If you believe a bank, money services business, or another covered institution is violating the Bank Secrecy Act (BSA), you may be able to report what you know to the Financial Crimes Enforcement Network (FinCEN), a bureau of the U.S. Department of the Treasury. FinCEN administers the BSA and has a whistleblower program for people who provide information about certain violations.

Reporting is not the same as proving a case. You do not need to investigate the institution yourself, and you should not take records you are not authorized to access. Your job is to provide truthful, specific information and explain how you learned it. This guide covers the **FinCEN whistleblower form**, what may qualify as a reportable violation, and practical steps for making a **BSA whistleblower submission**.

Start by understanding what the BSA requires

The BSA and its regulations impose recordkeeping, reporting, and compliance duties on covered financial institutions. Which duties apply depends on the institution and the activity involved. Common areas include:

- **Suspicious Activity Reports (SARs):** Certain institutions must file SARs when a transaction or pattern meets applicable reporting criteria. SARs are confidential. In general, employees and other people should not disclose whether a SAR was filed, or provide a copy, unless disclosure is legally authorized.
- **Currency Transaction Reports (CTRs):** Covered institutions generally must report qualifying cash transactions over the applicable threshold. Possible issues include failing to report transactions that should have been reported or structuring activity to evade reporting requirements.
- **Customer due diligence (CDD):** Covered institutions have obligations concerning customer identification, understanding customer relationships, and—when required—identifying and verifying beneficial owners of legal entity customers.
- **Anti-money laundering (AML) programs:** Institutions subject to the relevant rules must maintain AML programs with required elements. Depending on the institution and governing law, those elements can include internal controls, independent testing, a designated compliance officer, and employee training.

A compliance weakness is not automatically a legal violation. A late response, a frustrating policy, or a single mistake may not establish that an institution violated the BSA. The important questions are what rule applied, what the institution did or failed to do, and what facts support that account. Avoid describing something as “fraud” unless you have facts supporting that specific allegation; a potential BSA violation is not necessarily fraud.

What may qualify as a reportable BSA/AML violation?

A report may concern conduct that appears to violate the BSA, its implementing regulations, or related requirements. Examples may include repeated failures to file required reports, manipulating records or controls to conceal reportable activity, or maintaining an AML program that is ineffective in ways connected to legal duties. The facts and applicable rules matter. A weak program is not automatically unlawful simply because it did not prevent every suspicious transaction.

Useful information is concrete. For example, you might describe a recurring process, a particular category of transactions, a control that was knowingly bypassed, or a management decision that affected required reporting. Explain dates, business units, people involved by role where possible, and how you know. Separate what you personally observed from what someone else told you and from what you infer.

Who may be eligible for a whistleblower award?

FinCEN's whistleblower program can provide awards to eligible individuals who voluntarily provide original information that leads to certain successful enforcement actions. The statutory program generally ties awards to qualifying actions resulting in monetary sanctions exceeding $1 million. An award is not guaranteed: eligibility, the quality and timing of the information, the result of the enforcement action, and other legal requirements all matter.



"Original information" generally means information derived from your independent knowledge or analysis that is not already known to the government, subject to legal rules and exceptions. Information already publicly available, or merely repeating allegations without adding meaningful facts, may not qualify. Do not assume you are ineligible just because you work for the institution or have raised an issue internally. But your role, how you obtained the information, and any applicable exclusions can affect eligibility.

The program has rules concerning who may receive an award and what information qualifies. Certain people—such as individuals involved in the reported conduct—may be barred or restricted, and special rules can apply to people who obtain information through legal, audit, compliance, or other professional duties. An attorney can help assess those issues before you submit.

How to make a FinCEN whistleblower submission

Use the current instructions on FinCEN's official website. FinCEN's whistleblower submission form is the agency process referenced for providing information; check the official page for the current form, permitted submission method, and required declarations. Do not rely on an old link or a third-party summary as the filing procedure.

1. **Write down a timeline promptly**

   As soon as you can after an important event, write down the date, what happened, who was present, and how you learned it. Note when you raised a concern and what response you received. Keep the account factual and distinguish direct knowledge from assumptions. A contemporaneous timeline is often more useful than trying to reconstruct events months later.

2. **Identify the duty and the conduct**

   Describe the possible BSA/AML duty involved—such as SAR reporting, CTR reporting, CDD, or AML program controls—and the conduct that concerns you. You do not need to cite a regulation if you are unsure. It is better to explain the facts accurately than to guess at a legal citation.

