

# Financial Crimes Enforcement Network (FinCEN) Issues Geographic Targeting Order Effective November 6



## What is a Geographic Targeting Order (GTO)?

*A GTO is an Order issued by the Financial Crimes Enforcement Network (FinCEN), imposing reporting requirements on a business in a specific geographic area for transactions involving certain amounts of U.S. currency or other monetary instruments.*

The Financial Crimes Enforcement Network's mission is to safeguard the financial system from illicit use and combat money laundering and promote national security through the collection, analysis, and dissemination of financial intelligence and strategic use of financial authorities.

FinCEN recently issued a Geographic Targeting Order (GTO) which requires title companies to collect and report information about those involved in certain real estate transactions.

**The order was effective as of November 6, 2020, and will remain in force until May 4, 2021.**

**Contact your Lawyers Title  
Sales Executive for more information,  
or view the order at:**

[www.fnas.com/fnasdocs/Bulletins/  
RealEstateGTONovember2020  
FidelityNationalFinancialInc.pdf](http://www.fnas.com/fnasdocs/Bulletins/RealEstateGTONovember2020FidelityNationalFinancialInc.pdf)

## Covered Transactions, as defined by the Order meet the following criteria:

- Residential real property
- Purchased by a Legal Entity as it is defined in Section III.A of the Order
- For a purchase price of \$300,000 or more in one of the following areas:
  1. Bexar, Tarrant, or Dallas County, Texas
  2. Miami-Dade, Broward, or Palm Beach County, Florida;
  3. The Boroughs of Brooklyn, Queens, Bronx, Staten Island, or Manhattan, New York City, New York
  4. The California Counties of San Diego, Los Angeles, San Francisco, San Mateo, or Santa Clara
  5. The City and County of Honolulu, Hawaii
  6. Clark County, Nevada
  7. King County, Washington
  8. The Massachusetts Counties of Suffolk or Middlesex
  9. Cook County, Illinois
- The purchase is made without a bank loan or similar form of external financing; and
- Such purchase is made, at least in part, using currency or a cashier's check, a certified check, a traveler's check, a personal check, a business check, a money order in any form, a funds transfer, or virtual currency

