

## FinCEN Extends Effectiveness Date of Orders Targeting CIBanco, Intercam, and Vector until October 20, 2025

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Parties have an additional six weeks to prepare for the impact of FinCEN's June 25, 2025 orders targeting three Mexican financial institutions.

On August 19, 2025, FinCEN **extended** the effectiveness date of three orders targeting CIBanco S.A. Institución de Banca Múltiple ("CIBanco"), Intercam Banco S.A., Institución de Banca Múltiple ("Intercam"), and Vector Casa de Bolsa, S.A. de C.V. (collectively, the "Designated FIs"). The new effectiveness date is October 20, 2025.

As described in greater detail [here](#), the orders are FinCEN's first under the 2024 FEND Off Fentanyl Act. They contain FinCEN's finding that the Designated FIs are of "primary money laundering concern in connection with illicit opioid trafficking." Beginning on the effectiveness date—now October 20, 2025—the orders require covered financial institutions to reject any prohibited transmittal of funds involving a Designated FI. This is the second time FinCEN has extended the compliance deadline; FinCEN previously extended the effectiveness date to September 4, 2025.

Also on August 19, 2025, Mexico's Ministry of Finance and Public Credit **announced** that CIBanco's trust division is to be sold to Banco Multiva S.A. and that "a significant portion" of Intercam's operations are to be sold to Kapital Bank. Both transactions are subject to Mexican regulatory approval and no timing for completion has been announced.

On August 17, 2025, CIBanco **challenged** FinCEN's order in federal court, arguing that the bank had no notice of FinCEN's order and no opportunity to confront the evidence described therein. CIBanco asks the court to enjoin FinCEN's order, rescind all statements related to the order, and award costs to CIBanco. In light of FinCEN's extension of the order's effectiveness date, the parties consented to continue a hearing initially scheduled for August 20, 2025.