



Carl Fornaris Shares Insights on Proposed Rule to Delay Investment Adviser Anti-Money Laundering Rules in *ThinkAdvisor*

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Winston & Strawn partner Carl Fornaris was quoted in *ThinkAdvisor* discussing the U.S. Treasury Department's proposal to delay the implementation of an anti-money laundering rule for investment advisors until January 1, 2028. The proposed extension is meant to afford it "an opportunity to reduce any unnecessary or duplicative regulatory burden and ensure the IA AML Rule strikes an appropriate balance between cost and benefit."

Carl noted that most RIAs "implement some type of a voluntary 'best practice' AML program already, and they should continue doing so."

FinCEN's reprieve on mandatory AML compliance "for at least another two years does not mean that AML compliance should be ignored," he said. Firms should "continue to make AML compliance an important compliance item so that your critical third party relationships — broker-dealers, banks and larger fund investors — know that there are no AML 'blind spots' in your business model."

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