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# Amendments to the Regulations of the Federal Law on the Prevention and Identification of Transactions Involving Funds of Illicit Origin

On March 27, 2026, the Decree amending, adding, and repealing various provisions of the Regulations of the Federal Law for the Prevention and Identification of Transactions Involving Illicit Funds (the “**Regulations**”) was published in the Official Gazette of the Federation (“**DOF**”).

The amendments to the Regulations: (i) complement the 2025 amendments to the Federal Law on the Prevention and Identification of Transactions Involving Illicit Funds (the “**Anti-Money Laundering Law**”); (ii) expand the powers of the Financial Intelligence Unit (“**FIU**”) and the Tax Administration Service (“**SAT**”); (iii) clarify operational obligations; and (iv) create new oversight mechanisms.

The following is a summary of the key changes to the Regulations and their impact on companies.

## I. Expanded powers of the FIU and the SAT

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The amendment to the Regulations expands and clarifies the powers of the FIU and the SAT regarding the verification of compliance with anti-money laundering obligations.

Specifically, the amendment expands powers related to verification visits, the receipt of reports concerning vulnerable activities under the Anti-Money Laundering Law, the retention of information, audits, and the grounds for imposing sanctions for non-compliance.

## II. Clarification of compliance obligations for vulnerable activities

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The amendment to the Regulations clarifies the compliance obligations of individuals or companies that carry out any of the vulnerable activities established in the Anti-Money Laundering Law, and reinforces certain other obligations introduced by the 2025 amendments to the Anti-Money Laundering Law.

These clarifications include: (i) thresholds for filing reports; (ii) training content on money laundering prevention; (iii) retention of internal or external audit report content; (iv) the filing of 24-hour reports for transactions potentially related to transactions involving funds of illicit origin; and (v) the procedures for identifying non-compliance with anti-money laundering obligations.

### III. Clarification of specific vulnerable activities

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*Gambling and raffles:* It is clarified that linked transactions exist when two or more transactions are conducted with the same person, and such activity is considered a vulnerable activity when the total amount of the transactions exceeds 325 UMAs within a 24-hour period.

*Granting of loans or credits:* It is clarified that the loan or credit is deemed granted when the funds are made available to the customer, not when the contract is signed.

*Transfer or custody of securities:* If the value of the transferred assets is not established, the transfer or custody activity will always be subject to reporting.

*Exchange of virtual assets:* A single report must be filed in respect of both the exchange of virtual assets and the receipt of consideration for that exchange.

### IV. Politically Exposed Persons

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The amendment introduces a new chapter in the Regulations, under which the FIU will compile and maintain a definitive list of Politically Exposed Persons (“**PEPs**”). It is also established that financial institutions and regulated entities may consult the FIU through the designated electronic means to determine whether a customer is listed as a PEP.

### V. Recommendations for companies

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Following the publication of the amendments to the Regulations, companies must act proactively to ensure compliance with anti-money laundering obligations, as the regulatory framework requires a comprehensive compliance system extending beyond the mere filing of reports for engaging in vulnerable activities.

In this regard, we set out below a series of recommendations to assist companies in mitigating the risks arising from the amendments to the Regulations as well as the 2025 amendments to the Anti-Money Laundering Law:

- **Conduct an immediate assessment:** Determine whether any of the company’s activities qualify as vulnerable activities and ensure that the corresponding obligations are fulfilled.
- **Update internal policies and procedures:** Review and update anti-money laundering policies and compliance manuals to reflect the new provisions, deadlines, and obligations arising from the amendments to the Anti-Money Laundering Law and the Regulations.
- **Strengthen controls over PEPs:** Implement or update verification mechanisms and established procedures for consulting the FIU’s definitive list to determine whether clients are listed as politically exposed persons.
- **Monitor the issuance of the General Rules:** Several critical matters — including the identification of the controlling beneficial owner — remain pending regulation through the General Rules, and companies are advised to monitor their publication closely so as to adjust internal controls in a timely manner.

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