



FinCEN Renews

Money Laundering GTOs

The Financial Crimes Enforcement Network (FinCEN) announced April 17, 2024 the renewal of the issuance of revised Geographic Targeting Orders (GTOs) that require U.S. title insurance companies to identify the natural persons behind shell companies used in all-cash transactions OR transactions with non-institutional lenders for the purchase of residential real estate.

The extended GTOs run through October 15, 2024. All other provisions remain in effect.

Covered areas in California include:

San Diego, Los Angeles, San Francisco, San Mateo and Santa Clara counties.

A currency transaction report must be filed with FinCEN if these things occur:

- Location (deal occurs in one of the areas included in the GTOs)
- All-cash deal or transactions with non-institutional lenders
- Purchase price exceeds \$300,000
- Purchaser is a corporation, limited liability company, partnership or similar business entity whether formed under the laws of a state or United States or a foreign jurisdiction
- Purchase price paid via monetary instrument, wire transfer or virtual currencies

American Land Title Association (ALTA) has developed several tools to help members comply with the order.

Please visit alta.org/business-tools/fincen.cfm

Companies with questions can email FinCEN at FRC@FinCEN.gov

Frequently asked questions regarding these GTOs are available at fincen.gov

Contact ALTA at (202) 296-3671 or communications@alta.org

