

Sean Farrell Quoted in GCR on Whistleblower Program's Impact

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Partner [Sean Farrell](#) was quoted in the *Global Competition Review* (GCR) article, "'Tragic Lack of Whistleblower Protections': FTC Official." The article covers remarks by senior Federal Trade Commission and DOJ Antitrust Division officials at the [Chicago Competition Law Forum](#) at the University of Chicago, focusing on the absence of statutory whistleblower protections at the FTC and the impact of the DOJ's whistleblower rewards program on antitrust enforcement.

Sean spoke about how the DOJ's whistleblower program, launched in July 2025, is already changing how companies approach self-reporting. Drawing on his experience as the former chief of the Antitrust Division's New York office, Sean noted a marked increase in leniency applications after the program's rollout. "This is anecdotal, but I was the chief of the New York office for about three years. The whistleblower program was rolled out in July 2025. Prior to July 2025, while I was in that role, we probably got one or two agency markers that came our way," he said. The program triggered "three very substantial leniency markers" in his final eight months at the DOJ.

Sean said the program is compelling companies to reconsider the timing of self-reporting. "That anecdotal evidence suggests to me that companies now have to take very seriously... the calculus of whether and when to come in," he said. "This seems to be bending the curve for companies that are deciding not to sit on things and to come in, and I think that's a good thing."

Sean also cautioned that whistleblowers can present challenges in litigation, particularly when a witness has a financial reward on the line. "They are going to get cross-examined on the fact that they have a financial incentive in the outcome of the case," he said. "And that could be a very compelling line of cross-examination."

Read the full article [here](#) (subscription required).