

FROM: Underwriting Department
DATE: September 30, 2025
TO: All Agents
RE: **Anti-Money Laundering (AML) Rule Rollout Moved to 03/01/2026**

FinCEN announced today the implementation date of the new Anti-Money Laundering Reporting Rule is postponed from December 01, 2025, to **March 01, 2026**.

Please see Underwriting Bulletin 2025-005 released September 23, 2025, for background information about the pending new Federal regulation.

The planned FNTI Bulletin covering the final AML Reporting Rule will be issued closer to the new implementation date of March 01, 2026, discussing the Rule in detail.

This mandatory reporting requirement is being implemented by federal law, and we strongly recommend that all Agents read the background information carefully and implement the necessary procedures to comply with the reporting requirement.

Please Note: Despite this postponement, FNTI expects this Rule to go into effect next year. FinCEN announced the postponement was to provide the industry with more time to comply with the new rule, reduce business burden, and ensure effective regulation.

*IMPORTANT: All counties/states who are currently governed by the Geographic Targeting Order should continue to comply with their respective Orders. See links below for most recent Bulletin Orders from April 15, 2025: [UN-2025-001](#)

FNTI will keep you updated with any further changes.

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.