In FinCEN's whistleblower program, "sanctions collected" generally refers to qualifying money the government actually receives after an enforcement action—not simply the amount a court or agency orders someone to pay. That distinction matters because an award percentage basis may depend on collections, and an award is not guaranteed just because a tip leads to an investigation or a penalty.

The phrase can also be confusing because "sanctions" has more than one meaning. In this context, it usually means monetary sanctions imposed in an eligible enforcement action. Here's a story that illustrates this perfectly: thought they could save money but ended up paying more.. It does not necessarily mean sanctions imposed under a foreign-policy or economic-sanctions program, such as an asset-blocking measure. The details depend on the law, the action, and the rules in effect.

This guide explains FinCEN's role, basic Bank Secrecy Act (BSA) and suspicious activity report (SAR) concepts, examples of potentially reportable conduct, and practical steps for preparing a useful tip. It is general information, not legal advice. Check FinCEN's whistleblower program page for current instructions and consult a qualified lawyer about your circumstances.

What Is FinCEN?

The Financial Crimes Enforcement Network (FinCEN) is a bureau of the U.S. Department of the Treasury. It administers the BSA and supports efforts to detect and deter money laundering and other financial crimes. FinCEN collects and analyzes financial information, including reports submitted by financial institutions, and makes information available to appropriate law enforcement and regulatory authorities.

FinCEN is not the only agency that investigates or brings cases involving financial misconduct. Depending on the conduct, other federal or state authorities may investigate, bring an enforcement action, or pursue a criminal case. A whistleblower tip may be relevant to FinCEN, another agency, or more than one authority; the appropriate reporting route depends on the facts and the program's requirements.

What Does "Sanctions Collected" Mean?

Ask yourself this: for an eligible whistleblower award, the important figure is not necessarily the headline penalty announced in a settlement or judgment. A public order might state that a person or company owes a substantial amount. If the government has collected only part of that amount—or has not collected it—the amount actually collected may differ from the amount imposed.

Term Plain-language meaning Why it matters Sanctions imposed The amount a court or authority orders as a penalty or other monetary consequence. An order does not by itself show that the money has been paid or recovered. Sanctions collected Qualifying money actually received or recovered by the government. Collections may be relevant to the award calculation under the applicable law and rules. Whistleblower award A possible payment to an eligible whistleblower who meets program requirements. Eligibility and amount are determined under the program; payment is not automatic.

The focus keywords "government collects sanctions" and "enforcement action proceeds" are useful shorthand, but they should not be read as a promise that every dollar in a settlement is part of an award calculation. Which amounts count, how related proceedings are treated, and when collections are recognized are questions for the governing statute, regulations, and agency process.



The “Over $1 Million” Threshold

FinCEN describes an eligibility threshold based on monetary sanctions exceeding $1 million in a qualifying action. That is a threshold about the action and its qualifying sanctions—not a promise that a whistleblower will receive a payment once an investigation begins. The relevant amount and how it is calculated depend on the program’s rules and the facts of the enforcement action.

Award Percentage Basis

The program provides for an award that may be a percentage of qualifying monetary sanctions collected in a covered action, subject to statutory and regulatory requirements. The award percentage basis is not a fixed percentage that can be assumed in advance. The award decision depends on such matters as eligibility, the value and usefulness of the information, the whistleblower’s contribution, and any applicable limitations or exclusions.

In short, an announced penalty, a qualifying collected amount, and an individual award are three different things. Do not rely on a public settlement figure alone to estimate a possible award. FinCEN’s current program materials and the governing rules are the better sources for the terms that apply.

BSA and SAR Reporting Basics

The BSA is a federal framework that requires certain financial institutions and other covered businesses to keep records and report specified transactions or suspected activity. Its requirements can include customer identification, recordkeeping, currency transaction reporting, and monitoring for suspicious activity. The exact obligations depend on the type of institution and the applicable rule.

A SAR is a suspicious activity report that a covered financial institution files with FinCEN when required by law or regulation. SARs can help authorities identify patterns and investigate suspected financial crime. They are not public complaints, and a customer or other person generally cannot file a SAR on fincen proposed rule april 1 2026 behalf of a bank. SAR confidentiality rules also restrict disclosure by the institution and its personnel.

