

BAPCPA Table 9X.

U.S. Bankruptcy Courts—FRBP 9011 Sanctions Against Attorneys of Individual Debtors in Nonbusiness Bankruptcy Cases Closed under All Chapters During the 12-Month Period Ending December 31, 2025, as Required by 28 U.S.C. 159(c)

| Circuit and District | Cases | | | Total Damages Awarded (in \$000s) |
|----------------------|----------------|----------------|----------------------|--------------------------------------|
| | Total | With Sanctions | With Damages Awarded | |
| Total | 516,714 | 5 | 3 | 22 |
| DC | 411 | 0 | 0 | 0 |
| 1st | 12,924 | 0 | 0 | 0 |
| ME | 544 | 0 | 0 | 0 |
| MA | 4,765 | 0 | 0 | 0 |
| NH | 867 | 0 | 0 | 0 |
| RI | 972 | 0 | 0 | 0 |
| PR | 5,776 | 0 | 0 | 0 |
| 2nd | 23,811 | 0 | 0 | 0 |
| CT | 3,502 | 0 | 0 | 0 |
| NY,N | 3,858 | 0 | 0 | 0 |
| NY,E | 9,282 | 0 | 0 | 0 |
| NY,S | 4,605 | 0 | 0 | 0 |
| NY,W | 2,328 | 0 | 0 | 0 |
| VT | 236 | 0 | 0 | 0 |
| 3rd | 26,998 | 0 | 0 | 0 |
| DE | 1,498 | 0 | 0 | 0 |
| NJ | 12,316 | 0 | 0 | 0 |
| PA,E | 4,927 | 0 | 0 | 0 |
| PA,M | 3,577 | 0 | 0 | 0 |
| PA,W | 4,675 | 0 | 0 | 0 |
| VI | 5 | 0 | 0 | 0 |
| 4th | 41,417 | 0 | 0 | 0 |
| MD | 11,013 | 0 | 0 | 0 |
| NC,E | 4,309 | 0 | 0 | 0 |
| NC,M | 2,349 | 0 | 0 | 0 |
| NC,W | 2,211 | 0 | 0 | 0 |
| SC | 4,875 | 0 | 0 | 0 |
| VA,E | 11,569 | 0 | 0 | 0 |
| VA,W | 3,572 | 0 | 0 | 0 |
| WV,N | 675 | 0 | 0 | 0 |
| WV,S | 844 | 0 | 0 | 0 |

BAPCPA Table 9X. (December 31, 2025—Continued)

| Circuit and District | Cases | | | Total Damages Awarded (in \$000s) |
|----------------------|----------------|----------------|----------------------|--------------------------------------|
| | Total | With Sanctions | With Damages Awarded | |
| Total | 516,714 | 5 | 3 | 22 |
| 5th | 48,829 | 3 | 2 | 14 |
| LA,E | 2,149 | 3 | 2 | 14 |
| LA,M | 1,119 | 0 | 0 | 0 |
| LA,W | 5,069 | 0 | 0 | 0 |
| MS,N | 4,007 | 0 | 0 | 0 |
| MS,S | 4,992 | 0 | 0 | 0 |
| TX,N | 10,728 | 0 | 0 | 0 |
| TX,E | 5,280 | 0 | 0 | 0 |
| TX,S | 8,433 | 0 | 0 | 0 |
| TX,W | 7,052 | 0 | 0 | 0 |
| 6th | 77,152 | 0 | 0 | 0 |
| KY,E | 5,294 | 0 | 0 | 0 |
| KY,W | 5,399 | 0 | 0 | 0 |
| MI,E | 16,870 | 0 | 0 | 0 |
| MI,W | 3,341 | 0 | 0 | 0 |
| OH,N | 13,868 | 0 | 0 | 0 |
| OH,S | 11,429 | 0 | 0 | 0 |
| TN,E | 7,012 | 0 | 0 | 0 |
| TN,M | 5,156 | 0 | 0 | 0 |
| TN,W | 8,783 | 0 | 0 | 0 |
| 7th | 50,456 | 1 | 1 | 8 |
| IL,N | 20,411 | 1 | 1 | 8 |
| IL,C | 2,524 | 0 | 0 | 0 |
| IL,S | 1,785 | 0 | 0 | 0 |
| IN,N | 6,587 | 0 | 0 | 0 |
| IN,S | 9,310 | 0 | 0 | 0 |
| WI,E | 7,181 | 0 | 0 | 0 |
| WI,W | 2,658 | 0 | 0 | 0 |

