When someone spots possible money laundering or sanctions evasion at work, the hard part is often not recognizing that something looks wrong. It is deciding what to do with the information: which facts matter, how to report them safely, and how to avoid disclosing protected material such as a Suspicious Activity Report (SAR).

That is why people hire whistleblower attorneys for anti-money laundering (AML) cases. A lawyer can help assess whether the information may qualify for a government award, frame a submission so investigators can use it, and advise on retaliation risks. An attorney cannot guarantee an award, an investigation, or protection from workplace consequences. But experienced counsel can help a whistleblower make informed decisions before taking steps that may be difficult to undo.



What Is the AML/BSA Whistleblower Program?

The Bank Secrecy Act (BSA) is the main federal framework requiring financial institutions and certain other businesses to keep records and help detect and report possible financial crime. Its requirements include customer due diligence, recordkeeping, and filing SARs with the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN).



The BSA whistleblower program allows individuals to provide information about certain violations to the government and, if statutory requirements are met, seek a monetary award. In general, awards may be available when original information leads to a successful enforcement action with more than $1 million in monetary sanctions collected. The statutory award range is generally 10% to 30% of collected monetary sanctions, subject to the law and the government's determination.

The program is not simply a way to report a bad workplace or an ineffective compliance department. The information must concern a covered legal violation and meet requirements for an award. A report can still be useful to government investigators even if it does not qualify for compensation.

FinCEN's website, fincen.gov, is an important source for official program information and reporting instructions. The availability and process for submitting information can change, so check FinCEN's current guidance rather than relying on an old form or third-party summary.

Legal Origin and Timeline

The AML whistleblower framework grew out of the Anti-Money Laundering Act of 2020, which amended the BSA to create whistleblower incentives and protections. Congress then strengthened the framework through the AML Whistleblower Improvement Act of 2022, enacted as part of the National Defense Authorization Act for Fiscal Year 2023. President Biden signed that law on December 23, 2022.

The 2022 law addressed limitations in the original framework, including award incentives and protections against retaliation. It also broadened the legal landscape relevant to whistleblower reporting, including certain sanctions-related violations. The details can depend on the specific conduct, the statute involved, and the government action that follows.

This timeline matters because a person may find older articles that describe a different version of the program. An attorney can help identify which provisions apply and whether the facts fit a covered category under current law.

Who May Be Eligible—and What Is "Original Information"?

The program is intended for individuals who voluntarily provide original information about covered violations. A person's job title does not automatically decide eligibility. Current and former employees, contractors, and others

may have relevant information. The person does not necessarily have to be the one who filed a SAR or made the first internal complaint.

"Original information" generally means information based on the person's independent knowledge or independent analysis that is not already known to the government from another source, subject to statutory rules and exceptions. The government will assess the information and how it contributed to an enforcement action. Merely repeating public allegations or forwarding rumors may not meet the standard.

For example, an employee might know that a customer repeatedly moved funds through linked accounts just below an internal review threshold, while managers instructed staff not to escalate the pattern. The useful information may include dates, account relationships, the instruction, and records that support it—not just the employee's conclusion that "the bank ignored money laundering."

Eligibility is fact-specific. A person's own role in the conduct may affect an award, and other statutory limits can apply. Do not assume that participation automatically disqualifies you—or that reporting automatically makes you eligible. A whistleblower attorney can evaluate the facts before a submission is made.

What Violations May Qualify?

AML whistleblower matters can involve different forms of conduct. The legal question is not simply whether something seems suspicious, but whether the facts may show a covered violation and can be explained clearly.

Issue Example of potentially relevant facts Why details matter SAR-related failures A financial institution allegedly fails to identify or report a pattern of suspicious transactions, or employees are directed to suppress escalation. A SAR is a confidential report, and the underlying facts must be handled carefully. Dates, decisions, and escalation history can help investigators understand what happened. Structuring Transactions are allegedly divided or arranged to evade reporting or recordkeeping requirements. Individual transactions may appear ordinary. A timeline, related parties, and repeated patterns may show the larger picture. Customer due diligence (CDD) Required customer identity, beneficial ownership, or risk information is allegedly ignored, falsified, or not maintained. Evidence may show what the institution knew, what procedures required, and whether exceptions were repeated or concealed. Recordkeeping Required records are missing, inaccurate, altered, or not retained as required. It helps to identify the record, the applicable process, who handled it, and when it was changed or omitted. Sanctions violations Payments or services may have been processed for a blocked person or prohibited jurisdiction, or controls may have been bypassed. The relevant sanctions authority and transaction trail matter. Sanctions issues can involve laws beyond the BSA, so legal analysis is important.

