic industries as well as whistleblowers. The task force also encouraged all importers to conduct thorough audits and voluntarily self-disclose and remediate any unlawful behavior.

Implications for Clients

The creation of this task force signals the administration's willingness to pursue criminal enforcement in an area that has historically been policed through civil or administrative enforcement, as discussed in our [prior client alert](#). Importers, exporters, and logistics providers should expect heightened scrutiny of their trade practices, documentation, and compliance programs. In addition to heightened scrutiny from government agencies, companies operating in international supply chains should also anticipate a rise in *qui tam* False Claims Act cases initiated by whistleblower plaintiffs, further underscoring the need for rigorous compliance and monitoring. Companies should review internal controls, ensure accurate classification and valuation of goods, and maintain robust compliance procedures to mitigate risk. Violations may result in significant civil and criminal penalties, reputational harm, and disruption of business operations.

Recommended Actions

With the Trump administration's implementation of new tariffs and the DOJ's focus on pursuing customs enforcement through civil and criminal means, it is imperative that companies importing goods, particularly from China and other countries facing increased scrutiny, maintain effective compliance programs. Key items include:

- Training staff on updated enforcement priorities and relevant regulations;
- Ensuring internal systems are tracking updates to tariff rates;
- Reviewing country-of-origin certifications, especially for goods sourced from high-risk jurisdictions;
- Maintaining detailed records and examining supplier contracts;
- Conducting internal audits and investigations where potential inflection points exist, and preparing for voluntary disclosure and remediation.

This alert is intended as a guide only and is not a substitute for specific legal or tax advice. Please reach out to the authors with any specific questions. We expect to continue to monitor the topics addressed in this alert and provide future client updates when useful.

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