

**Table O-4**

**CULPABILITY FACTORS FOR SENTENCED ORGANIZATIONS<sup>1</sup>**  
**Fiscal Year 2024**

<b>Involvement in or Tolerance of Criminal Activity by Authority - §8C2.5(b)</b>	<b>N</b>	<b>%</b>
Involvement/tolerance in an organization/unit of 5,000+ employees	0	0.0
Involvement/tolerance in an organization/unit of 1,000+ employees	1	3.2
Involvement/tolerance in an organization/unit of 200+ employees	2	6.5
Involvement/tolerance in an organization/unit of 50+ employees	4	12.9
Involvement/tolerance in an organization/unit of ten or more employees	9	29.0
No involvement/tolerance OR fewer than ten employees	15	48.4
<b>TOTAL</b>	<b>31</b>	<b>100.0</b>
<b>Prior History - §8C2.5(c)</b>	<b>N</b>	<b>%</b>
One similar criminal/two similar administrative violations within ten years	0	0.0
One similar criminal/two similar administrative violations within five years	0	0.0
Organization had no prior record	31	100.0
<b>TOTAL</b>	<b>31</b>	<b>100.0</b>
<b>Violation of an Order - §8C2.5(d)</b>	<b>N</b>	<b>%</b>
Organization violated a judicial order or condition of probation for similar conduct	0	0.0
Organization violated condition of probation	0	0.0
Organization did not violate an order or probation	31	100.0
<b>TOTAL</b>	<b>31</b>	<b>100.0</b>
<b>Obstruction of Justice - §8C2.5(e)</b>	<b>N</b>	<b>%</b>
Organization obstructed justice	1	3.2
Organization did not obstruct justice	30	96.8
<b>TOTAL</b>	<b>31</b>	<b>100.0</b>
<b>Effective Compliance and Ethics Program - §8C2.5(f)</b>	<b>N</b>	<b>%</b>
Organization did have an effective compliance and ethics program	0	0.0
Organization had no compliance and ethics program	31	100.0
<b>TOTAL</b>	<b>31</b>	<b>100.0</b>
<b>Self-Reporting, Cooperation, and Acceptance of Responsibility - §8C2.5(g)</b>	<b>N</b>	<b>%</b>
Reported offense to governmental authorities	0	0.0
Cooperated with investigation	19	61.3
Accepted responsibility	11	35.5
Organization did not self-report, cooperate, or accept responsibility	1	3.2
<b>TOTAL</b>	<b>31</b>	<b>100.0</b>

<sup>1</sup> Of the 80 organizational cases, the fine guideline was applied in 31 cases. For the remaining 49 cases, the fine guideline was not applied or data on the application of the fine guidelines were missing. A description of Chapter Eight culpability factors can be found in USSG §8C2.5. Descriptions of variables used in this table are provided in Appendix A.