



# FinCEN

# ALERT

FIN-2025-Alert003

November 28, 2025

## FinCEN Alert on Cross-Border Funds Transfers Involving Illegal Aliens

### Suspicious Activity Report (SAR) Filing Request:

FinCEN requests that MSBs reference this Alert by including the key term “FIN-2025-Alert003” in SAR field 2 (Filing Institution Note to FinCEN) and the narrative.

The U.S. Department of the Treasury’s (Treasury) Financial Crimes Enforcement Network (FinCEN) is issuing this Alert to urge money services businesses (MSBs)<sup>1</sup> to be vigilant in detecting, identifying, and reporting suspicious activity connected to cross-border funds transfers<sup>2</sup> involving illegal aliens, *i.e.*, individuals without legal status in the United States.<sup>3</sup> FinCEN is issuing this Alert as part of the U.S. Department of the Treasury’s effort to prevent the exploitation of the U.S. financial system by illegal aliens

seeking to move illicitly obtained funds, including by moving those funds across the border. This Alert is also consistent with Executive Order 14159, *Protecting the American People Against Invasion*, which notes that illegal aliens “present significant threats to national security and public safety” and highlights the need to “dismantle cross-border human smuggling and trafficking networks.”<sup>4</sup>

FinCEN has taken multiple steps this year to highlight the risks involved with cross-border financial activity, particularly transactions that benefit Mexico-based cartels, several of which have been designated as Foreign Terrorist Organizations.<sup>5</sup> Earlier this year, FinCEN issued Geographic Targeting Orders requiring MSBs located in certain counties and ZIP codes along the southwest border in Arizona, California, and Texas to file Currency Transaction Reports (CTR)s with FinCEN at a lower-dollar threshold than standard CTR reporting requirements.<sup>6</sup> Additionally, FinCEN

1. 31 C.F.R. § 1010.100(ff).

2. See 31 C.F.R. § 1010.100(w).

3. As used in this Alert, “illegal aliens” does not include: (1) U.S. citizens or nationals; (2) lawful permanent residents of the United States; (3) aliens whose presence in the United States is authorized by a visa or other permission to legally enter and remain in the United States and have not exceeded their authorization to remain in the United States; or (4) aliens whose employment in the United States is authorized by statute or regulation or who are otherwise specifically authorized to be employed in the United States.

4. Executive Order 14159, *Protecting the American People Against Invasion*, 90 FR 8443 (issued Jan. 20, 2025; published Jan. 29, 2025).

5. Executive Order 14157, *Designating Cartels and Other Organizations as Foreign Terrorist Organizations and Specially Designated Global Terrorists*, 90 FR 8439 (issued Jan. 20, 2025; published Jan. 29, 2025); Department of State, *Foreign Terrorist Organization Designations of Tren de Aragua, Mara Salvatrucha, Cartel de Sinaloa, Cartel de Jalisco Nueva Generacion, Carteles Unidos, Cartel del Noreste, Cartel del Golfo, and La Nueva Familia Michoacana*, 90 FR 10030 (Feb. 20, 2025).

6. FinCEN, *Issuance of a Geographic Targeting Order Imposing Additional Recordkeeping and Reporting Requirements on Certain Money Services Businesses Along the Southwest Border*, 90 FR 12106 (Mar. 14, 2025); FinCEN, *Geographic Targeting Order Imposing Recordkeeping and Reporting Requirements on Certain Money Services Businesses Along the Southwest Border*, 90 FR 43557 (Sept. 10, 2025). In accord with applicable court orders, MSBs under the jurisdiction of the U.S. District Court for the Southern District of California as well as certain Texas-based MSBs have not been, and are not currently, required to submit information to FinCEN pursuant to these Geographic Targeting Orders.

published an alert on bulk cash smuggling and repatriation by Mexico-based transnational criminal organizations (TCOs),<sup>7</sup> an alert on oil smuggling schemes on the U.S. southwest border associated with Mexico-based cartels,<sup>8</sup> and an advisory on the use of Chinese money laundering networks, including those used by Mexico-based TCOs to launder illicit proceeds.<sup>9</sup>

According to the Bureau of Economic Analysis, personal remittances from U.S. resident immigrants to foreign residents totaled over \$72 billion in 2024.<sup>10</sup> Money laundering and terrorist financing risks associated with cross-border funds transfers vary depending on factors such as the number and dollar volume of transactions and geographic location of originators and beneficiaries.<sup>11</sup> While the vast majority of remittances from the United States are legitimate and can provide critical financial support to family members abroad, FinCEN previously cautioned that malign actors have used low-dollar cross-border funds transfers to facilitate or commit terrorist financing, narcotics trafficking, and other illicit activity.<sup>12</sup>

MSBs are generally required to file a suspicious activity report (SAR) for a transaction that involves at least \$2,000 and that the MSBs know, suspect, or have reason to suspect is relevant to a possible violation of law or regulation; this includes the cross-border transfer of funds derived from unlawful employment or otherwise derived from funds the MSB knows, suspects, or has reason to suspect were illicitly obtained in the United States by illegal aliens.

As such, to support the filing of SARs reporting a possible violation of law or regulation connected to cross-border transfers of funds by illegal aliens, financial institutions should use the SAR key term “FIN-2025-Alert003” in SAR field 2 (“Filing Institutions Note to FinCEN”) and the narrative.

## For Further Information

FinCEN’s website at [www.fincen.gov](http://www.fincen.gov) contains information on how to register for FinCEN Updates. Questions or comments regarding the contents of this Alert should be addressed to the FinCEN Regulatory Support Section by submitting an inquiry at [www.fincen.gov/contact](http://www.fincen.gov/contact).

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7. FinCEN, FIN-2025-Alert001, [\*FinCEN Alert on Bulk Cash Smuggling and Repatriation by Mexico-Based Transnational Criminal Organizations\*](#) (Mar. 31, 2025).
  8. FinCEN, FIN-2025-Alert002, [\*FinCEN Alert on Oil Smuggling Schemes on the U.S. Southwest Border Associated with Mexico-Based Cartels\*](#) (May 1, 2025).
  9. FinCEN, FIN-2025-A003, [\*FinCEN Advisory on the Use of Chinese Money Laundering Networks by Mexico-Based Transnational Criminal Organizations to Launder Illicit Proceeds\*](#) (Aug. 28, 2025).
  10. Bureau of Economic Analysis, [\*International Data: International Transactions, International Services, and International Investment Position Tables\*](#), Table 5.1, Line 18 (accessed Nov. 19, 2025).
  11. See, e.g., Federal Financial Institutions Examination Council BSA/AML Manual, [\*Risks Associated with Money Laundering and Terrorist Financing: Funds Transfers—Overview\*](#) (2014).
  12. FinCEN, *Threshold for the Requirement to Collect, Retain, and Transmit Information on Funds Transfers and Transmittals of Funds that Begin or End Outside the United States, and Clarification of the Requirement to Collect, Retain, and Transmit Information on Transactions Involving Convertible Virtual Currencies and Digital Assets with Legal Tender Status*, 85 FR 68005, 68007-08 (Oct. 27, 2020).