



TO: Alliant National Colorado, District of Columbia, Florida, Illinois, Maryland, Nevada, Texas, and Virginia Agents

DATE: October 16, 2024

SUBJECT: ***FinCEN Geographic Targeting Order Effective October 16, 2024***

The Financial Crimes Enforcement Network (“FinCEN”) of the United States Department of the Treasury has extended its Geographic Targeting Orders (“GTO’s”) requiring Alliant National and its agents to collect and report information on certain residential real estate purchases in specifically identified cities and counties through April 14, 2025. See attached copy. All previously identified geographic locations remain the same, without any additions or deletions.

Unless renewed or otherwise extended, the new GTO expires on April 14, 2025, for all identified geographic locations. The new GTO still imposes the same potential civil and criminal penalties for noncompliance by Alliant National or its agents.

As with the prior GTOs, “Covered Transactions” must be reported. A “Covered Transaction” is one in which:

- 1) The purchase price is either \$300,000 or more; or \$50,000 or more if the property is located in either the City or County of Baltimore, Maryland.
- 2) The property is located in one of the following states, and its counties or cities:

| State | Counties | | | | | | Cities | | |
|----------------------|--------------|------------|-------------|-----------------|------------|----------|------------|--------------|---------|
| District of Columbia | | | | | | | | | |
| Colorado | Adams | Arapahoe | Clear Creek | Denver | Douglas | Eagle | | | |
| | Elbert | El Paso | Fremont | Jefferson | Mesa | Pitkin | | | |
| | Pueblo | Summit | | | | | | | |
| Florida | Broward | Miami-Dade | Palm Beach | Hillsborough | Pasco | Pinellas | | | |
| | Manatee | Sarasota | Charlotte | Lee | Collier | | | | |
| Illinois | Cook | | | | | | | | |
| Maryland | Anne Arundel | Howard | Montgomery | Prince George’s | Baltimore | | Baltimore | | |
| Nevada | Clark | | | | | | | | |
| Texas | Bexar | Dallas | Tarrant | Harris | Montgomery | Webb | | | |
| | Travis | | | | | | | | |
| Virginia | Arlington | Fairfax | | | | | Alexandria | Falls Church | Fairfax |

- 3) The property is residential;
- 4) The purchase is made without a bank loan or other similar form of external financing (hard money loans are non-institutional so they do not qualify as bank loans);

5) The purchaser is a “Legal Entity” (a corporation, limited liability company, partnership, or other similar business entity, whether formed under the laws of a state in the U.S. or a foreign jurisdiction; this term no longer includes Trusts or Trustees of Trusts); and

6) The 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, or a money order in any form, a funds transfer (wired funds), or virtual currency.

For a Covered Transaction, the GTO requires that certain information be reported on FinCEN’s Currency Transaction Report. This information includes:

1) The identity of the Purchaser (the Legal Entity that is purchasing the residential real estate in a Covered Transaction);

2) The identity of the “Beneficial Owners” of the Legal Entity (defined as each individual who directly or indirectly owns 25% or more of the equity interests in a corporation, partnership or other business entity; and

3) The identity of the person primarily responsible for representing the Purchaser.

All Alliant National search reports/commitments involving any land in the above-referenced states and counties must include the following requirement in Schedule B for Colorado, the District of Columbia, Florida, Illinois, Maryland, Nevada, Virginia, and in Schedule C for Texas:

| State / Schedule | Language for Requirement |
|-------------------------------------|---|
| Colorado, on Schedule B | When 1) the land is residential real property and is located in Adams, Arapahoe, Clear Creek, Denver, Douglas, Eagle, Elbert, El Paso, Fremont, Jefferson, Mesa, Pitkin, Pueblo, and Summit counties, Colorado; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated October 16, 2024 or any renewal thereof. |
| District of Columbia, on Schedule B | When 1) the land is residential real property and is located in the District of Columbia; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated October 16, 2024 or any renewal thereof. |
| Florida, on Schedule B | When 1) the land is residential real property and is located in Broward, Miami-Dade, Palm Beach, Hillsborough, Pasco, Pinellas, Manatee, Sarasota, Charlotte, Lee or Collier counties, Florida; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated October 16, 2024 or any renewal thereof. |
| Illinois, on Schedule B | When 1) the land is residential real property and is located in Cook county, Illinois; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, |

