

WHISTLEBLOWING

U.S. Treasury Department Is Now Accepting Whistleblower Tips on International Violations

By Bruce Zagaris

On February 13, 2026, the United States (U.S.) Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) opened a new dedicated webpage to accept whistleblower tips on fraud, money laundering, and sanctions violations.¹

FinCEN encourages whistleblowers to provide information as soon as possible and to supply detailed, specific documentation in support of their claims.²

FinCEN's webpage explains that it administers a whistleblower program that offers incentives and protections to encourage individuals to furnish information about violations, or conspiracies to violate, the following statutes and their implementing regulations: the Bank Secrecy Act (BSA); the International Emergency Economic Powers Act (IEEPA); Trading with the Enemy Act (TWA); or Foreign Narcotics Kingpin Designation Act (Kingpin Act).³

Persons who furnish information about such violations or conspiracies to violate the above-captioned laws may be eligible for awards if the information they furnish leads to a successful enforcement action by the Treasury or the Department of Justice (DOJ) resulting in monetary penalties exceeding \$1,000,000, and the tip meets the requirements in [31 U.S.C. §5323](#) and its implementing regulation.⁴ Under the 2022 Anti-Money Laundering Whistleblower Improvement Act (AMIWIA), there is a minimum award for whistleblowers of not less than 10 percent of the collected monetary sanctions. The UMAIWA establishes the Financial Integrity Fund for the payment of such awards. The fund is comprised of collected monetary sanctions and investments of the fund.

FinCEN is committed to protecting whistleblower confidentiality in accordance with 31 U.S.C. § 5323.⁵

FinCEN shares the information it obtains from whistleblowers with the offices at Treasury and DOJ that enforce the BSA, IEEPA, TWEA, and the Kingpin Act, including the Treasury's Office of Foreign Asset Controls (OFAC); the DOJ's Money Laundering, Narcotics and Forfeiture Section; the DOJ's Foreign Investment Review Section; and the DOJ's Counterintelligence and Export Control Section.⁶

FinCEN plans to publish a regulation to fully implement 31 U.S.C. §5323, as amended by the Anti-Money Laundering Act of 2020 and the Anti-Money Laundering Whistleblower Improvement Act of 2022. Once it finalizes the regulation, FinCEN will start processing and paying awards.⁷

Background and What to Look For

FinCEN has issued a bulletin soliciting whistleblower tips. FinCEN is particularly interested in information about violations of these statutes that may involve, enable, or arise out of a suspected fraud scheme. On March 25, 2025, U.S. President Donald J. Trump issued Executive Order (E.O.) 14249, Protecting America's Bank Account Against Fraud, Waste, and Abuse. The Treasury's 2024 National Money Laundering Risk Assessment identifies fraud as one of the largest sources of illicit proceeds in the U.S.⁸

The Bulletin also sets forth the types of fraud persons should look for. Fraudsters can undertake illegal conduct by:

1. Using misrepresented, stolen, or fake identities, including using evolving technologies to create "deepfake" identification documents. They can also use the identities to establish a potential

¹ U.S. Treasury FinCEN, *Treasury Accepting Whistleblower Tips on Fraud, Money Laundering, Sanctions Violations*, Feb. 13, 2026.

² *Id.*

³ FinCEN, [Whistleblower Program](#) (accessed Feb. 13, 2026).

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

⁷ *Id.*

⁸ FinCEN Whistleblower Bulletin: Blow the Whistle on Fraud-Related AML and Sanctions Violations

- relationship, or to circumvent customer identification and verification and customer due diligence requirements.
2. Purporting to furnish services, including ones associated with government benefits programs, and, instead, misappropriating the relevant funds, which may be laundered through financial institutions.⁹
 3. Impersonating or falsely implying authorization or endorsement by a real or fictitious government agency.¹⁰

FinCEN is also encouraging the public to inform FinCEN of potential violations by financial institutions of the Bank Secrecy Act and the national security laws covered by FinCEN's whistleblower program, which may include:

4. A financial institution which does not undertake customer due diligence (CDD), or has inadequate CDD on a customer that is a recently created company or a non-profit organization enrolled in a government benefit program, which suddenly receives a significant amount in federal payments soon after starting operations.¹¹
5. A financial institution without controls or with insufficient controls to detect and investigate potential structuring, where deposits at convertible virtual currency kiosks may be separated into multiple, lower-value transactions, or through "smurfing," across multiple locations.¹²
6. A financial institution without controls or insufficient controls to detect and investigate virtual currency investment scams known as "pig butchering."¹³
7. A financial institution that does not comply with a Geographic Targeting Order designed to combat the laundering of the proceeds of fraud.¹⁴
8. A company submitting to a service provider falsified trade-related documentation, which can obfuscate evidence of a nexus to sanctionable activity, a sanctioned jurisdiction, or a Specially Designated National's (SDN) involvement in the transaction.¹⁵
9. A U.S.-based person sending multiple, structured, or repetitive wire transfers to Mexican financial institutions with memos such as "taxes" or "fees" for a timeshare, indicating that the beneficiaries may be acting on behalf of an SDN.¹⁶

Analysis

While professionals who represent whistleblowers will welcome the press release and bulletin announcing the start of a new dedicated webpage and the solicitation of tips on financial violations, they will be waiting anxiously for the release of a regulation to fully implement the whistleblower law.

Although it is not so easy to find cases in which monetary penalties exceed \$1 million, the new executive orders and resources with respect to narco-terrorism and sanctions violations (i.e., shadow fleet carrying Iranian oil) seem especially potentially fruitful areas for whistleblowers. Some of the transnational organized crime, pig butchering, and related fraud scams may also produce significant penalties.

Meanwhile, the fact that the U.S. government is announcing this five years after the enactment of legislation promising a regulation to implement the law and soliciting tips shows a lack of priority for this enforcement initiative.

⁹ *Id.* The Bulletin refers to many alerts and notices in recent years about these types of fraud schemes.

¹⁰ *Id.*

¹¹ See FinCEN, FIN-2026-Alert001, *FinCEN Alert on Fraud Rings and Their Exploitation of Federal Child Nutrition Programs in Minnesota* (Jan. 9, 2026).

¹² See FinCEN, FIN-2025-NTC1, *FinCEN Notice on the Use of Convertible Virtual Currency Kiosks for Scam Payments and Other Illicit Activity* (Aug. 4, 2025).

¹³ See FinCEN, FIN-2023-Alert005, *FinCEN Alert on Prevalent on Virtual Currency Investment Scam Commonly Known as 'Pig Butchering'* (Sept. 8, 2023).

¹⁴ See FinCEN, Press Release, *Secretary Bessent Announces Initiatives to Combat Rampant Fraud in Minnesota* (Jan. 9, 2026).

¹⁵ See OFAC, *Compliance Communiqué: Sanctions Guidance for the Maritime Shipping Industry* (Oct. 31, 2024); OFAC, *Sanctions Advisory Guidance for Shipping and Maritime Stakeholders on Detecting and Mitigating Iranian Oil Sanctions Evasion* (Apr. 16, 2025).

¹⁶ See FinCEN, OFAC, and FBI, *FinCEN, OFAC, and FBI Joint Notice on Timeshare Fraud Associated with Mexico-Based Transnational Criminal Organizations* (July 16, 2024).