



Financial Crimes Enforcement Network  
U.S. Department of the Treasury

Washington, D.C. 20220

## FREQUENTLY ASKED QUESTIONS

**Issued: June 25, 2025**

**Subject: Section 2313a Orders Prohibit Certain Transmittals of Funds Involving CIBanco, Intercam, and Vector**

On June 25, 2025, FinCEN issued three orders, pursuant to 21 U.S.C. 2313a<sup>1</sup> (section 2313a), finding, respectively, CIBanco S.A., Institución de Banca Multiple (CIBanco)<sup>2</sup>, Intercam Banco S.A., Institución de Banca Multiple (Intercam)<sup>3</sup>, and Vector Casa de Bolsa, S.A. de C.V. (Vector),<sup>4</sup> to be financial institutions operating outside of the United States that are of primary money laundering concern in connection with illicit opioid trafficking. These orders further impose a prohibition on certain transmittals of funds involving CIBanco, Intercam, or Vector by any covered financial institution (see question 6). These are the first orders issued under section 2313a.

FinCEN expects covered financial institutions to: (1) implement procedures to ensure compliance with the terms of the orders; and (2) exercise reasonable due diligence to prevent engaging in transmittals of funds involving CIBanco, Intercam, or Vector.

To assist covered financial institutions in complying with the orders, FinCEN is publishing this list of frequently asked questions (FAQs). These FAQs are applicable only to these orders and should not be construed to apply to any other regulation or order issued by FinCEN. Terms used but not otherwise defined herein have the meaning set forth in the orders. For additional questions, please contact the FinCEN Resource Center at [www.fincen.gov/contact](https://www.fincen.gov/contact).

### 1) What is section 2313a?

In 2024, Congress enacted the FEND Off Fentanyl Act,<sup>5</sup> which, among other things, added 21 U.S.C. 2313a. Section 2313a grants the Secretary of the Treasury (Secretary) the authority to make a finding that “reasonable grounds exist for concluding” that any of the following is of primary money laundering concern in connection with illicit opioid trafficking:

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<sup>1</sup> Section 2313a codifies section 7213A of the Fentanyl Sanctions Act, as amended by section 3201(a) of the FEND Off Fentanyl Act (Division E, Title II, section 3201(a) of Public Law 118-50 (Apr. 24, 2024)).

<sup>2</sup> CIBanco S.A., Institución de Banca Multiple’s website available at <https://www.cibanco.com>.

<sup>3</sup> Intercam Banco S.A., Institución de Banca Multiple’s website available at <https://www.intercam.com.mx>.

<sup>4</sup> Vector Casa de Bolsa, S.A. de C.V.’s website available at <https://www.vector.com.mx/en>.

<sup>5</sup> The FEND Off Fentanyl Act is Division E of Public Law 118-50 (Apr. 24, 2024).

- (i) One or more financial institutions operating outside of the United States;
- (ii) One or more classes of transactions within, or involving, a jurisdiction outside of the United States; or
- (iii) One or more types of accounts within, or involving, a jurisdiction outside of the United States.<sup>6</sup>

Upon making such a finding, the Secretary is authorized to require domestic financial institutions and domestic financial agencies to take certain “special measures.” The six special measures are safeguards that may be employed to defend the United States financial system from money laundering risks connected to illicit opioid trafficking.<sup>7</sup> The Secretary may impose one or more of these special measures to protect the U.S. financial system from such threats. The authority of the Secretary to administer section 2313a has been delegated to FinCEN.<sup>8</sup>

Actions pursuant to section 2313a may be in the form of orders, regulations, or as otherwise permitted by law.

The full statute can be found here: [21 U.S.C. 2313a](#).

## **2) How is section 2313a different from section 311 of the USA PATRIOT Act?**

Both authorities grant Treasury important tools for combatting financial institutions, classes of transactions, or types of accounts found to be of primary money laundering concern. However, section 2313a specifically focuses on money laundering in connection with illicit opioid trafficking. In doing so, this powerful authority authorizes Treasury to impose a broader set of special measures than section 311—including prohibiting or placing conditions on transmittals of funds—and allows Treasury to take action via order.

## **3) Is a section 2313a order criminal in nature?**

No, section 2313a orders are civil orders, not criminal prosecutions or any other exercise of criminal or prosecutorial authority. Section 2313a vests FinCEN with the authority to make certain findings that CIBanco, Intercam, and Vector are of a primary money laundering concern to the United States and to impose certain restrictions and conditions on financial institutions and their interactions with these entities. These 2313a orders do not impose any criminal penalties on CIBanco, Intercam, or Vector.

