

UNDERWRITING BULLETIN

TO: All ANTIC Policy Issuing Agents
FROM: ANTIC Underwriting Department
DATE: November 6, 2024
RE: FinCEN Extends Geographic Targeting Order

On October 15, 2024, the Financial Crimes Enforcement Network (FinCEN) renewed and expanded its previous Geographic Targeting Order (GTO), effective beginning October 16, 2024 and ending April 14, 2025. We expect the GTO will continue to be renewed. A copy of the latest order is attached.

The GTO requires U.S. title insurance companies to identify the natural persons behind shell companies used in all-cash purchases of residential real estate. The purchase amount threshold remains \$300,000 or more for each covered metropolitan area, with the exception of the City or County of Baltimore Maryland, where the threshold amount is \$50,000 or more.

The GTOs cover the following counties within the following major U.S. metropolitan areas:

- Texas: Bexar (San Antonio), Tarrant (Fort Worth), Dallas, Harris (Houston), Montgomery, Webb (Laredo) and Travis (Austin) Counties
- Florida: Miami-Dade, Broward, Palm Beach and Hillsborough, Pasco, Pinellas, Manatee, Sarasota, Charlotte, Lee, and Collier Counties
- New York: Boroughs of Brooklyn, Queens, Bronx, Staten Island and Manhattan in New York City
- California – San Diego, Los Angeles, San Francisco, San Mateo and Santa Clara Counties
- Hawaii: Counties of Hawaii, Maui, Kauai or Honolulu, or the City of Honolulu
- Nevada: Clark County (Las Vegas)
- Washington: King County (Seattle)
- Massachusetts: Suffolk, Middlesex (Boston), Bristol, Essex, Norfolk, and Plymouth Counties
- Illinois: Cook County (Chicago)
- Maryland: Montgomery, Anne Arundel, Prince George’s, Howard or Baltimore Counties or City of Baltimore
- Virginia: Arlington or Fairfax counties; or the cities of Alexandria, Falls Church, or Fairfax
- Connecticut: Fairfield and Litchfield County
- Colorado: Adams, Arapahoe, Clear Creek, Denver, Douglas, Eagle, Elbert, El Paso, Fremont, Jefferson, Mesa, Pitkin, Pueblo and Summit Counties
- District of Columbia

We are NOT required to report:

- Properties acquired by U.S. publicly traded corporations or entities and their wholly-owned subsidiaries
- The beneficial owners of trusts which take title to a property
- An Exchange Accommodation Titleholder (EAT) who is only “parking” the property for a



1031 exchange. However, if the EAT subsequently transfers the property to a legal entity (the final buyer), then reporting is required for the final buyer.

News Release: [FinCEN Renews Real Estate Geographic Targeting Orders | FinCEN.gov](#)

GTO: [FinCEN GTO Phase 19, October 16, 2024](#)

FAQs: [FinCEN Residential Real Estate GTO, October 16, 2024](#)

The Agent may be held responsible for any loss sustained as a result of failure to follow the standards set forth above.