

Partner Laurel Loomis Rimon Discusses FinCEN's New SAR Filing FAQs in *Regulatory Compliance Watch*

Publications

November 4, 2025

In a recent article for *Regulatory Compliance Watch*, Partner Laurel Loomis Rimon discussed FinCEN's newly released FAQs regarding Suspicious Activity Report (SAR) filing requirements and their implications for financial institutions and investment advisers.

“I would not expect that most investment advisers are filing SARs, given there’s no legal obligation to do so yet,” said Laurel. “You can file voluntary SARs, but there’s a safe harbor for doing so that only applies if the SARs are mandatory to be reported.”

Laurel also noted that while the FAQs do not change existing reporting obligations, they signal a somewhat lighter regulatory tone: “There's nothing that changes the existing requirements in the new FAQs, but there is an air of deregulation in them that firms will welcome. The FAQs will supply some aid to financial institutions to do a little bit less [in reporting SARs] because they'd be less worried that regulators would fault them for some things.”

[Read More](#)

Laurel is Co-Chair of the Jenner & Block’s Fintech and Crypto Assets Practice and founder of the firm’s Payments Practice. As a former federal prosecutor with deep experience in the financial regulatory and enforcement sector, she offers clients practical advice when facing compliance or enforcement challenges involving anti-money laundering, consumer protection, federal or state oversight, fintech, and payments.

Related Attorneys



Laurel Loomis Rimón

Partner

lrimon@jenner.com

+1 202 639 6868

Related Capabilities

Fintech and Crypto Assets

Payments

Related Locations

Washington, DC

San Francisco

© 2026 Jenner & Block LLP. Attorney Advertising. Jenner & Block LLP is an Illinois Limited Liability Partnership including professional corporations. This publication, presentation, or event is not intended to provide legal advice but to provide information on legal matters and/or firm news of interest to our clients and colleagues. Readers or attendees should seek specific legal advice before taking any action with respect to matters mentioned in this publication or at this event. The attorney responsible for this communication is Brent E. Kidwell, Jenner & Block LLP, 353 N. Clark Street, Chicago, IL 60654-3456. Prior results do not guarantee a similar outcome. Jenner & Block London LLP, an affiliate of Jenner & Block LLP, is a limited liability partnership established under the laws of the State of Delaware, USA and is authorised and regulated by the Solicitors Regulation Authority with SRA number 615729. Information regarding the data we collect and the rights you have over your data can be found in our Privacy Notice. For further inquiries, please contact dataprotection@jenner.com.

Stay Informed