## **4) Why wasn’t there a proposed rulemaking for CIBanco, Intercam, or Vector?**

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<sup>6</sup> 21 U.S.C. 2313a(a).

<sup>7</sup> 21 U.S.C. 2313a(a)(1) explicitly references the “the special measures provided for in section 9714(a)(1) of the National Defense Authorization Act for Fiscal Year 2021 (Public Law 116–283; 31 U.S.C. 5318A note) (section 9714). Section 9714, in turn, references the five special measures set out in 31 U.S.C. 5318A(b)(1)-(5).

<sup>8</sup> See Treasury Order 101-05, 31 U.S.C. 321(b).

As noted above, section 2313a expressly authorizes Treasury to utilize this authority via the issuance of an order. FinCEN determined that, given the threat to the U.S. financial system posed by CIBanco, Intercam, and Vector, issuing orders with a 21-day implementation window was appropriate.

**5) What are these financial institutions and what services do they provide?**

For the purposes of the CIBanco order, CIBanco is defined as CIBanco S.A, Institución de Banca Múltiple, a Mexico-based commercial bank, and its branches, subsidiaries, and offices located in Mexico. Any branches, subsidiaries, and offices of CIBanco S.A, Institución de Banca Múltiple, operating outside of Mexico, including any such branches, subsidiaries, and offices located in the United States, are expressly excluded from the definition of “CIBanco” for the purposes of this order.

By its own account, CIBanco provides various banking products and services, including term deposits in U.S. dollars (USD), certificates of deposit, money market instruments, checking accounts, car loans, business credit, and credit cards. It also provides foreign trade, trust, investment, securities, and currency exchange services.

For the purposes of the Intercam order, Intercam is defined as Intercam Banco S.A., Institución de Banca Múltiple, a Mexico-based commercial bank, and its subsidiaries, branches, and offices located in Mexico. Any branches, subsidiaries, and offices of Intercam Banco S.A., Institución de Banca Múltiple, operating outside of Mexico, including any such branches, subsidiaries, and offices located in the United States, are expressly excluded from the definition of “Intercam” for the purposes of this order.

By its own account, Intercam offers various financial services, including international banking, foreign exchange, insurance, investment services, and import and export services.

For the purposes of the Vector order, Vector is defined as Vector Casa de Bolsa, S.A. de C.V., a Mexico-based brokerage firm, and its subsidiaries, branches, and offices located in Mexico. Any branches, subsidiaries, and offices of Vector Casa de Bolsa, S.A. de C.V. operating outside of Mexico, including any such branches, subsidiaries, and offices located in the United States, are expressly excluded from the definition of “Vector” for purposes of this order.

By its own account, Vector offers various financial services including, but not limited to, mutual fund management, money market, foreign exchange, investment banking, corporate finance, and fiduciary services.

**6) How are CIBanco, Intercam, and Vector tied to fentanyl?**

Through information available to FinCEN, CIBanco, Intercam, and Vector were determined to have played vital roles in facilitating money laundering activities of Mexico-based cartels engaging in illicit opioid trafficking, including facilitating payments for the procurement of precursor chemicals essential for the production of illicit opioids by drug trafficking

organizations (DTOs), some of which were also designated this February as Foreign Terrorist Organizations (FTOs).<sup>9</sup>

For further details concerning CIBanco, Intercam, and Vector's activities relating to the trafficking of illicit narcotics, including fentanyl, see the orders at the FinCEN.gov website.

**7) What is a covered financial institution?**

For the purpose of the orders, FinCEN has determined that a covered financial institution would be any domestic financial institution as defined in 31 CFR 1010.100(t).

**8) How should covered financial institutions interpret the section 2313a orders?**

The orders become effective 21 days after the orders are published in the *Federal Register*. By that date, covered financial institutions should: (1) cease any and all transmittals of funds, from or to CIBanco, Intercam, or Vector, as defined in the orders; and (2) consider the finding of primary money laundering concern regarding CIBanco, Intercam, and Vector when complying with their other Bank Secrecy Act obligations, including any applicable obligations to establish and maintain anti-money laundering and countering the financing of terrorism (AML/CFT) compliance programs.

