

# Financial Crimes Enforcement Network (FinCEN)

## Year in Review for Fiscal Year 2025



The mission of the Financial Crimes Enforcement Network is to safeguard the financial system from illicit activity, counter money laundering and the financing of terrorism, and promote national security through strategic use of financial authorities and the collection, analysis, and dissemination of financial intelligence.

**Y I R**  
FY2025

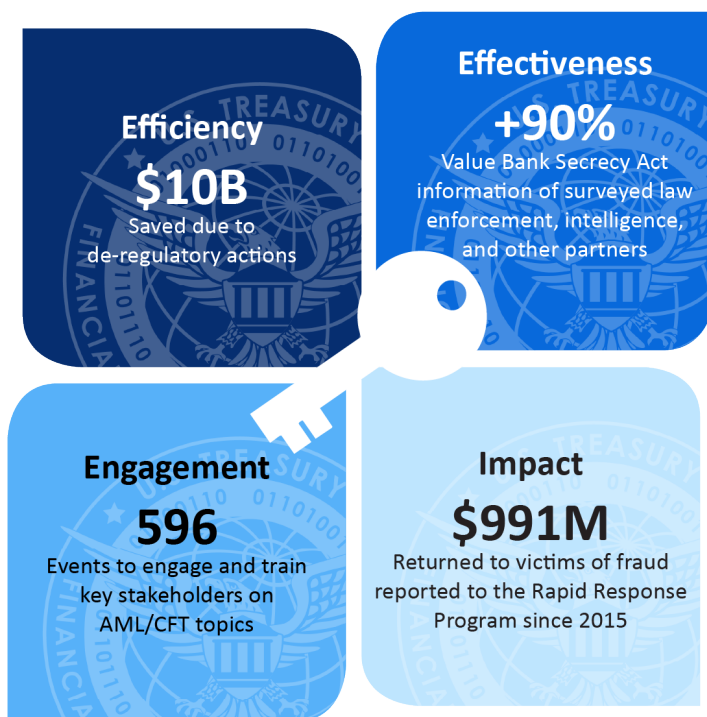


# FinCEN Year in Review for FY 2025

## Financial Crimes Enforcement Network (FinCEN) Year in Review for FY 2025

In FY25, FinCEN leveraged its tools to advance the Administration’s highest national security and law enforcement priorities and protect the lives and livelihoods of the American people, including countering cartels and drug trafficking; imposing maximum pressure on Iran; fighting child sexual exploitation; and combating fraud. In parallel, FinCEN has also worked to modernize the U.S. anti-money laundering and countering the financing of terrorism (AML/CFT) regime and support the Department of the Treasury’s efforts to promote the responsible growth and use of digital assets.

### Key FY25 Accomplishments



## Stolen Funds are Returned to Victims

Through the Rapid Response Program, FinCEN partners with law enforcement and leverages its authority to share financial intelligence rapidly with counterpart financial intelligence units (FIUS) to help victims and their financial institutions recover funds stolen through cyber-enabled financial crime schemes, including business e-mail compromise.

### Rapid Response Program FY25

- 392 total referrals with 320 on behalf of individuals
- 815 financial transactions from referrals with 320 from individuals and 495 from businesses
- 96 foreign jurisdictions across the globe received fraud proceeds and worked with FinCEN since 2015
- More than \$1.76B frozen and \$991M returned since 2015
- Over \$362.6M reported to the RRP in FY25, with \$182.2M (50%) frozen by partners in FY25
- \$95.5.M out of the \$182.2M that was frozen was returned to victims in FY25



# FinCEN Year in Review for FY 2025

Funds that were frozen by partners had a breakdown of the below major crime typologies:

TYOPOLOGY	DOLLARS FROZEN
Business Email Compromise	\$90,954,662.26
Investment Fraud	\$39,862,914.56
Account Takeover	\$21,121,807.94
Phone Scam	\$18,577,595.74
Spoofing and Phishing	\$9,729,223.64
Other	\$1,955,975.16

## Advisories and Trend Analyses Alert the Public

FinCEN, through its [Advisory Program](#), communicates priority money laundering, terrorist financing, and other illicit finance threats and vulnerabilities to the U.S. financial system. Financial institutions may use this information to support effective, risk-based, and reasonably designed AML/CFT programs and suspicious activity monitoring systems to help generate highly useful information for law enforcement and national security agencies.

