

	Department of Justice Whistleblower Pilot Program	SDNY Whistleblower Pilot Program	Securities and Exchange Commission Whistleblower Program	Commodity Futures Trading Commission Whistleblower Program	Internal Revenue Service Whistleblower Program	FinCEN's Whistleblower program*	False Claims Act / qui tam actions
Misconduct Covered by Program	<ul style="list-style-type: none"> Corporate or financial misconduct in violation of federal law not covered by another federal whistleblower program Violations may include criminal abuses of the U.S. financial system, domestic corruption and FCPA violations outside the jurisdiction of the SEC (e.g., non-issuer violations) 	<ul style="list-style-type: none"> Criminal conduct involving public or private companies, exchanges, financial institutions, investment advisers, or investment funds involving fraud or corporate control failures or affecting market integrity, or criminal conduct involving state or local bribery or fraud relating to federal, state, or local funds 	<ul style="list-style-type: none"> Conduct involving violations of the federal securities laws including market manipulation, offering and accounting fraud, insider trading, and FCPA violations 	<ul style="list-style-type: none"> Conduct involving violations of the Commodity Exchange Act including market manipulations, spoofing, corrupt practices, virtual currency fraud, and investment frauds in the commodities and derivatives markets 	<ul style="list-style-type: none"> Conduct involving noncompliance with the U.S. tax laws or other laws the IRS is authorized to administer, enforce, or investigate 	<ul style="list-style-type: none"> Conduct involving violations of the Bank Secrecy Act and Anti-money Laundering Act including money laundering and sanctions violations 	<ul style="list-style-type: none"> Conduct involving false or fraudulent claims resulting in financial loss to the federal government
Eligibility	<ul style="list-style-type: none"> The individual provides the information voluntarily and submits non-public truthful information not already known to the government The individual is not involved in the reported criminal activity All victims have been properly compensated No other federal whistleblower program applies 	<ul style="list-style-type: none"> The individual provides the information voluntarily and submits non-public truthful information not already known to the government The individual is able to provide substantial assistance and is prepared to cooperate fully The individual has not engaged in certain criminal conduct (e.g., terrorism) and does not have a prior felony conviction or a conviction involving fraud 	<ul style="list-style-type: none"> The individual provides the information voluntarily and submits high-quality, original information not known to the SEC that leads to an enforcement action involving monetary sanctions over \$1,000,000 The individual can be involved in the wrongdoing, but it may impact the award amount 	<ul style="list-style-type: none"> The individual provides the information voluntarily and submits original information that is not known to the CFTC that leads to a successful enforcement action involving monetary sanctions over \$1,000,000. The individual will be ineligible if convicted of a criminal violation related to the enforcement actions 	<ul style="list-style-type: none"> The individual submits information that relates to a tax noncompliance matter in which the tax, penalties, interest, additions to tax, and additional proceeds in dispute exceed \$2,000,000 	<ul style="list-style-type: none"> The individual provides the information voluntarily and submits original information that is not known to FinCEN that leads to a successful enforcement action involving monetary sanctions over \$1,000,000 The individual will be ineligible if convicted of a criminal violation related to the enforcement action BSA/AML compliance personnel or auditors at a company may qualify as whistleblowers. 	<ul style="list-style-type: none"> The individual (<i>qui tam</i> relator) with knowledge of fraud against the government may file suit on behalf of the U.S. The suit may not be based upon information that has been disclosed to the public through any of several means including: criminal, civil, or administrative hearings in which the government is a party or, audits, reports, or investigations, or through the news media
Benefits	<ul style="list-style-type: none"> The individual could qualify to receive a portion of the resulting criminal or civil forfeiture if the individual helps the DOJ discover significant corporate or financial misconduct 	<ul style="list-style-type: none"> The individual will not be prosecuted in exchange for his cooperation if the above conditions are met 	<ul style="list-style-type: none"> The individual could qualify for an award ranging between 10% and 30% of the money collected in the enforcement action 	<ul style="list-style-type: none"> The individual could qualify for an award ranging between 10% and 30% of the money collected in the CFTC's enforcement action or a related action (by another federal agency) 	<ul style="list-style-type: none"> The individual could qualify for an award ranging between 10% and 30% of the money collected 	<ul style="list-style-type: none"> The individual could qualify for an award ranging between 10% and 30% of the money collected and attributable to the whistleblower's information 	<ul style="list-style-type: none"> The relator can share in the government's monetary recovery and recover attorney's fees and costs from the defendant. If the government intervenes in the suit, the relator's share will be 15%-25% of the proceeds collected by the U.S. If the government declines to intervene, the relator's share will be 25%-30% of the proceeds collected by the U.S.
Program Information	<p>The pilot program will have a formal start date later this year. https://www.justice.gov/opa/speech/deputy-attorney-general-lisa-monaco-delivers-keynote-remarks-american-bar-associations</p>	<p>https://www.justice.gov/31v/usao-sdny/sdny-whistleblower-pilot-program</p>	<p>https://www.sec.gov/whistleblower</p>	<p>https://www.whistleblower.gov/overview</p>	<p>https://www.irs.gov/compliance/whistleblower-office</p>	<p>*FinCEN has not fully implemented the AML whistleblower program and has yet to publish a Notice of Proposed Rule Making to govern the whistleblower program. See https://www.grassley.senate.gov/imo/media/doc/grassley_warren_and_warwick_to_fincen_-_aml_Whistleblower_program_implementation.pdf. Bank Secrecy Act, 31 U.S.C.5323 – Whistleblower incentive and protections</p>	<p>https://www.justice.gov/sites/default/files/civil/legacy/2011/04/22/C-FRAUDS_FCA_Primer.pdf</p>