

## Agency Bulletin: AGNAT-2022-015

Date: October 28, 2022

To: ALL FNTI AGENTS

From: AGENCY DEPARTMENT

RE: **FinCEN Extends Order Requiring Reporting for Certain Transactions in Specific Areas of the USA**

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Dear Agents:

On October 26, 2022 the Financial Crimes Enforcement Network (FinCEN) has once again issued a Geographic Targeting Order (“GTO”). The most recent GTO received by First National Title Insurance is attached hereto. Please refer prior bulletins and to the actual GTO for the full reporting details.

### GTO PERIOD:

THE TERMS OF THE OCTOBER 26, 2022 GTO FOR PURCHASE OF PROPERTIES WITHIN THE TEXAS COUNTIES OF HARRIS, MONTGOMERY, OR WEBB, ARE EFFECTIVE BEGINNING NOVEMBER 25, 2022, AND ENDING ON APRIL 24, 2023 (EXCEPT AS OTHERWISE PROVIDED IN SECTION III.C OF THE GTO).

THE TERMS OF THE OCTOBER 26, 2022 GTO FOR PURCHASES IN ALL OTHER COUNTIES COVERED BY THE GTO ARE EFFECTIVE BEGINNING OCTOBER 27, 2022, AND END ON APRIL 24, 2023

### COVERED COUNTIES:

For residential real property purchased by a “Legal Entity” (as this term is defined in the Section III.A of the GTO) where the purchase price of the residential real property is in the amount of \$300,000 or more, the following counties are affected by the GTO:

- Texas Counties of Bexar, Tarrant, Dallas, with the addition of Harris, Montgomery, and Webb counties, effective beginning November 25, 2022;
- Boroughs of Manhattan, Bronx, Brooklyn, Queens, and Staten Island in the City of New York, State of New York;
- Florida Counties of Miami-Dade, Broward, and Palm Beach;
- California Counties of San Diego, Los Angeles, San Francisco, San Mateo, and Santa Clara;
- Clark County, Nevada;

- King County, Washington;
- Massachusetts counties of Suffolk and Middlesex;
- Cook County, Illinois;
- The Hawaii counties of Hawaii, Maui, Kauai, or Honolulu, or the City of Honolulu;
- The Maryland counties of Montgomery, Anne Arundel, Prince George's, or Howard;
- The Virginia counties of Arlington or Fairfax, or the cities of Alexandria, Falls Church, or Fairfax;
- The Connecticut county of Fairfield;
- The District of Columbia;

AND

- Additionally, purchases of residential real property by a "Legal Entity" (as this term is defined in the Section III.A of the GTO) in the amount of **\$50,000** or more in the City or County of Baltimore in Maryland are affected by this GTO.

Purchases by individuals are not required to be reported nor does the GTO require reporting for purchases made by legal entities that are United States publicly-traded companies.

FNTI continues to monitor all communications from FinCEN, the American Land Title Association, and the Texas Land Title Association regarding the GTO and may amend the above information should we become aware of necessary and/or needed changes.

Helpful Links:

[GTO](#)

Not only are we at FNTI available for questions, the FinCEN Resource Center may be contacted at 800-767-2825, (Monday thru Friday from 8 a.m. to 6 p.m. Eastern time).

(Previously issued Bulletins (may be renumbered and differ from last bulletin issued) are locatable on FNTI's website, <https://fnti.com/agents/bulletins/agency-bulletins/>:

Agency Bulletin AGTX/FL-2016-005 dated 08/18/2016  
Agency Bulletin AGTX/FL-2017-002 dated 02/22/2017



Agency Bulletin AGTX/FL-2017-005 dated 08/24/2017  
Agency Bulletin AGTX/FL-2018-001 dated 03/27/2018  
Agency Bulletin AGTX/FL-2018-005 dated 11/26/2018  
Underwriting Bulletin UNTX.FL-2019-001 dated 05/22/2019  
Agency Bulletin AGTX/FL-2019-008 dated 11/11/2019  
Agency Bulletin AGTX/FL/NV 2020-004 dated 05/13/2020  
Agency Bulletin AGTX/FL/NV-2020-007 dated 11/6/2020  
Agency Bulletin AGTX/FL/NV-2021-001 dated 04/30/2021)  
Agency Bulletin AGTX/FL/NV-2021-006 dated 10/29/2021

Thank you for being part of the FNTI Agency family.