FinCEN periodically publishes [Financial Trend Analyses \(FTAs\)](#) describing threat pattern and trend information derived from BSA filings. These reports highlight priority illicit finance risks and the value of information filed by financial institutions in accordance with the BSA and are issued pursuant to section 6206 of the Anti-Money Laundering Act of 2020.

Together, the products published in FY25 provided the public with information on a number of key priority threats, including cartels, Iran, Chinese money laundering networks, fentanyl, terrorism financing, and fraud.

**FinCEN ADVISORY**  
June 6, 2025  
FIN-2025-A002

**FinCEN Advisory on the Iranian Regime's Illicit Oil Smuggling Activities, Shadow Banking Networks, and Weapons Procurement Efforts**

**Introduction**

The U.S. Department of the Treasury's (Treasury) Financial Crimes Enforcement Network (FinCEN) is issuing this Advisory to assist U.S. financial institutions in identifying and reporting potential sanctions evasion and other suspicious activity related to the Islamic Republic of Iran (Iran). On February 4, 2025, President Trump issued National Security Presidential Memorandum (NSPM-2) announcing a maximum pressure campaign against Iran with the goals of denying Iran nuclear weapons and intercontinental ballistic missiles (ICBMs), countering its development of other weapons capabilities, neutralizing Iran's network and campaign of regional aggression, and disrupting, degrading, and denying Iran, including the Islamic Revolutionary Guard Corps (IRGC), and its terrorist proxies, access to the resources that sustain their destabilizing activities.<sup>1</sup>

To support the implementation of NSPM-2, Treasury's Office of Foreign Assets Control (OFAC) has issued several rounds of designations targeting Iranian oil exports (including illicit use of oil smuggling vessels), which are a significant revenue stream for the regime and its terrorist proxies, and Iranian weapons proliferation.<sup>2</sup> This Advisory supports the U.S. maximum pressure campaign against Iran and replaces FinCEN's 2018 Advisory on the Iranian Regime's Illicit Activities.<sup>3</sup> As such, it provides updated red flags and information on current trends and typologies for Iranian sanctions evasion and other illicit activity, including oil smuggling, "shadow banking" networks, and weapons procurement. It is being issued concurrent with OFAC's June 6 sanctions action, the first such action targeting an Iranian "shadow banking" network since the issuance of NSPM-2.<sup>4</sup>

This Advisory is also consistent with FinCEN's National Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) Priorities, which include terrorist financing and proliferation financing, as well as Treasury's 2024 National Terrorist Financing Risk Assessment and 2024 National Proliferation Financing Risk Assessment.<sup>5</sup>

The information contained in this Advisory is derived from FinCEN's analysis of Bank Secrecy Act (BSA) data, open-source reporting, and information provided by law enforcement partners.

FINANCIAL CRIMES ENFORCEMENT NETWORK

**Financial Trend Analysis**

**Fentanyl-Related Illicit Finance: 2024 Threat Pattern & Trend Information**

April 2025

**FinCEN ALERT**

FIN-2024-A10004 November 13, 2024

**FinCEN Alert on Fraud Schemes Involving Deepfake Media Targeting Financial Institutions**

**Suspicious Activity Report (SAR) Filing Request:**

FinCEN requests that financial institutions reference the alert in SAR field 2 (Filing Institution Note to FinCEN) and the narrative by including the key term "FIN-2024-DEEPFAKES/FRAUD".

The U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) is issuing this alert to help financial institutions identify fraud schemes associated with the use of deepfake media created with generative artificial intelligence (GenAI) tools. This alert explains typologies associated with these schemes, provides red flag indicators to assist with identifying and reporting related suspicious activity, and reminds financial institutions of their reporting requirements under the Bank Secrecy Act (BSA). This alert is also part of the U.S. Department of the Treasury's broader effort to provide financial institutions with information on the opportunities and challenges that may arise from the use of AI.<sup>1</sup>

Beginning in 2023 and continuing in 2024, FinCEN has observed an increase in suspicious activity reporting by financial institutions describing the suspected use of deepfake media in fraud schemes targeting their institutions and customers. These schemes often involve criminals altering or creating fraudulent identity documents to circumvent identity verification and authentication methods.<sup>2</sup> The potential for deepfake media to be used in fraud schemes is one of several risks associated with