| | |
|-------------------------|--|
| | the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated October 16, 2024 or any renewal thereof. |
| Maryland, on Schedule B | When 1) the land is residential real property and is located in Anne Arundel, Howard, Montgomery, or Prince George’s counties, Maryland; and the total purchase price is \$300,000 or more; or 2) the land is residential real property and is located in the city or county of Baltimore, Maryland, and the total purchase price is \$50,000 or more; and 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated October 16, 2024 or any renewal thereof. |
| Nevada, on Schedule B | When 1) the land is residential real property and is located in Clark county, Nevada; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated October 16, 2024 or any renewal thereof. |
| Texas, on Schedule C | When 1) the land is residential real property and is located in Bexar, Dallas, Tarrant, Harris, Montgomery, Travis or Webb counties, Texas; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated October 16, 2024 or any renewal thereof. |
| Virginia, on Schedule B | When 1) the land is residential real property and is located in Arlington or Fairfax counties, Virginia; or located in the cities of Alexandria, Falls Church or Fairfax; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated October 16, 2024 or any renewal thereof. |

Upon request, purchaser must provide certain required information to the Title Agent prior to closing. Please refer to the GTO Questionnaire and GTO Information Gathering Form to assist you in determining whether a transaction is a Covered Transaction and how to report a Covered Transaction.

[CLICK HERE](#) to download the GTO Questionnaire.

[CLICK HERE](#) to download the GTO Information Gathering Form.

As a courtesy to our Title Agents, Alliant National will prepare and submit the required FinCEN filing for you upon your submission to us of the completed GTO Questionnaire, GTO Information Gathering Form, and legible photo-copies of government-issued identification for the parties involved in the Covered Transaction. Please deliver these documents to us no later than 5 days after closing via our secure electronic portal, accessible from our Agent Resource Center (for which you will need your user name and password to enter), and then click on the tab called “Resource Center,” and select “FinCEN” from the drop-down menu. That will take you to a webpage from which you can download the above-referenced forms, and into which you can

drag the forms, once completed, to upload to Alliant National. To assist you in properly preparing these forms and submitting the information to us, please refer to our tutorial for detailed instructions and depictions.

[CLICK HERE](#) to download the Compliance Tutorial.

If you have elected to prepare and submit the required FinCEN filing, yourself, via the [BSA E-Filing System](#), then please provide us with a copy of the CTR 112 Report and photo-copies of government-issued identification for the parties involved in the Covered Transaction. Our secure electronic portal, accessible via the Agent Resource Center (as described above), should also be used for this transmission in order to protect Non-Public Personal Information (NPI).

If you have difficulty accessing the secure electronic portal, or have any questions, please contact our Regulatory Compliance Officer, Elyce Schweitzer, at eschweitzer@alliantnational.com, or phone (303)682-9800, ext. 415, for assistance.

The GTO requires both Alliant National and its agents to retain copies of all records for a period of five (5) years after April 14, 2025 or longer if the GTO is renewed or otherwise extended. This is an extension of the prior GTO. To meet this requirement, you will need to keep copies of the completed GTO Questionnaires, and for Covered Transactions, copies of the GTO Information Gathering Forms and photo ID's of all parties shown on that form.

As always, please contact us with any questions or comments.



Financial Crimes Enforcement Network
U.S. Department of the Treasury

Washington, D.C. 20220

GEOGRAPHIC TARGETING ORDER

The Director of the Financial Crimes Enforcement Network (FinCEN) hereby issues a Geographic Targeting Order (Order) requiring Alliant National Title Insurance Company to collect and report information about the persons involved in certain residential real estate transactions, as further described in this Order.

