

**Table O-4****CULPABILITY FACTORS FOR SENTENCED ORGANIZATIONS<sup>1</sup>****Fiscal Year 2025**

<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	3	8.3
Involvement/tolerance in an organization/unit of 1,000+ employees	0	0.0
Involvement/tolerance in an organization/unit of 200+ employees	3	8.3
Involvement/tolerance in an organization/unit of 50+ employees	9	25.0
Involvement/tolerance in an organization/unit of ten or more employees	9	25.0
No involvement/tolerance OR fewer than ten employees	12	33.3
<b>TOTAL</b>	<b>36</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	2	5.6
Organization had no prior record	34	94.4
<b>TOTAL</b>	<b>36</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	36	100.0
<b>TOTAL</b>	<b>36</b>	<b>100.0</b>
<b>Obstruction of Justice - §8C2.5(e)</b>	<b>N</b>	<b>%</b>
Organization obstructed justice	5	13.9
Organization did not obstruct justice	31	86.1
<b>TOTAL</b>	<b>36</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	1	2.8
Organization had no compliance and ethics program	35	97.2
<b>TOTAL</b>	<b>36</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	15	41.7
Accepted responsibility	14	38.9
Organization did not self-report, cooperate, or accept responsibility	7	19.4
<b>TOTAL</b>	<b>36</b>	<b>100.0</b>

<sup>1</sup> Of the 110 organizational cases, the fine guideline was applied in 36 cases. For the remaining 74 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.