3. **Preserve information lawfully**

   Keep a record of information you are authorized to possess, such as your own notes or communications you may lawfully retain. Do not access systems without permission, remove customer records, copy restricted databases, or disclose a SAR or information that would reveal its existence. Do not email work documents to yourself. If relevant records are on an employer's systems, describe where they are and discuss lawful handling with an attorney.

4. **Review internal compliance channels carefully**

   Internal compliance channels—such as a compliance hotline, manager, or ethics office—may be one way to raise a concern. Whether to report internally, report to FinCEN, or do both depends on the facts, safety concerns, and applicable rules. Internal reporting does not necessarily substitute for a submission to the government, and you should not assume it preserves award eligibility or deadlines. Get legal advice if timing or retaliation is a concern.

5. **Complete the official submission accurately**

   Follow FinCEN's current form instructions. Provide your contact information as requested, describe the conduct and supporting facts, identify potential witnesses or records, and answer certification questions truthfully. If you want to submit anonymously, check the current rules: anonymous submissions generally require representation by an attorney who can submit on your behalf and provide required information to the agency.

6. **Keep a record of the filing**

   Save a copy of what you submitted and any confirmation, using a secure method that does not violate workplace policies or expose confidential information. Record the submission date in your timeline. FinCEN may not provide frequent updates, and an investigation can take a long time—or may not result in public action.

What to include in a useful BSA whistleblower submission

A concise, organized account is usually easier to assess than a large collection of unexplained documents. Consider including:

- The institution, relevant business unit, and approximate period involved.
- The conduct you believe may violate a BSA requirement, stated in plain language.
- Specific examples, dates, transaction patterns, or decisions, to the extent you lawfully know them.
- How you learned the information and whether it is firsthand, reported to you, or inferred.
- People who may have relevant knowledge, identified by role if names are uncertain.
- Where relevant records may be located, without taking or transmitting material you are not authorized to disclose.

- Whether you raised the concern internally or with another government agency, and when.

Issue Helpful approach Avoid Possible violation Connect specific conduct to a possible reporting, recordkeeping, or program duty. Calling every compliance problem “fraud” without facts tying it to a legal duty. Evidence Explain what you observed and where supporting records may exist. Unauthorized access, copying, or removal of customer or employer records. SAR information Ask a lawyer how to describe concerns without disclosing protected information. Revealing whether a SAR was filed or sharing a SAR outside authorized channels. Timing Make a dated timeline and note when concerns were raised. Assuming internal reporting alone preserves every right or deadline.

Working with a whistleblower attorney

A lawyer experienced with whistleblower matters can help you assess whether the information is original, whether you may qualify for an award, how to protect confidential information, and how to submit through the correct process. Counsel can also help you think through retaliation risks and whether to use an anonymous submission where permitted. A lawyer cannot promise that FinCEN will investigate, bring an enforcement action, or pay an award.

Some whistleblower attorneys work on a contingency-fee basis, meaning the attorney’s fee is generally tied to a recovery or award rather than billed entirely by the hour. The written agreement should explain the fee percentage, expenses, what happens if there is no award, and who pays costs. Ask questions before signing, and confirm that the lawyer has handled the relevant type of whistleblower matter. A directory such as USAttorneys.com may help you locate lawyers, but confirm each lawyer’s qualifications and experience directly.

Confidentiality, retaliation, and realistic expectations

Do not assume that your identity will remain secret in every circumstance. The program has confidentiality provisions, but disclosure may be permitted or required under certain legal circumstances. Discuss anonymity and information handling with counsel before filing if those issues matter to you.

Retaliation protections and remedies can depend on the law that applies and the facts. Keep a separate, dated record of workplace actions you **usattorneys** believe may be retaliatory, including changes in duties, threats, discipline, or termination. Save only records you are authorized to retain. If you face an urgent employment decision or a filing deadline, speak with an attorney promptly; deadlines can be short and vary by legal claim.

Finally, do not expect a quick response. Government review can take time, and agencies may be unable to confirm whether they are investigating. A lack of updates does not necessarily mean your submission was ignored, but it also does not mean an award or enforcement action will follow.



Before you submit

- Check the current FinCEN whistleblower form and instructions on FinCEN's official website.
- Write down a factual timeline while events are fresh.
- Describe the possible BSA duty and conduct without overstating what you know.
- Protect SAR confidentiality and do not take or email yourself work records.
- Consider legal advice about eligibility, anonymity, internal reporting, and retaliation.
- Keep a secure record of what you submitted and when.

To **report AML violations** responsibly, accuracy and lawful handling matter more than dramatic language. A clear account of what happened, how you know, and where evidence may be found gives FinCEN a better starting point while helping protect you from avoidable mistakes.