Headlines about whistleblower awards can make the process sound simple: spot a compliance problem, report it, collect a percentage of the penalty. That is not the real story.

FinCEN's whistleblower program is real, and payment-company employees may have relevant information. But an award is not automatic, investigations can take years, and the underlying conduct must meet specific legal requirements. The first step is not posting an accusation online. It is understanding what the program covers, preserving what you lawfully know, and submitting useful information through the official channel.

This guide explains the basics for people working in payment company compliance, operations, product, risk, or leadership. It is general information, not legal advice about a particular situation.

What the FinCEN whistleblower program does

The program allows eligible whistleblowers to provide information about certain violations of the Bank Secrecy Act (BSA) and related anti-money-laundering laws. The BSA is the federal framework behind requirements such as anti-money-laundering programs, suspicious activity reporting, and certain recordkeeping duties.

The Anti-Money Laundering Act of 2020 (AMLA), enacted in 2021, established a statutory award structure. The AML Whistleblower Improvement Act of 2022 later created a funding mechanism through the Treasury Department's Financial Integrity Fund. In practical terms, this helped address a major problem with the original program: statutory awards had been authorized, but there was no dedicated funding structure to pay them.



Under the law, a qualifying whistleblower may receive an award of 10% to 30% of monetary sanctions collected in a covered action when the applicable threshold is met. That range is not a promise or a standard payout. Awards are discretionary and depend on factors such as the value of the information, the whistleblower's assistance, and the government's use of the information.

Why payment companies should pay attention

A common misconception is that BSA rules are "bank rules." Banks are major players, but they are far from the whole picture. BSA coverage extends to a range of financial businesses, including many money services businesses

(MSBs). Depending on its activities, a payment company may have BSA duties directly, or its role may affect a regulated partner's compliance obligations.



That distinction matters. A company calling itself a "payments platform" is not automatically an MSB—or automatically outside the rules. Regulators look at what the business actually does, how money moves, who controls the transaction, and which legal exceptions may apply.

Common payment-company issues that may raise BSA questions

- Operating as a money transmitter without meeting applicable registration or licensing requirements.
- Failing to maintain an effective, risk-based anti-money-laundering program where one is required.
- Ignoring suspicious activity or failing to file required suspicious activity reports (SARs).
- Weak customer identification, transaction monitoring, or recordkeeping controls.
- Structuring products or transaction flows to avoid reporting or other BSA requirements.
- Providing misleading information to a regulator, bank partner, or auditor about how controls operate.

These are examples, not a finding that a particular company has broken the law. A control weakness, a disagreement over risk appetite, or a late filing does not by itself establish a whistleblower case. The facts, legal obligation, and impact matter.

MSB obligations: start with the company's actual activities

"MSB" is a regulatory category, not just a label in a company's marketing materials. Businesses that provide services such as money transmission or certain currency-related services may fall within the federal MSB framework. Some payment processors may qualify for an exemption in particular circumstances, but the details matter. A company cannot rely on a product name or a partner's status as a substitute for analyzing its own role.

For a payment company compliance review, useful questions include:

- Does the company accept and transmit funds, or does it only provide technology?
- Who has possession or control of customer funds at each stage?

- Is the company acting for a merchant or another party, and are the conditions for any claimed exemption met?
- Which legal entity provides the service, and where are its customers and transactions located?
- Is the company registered with FinCEN if required, and are state licensing obligations also being addressed?
- Who owns AML controls, SAR decisions, training, independent testing, and remediation?

Federal MSB status and state money-transmission licensing are related but separate issues. A company may need to consider both. The answer can change as a business adds products, markets, or new ways of moving funds.

Whistleblower criteria: what generally needs to be true

The program is designed for original information that contributes to a successful covered enforcement action. It is not a general complaint desk for every employment dispute or customer-service failure.

In broad terms, the information must be voluntary, original, and useful to the government's investigation or enforcement. A potential award generally depends on a successful action that results in monetary sanctions above the statutory threshold. The government determines whether the legal requirements are met and what award, if any, is appropriate.

Question What to consider Is the information original? Does it add specific, non-public facts, documents, or analysis rather than repeat information already known to authorities? Is it voluntary? Was it provided before a qualifying request or obligation required the disclosure? Timing can matter. Does it concern a covered violation? Can you identify the possible BSA or related legal requirement, the conduct, and the relevant period? Can it help establish a case? Does it point to records, transactions, decision-makers, control failures, or other evidence the government can verify? Could an award be available? Would a covered action meet the applicable monetary-sanction threshold? An award is never guaranteed.

