When a website says it is “not a law firm,” it is drawing a boundary around what the site provides. It may publish articles, explain legal processes, or describe how to report suspected misconduct. But unless the service is actually provided by a lawyer or law firm representing you, the site is not providing legal representation just because its content discusses the law.

That distinction matters if you are considering reporting suspected financial crime. The U.S. anti-money-laundering whistleblower program involves federal law, confidential information, and rules that can affect your rights. A website offering **general information** about the program may help you understand the basics, but that is different from legal advice about your particular facts.

This article explains what “not a law firm” usually means, how the anti-money-laundering and Bank Secrecy Act (BSA) whistleblower program works at a high level, and what to consider before sharing information about Suspicious Activity Reports (SARs) or other compliance issues. It is not legal advice.

What “Not a Law Firm” Usually Means

A website that says it is not a law firm is generally telling visitors that the site is not acting as their lawyer. It may not evaluate their specific situation, recommend a legal strategy, prepare a submission on their behalf, or communicate with regulators as their representative. The site may be operated by an information publisher, a nonprofit, a technology company, or another organization that does not provide legal services.

The exact meaning depends on the site and the services it offers. A disclaimer is an important notice, but it is not the only thing that determines whether a lawyer-client relationship exists. If you are unsure whether a lawyer has agreed to represent you, ask directly and get the answer in writing.

Phrase What it generally means What it does not automatically mean **No legal services** The site is not agreeing to act as your lawyer or provide legal representation. That every piece of information on the site is necessarily complete or applicable to your circumstances. **No attorney-client relationship** Using the site or reading its content does not, by itself, make the site’s operators your attorneys. That you have the same confidentiality protections as a client speaking with their lawyer. **General information** The material is intended to explain a topic broadly. That it answers what you personally should do, or replaces advice from a qualified lawyer.

Why the Distinction Matters for Whistleblowers

Whistleblower matters can involve employment concerns, confidentiality obligations, regulatory deadlines, and questions about whether information is eligible for an award. A general article cannot determine how those rules apply to a specific person or document. Nor does sending information through a website automatically create a confidential attorney-client communication.

This is especially important in banking and financial compliance. Employees may encounter internal alerts, customer records, investigation notes, or SAR-related information that is subject to strict restrictions. Do not assume that a public website is an appropriate place to upload those materials. Before sharing sensitive information, understand the website’s role, privacy practices, and any legal restrictions that may apply.

What Is the AML/BSA Whistleblower Program?

The anti-money-laundering (AML) whistleblower program provides a way for eligible individuals to report certain violations of federal law and, when statutory requirements are met, potentially receive an award based on

monetary sanctions collected by the government. The BSA is the Bank Secrecy Act, a federal law that requires financial institutions to maintain certain records and help detect and report suspected money laundering and other financial crime.

The Financial Crimes Enforcement Network (FinCEN), a bureau of the U.S. Department of the Treasury, has a central role in administering the program. Its official website, fincen.gov, is the place to check for current program information, instructions, and official materials. Other agencies may also have responsibilities depending on the conduct being reported.

A whistleblower tip is not the same thing as a court case, a government finding, or a guaranteed award. The government evaluates information, decides whether to investigate or bring an enforcement action, and determines whether the legal conditions for an award have been met. A report may be useful even if it does not result in an award, and a tip alone does not establish that anyone violated the law.

Legal Origin and Timeline

The AML/BSA whistleblower provisions were significantly expanded by the Anti-Money Laundering Act of 2020, which was included in the National Defense Authorization Act for Fiscal Year 2021. Congress then made further changes in the National Defense Authorization Act for Fiscal Year 2023, signed on **December 23, 2022**. Those changes strengthened the framework for reporting certain violations and seeking whistleblower awards.

The program's operation depends on statutory language and agency implementation. Forms, procedures, and guidance can change. For that reason, people considering a report should check the current information published by FinCEN rather than rely only on an older article, a third-party summary, or a social media post.