I. AUTHORITY

If the Director of FinCEN finds that reasonable grounds exist for concluding that additional recordkeeping and reporting requirements are necessary to carry out the purposes of the Bank Secrecy Act (BSA) or to prevent evasions thereof, the Director may issue an order that imposes such requirements on any domestic financial institution or nonfinancial trade or business or group of domestic financial institutions or nonfinancial trades or businesses in a geographic area. *See* 31 U.S.C. § 5326(a); 31 C.F.R. § 1010.370; Treasury Order 180-01. Pursuant to this authority, the Director of FinCEN hereby finds that reasonable grounds exist for concluding that the additional recordkeeping and reporting requirements described below are necessary to carry out the purposes of the BSA or prevent evasions thereof.¹

II. ADDITIONAL RECORDKEEPING AND REPORTING REQUIREMENTS

A. Business and Transactions Covered by This Order

1. For purposes of this Order, the “Covered Business” means Alliant National Title Insurance Company and any of its subsidiaries and agents.
2. For purposes of this Order, a “Covered Transaction” means a transaction in which:
 - i. Residential real property is purchased by a Legal Entity (as this term is defined in Section III.A of this Order);
 - ii. The purchase price of the residential real property is in the amount of \$50,000 or more in the City or County of Baltimore in Maryland, or in the amount of \$300,000 or more in any of the following areas:
 - (1) The Texas counties of Bexar, Tarrant, Dallas, Harris, Montgomery, Webb, or Travis;

¹ The Bank Secrecy Act, as amended, is codified at 12 U.S.C. §§ 1829b, 1951-1960 and 31 U.S.C. §§ 5311-5314, 5316-5336. Regulations implementing the Bank Secrecy Act appear at 31 C.F.R. Chapter X.

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- (2) The Florida counties of Miami-Dade, Broward, Palm Beach, Hillsborough, Pasco, Pinellas, Manatee, Sarasota, Charlotte, Lee, or Collier;
 - (3) The Boroughs of Brooklyn, Queens, Bronx, Staten Island, or Manhattan in New York City, New York;
 - (4) The California counties of San Diego, Los Angeles, San Francisco, San Mateo, or Santa Clara;
 - (5) The Hawaii counties of Hawaii, Maui, Kauai, or Honolulu, or the City of Honolulu;
 - (6) The Nevada county of Clark;
 - (7) The Washington county of King;
 - (8) The Massachusetts counties of Suffolk, Middlesex, Bristol, Essex, Norfolk, or Plymouth;
 - (9) The Illinois county of Cook;
 - (10) The Maryland counties of Montgomery, Anne Arundel, Prince George's, or Howard;
 - (11) The Virginia counties of Arlington or Fairfax, or the cities of Alexandria, Falls Church, or Fairfax;
 - (12) The Connecticut counties of Fairfield or Litchfield;
 - (13) The Colorado counties of Adams, Arapahoe, Clear Creek, Denver, Douglas, Eagle, Elbert, El Paso, Fremont, Jefferson, Mesa, Pitkin, Pueblo, or Summit;
or
 - (14) The District of Columbia.
- iii. Such purchase is made without a bank loan or other similar form of external financing by a financial institution that has both an obligation to maintain an anti-money laundering program and an obligation to report suspicious transactions under FinCEN regulations appearing in Chapter X of Title 31 of the Code of Federal Regulations.
 - iv. 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.

B. Reports Required to be Filed by the Covered Business

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1. If the Covered Business is involved in a Covered Transaction, then the Covered Business shall report the Covered Transaction to FinCEN by filing a FinCEN Currency Transaction Report within 30 days of the closing of the Covered Transaction. Each Currency Transaction Report filed pursuant to this Order must be: (i) completed in accordance with the terms of this Order and the Currency Transaction Report instructions (when such terms conflict, the terms of this Order apply), and (ii) e-filed through the BSA E-Filing system.²
2. A Currency Transaction Report filed pursuant to this Order shall contain the information specified in this section II.B about the Covered Transaction (when completing Part I, a Covered Business should select the + field as necessary to allow for the reporting of multiple parties).

Part I

3. A Covered Business must include in Part I information about the identity of the individual primarily responsible for representing the Legal Entity by selecting Field 2, box b (“Person conducting transaction for another”). The Covered Business also must obtain and record a copy of this individual’s driver’s license, passport, or other similar identifying documentation. A description of such documentation must be provided in Field 20.
4. A Covered Business also must include in Part I information about the identity of the Legal Entity by selecting Field 2, box c (“Person on whose behalf transaction was conducted”), and also selecting the “If entity” check box.
5. A Covered Business also must include in Part I information about the identity of the Beneficial Owner(s) (as defined in Section III.A of this Order) of the Legal Entity by selecting Field 2, box c. The Covered Business must obtain and record a copy of the Beneficial Owner’s driver’s license, passport, or other similar identifying documentation. A description of such documentation must be provided in Field 20 of the form.

