

**STATEMENT BY BLANK ROME LLP REGARDING THOMAS E. HAIDER**  
**December 18, 2014**

Earlier today the Treasury Department's Financial Crimes Enforcement Network ("FinCEN") filed a civil enforcement action against Thomas E. Haider in the United States District Court for the Southern District of New York. The suit seeks to hold Mr. Haider personally responsible for alleged anti-money laundering compliance failures at his former employer, MoneyGram International, Inc. ("MoneyGram"). The complaint seeks enforcement of a civil monetary penalty assessed by FinCEN and further seeks injunctive relief preventing Mr. Haider from working in the financial industry.

Mr. Haider served as MoneyGram's Chief Compliance Officer until May 2008, when he left the company. In 2012, MoneyGram entered into a Deferred Prosecution Agreement with the Justice Department, agreed to pay a \$100 million fine, and acknowledged that the company had systemic anti-money laundering compliance failures that allowed certain MoneyGram agents to perpetrate fraud on consumers.

FinCEN's action today marks the first time, to our knowledge, that the government has filed suit to hold an individual compliance officer personally responsible for alleged anti-money laundering compliance failures of his employer. According to Mr. Haider's lead counsel, Blank Rome LLP partner Ian M. Comisky, "this lawsuit is unprecedented and will undoubtedly have a chilling impact on those who work, or seek to work, as compliance officers at U.S. financial institutions and serve on the front lines in the government's fight against money laundering and terrorist financing."

The existence of FinCEN's investigation of Mr. Haider has been reported widely in the press due to leaks by the government, but Mr. Haider and his legal team have been unable to comment publicly until now due to the terms of a confidentiality agreement that FinCEN imposed. "Mr. Haider has been viewed by his peers as a pioneer in anti-money laundering compliance," added Mr. Comisky. "Moreover, MoneyGram had a comprehensive anti-money laundering compliance program that was focused on FinCEN's priorities at that time and was extensively reviewed and audited by independent experts as well as the Internal Revenue Service during Mr. Haider's term of employment."

Blank Rome LLP has represented Mr. Haider since he was notified in October 2013 that FinCEN was seeking to impose a civil monetary penalty and enjoin him from working for a financial institution. "Tom Haider believes that the government's allegations that he acted willfully or recklessly in connection with the operation of MoneyGram's anti-money laundering program are unfounded. While the current government mantra is for heightened individual responsibility, this is the wrong case to try to establish this principle," said Mr. Comisky.

Mr. Haider's trial team is comprised of Ian M. Comisky, Matthew D. Lee, and Jed M. Silversmith of Blank Rome's Philadelphia office.

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