

Tariff Evasion Enforcement Heats Up: DOJ's Latest Action

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On November 17, 2025, the U.S. Department of Justice (DOJ) announced criminal charges against a company and three individuals in connection with a large-scale duty and tariff evasion scheme. As alleged, the charged defendants engaged in a complex scheme “to illegally evade more than \$86 million in customs duties and tariffs on more than \$1.2 billion in jewelry imports into the United States.”^[1]

Acting U.S. Attorney and Special Attorney for the District of New Jersey Alina Habba stated that these charges reflect the dedication of the U.S. Attorney’s Office “to rooting out efforts by foreign companies and individuals to defraud the United States and undercut American businesses.” These charges were brought with the support of IRS Criminal Investigation (IRS-CI), Homeland Security Investigations (HSI), and U.S. Customs and Border Protection (CBP).

The charged company, UBS Gold, is an Indonesian jewelry company that ships jewelry globally, including to the United States. The three individuals charged alongside the company are senior executives and an employee who serviced customers in the U.S. The criminal complaint alleges the defendants engaged in a conspiracy to evade lawful duties and tariffs for shipments of jewelry to the U.S. by routing shipments through Jordan and falsely representing that the goods were manufactured in Jordan, which had a free trade agreement with the U.S. during the relevant period. The complaint alleges further that, after the imposition of tariffs on goods in 2025 from Indonesia and Jordan, among other countries, the defendants engaged in a scheme to avoid tariffs by falsely claiming that the jewelry was manufactured in the U.S. The four defendants are charged with one count of conspiracy to commit wire fraud.^[2]

These charges reflect the current administration’s increased focus on enforcing potential violations of U.S. trade laws, which we [forecasted previously](#). The announcement further reflects, as discussed in a prior [client alert](#), that the DOJ is devoting significant prosecutorial and law enforcement resources to “protecting the integrity of U.S. trade and ensuring that those who attempt to evade lawful duties or circumvent U.S. laws are held accountable.”^[3] This focus is consistent with the DOJ’s May 12, 2025 announcement that “trade and customs fraud, including tariff evasion” would be a “high-impact” area of white-collar crime that the DOJ Criminal Division would prioritize for investigation and prosecution.

Companies operating in the targeted sectors should anticipate increased scrutiny and enforcement actions related to tariff and customs duties. Businesses are encouraged to review their compliance programs and ensure that robust measures are in place to prevent and detect potential violations, including training employees on import compliance, monitoring supply chains, and accurate recordkeeping.

Troutman Pepper Locke is closely monitoring the administration's evolving priorities. If you have questions on how these priorities impact your business or wish to begin evaluating your existing compliance programs procedures, please do not hesitate to contact a member of our White Collar Litigation and Investigations team.

[1] <https://www.justice.gov/usao-nj/pr/indonesian-jewelry-company-co-owner-and-two-other-employees-charged-large-scale-duty-and>

[2] <https://www.justice.gov/usao-nj/media/1417871/dl?inline>

[3] <https://www.justice.gov/usao-nj/pr/indonesian-jewelry-company-co-owner-and-two-other-employees-charged-large-scale-duty-and>

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