1. See 31 U.S.C. § 532(a)(2); 31 CFR § 101.1003.  
2. Deepfake media, or "deepfakes," are a type of synthetic content that use artificial intelligence/machine learning to create realistic but fraudulent videos, images, audio, and text. (See Department of Homeland Security (DHS), "Increasing Threat of Deepfake Identifiers" ("DHS report").) As noted further by DHS, the threat of deepfake and synthetic media comes not from the technology used to create it, but from people's natural inclination to believe what they see, and as a result, deepfakes and synthetic media do not need to be particularly accurate or believable to be effective in spreading misinformation or disinformation.  
3. Artificial intelligence is a machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations, or decisions without being explicitly programmed. The term "generative AI" means the class of AI models that simulate the structure and characteristics of input data in order to generate desired synthetic content. This can include images, videos, audio, text, and other digital content. See White House, "Executive Order on Artificial Intelligence and Trustworthy Development and Use of Artificial Intelligence," (Oct. 30, 2023) ("E.O. 14176").  
4. U.S. Department of the Treasury (Treasury), "Treasury and Artificial Intelligence."  
5. Identity-related operations are a major cybercrime and fraud concern for financial institutions. FinCEN created and published its Identity Financial Trend Analysis in January 2024 that outlines a framework for evaluating regulations of various identity processes of account opening, account access, and closing transactions. See FinCEN, "Financial Trend Analysis: Identity-related Suspicious Activity," (2024, Blockchain, Identity, Case 9, 2024).



## FinCEN Year in Review for FY 2025

FinCEN Products	Publication Date
<a href="#">Notice: Financially Motivated Sextortion</a>	9/8/2025
<a href="#">Advisory: Use of Chinese Money Laundering Networks by Mexico-Based Transnational Criminal</a>	8/28/2025
<a href="#">Financial Trend Analysis: Chinese Money Laundering Networks: 2020 - 2024 Threat Pattern &amp; Trend Information</a>	8/28/2025
<a href="#">Notice: Use of Convertible Virtual Currency Kiosks for Scam Payments and Other Illicit Activity</a>	8/4/2025
<a href="#">Advisory: Iranian Regime's Illicit Oil Smuggling Activities, Shadow Banking Networks, and Weapons Procurement Efforts</a>	6/6/2025
<a href="#">Alert: Oil Smuggling Schemes on the U.S. Southwest Border Associated with Mexico-Based Cartels</a>	5/1/2025
<a href="#">Financial Trend Analysis: Fentanyl-Related Threat Patterns and Trends in Bank Secrecy Act Reports</a>	4/9/2025
<a href="#">Advisory: Financing of the Islamic State of Iraq and Syria (ISIS) and its Global Affiliates</a>	4/1/2025
<a href="#">Alert: Bulk Cash Smuggling and Repatriation by Mexico-Based Transnational Criminal Organizations</a>	3/31/2025
<a href="#">Alert: Fraud Schemes Abusing FinCEN's Name, Insignia, and Authorities for Financial Gain</a>	12/18/2024
<a href="#">Alert: Fraud Schemes Involving Deepfake Media Targeting Financial Institutions</a>	11/13/2024
<a href="#">Alert to Financial Institutions to Counter Financing of Hizballah and its Terrorist Activities</a>	10/23/2024



# FinCEN Year in Review for FY 2025

## FinCEN's Unique Authorities Protect the U.S. Financial System

### Enforcement

FinCEN maintains overall authority for enforcement of the BSA and conducts investigations of financial institutions, non-financial trades and businesses, and individuals for engaging in violations of the BSA.

FinCEN has administered a whistleblower program since 2021 that plays an important role in protecting the integrity of the U.S. financial system. The program offers financial incentives and protections to encourage individuals to provide information related to violations of the BSA and other authorities. FinCEN recently issued a Notice of Proposed Rulemaking (NPRM) for Whistleblower Incentives and Protections, to fully implement the whistleblower program. Whistleblowers will be invited to submit award applications after the final rule is implemented.

- 198 new whistleblower tips, complaints and referrals evaluated in FY25
- Over \$1.3B in civil money penalties in FY25

Civil Money Penalties Issued in FY25	Date	Type of Financial Institution
<a href="#">In the Matter of Brink's Global Services USA, Inc.</a>	01/31/2025	Money Services Business
<a href="#">In the Matter of Sahara Dunes Casino, LP d/b/a Lake Elsinore Hotel and Casino</a>	10/22/2024	Card Club
<a href="#">In the Matter of TD Bank, N.A. and TD Bank USA, N.A.</a>	10/10/2024	Depository Institution

### Special Measures

Through section 311 of the USA PATRIOT Act (31 U.S.C. 5318A); 21 U.S.C. 2313a, which codifies 7213A of the FEND OFF Fentanyl Act; and section 9714 of the Combating Russian Money Laundering Act (31 U.S.C. 5318A note), FinCEN may impose certain "special measures" to address "primary money laundering concerns."

