# ABARiskand CONTENTS

SEP | OCT 2025 | VOL. 46 | NO. 5

## 4 Terrorist drug trafficking organizations: Understanding and countering the threat

BY DANNY MCGLYNN AND CATHERINE M. WOODS

Explore how cartels and Chinese money laundering networks fuel the fentanyl crisis, the red flags banks should know, and how FinCEN's new orders and expanded public-private partnerships are reshaping the financial sector's response to this national security threat.

#### Combating mail fraud: Insights from Caitlin Piasecki, U.S. postal inspector and mail theft program manager

BY SEPIDEH ROWLAND, CAFP, CCBCO

U.S. Postal Inspector Caitlin Piasecki discusses how check fraud has evolved into a cyberenabled, national threat. She also hightlights what financial institutions can do to improve SAR narratives, spot red flags, and partner with law enforcement to disrupt organized fraud networks.

### **37** Whistleblowers and AML: What banks need to know now

BY JULIAN L. ANDRÉ AND CAITLIN SHEARD

As whistleblower programs expand across FinCEN, DOJ, and other agencies, financial institutions face mounting risks and incentives for insiders to report misconduct. This article breaks down the latest developments, potential enforcement impacts, and practical steps banks can take to prepare now.

# **36** Anti-Money Laundering Act: 2025 **Update Where are we now?** What's vet to come?

BY ANNALOU TIROL

Former FinCEN Deputy Director AnnaLou Tirol unpacks where the Anti-Money Laundering Act of 2020 stands today, from delayed rulemakings to FinCEN's new enforcement authorities. She also discusses what financial institutions can do now to stay agile in a rapidly evolving regulatory landscape.









#### **COLUMNS**

14 ABA Insights FinCEN's fentanyl orders: What banks need to know before October 20

BY HEATHER TREW

17 Crypto

The future of money: How U.S. Banks are embracing stablecoins in the wake of the **GENIUS Act** 

BY ARI REDBORD AND THOMAS ARMSTRONG

28 Compliance **Fundamentals** 

> Regulation E back to basics: Remittance transfers

BY ELIZABETH CREW, CRCM. CAMS

#### **DEPARTMENTS**

- 3 Letter from the **Editor** BY LAINE CROSBY
- 40 From the Hotline BY LESLIE CALLAWAY, CRCM. CAMS, CAFP AND TERRY L. HOLLINGER, CRCM
- **42** Highlights BY LAINE CROSBY
- **44** Regulatory **Developments Table**
- 48 Continuing **Education Quiz**