**Possibly—but do not assume that mailing a letter is an accepted substitute for FinCEN's current submission procedure.** FinCEN's whistleblower process and submission instructions can change. Before sending anything, check the FinCEN whistleblower program page for the current method, required forms, mailing address, and instructions for protecting your identity. If the page does not clearly confirm a written submission option, contact FinCEN using contact details on its official website before mailing a tip.

This distinction matters: a letter may alert the agency to suspected misconduct, but that does not necessarily mean it satisfies the program's requirements for a whistleblower submission or a potential award claim. This article explains what FinCEN does, how Bank Secrecy Act reporting fits in, what conduct may be reportable, and how to prepare a useful tip whether the current process is online, by mail, or both.



## What Is FinCEN?

The Financial Crimes Enforcement Network, or FinCEN, is a bureau of the U.S. Department of the Treasury. It administers and enforces key parts of the Bank Secrecy Act (BSA), collects and analyzes financial information, and shares intelligence with law enforcement and other authorized users. Its work supports efforts to detect and disrupt money laundering, terrorist financing, sanctions evasion, fraud, and other financial crime.

FinCEN is not the same as a bank's compliance department, a local police department, or a private whistleblower law firm. It receives certain reports and tips, but it does not promise that every submission will lead to an investigation, public action, or payment. A whistleblower submission is also not a substitute for reporting an immediate threat to emergency services or the appropriate law-enforcement agency.

## What the BSA and SAR Reporting Require

The BSA is a federal framework requiring certain financial institutions and other covered businesses to maintain anti-money-laundering controls and report specified activity. Depending on the institution and circumstances, duties can include customer identification, recordkeeping, monitoring transactions, and filing reports with FinCEN.

One important report is a Suspicious Activity Report (SAR). A covered financial institution generally files a SAR when it knows, suspects, or has reason to suspect that a transaction involves funds from illegal activity, is designed to evade BSA requirements, lacks an apparent lawful purpose, or uses the institution to facilitate criminal activity. Specific rules and thresholds vary by institution and situation.

SARs are confidential. Employees and other people with access to a SAR generally must not disclose that it was filed, or reveal information that would disclose its existence, except as permitted by law. A person considering a tip should avoid attaching or forwarding a SAR—or telling someone that a SAR exists—without first getting qualified legal advice about confidentiality and disclosure restrictions. A whistleblower tip and a SAR are different things: one does not automatically replace the other.

## What Conduct May Be Reportable?

FinCEN's whistleblower program concerns certain violations of the BSA and related laws within the program's scope. The statute and agency guidance determine eligibility; a suspicious-looking transaction, by itself, does not establish a violation. Examples of conduct that may merit review include:

- A financial institution allegedly failing to maintain or implement an effective AML program as required by law.
- Repeated failures to investigate or report suspicious activity, where the facts suggest a knowing or serious compliance breakdown.
- Transactions allegedly structured to evade reporting requirements, such as dividing activity into smaller amounts, when supported by evidence of intent.
- Use of shell companies, nominee accounts, or complex transfers to conceal the source, ownership, or destination of funds.
- Possible money laundering, terrorist financing, or sanctions-related conduct involving a covered institution or other person subject to relevant BSA requirements.
- False statements, altered records, or efforts to conceal a suspected BSA violation from regulators or investigators.

These are illustrations, not legal conclusions. A legitimate business can make unusual transactions, and a compliance mistake is not automatically fraud or a whistleblower-eligible violation. Describe the facts you can support and let the agency assess their significance.

## Can You Use a Written Submission Option?

The practical answer is: **check the current instructions before choosing mail.** Start at the FinCEN whistleblower program page, rather than relying on an old address, a copied form, or advice in a forum. Look for the current submission channel, any required whistleblower form, instructions for anonymous or represented submissions, and details about follow-up communications.

If FinCEN's current guidance expressly permits a written submission, follow its instructions exactly. Use the specified form and address, include required signatures or declarations, and check whether the agency asks for particular labeling or delivery methods. If the guidance directs people to an online portal, do not assume that an ordinary letter or email will be treated as a complete program submission. Ask FinCEN how to proceed if you cannot safely or practically use the online channel.

Question What to verify Is mail accepted? Look for an explicit written submission option in current FinCEN instructions. Is a form required? Use the current form and complete all required fields and declarations.