Part II

6. Part II shall contain information about the Covered Transaction as follows:
 - i. Field 23: Date of closing of the Covered Transaction.
 - ii. Field 25.z: Total purchase price of the Covered Transaction and the method of payment (leave Fields 25 a – i blank).

² In order to electronically file a Currency Transaction Report, a Covered Business will need a BSA E-Filing User account. To create a BSA E-Filing User account, please visit https://bsaefiling.fincen.treas.gov/Enroll_Now.html. For more information on E-Filing, please visit <https://bsaefiling.fincen.treas.gov/> and review “About the BSA E-Filing System”.

Part III

7. Part III shall contain information about the Covered Transaction as follows (when completing Part III, if the Covered Transaction involves the purchase of multiple properties, a Covered Business should select the + field as necessary to allow for the reporting of multiple property addresses):
 - i. Fields 33-37: Address of real property involved in the Covered Transaction.
 - ii. Field 41: Total purchase price of the real property listed in Fields 33-37. This should reflect the same purchase price as Field 25.z, except where multiple properties are purchased in the same Covered Transaction. When reporting a purchase of multiple properties in the same Covered Transaction, report total purchase price in Part II, Field 25.z, and price per property in Field 41 for each property.

Part IV

8. Part IV shall contain information about the Covered Business. The Covered Business shall ensure the term “REGTO1024” remains in Field 45 of Part IV.

III. GENERAL PROVISIONS

A. Additional Definitions

1. For purposes of this Order:
 - i. “Beneficial Owner” means each individual who, directly or indirectly, owns 25% or more of the equity interests of the Legal Entity purchasing real property in the Covered Transaction.
 - ii. “Legal Entity” means a corporation, limited liability company, partnership, or other similar business entity, whether formed under the laws of a state, or of the United States, or a foreign jurisdiction, other than a business whose common stock or analogous equity interests are listed on a securities exchange regulated by the Securities Exchange Commission (SEC) or a self-regulatory organization registered with the SEC, or an entity solely owned by such a business.
2. All terms used but not otherwise defined herein have the meaning set forth in 31 C.F.R. Chapter X.

B. Order Period

The terms of this Order for purchases in all counties covered by this Order are effective beginning October 16, 2024, and ending on April 14, 2025.

C. Retention of Records

The Covered Business must: (1) retain all records relating to compliance with this Order for a period of five years from the last day that this Order is effective (including any renewals of this Order); (2) store such records in a manner accessible within a reasonable period of time; and (3) make such records available to FinCEN, or any other appropriate law enforcement or regulatory agency, upon request.

D. No Effect on Other Provisions of the Bank Secrecy Act

Nothing in this Order otherwise modifies or affects any provision of the regulations implementing the BSA to the extent not expressly stated herein.

E. Confidentiality

This Order and its terms are not confidential.

F. Compliance

The Covered Business must supervise, and is responsible for, compliance by each of its officers, directors, employees, and agents with the terms of this Order. The Covered Business must transmit this Order to each of its agents. The Covered Business must also transmit this Order to its Chief Executive Officer or other similarly acting manager.

G. Penalties for Noncompliance

The Covered Business, and any of its officers, directors, employees, and agents, may be liable, without limitation, for civil or criminal penalties for violating any of the terms of this Order.

H. Validity of Order

Any judicial determination that any provision of this Order is invalid shall not affect the validity of any other provision of this Order, and each other provision shall thereafter remain in full force and effect. A copy of this Order carries the full force and effect of an original signed Order.

I. Paperwork Reduction Act

The collection of information subject to the Paperwork Reduction Act contained in this Order has been approved by the Office of Management and Budget (OMB) and assigned OMB Control Number 1506-0056. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number.

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J. Questions

All questions about the Order should be directed to the FinCEN Resource Center at FRC@FinCEN.gov.

Dated: October 15, 2024

Andrea M. Gacki
Director
Financial Crimes Enforcement Network