## TOP AREAS OF FINRA FOCUS 2025

## BATESGROUP.

See highlights of FINRA's continuing and emerging concerns on our **2025 FINRA Chart** below, which keeps track of articulated priorities from year to year.\*

\* Items highlighted in **gold** are new for 2025

	PAGE #				
CATEGORY	2021	2022	2023	2024	2025
Financial Crimes Prevention			5	4	3
-Cybersecurity and Cyber-Enabled Fraud*	8	10	5	4	3
Exam Findings:					
Account Access Authentication			6	7	
New Account Opening Identity Validation			6	7	
Identity Theft Prevention Program			6	7	
Inadequate Risk Assessment Process		11			
Data Loss Prevention Programs (not encrypting all confidential data)	9	11	6	7	3
Insufficient Branch Policies, Controls and Inspections	9	11	6	7	
Insufficient Training	9	11			
Insufficient Vendor Controls	9	11	6	7	
Insufficient Access Control Management	9	12			
Inadequate Change Management Supervision	9	12			
Limited Testing and System Capacity	9	12			
Digital Transformation and the Adoption of Cloud			7	7	
Log Management Practices			7	7	
Updating WSPs			7	7	
Suspicious Activity Report (SAR) Filings			7	7	
New SEC Cybersecurity Rules				4	
New Account Fraud					3
Quishing					3
Emerging Risks					
Vendor Risk		12		6	
Systemwide Outages	10				
Email and Account Takeovers**	10				3
Fraudulent Wire Requests	10				
Imposter Websites**	10			6	3
Ransomware**	10			6	3
Insider Threat**				6	3
Artificial Intelligence**				10	4
Quasi-Advanced Persistent Threats (Quasi-APTs)					4
Cybercrime-as-a-Service					4
Quantum Computing Risks					5
-Anti-Money Laundering, Fraud and Sanctions#	5	5	9	11	6
Exam Findings:					
Misconstruing Obligation to Conduct CIP and CDD			11	13	7
Unreasonable Procedures Concerning CIP and CDD					7
Inadequate Verification of Customer Identities			11	13	7
Inadequate Responses to Red Flags				13	7
Identity Theft			11		
Inadequate Due Diligence			11	13	8
Inadequate Ongoing Monitoring and Reporting of Suspicious Transactions		7	11	13	8
Inadequate Handling of FinCEN Information Requests			11	13	
Inadequate Testing			11	13	8
Inadequate Training					9

CATEGORY         2021         2021           Inadequate AML Transaction Monitoring         5         2021         2022           Limited Scope for Suspicious Activity Reports (SRB)         5         2021         2022           Inadequate AML Framework for Cash Management Accounts         6         2021         2021         2021           Unclear Delegation of AML Responsibilities         6         2021 </th <th>2 2023 11 12 13</th> <th>2024</th> <th>2025</th>	2 2023 11 12 13	2024	2025
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** No longer included in "Emerging Risks" but as a key consideration.						
# Previously listed as "Anti-money Laundering."						
~ Previously listed as "Funding Portals and Crowdfunding Offerings."						
^ Previously included in "Communications with the Public."						
Source: 2025 Report on FINRA's Examination and Risk Monitoring Program						
Compiled by Alex Russell, Senior Managing Director, White Collar, Regulatory and Inte	ernal Investiga	ations				