Where should it go? Use only an address published in current official guidance or confirmed by FinCEN. How is identity handled? Review the program's instructions on confidentiality, anonymous submissions, and attorney representation. Has the process changed? Check for submission process updates before sending and again if a significant delay occurs.

Mail can create access and privacy risks. Do not place original records, privileged communications, or sensitive personal information in an envelope without considering whether you have authority to disclose them and whether the channel is appropriate. Keep a paper trail: save a dated copy of what you submitted, the version of the instructions you followed, proof of mailing or delivery, and any later correspondence. Store those records securely and limit access.

## How to Prepare a High-Quality Tip

A strong tip is clear, specific, and organized. It helps the reader understand what may have happened, when it happened, who may have been involved, and what evidence supports the account. You do not need to prove the entire case yourself. Avoid speculation presented as fact and avoid sending a large, unexplained dump of material.

1. **Identify the conduct and the time period.**

   State the suspected activity in plain language. Give approximate dates, locations, accounts, entities, products, or transaction patterns where known. If dates are estimates, say so.

2. **Separate what you saw from what you heard.**

   Explain what you personally observed, did, reviewed, or recorded. Separately identify information you learned from another person, a document, or a public source. For example: "I reviewed the transaction log dated May 4" is different from "A colleague told me the transfer was approved to avoid scrutiny." Name the source when appropriate and lawful, and make clear when you cannot independently verify a statement.

3. **Explain why the activity may matter.**

   Connect the facts to a possible BSA or related violation without overstating the conclusion. Describe relevant controls, reporting practices, management decisions, or apparent concealment. If you do not know whether a SAR was filed, say that rather than assuming one was not.

4. **Make an evidence inventory.**

   List records that may support the tip, such as transaction records, emails, policies, audit findings, or meeting notes. For each item, note its date, creator or source, and what it may show. Do not alter original files or obtain records through unauthorized access.

5. **Consider confidentiality and legal restrictions.**

   Before sharing customer data, SAR-related information, privileged material, or records belonging to an employer, consider whether disclosure is permitted and how to protect it. Consult a lawyer familiar with whistleblower and financial-regulatory matters if the issue is significant or the rules are unclear. Do not send sensitive documents to an unverified address or recipient.

6. **Use the current official channel and preserve your records.**

   Follow the latest FinCEN instructions for the online or written submission option. Keep copies and delivery records, but do not circulate the tip or supporting documents more widely than necessary. Keep

a paper trail of the submission, follow-up, and any changes to the process.




## Online or Mail: Practical Differences

An online portal may offer structured fields, clearer prompts, and a direct way to provide follow-up information. A written submission may be useful for someone who cannot use the portal, but it can raise questions about delivery, form requirements, and whether the materials are complete. Neither method guarantees that FinCEN will respond on a particular schedule or that a tip will qualify for an award.

Do not treat a mailing receipt as proof that FinCEN accepted a tip under its whistleblower program. It can show that an item was delivered, but acceptance, eligibility, and any later award are https://www.lexinter.net/how-to-submit-a-fincen-whistleblower-program-tip separate questions governed by current law and agency procedures. If you are seeking potential whistleblower status or an award, review the program's rules carefully and consider getting legal advice before submitting.

## Useful Resources and Submission Process Updates

Use the FinCEN whistleblower program page as the primary source for program-specific requirements. Because forms, channels, addresses, and procedural details may change, check current FinCEN guidance immediately before submitting. In particular, verify whether a written submission option is available, whether a form is mandatory, and how the program handles identity and representation. This is the safest way to account for submission process updates rather than relying on an old article or unofficial summary.

For background education on AML, BSA obligations, and compliance concepts, ACAMS provides training resources at acams.org. Training can help readers understand financial-crime terminology and compliance practices, but ACAMS materials do not replace FinCEN's official submission instructions or individualized legal advice.

## Bottom Line

You may be able to submit a FinCEN whistleblower tip in writing, but the reliable answer depends on the agency's current instructions. Check the FinCEN whistleblower program page before mailing anything,

confirm the required form and address, and contact FinCEN if the written submission option is unclear. Prepare a concise account, distinguish what you personally observed from what you heard, protect confidential information, and keep a paper trail. A careful submission can make the facts easier to assess, but it cannot guarantee an investigation, a timeline, or an award.

*This article is general information, not legal advice. FinCEN's rules and procedures control, and people with questions about eligibility, confidentiality, or disclosure should consult a qualified attorney.*