



March 8, 2023

The Honorable Janet L. Yellen  
Secretary of the Treasury  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

**Re: Permanent Leadership of the Financial Crimes Enforcement Network (FinCEN)**

Dear Secretary Yellen,

As a broad coalition of non-profit groups dedicated to the fight against corruption and money laundering within the United States and abroad, we write to call for the **timely appointment of a permanent director for the Financial Crimes Enforcement Network (FinCEN)**.

A permanent director at FinCEN is crucial to the efficacy of a bureau of the Treasury Department that is currently tackling some of the biggest challenges facing U.S. national security and global democracy. At a time when the threats posed by transnational criminals, terrorist organizations, kleptocrats, and the illicit financial flows that fund them are increasingly pronounced, FinCEN's mission to protect the U.S. financial system is more important than ever.

As demonstrated by the ample bipartisan support for [increased FinCEN appropriations](#), Congress has increasingly recognized FinCEN's centrality to U.S. national security. FinCEN's vital roles include identifying Russian funds fanning the flames of the now year-long war in Ukraine, serving as our nation's financial crime fighters, and modernizing the U.S. anti-money laundering framework. In the past, we have commended the Biden Administration for explicitly recognizing the fight against corruption and dirty money within the U.S. as a key national security priority, both in its 2021 [Strategy on Countering Corruption](#) and in its 2022 [National Security Strategy](#). **To support the objectives in these strategies, FinCEN must be empowered to do its vital work through the appointment of a permanent director.**

Given the Department's committed support to the fight against corruption and financial secrecy, there should be no further delay naming permanent leadership at FinCEN. This vital national security bureau has no shortage of work to do in the coming months and years. FinCEN has yet to fully implement the landmark Corporate Transparency Act (CTA), which will end the use of anonymous shell entities to commit financial crimes within the U.S. by Russian oligarchs, human rights abusers, and other international and domestic bad actors. Though FinCEN finalized its first rule for the CTA in September, [major changes are needed](#) to the proposed second rule; moreover, further rules must be drafted to faithfully and effectively implement this vital transparency law. In the meantime, illicit funds continue to flow through the U.S. financial system while investigators and law enforcement officials go without the tools needed to identify the true owners of opaque shell companies.

Upcoming FinCEN rulemakings will also be central to tackling international money laundering through the \$50 trillion U.S. real estate and \$11 trillion private investment markets. FinCEN will need the financial, technological, and personnel resources necessary to both finalize and effectively enforce these rulemakings.

**For nearly two years, the Bureau has gone without permanent leadership, contradicting both the gravity of FinCEN's mission and the stated national security, economic, and criminal justice objectives of the Administration.** Lack of a permanent director complicates endeavors to set a clear vision and direction, build and maintain a collaborative leadership team, and ensure staff are best able to deliver for the American people. For FinCEN to keep our financial system safe, it needs stable and senior leadership both to address these vital gaps in U.S. anti-money laundering rules and to better empower investigators and U.S. officials to identify and ward against future threats.

FinCEN's work is, and will continue to be, central to the national security and economic readiness of the United States. We, the undersigned, call on the Treasury Department to appoint a permanent FinCEN director with an urgency reflective of the widely recognized importance of the agency and its mission.

Sincerely,

American Coalition for Syria  
Anti-Corruption Data Collective (ACDC)  
Antiquities Coalition  
Citizens for Responsibility and Ethics in Washington (CREW)  
Coalition for Integrity

FACTCOALITION

EarthRights International  
EG Justice  
Financial Accountability and Corporate Transparency (FACT) Coalition  
Foreign Policy for America  
Friends of Angola  
Friends of the Earth  
Global Financial Integrity  
Greenpeace USA  
Institute on Policy Studies - Program on Inequality  
Joint Baltic American National Committee (JBANC)  
Jubilee USA  
Never Again Coalition  
ONE Campaign  
Polaris Project  
Project On Government Oversight (POGO)  
Publish What You Pay - U.S.  
Razom for Ukraine  
The Sentry  
Transparency International U.S.  
US Africa Bridge Building Project  
U.S. PIRG

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