Eligibility and "Original Information"

Eligibility is not simply a matter of being the first person to complain. The statute sets requirements for the information and the circumstances in which it is provided. In broad terms, the program is directed at individuals who voluntarily provide useful, original information about qualifying violations. Whether someone qualifies depends on the law and the facts of the particular report.

What "Original Information" Generally Means

"Original information" generally refers to information that is based on the person's independent knowledge or independent analysis and is not already known to the government, subject to statutory definitions and exceptions. A report that merely repeats a public news story or restates information already available to authorities may not meet the standard. On the other hand, a person may sometimes add value by identifying evidence, explaining a transaction pattern, or connecting facts that are otherwise difficult to interpret.

Original does not necessarily mean that the whistleblower personally witnessed every event. It can include information learned through work or analysis, but legal rules and exclusions may apply. The government assesses the information under the statute; a website cannot promise that a particular submission will qualify.

Voluntary Reporting and Individual Circumstances

Timing can matter. The law's requirements around voluntary submissions, information already requested by authorities, and a person's role in the conduct can affect eligibility. There may also be special rules or exclusions for people who obtained information through certain professional duties or who participated in the wrongdoing. These are fact-sensitive questions, not something to resolve based on a general online checklist.

Do not take, copy, or transmit records you are not authorized to access. Do not alter files, bypass security controls, or ask coworkers to provide restricted documents. If you are concerned about what you may lawfully preserve or disclose, seek advice from a lawyer who handles whistleblower or financial-regulatory matters.



What Types of Violations May Qualify?

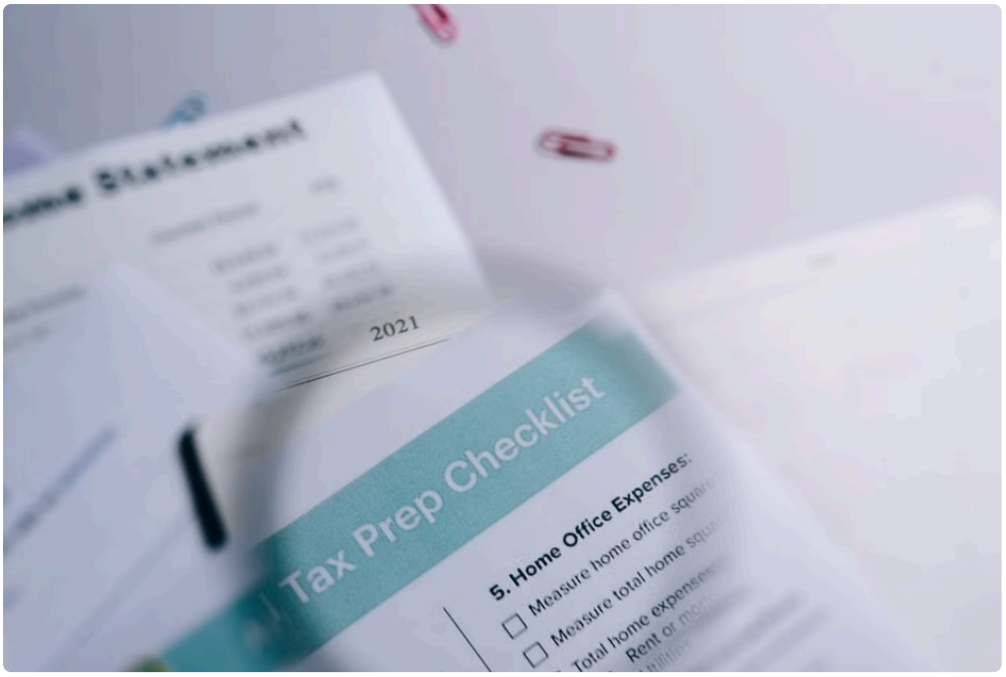
The program concerns specified violations, not every workplace dispute or every failure to follow an internal policy. Potentially relevant conduct can involve the BSA, money laundering, or certain sanctions violations. The particular statutory provision, the evidence, and the government's enforcement action matter.

