If you are considering reporting a bank's anti-money-laundering practices, the phrase "enforcement action" can sound abstract. In plain English, it means a government action to address an alleged legal or regulatory violation. Depending on the facts, that action may result in a court judgment, a settlement, an administrative order, or monetary sanctions.

Enforcement actions matter in a Bank Secrecy Act (BSA) whistleblower case because they can be part of the path to a whistleblower award. But a report does not automatically lead to an investigation, an enforcement action, or compensation. The government evaluates the information, determines what steps to take, and makes decisions on its own timeline.

This guide explains what an enforcement action may look like, which BSA duties may be involved, what information can be reportable, and why original information and eligibility rules matter. It is general information, not legal advice about any specific situation.

What "Enforcement Action" Means

The BSA is a federal law that requires covered financial institutions to maintain certain anti-money-laundering controls and report specified information. The Financial Crimes Enforcement Network (FinCEN), a bureau of the U.S. Department of the Treasury, administers key parts of the BSA and receives certain reports. Other government agencies may also investigate or bring actions involving BSA-related conduct.

An enforcement action is a formal government step to address an alleged violation. It may be civil, administrative, or criminal. Depending on the agency, the institution, and the evidence, an action might include a monetary penalty, a compliance order, a required remediation plan, or criminal consequences. Some matters end in a settlement; others proceed to litigation or another formal process. An inquiry or examination, by itself, is not necessarily an enforcement action.

In a whistleblower context, "government collection" is important. A penalty that is announced or ordered is not always the same as money actually collected. Award programs may tie potential awards to monetary sanctions collected as a result of qualifying enforcement activity. Whether a particular sanction or collection counts depends on the governing law, regulations, and facts.

How BSA Duties Can Be Involved

Not every compliance problem is a BSA violation. A missed training, a weak control, or an internal disagreement may be serious, but the relevant question is whether the facts point to a legal duty under the BSA or related requirements—and whether that duty was violated.

Suspicious Activity Reports (SARs)

Covered financial institutions must file a Suspicious Activity Report (SAR) when applicable rules require one. SAR duties concern identifying and reporting certain suspicious transactions, not usattorneys.com simply reporting every unusual or inconvenient event. Potential issues might include a repeated failure to identify activity that should be escalated, a pattern of not filing required reports, or conduct that interferes with proper reporting.

SAR information is protected. Do not copy, forward, or disclose an actual SAR or information that would reveal whether a SAR was filed unless a qualified attorney advises that the disclosure is permitted. A

whistleblower can often describe the underlying conduct without circulating protected reporting documents. Ask a lawyer how to handle records safely.

Currency Transaction Reports (CTRs)

Currency Transaction Reports (CTRs) generally concern qualifying cash transactions above applicable thresholds. A possible issue could involve a repeated failure to report covered transactions or practices that appear designed to evade reporting. The context matters: cash activity alone does not prove wrongdoing, and a CTR filing duty is not the same as a SAR filing duty.



Customer Due Diligence (CDD)

Customer due diligence requirements help institutions understand who their customers are and the nature and purpose of customer relationships. Depending on the institution and applicable rules, duties may include identifying and verifying customers, assessing risk, and monitoring relationships. A weak process may raise concerns, but the important details include what the institution was required to do, what it actually did, and whether the gap was significant or repeated.

AML Program Effectiveness

Covered institutions must maintain anti-money-laundering programs that meet applicable legal requirements. A reportable concern may involve more than a single mistake—for example, evidence that required controls were absent, knowingly bypassed, or ineffective despite repeated warnings. The legal analysis can depend on the institution's type, the governing rule, what management knew, and how the program operated in practice.

What May Qualify as a Reportable BSA/AML Violation?

A potentially reportable matter generally needs a connection to an applicable legal or regulatory obligation. The following examples are issues that could merit legal review; none proves a violation on its own:

- Repeated failure to file required SARs or CTRs under circumstances where a filing duty applied.
- Instructions or practices that appear intended to avoid, delay, or suppress required reporting.

- Material gaps in customer due diligence or transaction monitoring that management knew about and did not address.
- Records or communications suggesting that required AML controls were knowingly bypassed.
- Misleading statements to a regulator or examiner about the institution's BSA controls or reporting practices.

By contrast, a disagreement over a business decision, a customer complaint, or a general belief that "everyone knows" a department is failing is not enough by itself. Specific, firsthand facts matter: what happened, when it happened, which duty may apply, who was involved, and what records or witnesses could help verify the account. Avoid labeling conduct "fraud" unless you can connect the facts to a legal theory with advice from counsel.

Original Information and Basic Eligibility

Whistleblower award programs generally focus on original information: information based on a person's independent knowledge or analysis that is not already known to the government in the same form. Publicly available facts or information already provided to the government may raise eligibility questions. The rules can be technical, and timing, source, and the way a submission is made may matter.

