

Inside the DOJ Playbook: What the New Whistleblower and Self-Disclosure Policies Mean for Advertisers and Privacy Professionals

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The Department of Justice is sending a clear message to corporate America: the rules of engagement on enforcement have changed. For companies operating in the advertising and data privacy space — where regulatory scrutiny from the FTC, state attorneys general, and now the DOJ increasingly overlaps — these developments demand immediate attention.

With the Antitrust Division's launch of its first-ever whistleblower rewards program, revisions to corporate self-disclosure policies, and a renewed emphasis on cooperation credit across all white-collar enforcement areas, companies that handle consumer data, make advertising claims, or engage in competitive marketing practices face heightened exposure. A complaint that begins as an advertising or privacy matter can quickly escalate into a federal investigation involving allegations of fraud, anticompetitive conduct, or obstruction — particularly where self-regulatory missteps compound underlying compliance failures.

Why This Matters for the Ad Law and Privacy Community

Advertising and privacy professionals are no strangers to multi-agency enforcement. The same conduct that draws an FTC inquiry can attract DOJ attention when it involves deceptive practices at scale, data-sharing arrangements with anticompetitive dimensions, or misleading claims that cross the line into criminal fraud. The DOJ's updated policies now create powerful new incentives for insiders to blow the whistle — and powerful new risks for companies that delay self-disclosure when problems surface.

For in-house counsel and compliance officers managing advertising review processes, privacy programs, or internal investigations triggered by consumer complaints, understanding how the DOJ evaluates corporate cooperation and exercises prosecutorial discretion is no longer optional — it's essential.

Join Us for a Webinar

Kelley Drye Partners [Sean M. Farrell](#) and [Thomas F. Rybarczyk](#) — both former senior federal prosecutors — will offer an inside look at how the DOJ evaluates corporate conduct and determines

cooperation credit in a webinar titled *"Inside the DOJ Playbook: New Guidance on Whistleblowers, Leniency, and Self-Disclosure."* The discussion will be moderated by White Collar Partner [Sandra L. Musumeci](#).

Sean served as Chief of the Antitrust Division's New York Office and helped shape its whistleblower and compliance programs. Tom served as Chief of the Public Corruption and Civil Rights Section in the U.S. Attorney's Office in Los Angeles, focused on prosecuting public corruption and fraud. Together, they will draw on firsthand experience to provide practical guidance for companies navigating internal investigations and high-stakes enforcement matters.

Topics will include:

- How the DOJ evaluates self-disclosure and corporate cooperation
- Practical implications of the Antitrust Division's whistleblower and leniency programs
- Strategies for navigating multi-agency and multi-jurisdictional investigations
- What current DOJ enforcement priorities mean for compliance programs and risk management

Who Should Attend

This program is designed for in-house counsel, chief compliance officers, litigation and regulatory practitioners, and anyone advising organizations on government investigations, enforcement risk, and corporate compliance — including those managing advertising and privacy compliance programs where enforcement risk increasingly intersects with DOJ priorities.

[Register here.](#)