Eligibility can be affected by details such as a person's role in the conduct, involvement in an internal or government investigation, and how the information was obtained. Do not assume that a job title automatically qualifies or disqualifies you. Those are precisely the facts to assess before making a submission.

Where to start: a practical sequence

1. **Write down what you personally know.**

   Separate first-hand observations from things you heard from colleagues or inferred from reports. Note dates, products, transaction flows, teams involved, and what you believe the company was required to do.

2. **Identify the potential obligation and the gap.**

   For example: "The company's policy required escalation of these transactions, but the monitoring rule was disabled from March through June" is more useful than "the company ignores AML." Be precise without overstating what you can prove.

3. **Preserve information lawfully.**

   Keep a record of where relevant materials are located and how you encountered them. Do not break into systems, bypass access controls, take unrelated customer data, or violate a legal restriction to build a case. Do not alter original records.

4. **Check current official submission instructions.**

Use FinCEN's official whistleblower information and reporting process. Follow its current instructions for submitting a tip and supporting materials. A complete, organized account is generally more useful than a large, unexplained document dump.

5. **Get targeted legal advice if the facts are sensitive.**

   Ask a lawyer experienced in whistleblower matters and financial regulation: "Could this conduct fall under the BSA whistleblower provisions?" "How should I describe my role and how I obtained the records?" "Could a confidentiality, privilege, or retaliation issue affect how I submit?" Those questions are more productive than asking only whether you "have a case."

6. **Keep a submission record and avoid public claims.**

   Record when and how you submitted information, and retain any confirmation. Do not assume that a public post, an internal report, or a conversation with a business journalist is equivalent to a formal FinCEN submission.

What the award range does—and does not—mean

The 10% to 30% figure attracts attention. Here is the catch: it applies to qualifying monetary sanctions collected in a covered action, not to a company's total revenue, the amount of alleged losses, or a headline penalty that has not been collected. The percentage is discretionary. The outcome can depend on how much the whistleblower's information contributed, the quality and timeliness of assistance, and other factors set by law and the program's rules.

There is also a major timing issue. An investigation may take years. Authorities may decline to act, pursue a different theory, or resolve a matter without a qualifying recovery. Even when an enforcement action happens, award decisions and payment are separate steps. Treat the program as a potential legal remedy—not a near-term financial plan.

Tycoonstory.com and Facebook: useful for awareness, not for filing

Entrepreneurs may encounter whistleblower stories through business media such as Tycoonstory.com or through Facebook posts and groups. These can help surface topics to research, but they are not official sources for determining eligibility, and they are not FinCEN reporting channels.

Be careful with viral claims about guaranteed awards or "easy" payouts. Check legal details against FinCEN and other official government materials. And do not post confidential company records, customer information, or accusations on Facebook to get attention. Public disclosure can create privacy, employment, and legal problems—and may complicate a government submission.

Common mistakes to avoid

- **Assuming every payment company is an MSB.** Analyze the actual service and applicable exceptions.
- **Assuming no BSA exposure because the company is not a bank.** Many non-bank financial businesses have BSA obligations.
- **Submitting conclusions without evidence.** Identify who did what, when, how the process worked, and where supporting records may exist.
- **Taking documents improperly.** Evidence should be obtained and handled lawfully; more data is not always better.

- **Expecting a fast award.** The process depends on government investigation, enforcement, collections, and award review.
- **Using vague advice as a plan.** Ask specific questions about the legal theory, submission method, evidence handling, and retaliation concerns.

The bottom line

FinCEN's whistleblower program offers a real statutory path for reporting certain BSA and related violations, including conduct involving payment businesses. AMLA established the award framework, and the 2022 legislation suspicious activity report created a funding mechanism. But the 10% to 30% range is discretionary, depends on qualifying impact and collected sanctions, and is not a promise of payment.

If you are considering a report, start with facts: the company's activities, the possible MSB obligations, the specific control or reporting failure, and the evidence you can lawfully identify. Use FinCEN's official process, keep your account precise, and get advice on concrete questions before taking sensitive records or making public claims. The process is real. It is also slow, fact-dependent, and demanding.