



## Katten RegWatch: First Impressions of FinCEN's Proposed AML Rule for Investment Advisers

**Presented by Katten**

February 21, 2024

Katten will present "Katten RegWatch: First Impressions of FinCEN's Proposed AML Rule for Investment Advisers" at 10 a.m. ET on Wednesday, February 21.

US Treasury's Financial Crimes Enforcement Network (FinCEN) issued proposed rules on February 13, 2024, that would apply comprehensive anti-money laundering and countering the financing of terrorism (AML/CFT) measures to both Securities and Exchange Commission (SEC)-registered investment advisers and SEC-exempted reporting advisers. Currently, the US investment adviser industry is not subject to comprehensive AML/CFT requirements pursuant to the Bank Secrecy Act, such as implementing risk-based AML/CFT programs, reporting suspicious activity to FinCEN, and fulfilling recordkeeping requirements. The proposal would introduce these requirements uniformly and would delegate its examination authority to the SEC.

During this First Impressions event, senior attorneys from Katten's Investment Adviser group will provide a high-level discussion of FinCEN's proposal (including its potential implications if the rule is finalized as proposed), as well as their observations regarding the increased regulatory scrutiny on Office of Foreign Assets Control compliance.

Financial Markets and Funds attorneys providing their First Impressions will be Counsel Adam Bolter and Partners David Dickstein, Christian Hennion and Richard Marshall.

[Watch the video recording of the program.](#)

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