Name	Type of Action	Location	Date
<a href="#">Huione Group</a>	311	Cambodia	10/14/2025
<a href="#">CIBanco S.A., Institucion de Banca Multiple (CIBanco)</a>	2313a	Mexico	6/25/2025
<a href="#">Institución de Banca Multiple (Intercam)</a>	2313a	Mexico	6/25/2025
<a href="#">Vector Casa de Bolsa, S.A. de C.V. (Vector)</a>	2313a	Mexico	6/25/2025



## FinCEN Year in Review for FY 2025

### Public-Private Partnerships and Information Sharing Encourage Innovation and Coordination

#### Public-Private Partnerships

FinCEN Exchange is a voluntary public-private information sharing partnership among FinCEN, law enforcement agencies, national security agencies, financial institutions, and other private sector entities to enhance coordination, communication, and feedback in the fight against financial crime. The program serves as one of the critical feedback loops between the U.S. government and financial institutions, enhancing the two-way flow of information between the public and private sectors. (<https://www.fincen.gov/resources/fincen-exchange>)

#### **COMMAND: Combating and Obstructing Money Movements Associated with Narcotics and Drug Trafficking Organizations.**

In July 2025, FinCEN launched this new FinCEN Exchange series supporting [Executive Order 14157](#), which designates cartels and other organizations as foreign terrorist organizations and specially designated global terrorists. FinCEN held meetings in McAllen and El Paso, Texas, presenting on fentanyl-related activity, including potential links to trade-based money laundering, along the southwest border, and traveled to a key port of entry in El Paso to meet with local, state, and federal law enforcement.

#### **PROTECT: Promoting Regional Outreach to Educate Communities on the Threat of Fentanyl.**

In FY25 FinCEN continued its partnership with Internal Revenue Service Criminal Investigation (IRS-CI) and held 3 additional FinCEN Exchange events in the PROTECT series. These events took place in U.S. cities highly impacted by the opioid epidemic and convened U.S. law enforcement including IRS-CI, the U.S. Postal Inspection Service, the U.S. Secret Service, the Department of Justice Money Launder, Narcotics, and Forfeiture Section (formerly, "Money Laundering and Assets Recovery Section"), various U.S. Attorney's Offices, U.S. Customs and Border Protection Services, and state and local law enforcement, and financial institutions.

#### **IMPACT: Iran Maximum Pressure and Counter Terrorism.**

Treasury Secretary Scott Bessent launched the IMPACT FinCEN Exchange series. The first IMPACT FinCEN Exchange event furthered Treasury's role in implementing President Trump's [National Security Presidential Memorandum-2 \(NSPM-2\)](#), the policy of the United States to enact maximum pressure on the Islamic Republic of Iran to end its nuclear threat, curtail its ballistic missile program, and stop its support for terrorist groups. (<https://www.fincen.gov/news/news-releases/treasury-convenes-financial-institutions-law-enforcement-washington-dc-support>)."

*Additional FinCEN Exchange topics included:*

- Fraud
- U.S. Southwest Border Geographic Targeting Order
- Cartels, human trafficking, and fentanyl
- Leveraging technology to promote innovation and address fraud and scam risks

FinCEN also hosted an international PPP event in partnership with Canada's Financial Transactions and Analysis Centre (FINTRAC) bringing together government officials from the United States, Canada,



# FinCEN Year in Review for FY 2025

Australia, and the United Kingdom to discuss key administration priority issues, including Chinese money laundering, fentanyl, human trafficking, and online child sexual exploitation. (<https://www.fincen.gov/news/news-releases/readout-second-annual-fintrac-fincen-symposium-washington-dc>).

## Information Sharing Programs

### Section 314(a) Requests

Section 314(a) enables federal, state, local, and certain foreign law enforcement agencies, through FinCEN, to reach out to financial institutions to locate accounts and transactions of persons that are reasonably suspected based on credible evidence of terrorism or money laundering.