FinCEN administers a whistleblower process established under federal law. The agency's process and applicable regulations set out requirements for submitting information and seeking an award. In broad terms, a qualifying submission may need to be voluntary, sufficiently specific, and useful to an enforcement matter that results in qualifying monetary sanctions. Eligibility and award decisions are not guaranteed. Certain people or circumstances may be excluded or treated differently under the rules, so do not assume that your job title or role is irrelevant.

The **FinCEN whistleblower submission form** is an agency process tool for providing information. Completing a form does not mean that FinCEN will open an investigation, bring an enforcement action, or issue an award. Follow the current official instructions and consider legal advice before submitting. Do not send protected SARs or other restricted material unless counsel confirms the proper method.

Internal Reporting and Protecting Your Information

Internal compliance channels—such as an AML officer, ethics hotline, or compliance department—may be one way to raise a concern. Whether to report internally, externally, or both depends on the facts, workplace risks, and applicable rules. An internal report may help create a record or prompt corrective action, but internal reporting is not a substitute for understanding any external program's requirements or deadlines.

Do not assume that an internal report automatically preserves eligibility for a government award. Nor should you assume that you must report internally before contacting a government agency. Get advice about the rules that apply to your situation, especially if you are concerned about retaliation, confidentiality, or a possible conflict of interest.



Preserve information lawfully. Do not access systems without authorization, remove confidential files, or email work documents to a personal account. Keep a private, factual record of events without copying restricted records. Write down a timeline the same day something happens: dates, people present, what you observed directly, what you were told, and any follow-up. Separate firsthand knowledge from assumptions or secondhand accounts.

Why Monetary Sanctions and Government Collection Matter

Monetary sanctions are financial penalties or other monetary amounts imposed through a qualifying enforcement process. In some whistleblower programs, the possible award is linked to sanctions collected by the government, rather than simply the amount announced in a press release. The rules may also address what counts as a qualifying action and how an award is determined.

That distinction is one reason not to treat a large headline penalty as a promise of payment to a whistleblower. A case may not produce a sanction; a sanction may not be collected in full; and a person may not meet the program's eligibility requirements. Awards are determined through the applicable process, not by an employer, a private lawyer, or the whistleblower alone.

Term Plain-English meaning Why it matters Enforcement action A formal government step addressing an alleged violation It may be the outcome connected to a whistleblower submission Regulatory penalties Financial or other consequences imposed by a regulator or through a related process Not every compliance concern results in a penalty Monetary sanctions Qualifying monetary penalties or amounts imposed under applicable law Potential award rules may depend on sanctions and collections Government collection Money actually recovered by the government An announced penalty and an amount collected may differ

Working With a Whistleblower Attorney

A lawyer experienced with whistleblower matters can help assess whether the facts may involve a BSA duty, whether information is original, how to make a submission, and what confidentiality or retaliation concerns need attention. Counsel can also help distinguish a potentially reportable violation from a general workplace dispute and advise on avoiding unauthorized disclosure.

Some whistleblower attorneys work on a contingency-fee basis. That generally means the attorney's fee depends on a recovery or award, as defined in the written engagement agreement. "Contingency" does not mean there are no costs, no conditions, or guaranteed compensation. Ask how fees are calculated, who pays case expenses, what happens if there is no award, and whether the lawyer represents you in dealings with the agency. USAttorneys.com may be one place to look for legal information or attorney listings, but check a lawyer's qualifications and experience directly.

Practical Steps Before You Report

1. **Write a factual timeline.** Record dates, people, events, and what you personally observed. Do this promptly while details are fresh.
2. **Identify the possible duty.** Note whether the concern relates to SARs, CTRs, CDD, an AML program, or another specific requirement.
3. **Preserve lawfully.** Do not take restricted documents, access systems improperly, or send work files to personal email.
4. **Separate evidence from inference.** Label what you saw, what someone told you, and what you suspect.
5. **Get advice on the process.** A whistleblower attorney can discuss eligibility, the FinCEN submission process, internal channels, and potential risks.

The Bottom Line

An enforcement action in a BSA whistleblower case is a formal government response to an alleged violation—not simply an internal investigation or a compliance disagreement. Possible issues can involve SAR, CTR, CDD, or AML program duties, but the facts must connect to an applicable legal obligation. Original information, eligibility, and the government's eventual collection of qualifying monetary sanctions may all matter to an award.

Report carefully, protect restricted information, and keep a same-day timeline. No one can promise that a submission will lead to an investigation, regulatory penalties, government collection, or an award. A lawyer familiar with whistleblower rules can help you understand the options without overstating what the process can deliver.