

SEC FY 2025 Enforcement Results Reveal Changing Priorities From Record Numbers to Investor Protection

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The Securities and Exchange Commission's (SEC) April 7, 2026, [press release](#) on its fiscal year (FY) 2025 enforcement results is less about numbers and more about a philosophical reset. Under Chairman Paul Atkins and Commissioner Mark Uyeda, who served as acting chair prior to the chairman's confirmation, the SEC is expressly stepping back from what it characterizes as "regulation by enforcement" and volume-driven metrics, and recentering on what it has described as fraud, investor harm, and congressional intent. For registrants and other market participants, this shift has direct consequences for how enforcement risk is likely to be assessed going forward.

Redefining 'Effective' Enforcement

In a first, the SEC's release openly criticizes prior years' focus on headline statistics such as case counts and aggregate penalties as a measure of enforcement success. It describes a "rush" of actions in advance of the 2025 inauguration and highlights waves of off-channel communications cases and other technical violations that, in the current SEC's view, identified no direct investor harm and produced little in the way of concrete investor protection.

Against that backdrop, FY 2025 is framed as a transition year. The SEC reports filing 456 enforcement actions, including 303 standalone cases and 69 follow-on administrative proceedings, with orders for monetary relief totaling \$17.9 billion. But it also discloses that, after backing out amounts deemed satisfied by restitution or forfeiture in related criminal cases and certain legacy judgments, the underlying FY 2025 totals are approximately \$1.4 billion in disgorgement and prejudgment interest and \$1.3 billion in civil penalties. The SEC's implicit point is that "real" enforcement effectiveness should be measured by whether cases prevent or redress investor harm, not by how large the gross number appears.

Moving Away from 'Regulation by Enforcement'

Atkins states that the SEC has "put a stop to regulation by enforcement" and has recentered on its core mission. The press release criticizes the prior SEC's reliance on novel legal theories in areas such as off-channel communications, certain crypto registration actions, and "dealer definition" cases, especially where the connection to investor harm was tenuous. Uyeda, in turn, emphasizes a return to coherent and transparent policymaking through rulemaking and engagement, with enforcement reserved for its traditional role: addressing violations, not indirectly setting policy.

Renewed Focus on Retail and Classic Fraud

At the center of the FY 2025 narrative is retail investor protection. The SEC highlights a series of large alleged schemes that raised hundreds of millions of dollars from thousands of investors, including Ponzi-style offerings and other frauds targeting retirees, veterans, seniors, and religious communities. It also points to cases against issuers for significant disclosure failures and against investment advisers for conflicts of interest in fee-based advisory programs.

The common thread in these matters is clear: alleged misrepresentations or omissions about risks, use of proceeds, or conflicts that led directly to investor losses. These are the sorts of cases that fit squarely within longstanding anti-fraud principles, and the SEC is signaling that this is where it intends to concentrate its enforcement capital.

Emphasis on Individual Accountability

The SEC also stresses an increased focus on charging individuals. Roughly two-thirds of standalone actions in FY 2025 included at least one individual defendant, and, under Uyeda and Atkins, nearly nine out of 10 standalone actions reportedly involved individuals. The SEC obtained 119 officer-and-director bars.

The rationale is deterrence. Monetary sanctions against entities alone may not shift behavior if the individuals responsible face limited personal consequences. Going forward, firms should expect the staff to look closely at who knew what, when, and to design resolutions that address individual responsibility as well as institutional remediation.

Market Integrity, Cross-Border Fraud, and Emerging Tech

The FY 2025 results also make clear that the SEC is not retreating from complex or cross-border cases. The SEC formed a Cross-Border Task Force to focus on foreign-based actors targeting U.S. markets, and brought actions involving alleged “pump-and-dump” and “ramp-and-dump” schemes, account takeovers, and other market-abuse conduct. Classic market integrity cases such as insider trading, spoofing, and manipulative trading remain central. The SEC highlights actions against corporate insiders, investor relations personnel, and professional traders, as well as a spoofing case in which the defendant allegedly generated six-figure profits through manipulative order placement.

In crypto and emerging technologies, the SEC describes a “course correction” rather than a retreat. It launched a Cyber and Emerging Technologies Unit to complement its crypto efforts and continues to pursue cases where digital assets, blockchain, or artificial intelligence (AI) are used as vehicles for fraud or misrepresentation. The focus, however, is more on fact-specific misconduct, *i.e.*, false statements about offerings, misuse of investor funds, and inflated claims about technology, than on pushing the boundaries of jurisdiction through high-profile test cases.

Cooperation, Remediation, and Whistleblower Trends

The SEC reiterates that meaningful cooperation and remediation can materially affect outcomes. In FY 2025,

some parties that self-reported, assisted the staff's investigations, or remediated violations received reduced penalties or were not charged. While specifics are limited, the message is consistent with past practice: in a resource-constrained environment, the Division of Enforcement will reward conduct that saves investigative time and addresses root causes.

At the same time, the volume of incoming information continues to rise. The SEC received a record 53,753 tips, complaints, and referrals in FY 2025 (nearly 19% more than in the prior year) and awarded about \$60 million to 48 whistleblowers. It also returned approximately \$262 million to harmed investors. Strong internal reporting channels and compliance cultures remain critical as whistleblower activity and regulatory attention to tips continue to increase.

Conclusion

The SEC's FY 2025 enforcement report is a clear statement of priorities. Headline-grabbing penalty totals and large case counts are no longer the SEC's preferred metric of success. Instead, the Division is being tasked with bringing fewer but more consequential cases: those that confront fraud in its many forms, protect retail investors, safeguard market integrity, and hold individual wrongdoers to account. Firms that align their compliance and governance programs with that reality (and that are prepared to demonstrate real investor-focused remediation when problems occur) will be better positioned in this new enforcement landscape.

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