Iran Illicit-Finance Whistleblowers

The Financial Crimes Enforcement Network (“FinCEN”) is currently seeking information regarding violations of the Bank Secrecy Act and U.S. economic sanctions involving Iran. If you have information regarding suspected violations, contact us for a free consultation.

On August 24, 2026, the U.S. Department of the Treasury launched “Operation Economic Outcast,” a campaign targeting the financial networks and resources supporting the Islamic Republic of Iran. Treasury Secretary Scott Bessent dubbed the initiative “Economic D-Day” and described its objective as severing the economic lifelines sustaining the Iranian government. The operation will target networks, facilitators, and financial channels used to smuggle oil, evade sanctions, and move illicit funds.

As part of Operation Economic Outcast, FinCEN is encouraging whistleblowers to report potential violations of the Bank Secrecy Act, International Emergency Economic Powers Act, Trading With the Enemy Act, and Foreign Narcotics Kingpin Designation Act. FinCEN is especially interested in information concerning illicit-finance schemes involving Iran-supported groups, including the use of front companies, opaque financial institutions, digital assets, crowdfunding platforms, and transactions inconsistent with a customer’s stated business or purpose.

Whistleblowers who voluntarily provide information that leads to a successful enforcement action may be eligible for an award of **10% to 30% of the collected penalties**.

FinCEN has identified a number of potential indicators of Iranian sanctions evasion and illicit finance, including:

- Use of companies and jurisdictions associated with heightened sanctions-evasion risk, including Iraq, the United Arab Emirates, Türkiye, and China;
- Irregularities in shipping documentation designed to obscure links to Iran or the true identity of vessels;
- Payments involving digital-asset exchanges or service providers located in Iran or entities acting as fronts for them;
- Shipping companies with Iranian counterparties, including companies operating through Iraq, the UAE, China, or Hong Kong;
- Unusual use of exchange houses or transactions that do not reflect ordinary commercial practices;
- Unusual digital-asset transactions involving petroleum, shipping, trading, or trust companies; and

- Use of unregistered peer-to-peer exchanges, foreign money-services businesses, or nested digital-asset exchanges.

If you have information regarding illicit-financial schemes or sanctions evasion involving Iran or Iran-supported groups, contact us for a free consultation.