

Laurel Loomis Rimon Analyzes FinCEN's Proposed New Rules for Bank Secrecy Act and Countering Financing of Terrorism Requirements

Publications

May 4, 2026

By: Laurel Loomis Rimon

In the *New York Law Journal*, Partner Laurel Loomis Rimon analyzed the Financial Crimes Enforcement Network's (FinCEN) proposed overhaul of Bank Secrecy Act Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) program requirements. In an article entitled *A Practitioner's Guide to FinCEN's New AML/CFT Rules*, Laurel highlights aspects of the proposed rules that would raise potential enforcement risks.

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Laurel discusses how regulators are likely to enforce their authority in the context of the proposed new rules, focusing on fintech companies, crypto platforms, and their bank partners. She analyzes the rule's new "establish and maintain" framework, the continuous risk assessment obligations triggered by material business changes, and FinCEN's explicit encouragement of machine learning and other innovative compliance technologies.

Laurel is a partner in Jenner & Block's where she serves as a Co-Chair of the firm's Fintech and Crypto Assets Practice. She is also founder of Jenner's Payments Practice.

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