- 1,065 Requests
- 58 Terrorism-related, 1,007 Money Laundering-related requests and 114 Law Enforcement agencies involving 6,883 Subjects
- 13,887 financial institutions, 20,095 points of contact, and 64,259 positive responses

### Section 314(b)

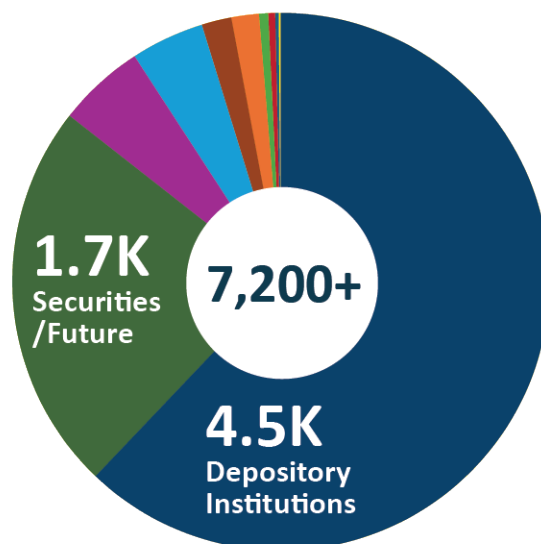
Section 314(b) of the USA PATRIOT Act permits registered financial institutions to share information with one another in order to identify money laundering or terrorist activity, and to report any identified suspicious activity to FinCEN.

## Section 314(b) In FY25

- +7,200 314(b) registered financial institutions
- +1,690 financial institutions referenced 314(b) in SAR narratives
- +65,480 SARs that referenced 314(b)
- +80 terrorism-related SARs referenced 314(b)

The number of 314(b) registered financial institutions

- Depository Institutions: **4,500**
- Securities/Futures: **1,700**
- Money Services Business (MSBs): **380**
- Casino/Card Club: **320**
- Trust Company: **130**
- Insurance Company: **120**
- Loan or Finance Company: **40**
- Commodities/Futures: **30**
- Associations: **15**
- Other: **10**





## FinCEN Year in Review for FY 2025

### *Egmont Information Sharing*

FinCEN routinely shares and receives information with other members of the Egmont Group of Financial Intelligence Units (FIUs), a global network of FIUs, to support investigations of money laundering and other financial crimes at home and abroad.

Egmont Information	FY25
Members of the Egmont Group of FIUs	182
Incoming Requests from Foreign FIUs	1,131
Request Responses	1,115
Outgoing Requests to Foreign FIUs	539
Outgoing Spontaneous Disclosures	359
Incoming Spontaneous Disclosures	888

## Bank Secrecy Act Data Advances Law Enforcement Missions

The financial intelligence contained in Bank Secrecy Act (BSA) reporting that is maintained by FinCEN is a critical source of information used in law enforcement efforts, including investigations and prosecutions of financial crimes, money laundering and predicate offenses, and other illicit activities. FinCEN's law enforcement partners report extensive use of BSA information to generate new leads and advance existing investigations.

In addition to approximately 540 analytical reports that FinCEN provided to law enforcement and other customers in FY25, FinCEN provides select authorized partners with direct access to BSA data in support of official duties, including investigations and prosecutions of criminal activity.

### **Authorized Access to BSA Data in FY25**

- Authorized users conducted over 2.52 million searches using BSA Search, a tool provided by FinCEN, that allows users to access, query, and analyze BSA data. Collectively, 464 federal, state, and local law enforcement, regulatory, and national security agencies have access to BSA Search.
- Additionally, certain federal partners have integrated access to BSA data and conducted over 61.38M searches. Total BSA data searches therefore exceeded 63.9M total searches in FY2025.

### **BSA Training for Law Enforcement**

- 15,300 BSA users trained
- 551 BSA training programs conducted

FinCEN's training team conducted extensive outreach to authorized BSA users to enhance their ability to effectively use BSA information in the course of their duties.



# FinCEN Year in Review for FY 2025

## *Internal Revenue Service Criminal Investigation (IRS-CI)*

In IRS-CI’s BSA Metrics FY25 publication, it identified BSA data as a critical element of its complex cases and in FY25, IRS-CI searched BSA data in 94% of its cases and conducted over 3.9M searches in FY25.<sup>1</sup>

- In FY23-25, an average of 88.6% of IRS-CI investigations recommended for prosecution had one or more BSA filings associated with the primary subject. These cases resulted in:
  - o 98% conviction rate
  - o 42 months avg sentence
  - o Avg asset value of
    - \$799M seized
    - \$454M forfeited
    - \$498M in restitution
- In FY25, 88.6% of IRS-CI cases opened had one or more BSA filings associated with the primary subject, with 79.7% of these cases associated with SARs.
- In FY25, 11.7% of all investigations opened by IRS-CI originated from a BSA filing, with 89.3% of these cases initiated from a SAR and 9.2% initiated from a CTR.
- In FY25, 66.8% of IRS-CI investigations opened had a primary subject associated with a CTR.

