

OFAC and FinCEN release proposed rule to implement the GENIUS Act

April 21, 2026 | Client Update

FinCEN and OFAC have taken steps to implement the AML/CFT and sanctions compliance obligations under the GENIUS Act, the most notable of which include compliance requirements applicable to both primary and secondary market activity.

[Read the full update](#)

If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

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