

# United States Senate

WASHINGTON, DC 20510

February 3, 2026

The Honorable Scott Bessent  
Secretary  
Department of Treasury  
1500 Pennsylvania Avenue NW  
Washington, DC 20220

The Honorable Andrea Gacki  
Director  
Financial Crimes Enforcement Network  
1500 Pennsylvania Avenue NW  
Washington, DC 20220

Dear Secretary Bessent and Director Gacki:

We write to urge you to finalize rules implementing the Anti-Money Laundering Whistleblower Improvement Act whistleblower program. We agree completely with Director Gacki's May 2024 statement that the whistleblower program "holds tremendous potential as an enforcement force-multiplier" and is a vital tool to "increase enforcement by strategically deploying [FinCEN's] limited resources."<sup>1</sup> Indeed, Congress also recognized this observation and created the whistleblower program on a bipartisan basis in 2020 and strengthened it in 2022. An effective FinCEN whistleblower program is a critical tool for America's on-going fight against terrorists, drug-traffickers, and sanctioned state actors who are threats to our national security. Congress created the whistleblower program over five years ago. Yet, FinCEN has not finalized regulations that will make the program fully operational in the fight against America's enemies or even create a dedicated webpage for whistleblowers to learn about the program or submit tips.<sup>2</sup> We urge you to do so.

One of our concerns is that whistleblowers are apparently unable to receive awards until the program rules have been finalized even though FinCEN has publicly acknowledged it already established its Financial Integrity Fund to pay out awards.<sup>3</sup> According to Director Gacki's May 2024 remarks, hundreds of whistleblowers have already submitted unique tips to FinCEN. If these tips led to successful enforcement actions, then these whistleblowers ought to receive the award they're entitled to without delay. It is imperative that FinCEN finalize its rules and expeditiously pay out awards to incentivize future whistleblowers who put their livelihoods and often lives on the line to help law enforcement find and stop the flow of illicit funds to criminal cartels, terrorists, and sanctioned state actors.

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<sup>1</sup> FinCEN, *Prepared Remarks of FinCEN Director Andrea Gacki During the SIFMA AML Conference*, Press Release (May 6, 2024), <https://www.fincen.gov/news/speeches/prepared-remarks-fincen-director-andrea-gacki-during-sifma-aml-conference>.

<sup>2</sup> See Letter from Chairman Grassley, Senator Warren, and Senator Warnock to Andrea Gacki, Director, Financial Crimes Enforcement Network, (Feb. 2, 2024), [https://www.grassley.senate.gov/imo/media/doc/grassley\\_warren\\_and\\_warnock\\_to\\_fincen\\_-\\_aml\\_whistleblower\\_program\\_implementation.pdf](https://www.grassley.senate.gov/imo/media/doc/grassley_warren_and_warnock_to_fincen_-_aml_whistleblower_program_implementation.pdf).

<sup>3</sup> FinCEN, *Statement of FinCEN Director Andrea Gacki before the House Committee on Financial Services*, Press Release (Feb. 14, 2024), <https://www.fincen.gov/news/testimony/statement-fincen-director-andrea-gacki-house-committee-financial-services>.

America's enemies continue to find new and innovative ways to skirt our laws to launder money, fund terrorism, and evade sanctions. FinCEN recently raised the alarm on the danger posed by Chinese Money Laundering Organizations, including helping criminal cartels launder the proceeds of opiate trafficking into the United States.<sup>4</sup> Nazem Ahmad used art and diamonds to launder \$160 million to fund Hezbollah terrorism.<sup>5</sup> Terrorists like ISIS and the Houthis, as well as criminal cartels in South and Central America, have used looted antiquities to launder money. Kremlin cronies, North Korea, and Iran continue to find loopholes in our sanctions and money-laundering compliance system. This summer we introduced the bipartisan *Art Market Integrity Act* to require money-laundering compliance by art dealers and auction houses.<sup>6</sup> This bill would close a loophole that allows illicit funds to flow through the over \$25 billion domestic art market. Whistleblowers are a critical and effective tool that can be used to help law enforcement uncover these and other sophisticated schemes to launder money and fund terrorism.

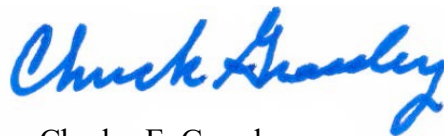
We urge FinCEN to finalize its rules, consistent with best whistleblower practices, that would allow the whistleblower program to operate effectively and swiftly pay out awards to successful whistleblowers. A fully operational whistleblower program is the enforcement force-multiplier FinCEN needs to find and stop the sophisticated schemes that criminal cartels, terrorists, and sanctioned actors use to funnel money through our financial system. Accordingly, we request that you keep our offices fully updated on the status of FinCEN's proposed rulemaking for its whistleblower program.

Thank you for your prompt review and responses. If you have any questions, please contact Brian Randolph on Senator Grassley's Committee staff at (202) 224-5225 and Devin Gould on Senator Fetterman's staff at (202) 224-4254.

Sincerely,



John Fetterman  
United States Senator



Charles E. Grassley  
Chairman  
Committee on the Judiciary

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<sup>4</sup> FinCEN, *FinCEN Issues Advisory and Financial Trend Analysis on Chinese Money Laundering Networks*, (Aug. 8, 2025), <https://home.treasury.gov/news/press-releases/sb0231>.

<sup>5</sup> Department of Justice, *OFAC-Designated Hezbollah Financier and Eight Associates Charged with Multiple Crimes Arising Out of Scheme to Evade Terrorism-Related Sanctions*, (April 18, 2023), <https://www.justice.gov/archives/opa/pr/ofac-designated-hezbollah-financier-and-eight-associates-charged-multiple-crimes-arising-out>

<sup>6</sup> Press Release, Grassley, Fetterman Introduce Bipartisan Bill to Crack Down on Art Market Money Laundering, Terrorist Financing, (Jul. 23, 2025), <https://www.judiciary.senate.gov/press/rep/releases/grassley-fetterman-introduce-bipartisan-bill-to-crack-down-on-art-market-money-laundering-terrorist-financing>.