## *Federal Bureau of Investigation (FBI)*

The FBI leverages Suspicious Activity Reports (SARs) and Currency Transaction Reports (CTRs), reports submitted to FinCEN pursuant to the BSA (see the glossary for “BSA Reports” and other definitions), in a significant percentage of major cases across priority crime areas.

- In FY25, the FBI arrested 5,957 investigative subjects across case programs (see table below) tied to BSA Reports.
- In FY25, the FBI indicted 4,727 investigative subjects tied to BSA Reports.
- In FY25, 2,795 FBI investigative subjects tied to BSA Reports were convicted.

<b>FBI Case Program</b>	<b>FBI Subjects included in SARs in FY25</b>	<b>SAR Count in FY25</b>	<b>FBI Subjects with CTRs in FY25</b>	<b>CTR Count in FY25</b>	<b>Percentage of Active Investigations linked to SARs/CTRs</b>
Complex Financial Crime Program	5,257	14,167	2,509	11,366	38.8%
International Terrorism Program	279	636	154	506	15.1%
Organized Crime Drug Enforcement Program	1,353	2,173	737	2,262	47.6%
Public Corruption Program	848	1,990	516	2,557	27.4%
Transnational Organized Crime – Foreign Terrorist Organization Program	581	1,166	400	1,627	32.8%

<sup>1</sup> [Publication 6129 \(2-2026\)](#)



# FinCEN Year in Review for FY 2025

## FinCEN’s FY25 BSA Search Performance Measure<sup>2</sup>

Approximately 1,400 BSA Search users completed a user satisfaction survey in FY25:

- 91% of respondents that query BSA data find the resulting financial intelligence valuable to the detection and deterrence of illicit activity
- 92% of respondents found that data supported existing investigations or examinations
- 91% of respondents found that data provided information for investigative or examination reports
- 90% of respondents found that data helped in identifying new leads
- 91% of respondents found that data revealed previously unknown information
- 91% of respondents found that data verified existing information
- 91% of respondents found that data supplemented or expanded known information
- 86% of respondents found data used to open a new investigation or examination

## Law Enforcement Awards Program

The annual FinCEN Law Enforcement Awards Program recognizes investigative and prosecutorial teams that effectively leveraged BSA reporting. The awards demonstrate the value of BSA Reports to law enforcement efforts to protect the public and financial system.

- 7 awards
- 37 successfully prosecuted cases nominated
- 16,172 BSA reports reviewed in nominated cases
- 1,414 filing institutions that provided BSA reports that supported nominated cases
- 96 convictions resulting from nominated cases
- 39 law enforcement agencies that supported nominated cases
- 14 nominated cases that used 314(a)
- 5 nominated cases that used the Egmont Program
- \$1.1B \$ amount seized in nominated cases

### Reports Pursuant to the BSA

Approximately 335,000 registered financial institutions and other filers file BSA reports with FinCEN in support of law enforcement and national security objectives.<sup>3</sup>

Types of Report	FY 2022	FY 2023	FY 2024	FY 2025
Suspicious Activity Reports (SARs)	4.3M	4.6M	4.7M	4.8M
Currency Transaction Reports (CTRs)	20.6M	20.9M	20.5M	21.5M
Currency and Other Monetary Instrument Reports (CMIRs)	128,100	143,200	152,100	132,400
Reports of Cash Payments >\$10K Received in a Trade or Business	431,800	421,500	470,400	420,400
Foreign Bank and Financial Accounts (FBARs)	1.5M	1.6M	1.7M	1.8M

<sup>2</sup> [2] FinCEN survey response rates are below 80%. Low response rates and the lack of nonresponse bias analysis may impact the usefulness of the survey results.

