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## United States Senate

COMMITTEE ON APPROPRIATIONS

WASHINGTON, DC 20510-6025

<http://appropriations.senate.gov>

October 25, 2018

The Honorable Steven T. Mnuchin  
Secretary of the Treasury  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue NW  
Washington, DC 20220

Dear Secretary Mnuchin,

I am deeply concerned by allegations that an employee in the Financial Crimes Enforcement Network (FinCEN) illegally exfiltrated and distributed extremely sensitive information from Suspicious Activity Reports (SARs).

As you have noted, “there is no excuse for anybody who has access to these important systems to release information on an unauthorized basis.” The system of SARs is critical to FinCEN’s work. Access to extremely sensitive information should be appropriately controlled, monitored, and compartmentalized, so to as eliminate unnecessary risk.

I am requesting more information about the policies and procedures in place for preventing the unauthorized disclosure of SARs.

- 1) How many FinCEN employees have authorized access to SARs?
- 2) To what extent does FinCEN monitor access to SARs? Is there a log of access to SARs including whether information is exfiltrated?
- 3) How does FinCEN assess whether access to SARs is conducted in accordance with an employee’s official responsibilities?
- 4) Please describe the internal penalties for any unauthorized disclosure of a SAR.
- 5) Have additional risk-based measures been considered to prevent future unauthorized disclosure of sensitive information?
- 6) Please provide copies of all policies and guidelines related to management of the SARs database including physical and cyber security controls, if needed in a classified annex.

- 7) Please provide a copy of FinCEN's SAR suppression policy.
- 8) Please provide copies of all policies and guidelines related to sharing SARs information with external authorized users.

Please provide these documents and responses no later than November 16, 2018.

In God We Trust.



James Lankford  
Chairman  
Subcommittee on Financial Services and General Government  
Committee on Appropriations