

# Financial Crime's Forgotten Statute Is Back

## Publications

February 2026

Partner Andrew Rohrbach and Associate Tanner Lockhead authored an article for the *New York Law Journal* examining the return of 18 U.S.C. § 225 — the "continuing financial crimes enterprise" statute — as a potent tool in federal white-collar prosecutions. The article traces the statute's origins in the 1989 savings and loan crisis, explains its extraordinary penalty structure, and analyzes two recent SDNY indictments that signal its revival after nearly a decade of disuse. Andrew and Tanner note that, under the current Administration's policy of charging the most serious readily provable offense, Section 225 will increasingly shape charging decisions, plea negotiations, and sentencing strategy in major fraud cases.

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Andrew is a partner in Jenner & Block's White Collar Defense & Investigations practice. He represents individuals and companies in high-stakes government investigations, prosecutions, and civil litigation. Prior to joining the firm, Andrew served as an Assistant United States Attorney in the Southern District of New York, where he prosecuted complex fraud and public corruption cases.

Tanner is an associate at Jenner & Block who assists clients in complex commercial, administrative, and constitutional litigation. Before joining the firm, he litigated voting rights and school desegregation cases at the NAACP Legal Defense Fund, including *Allen v. Milligan* at the Supreme Court, and served as Senior Advisor to the United States Special Counsel.

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