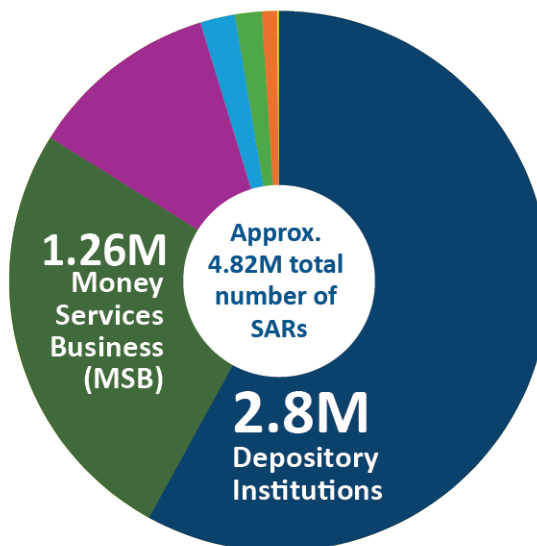
<sup>3</sup> M = Million



# FinCEN Year in Review for FY 2025

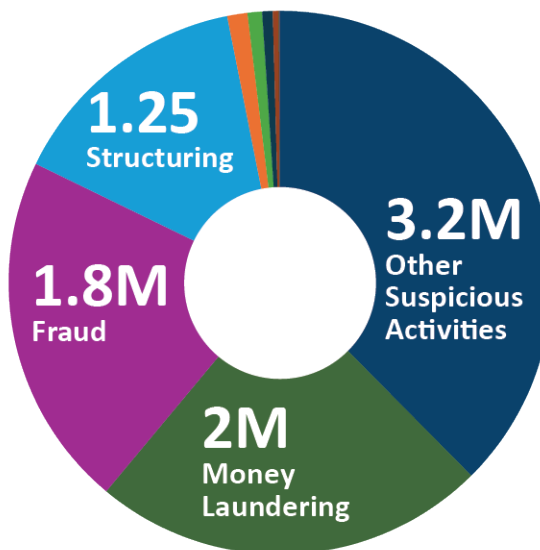
FY25 SARs by Type of Financial Institutions <sup>4 5</sup>

- Depository Institutions: **2.8M**
- Money Services Business (MSBs): **1.26M**
- Other: **550K**
- Securities /Futures: **101K**
- Casinos/Card Clubs: **77K**
- Loan or Finance Companies: **44K**
- Insurance Companies: **6K**



FY25 SAR Activity Type<sup>6</sup>

- Other Suspicious Activities: **3.2M**
- Money Laundering: **2M**
- Fraud: **1.8M**
- Structuring: **1.25M**
- Securities/Futures/Options: **102K**
- Cyber Event: **74K**
- Gaming Activities: **53K**
- Mortgage Fraud: **30K**
- Identification Documentation: **3.25K**
- Terrorist Financing: **1.8K**
- Insurance: **1.6K**



4 The “other” category includes filings by depository institution holding companies; dealers in precious metals, precious stones, or jewels; operators of credit card systems; and housing government sponsored enterprises.

5 An individual SAR may have more than one SAR activity type, and therefore the sum total of the corresponding graph exceeds the total number of SAR filings in FY25.

6 An individual SAR may have more than one SAR activity type, and therefore the sum total of the corresponding graph exceeds the total number of SAR filings in FY25.



# FinCEN Year in Review for FY 2025

## Glossary:

### Bank Secrecy Act (BSA)

The Currency and Foreign Transactions Reporting Act of 1970, as amended by the USA PATRIOT Act of 2001, the Anti-Money Laundering Act of 2020, and other statutes—a legislative framework that is commonly referred to as the “Bank Secrecy Act” (BSA)—authorizes the Secretary of the Treasury to impose reporting and other requirements on financial institutions and other businesses to help detect and prevent money laundering. Specifically, the regulations implementing the BSA require financial institutions to, among other things, keep records of cash purchases of negotiable instruments, file reports of cash transactions exceeding \$10,000 (daily aggregate amount), and to report suspicious activity that might signify money laundering, tax evasion, or other criminal activities. The BSA is sometimes referred to as an “anti-money laundering” (AML) law or jointly as “BSA/AML,” and is codified at 12 U.S.C. 1829b, 12 U.S.C. 1951-1960, 31 U.S.C. 5311-5314, 5316-5336, and includes notes thereto.

### BSA Reports (examples)

#### Suspicious Activity Reports (SARs)

Certain financial institutions are required to file SARs for certain activity. For example, banks are required to file SARs in the following circumstances:

- Transactions conducted or attempted by, at, or through the financial institution and aggregating \$5,000 or more, if the bank knows, suspects, or has reason to suspect that the transaction: Involves potential money laundering or other illegal activity (e.g., terrorism financing);
- Is designed to evade the BSA or its implementing regulations; or
- Has no business or apparent lawful purpose or is not the type of transaction that the particular customer would normally be expected to engage in, and the bank knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction.

#### Currency Transaction Reports (CTRs)

Financial institutions are required to report on CTRs currency (cash or coin) transactions over \$10,000 conducted by, or on behalf of, one person, as well as multiple currency transactions that aggregate to be over \$10,000 in a single day.