FinCEN recommends that covered financial institutions continue to implement appropriate AML/CFT procedures and systems, including traditional compliance screening to identify customers and determine their involvement in a transmittal of funds involving CIBanco, Intercam, or Vector.

**9) What is the penalty if FinCEN finds that a covered financial institution is continuing to transact with CIBanco, Intercam, or Vector in a manner prohibited by the orders?**

21 U.S.C. 2313a(d) provides that the penalties set forth in 31 U.S.C. 5321 and 5322 that apply to violations of special measures imposed under section 9714 of the Combatting Russian Money Laundering Act (Public Law 116-283) will apply to violations of any order, regulation, special measure, or other requirement imposed by a section 2313a action, in the same manner and to the same extent as described in sections 5321 and 5322.

**Civil penalties:** FinCEN may impose a civil money penalty in an amount equal to not less than two times the amount of the transaction, but not more than \$1,776,364 (as of today's date), on any covered financial institution that violates a section 2313a order. See [31 CFR 1010.821](#) (civil penalty inflationary adjustment table).

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<sup>9</sup> Department of State, *Foreign Terrorist Organization Designations of Tren de Aragua, Mara Salvatrucha, Cartel de Sinaloa, Cartel de Jalisco Nueva Generación, Carteles Unidos, Cartel del Noreste, Cartel del Golfo, and La Nueva Familia Michoacana*, 90 FR 10030 (Feb. 20, 2025), <https://www.federalregister.gov/d/2025-02873>; see 8 U.S.C. 1189(a)(1).

**Criminal penalties:** A covered financial institution that willfully violates a section 2313a order may also be subject to a criminal fine in an amount equal to not less than two times the amount of the transaction, but not more than \$1,000,000.

**10) Do these orders apply to historical transactions? Do covered financial institutions need to “reject” funds received before the orders’ effective dates?**

No. Covered financial institutions are only responsible for applying the orders to transactions that occur after the orders are effective. To ensure orderly implementation, FinCEN will delay the effective dates of these orders for 21 days from their publication to allow covered financial institutions time to adapt business practices to respond and comply (*i.e.*, a “wind down period” which FinCEN has allowed for in previous actions).

**11) Are covered financial institutions required to file a Suspicious Activity Report (SAR) when they identify and/or send funds back to CIBanco, Intercam, or Vector?**

Once they become effective, the orders authorize the rejection of transmittals of funds from CIBanco, Intercam, or Vector, but do not impose a new SAR reporting obligation or otherwise alter existing SAR reporting obligations. Consistent with existing SAR reporting obligations, covered financial institutions may consider, as warranted and appropriate, CIBanco, Intercam, and Vector’s identification as being of primary money laundering concern in connection with illicit opioid trafficking.

If a SAR is filed on CIBanco, Intercam, or Vector transactional activity, in Field 2 (Filing Institution Note to FinCEN) of the SAR format, FinCEN requests that covered financial institutions enter “CIBanco2313a FIN-2025”, “Intercam2313a FIN-2025”, and “Vector2313a FIN-2025” as appropriate.

As a reminder, certain financial institutions operating in the United States are required to file with FinCEN, to the extent and in the manner required by 31 CFR Chapter X, a report of any suspicious transaction relevant to a possible violation of law or regulation. Financial institutions required to file a SAR include but are not limited to: Banks (31 CFR 1020.320); Casinos and Card Clubs (31 CFR 1021.320); Money Services Businesses (31 CFR 1022.320); Brokers or Dealers in Securities (31 CFR 1023.320); Mutual Funds (31 CFR 1024.320); and Futures Commission Merchants and Introducing Brokers in Commodities (31 CFR 1026.320).

You can find additional information on BSA filing requirements at:

<https://bsaefiling.fincen.treas.gov/docs/FinCENSARElectronicFilingRequirements.pdf>

**12) What types of information would be useful in a SAR related to CIBanco, Intercam, or Vector?**

Transactional information specifically related to CIBanco, Intercam, or Vector, including the customer information related to the transaction(s) involving CIBanco, Intercam, or Vector to include name(s), identification numbers, phone numbers, physical address, and any other activity identified with that customer, would be useful in a SAR.

Please see FinCEN's advisory (FIN-2024-A002) outlining various typologies associated with the procurement of fentanyl precursor chemicals and manufacturing equipment at the following link: <https://www.fincen.gov/sites/default/files/advisory/2024-06-20/FinCEN-Supplemental-Advisory-on-Fentanyl-508C.pdf>