

**FROM:** Underwriting Department  
**DATE:** 4/15/2025  
**TO:** All Agents  
**RE:** FinCEN Renews Residential Real Estate Geographic Targeting Orders

All Agents:

Please be advised that effective Tuesday, April 15, 2025, the Financial Crimes Enforcement Network (“FinCEN”) has renewed and extended its Residential Real Estate Geographic Targeting Order (“GTO”) through October 9, 2025.

The Order requires U.S. title insurance companies to identify the natural persons behind shell companies used in non-financed purchases of residential real estate. FinCEN renewed the GTOs that cover certain counties and major U.S. metropolitan areas in California, Colorado, Connecticut, Florida, Hawaii, Illinois, Maryland, Massachusetts, Nevada, New York, Texas, Washington, Virginia, and the District of Columbia. **No changes have been made to jurisdictional coverage since the last issuance of these GTOs.** The purchase price threshold likewise remains \$300,000 for each covered metropolitan area, with the exception of the City and County of Baltimore, where the purchase price threshold is \$50,000.

Please refer to the [April 15, 2025, GTO Extension](#) for reporting details in addition to the FNTI bulletins below for FNTI specific reporting requirements.

HELPFUL LINKS:

Forms and additional information can be obtained through the FinCEN Resource Center at [FRC@FinCEN.gov](mailto:FRC@FinCEN.gov)

The FinCEN Resource Center may be contacted by phone at 800-767-2825, Monday through Friday, 8am to 6pm ET.

As always, your FNTI team is available to help with questions and guidance. Previously issued Bulletins on the FinCEN GTO can be located on the FNTI website at: <https://fnti.com/agents/bulletins/> or within the FirstNet PRO portal under Resources>Bulletins:

Agency Bulletin AGNAT-2023-002 dated May 12, 2023  
Agency Bulletin AGNAT-2022-015 dated October 28, 2022  
Agency Bulletin AGNAT-2022-009 dated May 2, 2022  
Agency Bulletin AGTX/FL/NV-2021-006 dated October 29, 2021  
Agency Bulletin AGTX/FL/NV-2021-001 dated April 30, 2021  
Agency Bulletin AGTX/FL/NV-2020-007 dated November 6, 2020  
Agency Bulletin AGTX/FL/NV-2020-004 dated May 13, 2020  
Agency Bulletin AGTX/FL-2019-008 dated November 11, 2019

Underwriting Bulletin UNTX.FL-2019-001 dated May 22, 2019  
Agency Bulletin AGTX/FL-2018-005 dated November 26, 2018  
Agency Bulletin AGTX/FL-2018-001 dated March 27, 2018  
Agency Bulletin AGTX/FL-2017-005 dated August 24, 2017  
Agency Bulletin AGTX/FL-2017-002 dated February 22, 2017  
Agency Bulletin AGTX/FL-2016-005 dated August 18, 2016

As always, thank you for being part of the FNTI family.

*This Underwriting Bulletin becomes a part of the principles and practices with which you are to comply under the terms of your Underwriting Agreement with First National Title Insurance Company. Should the content of this bulletin address the closing and escrow function, this information should be considered a directive and part of the principles and practices if non-compliance would result in liability to FNTI under either the insured closing service letter or policy of title insurance notwithstanding that the Underwriting Agreement does not include the closing and escrow functions of your agency.*