#### Currency and Other Monetary Instrument Reports (CMIRs)

Travelers and currency transporters are required to file a CMIR when entering or departing or shipping or receiving from/to the United States an aggregate amount of currency or other monetary instruments exceeding \$10,000.

#### Reports of Cash Payments Over \$10,000 in a Trade or Business (Form 8300)

A trade or business must file Form 8300 if it receives more than \$10,000 in cash in a single transaction or in related transactions.

#### Reports of Foreign Bank and Financial Accounts (FBARs)

A United States person that has a financial interest in or signature authority over foreign financial accounts must file an FBAR if the aggregate value of the foreign financial accounts exceeds \$10,000 at any time during the calendar year.

#### BSA Search

BSA Search is a web-based, secure tool designed to facilitate authorized users’ ability to access and analyze BSA data. BSA Search also allows users to apply filters and narrow search results; utilize enhanced data; and import lists of data (e.g., names, identification numbers, and addresses).

#### Egmont Group

The Egmont Group is an international network of Financial Intelligence Units (FIUs) designed to improve communication, information sharing, and training coordination amongst its FIU members. The Egmont Group supports its FIU members by helping them to expand and systematize the exchange of financial intelligence and information, improve expertise and capabilities of personnel, and enable secure communication with one another.

#### Financial Institution Advisory Program

FinCEN, through its Financial Institution Advisory Program, issues advisories to financial institutions concerning money laundering or terrorist financing threats and vulnerabilities for the purpose of enabling financial institutions to guard against such threats. Advisories often contain illicit activity typologies, red flags that facilitate monitoring, and guidance on complying with FinCEN regulations to address those threats and vulnerabilities.

#### Advisories

A comprehensive overview of an illicit finance threat, often related to broader national security issues. FinCEN began issuing advisories in 1996.

#### Alerts

A targeted description of a time-sensitive scheme or threat facing U.S. financial institutions. FinCEN began issuing alerts in 2020, initially to raise immediate awareness of a convertible virtual currency scheme.

#### Notices

A more narrowly focused and targeted summary of a specific illicit finance scheme or threat that is either emerging or, conversely, particularly prevalent but which could be prevented or mitigated by U.S. financial institutions with greater awareness. FinCEN began issuing notices in 2020, initially to address the onset of the COVID-19 Pandemic.



# FinCEN Year in Review for FY 2025

## Financial Trend Analysis (FTA)

FinCEN periodically publishes FTAs describing threat pattern and trend information derived from BSA filings. These reports highlight the value of information filed by financial institutions in accordance with the BSA and are issued pursuant to section 6206 of the Anti-Money Laundering Act of 2020.

## FinCEN Exchange

FinCEN Exchange is a voluntary public-private information-sharing partnership among law enforcement agencies, national security agencies, financial institutions, other relevant private sector entities, and FinCEN to effectively and efficiently combat money laundering, terrorism financing, organized crime and other financial crimes; protect the financial system from illicit use; and promote national security. The objective of FinCEN Exchange is to develop, deliver, and sustain innovative public-private information sharing in order to enable the private sector to better identify risks and provide FinCEN and law enforcement with critical information to disrupt money laundering, terrorism financing, and other financial crimes. Section 6103 of the Anti-Money Laundering Act of 2020 (AMLA), by amending the BSA, formally codified the FinCEN Exchange as a statutory program. FinCEN operates FinCEN Exchange consistent with all relevant legal authorities.

## Rapid Response Program (RRP)

Through the RRP, FinCEN helps victims and their financial institutions recover funds stolen as the result of certain cyber-enabled financial crime schemes, including business e-mail compromise. This RRP is a partnership among FinCEN, U.S. law enforcement (including the FBI, the U.S. Secret Service, Homeland Security Investigations, and the U.S. Postal Inspection Service), and foreign partner agencies that, like FinCEN, are the financial intelligent units of their respective jurisdictions. FinCEN uses its authority to share financial intelligence rapidly with counterpart FIUs and encourages foreign authorities to interdict the fraudulent transactions, freeze funds, and stop and recall payments using their authorities under their own respective legal and regulatory frameworks.

## Spontaneous Disclosures

The voluntary sharing of information related to suspected criminal activity from an FIU with another FIU (or more than one FIU) that is a party to a mutual sharing agreement, such as FIUs that are members of Egmont, even in the absence of a formal request and where the receiving FIU may be entirely unaware of the information's existence. The primary objective is to promote the proactive and voluntary exchange of information in criminal matters among the jurisdictions.