BAPCPA Table 9X. (December 31, 2025—Continued)

| Circuit and District | Cases | | | Total Damages Awarded (in \$000s) |
|----------------------|----------------|----------------|----------------------|--------------------------------------|
| | Total | With Sanctions | With Damages Awarded | |
| Total | 516,714 | 5 | 3 | 22 |
| 8th | 32,613 | 0 | 0 | 0 |
| AR ¹ | 6,622 | 0 | 0 | 0 |
| IA,N | 1,314 | 0 | 0 | 0 |
| IA,S | 1,997 | 0 | 0 | 0 |
| MN | 9,181 | 0 | 0 | 0 |
| MO,E | 5,786 | 0 | 0 | 0 |
| MO,W | 4,048 | 0 | 0 | 0 |
| NE | 2,578 | 0 | 0 | 0 |
| ND | 533 | 0 | 0 | 0 |
| SD | 554 | 0 | 0 | 0 |
| 9th | 89,404 | 0 | 0 | 0 |
| AK | 189 | 0 | 0 | 0 |
| AZ | 12,266 | 0 | 0 | 0 |
| CA,N | 5,882 | 0 | 0 | 0 |
| CA,E | 11,426 | 0 | 0 | 0 |
| CA,C | 26,269 | 0 | 0 | 0 |
| CA,S | 5,189 | 0 | 0 | 0 |
| HI | 1,072 | 0 | 0 | 0 |
| ID | 2,216 | 0 | 0 | 0 |
| MT | 709 | 0 | 0 | 0 |
| NV | 8,170 | 0 | 0 | 0 |
| OR | 7,346 | 0 | 0 | 0 |
| WA,E | 2,212 | 0 | 0 | 0 |
| WA,W | 6,424 | 0 | 0 | 0 |
| GU | 34 | 0 | 0 | 0 |
| NMI | 0 | 0 | 0 | 0 |
| 10th | 27,830 | 0 | 0 | 0 |
| CO | 8,047 | 0 | 0 | 0 |
| KS | 3,806 | 0 | 0 | 0 |
| NM | 1,553 | 0 | 0 | 0 |
| OK,N | 1,783 | 0 | 0 | 0 |
| OK,E | 1,077 | 0 | 0 | 0 |
| OK,W | 4,115 | 0 | 0 | 0 |
| UT | 6,952 | 0 | 0 | 0 |
| WY | 497 | 0 | 0 | 0 |

BAPCPA Table 9X. (December 31, 2025—Continued)

| Circuit and District | Cases | | | Total Damages Awarded (in \$000s) |
|----------------------|----------------|----------------|----------------------|--------------------------------------|
| | Total | With Sanctions | With Damages Awarded | |
| Total | 516,714 | 5 | 3 | 22 |
| 11th | 84,869 | 1 | 0 | 0 |
| AL,N | 9,283 | 0 | 0 | 0 |
| AL,M | 5,472 | 0 | 0 | 0 |
| AL,S | 3,607 | 0 | 0 | 0 |
| FL,N | 2,116 | 0 | 0 | 0 |
| FL,M | 21,991 | 0 | 0 | 0 |
| FL,S | 13,642 | 0 | 0 | 0 |
| GA,N | 19,316 | 1 | 0 | 0 |
| GA,M | 5,707 | 0 | 0 | 0 |
| GA,S | 3,735 | 0 | 0 | 0 |

NOTE: Federal Rule Of Bankruptcy Procedure (FRBP) 9011(C) provides for the imposition of sanctions upon attorneys, law firms, or parties that violate FRBP 9011(B) representations to the court. Data are for cases filed on or after October 17, 2006, and closed during the reporting period. Nonbusiness debt includes consumer debt, as defined in Section 101 of the U.S. Bankruptcy code, and other debt that the debtor indicates is not consumer debt or business debt. The United States territorial courts assume the jurisdiction of United States bankruptcy courts within their respective territories, which do not have separate bankruptcy courts.

¹ The United States Bankruptcy Court for Arkansas (AR) includes both the Eastern and Western Districts of Arkansas.