

Special Alert

July 23, 2025

FinCEN Announces Postponement and Reopening of the Investment Adviser Anti-Money Laundering Rule



On July 21, 2025 the U.S. Department of the Treasury’s Financial Crimes Enforcement Network (FinCEN) announced its intention to postpone the effective date of the final rule establishing the investment adviser anti-money laundering obligations – the IA AML Rule.

In the announcement, FinCEN shares that it will work through the rulemaking process to extend the effective date of the IA AML Rule by issuing exemptive relief. FinCEN anticipates delaying the effective date of the IA AML Rule from January 1, 2026 to January 1, 2028. In addition, FinCEN reports that it intends to revisit the substance of the IA AML Rule through a future rulemaking process and, together with the Securities and Exchange Commission, will revisit the joint proposed rule establishing customer identification program requirements for investment advisers.



Here is the link to announcement: <https://www.fincen.gov/news/news-releases/treasury-announces-postponement-and-reopening-investment-adviser-rule#:~:text=FinCEN%20anticipates%20delaying%20the%20effective,%2C%20until%20January%201%2C%202028>

Questions? Contact the DCS Team

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