A whistleblower tip is different from a SAR. It is information submitted through a whistleblower process about possible violations within that program's scope. A tip does not replace an institution's reporting obligations, and filing a tip does not authorize someone to disclose a confidential SAR. Do not copy, forward, or include a SAR or related restricted material unless counsel has assessed whether disclosure is lawful and appropriate.

What Conduct May Be Reportable?

Potentially relevant information may concern violations of the BSA or other laws within the whistleblower program's scope. The following examples are illustrative, not a checklist for deciding that a violation occurred:

- A financial institution repeatedly fails to maintain or apply required anti-money-laundering controls, despite clear warning signs.
- Employees or managers knowingly evade customer due diligence or transaction-monitoring requirements.
- A business conceals the true owner, source, destination, or purpose of funds through sham entities or misleading records.
- Transactions are structured or routed to avoid reporting or scrutiny, and internal records suggest that the conduct was deliberate.
- Records or reports are falsified, altered, or withheld in connection with a regulatory obligation or investigation.
- People responsible for controls knowingly ignore credible internal alerts about suspicious transactions.

A suspicious transaction is not proof of a violation. There may be lawful explanations, incomplete facts, or rules that do not apply to a particular person or business. A strong tip identifies the conduct and supporting facts without overstating what they prove.

How to Prepare a High-Quality Tip

Useful information is specific, organized, and honest about its limits. Before submitting anything, review FinCEN's instructions and consider speaking with a lawyer experienced in whistleblower matters. A lawyer can help assess eligibility, confidentiality, retaliation concerns, and whether the information may be subject to legal restrictions.

1. **Describe the conduct clearly**

   Explain what may have happened, when it occurred, where it took place, and which people or entities were involved. Identify the possible reporting or control failure if you know it. Avoid legal conclusions that go beyond the facts.

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

   Say plainly which facts you observed yourself and which came from another person, a document, or a secondhand account. For example, distinguish "I reviewed the transaction log" from "a colleague told me the transfer was concealed." Identify the source of secondhand information where appropriate, while protecting confidential or privileged material.



3. **Build a clear timeline**

   List important dates, transactions, internal warnings, responses, and later events. If a date is approximate, label it as approximate. Pretty simple.. A timeline helps reviewers understand sequence and may reveal whether the conduct was isolated or repeated.

4. **Identify supporting evidence**

   Describe records that may support the account, such as transaction details, policy documents, correspondence, audit findings, or meeting notes. Explain where the records are kept and how you know about them. Do not access systems or take documents you are not authorized to access or disclose.

5. **Preserve information lawfully**

   Keep original materials intact where you are entitled to retain them. Do not alter, annotate, or circulate sensitive records unnecessarily. Consider whether documents contain customer data, personal information, trade secrets, privileged communications, or SAR-related information before sharing them. Use secure, authorized channels and confirm who will have access.

6. **Explain what remains uncertain**

   Flag gaps, conflicting accounts, or facts you cannot verify. A precise account that acknowledges uncertainty is more useful than a sweeping claim. Do not speculate about what an authority will collect or what award you may receive.

Keep a paper trail: Maintain a lawful, secure record of relevant dates, your own notes, and communications about the report. Record what you submitted and when, but do not retain or share sensitive material in a way that violates company policy, privacy duties, court orders, or law. Ask counsel how to document the process safely.

Where Training Fits In

ACAMS offers anti-financial-crime training resources that may help readers understand AML concepts, transaction monitoring, and compliance practices. Those resources can be useful background, but they are not a substitute for FinCEN's official program instructions, legal advice, or the governing law. Use training to improve your understanding—not to turn an incomplete suspicion into a claim of proven misconduct.

Bottom Line

When FinCEN discusses sanctions collected, think of qualifying money the government actually receives through an eligible enforcement action, rather than simply the amount announced or ordered. The "over 1 million threshold" and any award percentage basis are governed by program requirements; neither guarantees an award. A careful tip presents concrete facts, distinguishes firsthand observations from information heard from others, identifies evidence without improperly disclosing it, and states what remains unknown.

For current requirements, start with FinCEN's whistleblower program page. For broader AML education, consult ACAMS resources at acams.org. Before submitting sensitive information, think through access, permissions, confidentiality, and legal protections with qualified counsel.