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Cyber-SARs: Anti-Money Laundering and Cybersecurity Rules

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Investment advisers may soon have a new cybersecurity reporting requirement from a federal regulator. Anti-money laundering (“AML”) requirements have recently been interpreted to include cybersecurity suspicious activity reporting (“SAR”) requirements, so if AML obligations are extended to investment advisers — as may happen — then these newly articulated cybersecurity reporting obligations will follow. In this article, former Schulte attorney Michael Yaeger, Melissa Goldstein and former Schulte attorneys Nicholas Dingeldein and Jennifer Ophem discuss the Cyber-SAR Guidance set forth by FinCEN and considerations that investment advisers may want to take into account based on the new guidance.

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