These are examples, not findings that a violation occurred. A poorly handled alert or a control failure does not automatically establish a legal violation. The context, applicable rules, and evidence all matter.

Why Hire an Attorney?

1. To Frame the Submission Around Evidence

A persuasive submission is not necessarily a long one. It should make it easier for investigators to understand what happened, why the conduct may violate the law, who was involved, and where supporting evidence may be found. An attorney can help frame submission materials around specific events rather than broad accusations.

That often means distinguishing firsthand knowledge from assumptions, explaining technical terms, and organizing a chronology. It may also mean identifying what is missing. For example, "the compliance team ignored alerts" is

less useful than describing the alert dates, the relevant customer or transaction pattern, the escalation path, and the response—while avoiding unnecessary disclosure of protected information.

2. To Maximize Usefulness Without Overstating the Case

Government investigators need concrete leads openclassactions.com they can verify. Counsel can help connect people, transactions, systems, and decisions; identify potential witnesses; and explain why a pattern may matter. This can maximize usefulness without turning uncertain facts into claims of certainty.

An attorney may also help separate information already public or already reported from new facts the whistleblower personally knows. That distinction can matter to both the investigation and any award analysis.

3. To Handle SAR Confidentiality and Sensitive Records

SARs are subject to strict confidentiality rules. A person should not assume they can share a SAR, identify its existence, or attach it to a personal report simply because they work for the institution or believe it proves misconduct. Improper disclosure can create serious legal and employment risks.

Counsel can help determine how to describe underlying conduct without improperly disclosing a SAR or other restricted material. They can also advise on handling customer data, internal documents, privileged communications, and information obtained through workplace access. Do not remove or send confidential files to a personal account without legal advice.

4. To Plan the Reporting Route

AML-related information may involve FinCEN, the Department of Justice, or other agencies, depending on the alleged conduct. The best route can depend on the law implicated, the evidence, and any other reporting already underway. An attorney can help evaluate where and how to submit information, and whether parallel reporting could create complications.

FinCEN's website is a starting point for official information, but it is not a substitute for case-specific legal advice. If a person has already reported internally or to a government agency, counsel can help document what was submitted and when.

5. For Retaliation Guidance

The BSA includes protections against certain forms of retaliation for lawful whistleblowing. Depending on the circumstances, remedies may include reinstatement, back pay, and other relief. Protection is not a guarantee that retaliation will not occur, and deadlines and procedures can apply. A person who believes retaliation has happened should get legal advice promptly; some complaints must be filed within a limited period.

An attorney can provide retaliation guidance before a report is made: how to keep a factual record of workplace events, how to respond to changes in duties or performance reviews, and how to avoid conduct that could undermine a later claim. Keep notes and relevant personal employment records in a lawful, secure manner. Do not take records that you are not entitled to possess.

What an Attorney Cannot Promise

No lawyer can guarantee that the government will open an investigation, bring an enforcement action, collect sanctions, or pay an award. A whistleblower also should not assume that anonymity is absolute or that an

employer will never infer who made a report. The confidentiality rules and disclosure risks depend on the process and circumstances.

Be cautious of anyone who promises a specific payout or urges you to disclose sensitive records before explaining the risks. A responsible attorney should discuss eligibility, confidentiality, retaliation, and uncertainty in plain language.

What to Do Next: A Practical Checklist

1. **Write a private chronology.** Note dates, people, transactions, decisions, and what you personally observed. Separate firsthand facts from what others told you.
2. **Preserve lawful evidence.** Do not alter records, access systems without authorization, or send confidential files to personal email or devices. Ask counsel how to handle documents.
3. **Do not disclose a SAR casually.** Treat SAR-related information as sensitive and get legal advice before sharing it outside authorized channels.
4. **Check official information.** Review FinCEN's current whistleblower materials at fincen.gov, including the current reporting process.
5. **Speak with a qualified whistleblower attorney.** Ask about AML/BSA experience, eligibility, submission strategy, confidentiality, and retaliation deadlines.
6. **Keep a record of workplace changes.** Document significant actions after reporting—such as discipline, altered duties, threats, or unusual performance criticism—without taking restricted information.

The Bottom Line

People hire whistleblower attorneys for AML cases because the stakes extend beyond making an accusation. The person may need to protect confidential SAR information, distinguish original evidence from speculation, choose a reporting route, and prepare for possible retaliation. Counsel can help frame submission materials, maximize usefulness to investigators, and explain the limits of the law.

The first step is usually careful, confidential preparation—not a dramatic confrontation or a mass transfer of company files. Get advice early, keep the facts precise, and use FinCEN's official resources to confirm the current program process.