- **SAR-related violations:** Financial institutions have obligations concerning the detection and reporting of suspicious activity. A tip might concern an alleged failure to file required reports, a pattern of reports that appears to omit significant activity, or conduct undermining reporting controls. A SAR itself is not proof of a crime.
- **Structuring:** Structuring generally means breaking up transactions to evade reporting requirements. A concern may involve a customer's conduct, an employee's assistance, or a control failure—but the context and evidence matter.
- **Customer due diligence (CDD):** CDD refers to steps financial institutions take to understand customers and assess risk, including identifying beneficial owners in circumstances covered by applicable rules. Alleged failures may be relevant when they relate to a qualifying legal violation.
- **Records and reporting:** The BSA requires certain records and reports. Allegations that required records were not maintained, were falsified, or were withheld may be relevant, depending on the facts and the law.
- **Sanctions:** Certain sanctions violations may fall within the whistleblower framework. Sanctions programs are complex and can involve rules administered by the Treasury Department's Office of Foreign Assets Control (OFAC).

These are examples of subject areas, not a finding that every mistake is a whistleblower violation. A control weakness, a missed deadline, a suspicious transaction, and a deliberate effort to evade the law are not interchangeable. The facts and applicable legal requirements determine how conduct is characterized.

SAR Confidentiality: A Critical Caution

SARs are reports that financial institutions submit to FinCEN about transactions that may involve suspicious activity. The existence or contents of a SAR are subject to strict confidentiality requirements. In general, institutions and their employees must not disclose a SAR or reveal that one was filed, except as permitted by law and applicable rules.. Exactly.



If you work at a financial institution, do not assume that you may upload a SAR, customer-identifying information, or internal investigation material to a whistleblower attorney contingency fee website. A concern about the institution's SAR process is different from permission to disclose the SAR itself. Official reporting channels and legal advice can help you understand how to describe conduct without improperly revealing protected information. Consult current FinCEN materials and a qualified attorney before sharing documents that may be restricted.

General Information Versus Legal Advice

A site that provides general information may explain the program's basic structure, point readers to FinCEN, or describe common terms. Legal advice, by contrast, applies law to a person's specific circumstances. It may involve assessing eligibility, evaluating confidentiality risks, helping prepare a submission, or advising on employment and retaliation concerns.

Think about it: look carefully at what the site says it does. Does it identify a licensed attorney? Does it explain whether the attorney represents you, what the scope of representation is, and how confidentiality works? Is there a written engagement agreement? If not, do not assume that using the site means you have retained counsel.

What to Do Next

1. **Start with official information.** Visit FinCEN's website and review the current whistleblower materials and reporting instructions.
2. **Separate facts from conclusions.** Write down what you observed, when it happened, who or what may be involved, and how you know. Avoid speculation and do not embellish.
3. **Protect restricted information.** Do not send SARs, customer data, or internal files to a third party until you understand whether disclosure is permitted.

4. **Consider independent legal advice.** If eligibility, confidentiality, employment consequences, or retaliation is a concern, speak with a lawyer experienced in whistleblower or financial-regulatory matters.
5. **Use a safe device and account.** Do not use a work laptop, work email, or employer-controlled network for sensitive personal communications. Avoid accessing records outside your authorized duties.
6. **Keep expectations realistic.** Reporting does not guarantee an investigation, enforcement action, award, or protection from every workplace consequence.

The Bottom Line

"Not a law firm" generally means that a website is offering **no legal services** and that visiting or contacting it does not, by itself, create an **attorney-client relationship**. Its articles may still provide useful **general information**, but they are not a substitute for advice tailored to your facts.

For AML/BSA whistleblower questions, check current information on FinCEN's official website. If your concern involves SARs, customer records, or internal investigations, treat confidentiality as a serious issue. Get qualified legal advice before sharing sensitive material or making decisions that could affect your rights.