

FinCEN Announces Intention to Postpone Effective Date of Anti-Money Laundering Rule for Registered Investment Advisers and Exempt Reporting Advisers

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On July 21, 2025, the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) announced its *intention* to postpone the effective date of the final rule establishing Anti-Money Laundering/Countering the Financing of Terrorism Program and Suspicious Activity Report Filing Requirements for Registered Investment Advisers and Exempt Reporting Advisers (IA AML Rule) from Jan. 1, 2026, until Jan. 1, 2028.

FinCEN will work through the rulemaking process to formally extend the IA AML Rule effective date and intends to provide the IA sector with regulatory certainty by issuing appropriate exemptive relief delaying the effective date. Leading up to the delayed effective date, FinCEN intends to revisit the substance and scope of the IA AML Rule and intends, together with the Securities and Exchange Commission, to revisit the joint proposed rule establishing customer identification program rule requirements for investment advisers.

[See the FinCEN press release here.](#)