



GEOGRAPHIC TARGETING ORDERS NOW EXTENDED TO OCTOBER 21, 2023

The Financial Crimes Enforcement Network's (FinCEN) 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. In early 2016 they issued Geographic Targeting Orders (GTO) requiring all of the Company-owned title agents to collect and report information about certain residential real estate transactions. Since then they have expanded and extended the order a few more times. FinCEN issued a new Order effective April 25, 2023 expiring on October 21, 2023, except for the counties of Adams, Arapahoe, Clear Creek, Denver, Douglas, Eagle, Elbert, El Paso, Fremont, Jefferson, Mesa, Pitkin, Pueblo, or Summit in the State of Colorado is effective beginning May 24, 2023.

Covered Transactions:

Transactions that meet ALL of the following parameters:

1. Sale of residential property (1 to 4 family) including condominiums and co-ops located in a covered area listed in the table to the right; and
2. Sale completed between April 25, 2023* through October 21, 2023; and
3. Sale price is at least \$50,000 when the property is located in the City of County of Baltimore in Maryland; or
4. Sale price is at least \$300,000 or more in all other geographic locations named in this memorandum; and
5. Buyer is a legal business entity (LLC, corporation, partnership) EXCEPT for (1) a Reverse Exchange where the exchange company is a division of IPX 1031; (2) a business whose common stock or analogous equity interests are listed on a securities exchange regulated by the Securities Exchange Commission ("SEC"); or (3) a self-regulatory organization registered with the SEC, or an entity solely owned by such a business.
6. 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.
7. Any portion of the transaction is paid with cash, cashier's check, certified check, traveler's check, personal check, business check, money order, funds transfer, or virtual currency.

* Except for the counties of Adams, Arapahoe, Clear Creek, Denver, Douglas, Eagle, Elbert, El Paso, Fremont, Jefferson, Mesa, Pitkin, Pueblo, or Summit in the State of Colorado is effective beginning May 24, 2023.

TARGET STATE	COVERED BOROUGH, CITY OR COUNTY
California	San Diego, Los Angeles, San Francisco, San Mateo or Santa Clara
Connecticut	Fairfield or Litchfield
Florida	Miami-Dade, Broward or Palm Beach
Hawaii	Hawaii, Maui, Kauai or Honolulu or the City of Honolulu
Illinois	Cook
Massachusetts	Suffolk or Middlesex
Maryland	Montgomery, Anne Arundel, Prince George's or Howard
New York	Brooklyn, Queens, Bronx, Staten Island or Manhattan in New York City
Nevada	Clark
Texas	Bexar, Tarrant, Dallas, Harris, Montgomery or Webb
Virginia	Arlington, Fairfax, Alexandria or Falls Church
Washington	King
	District of Columbia

The following counties in the State of Colorado covered by the GTO beginning May 24, 2023:

TARGET STATE	COVERED BOROUGH, CITY OR COUNTY
Colorado	Adams, Arapahoe, Clear Creek, Denver, Douglas, Eagle, Elbert, El Paso, Fremont, Jefferson, Mesa, Pitkin, Pueblo, or Summit

For more information and details about the GTO and how it may affect your transactions, please visit www.FinCEN.gov or contact your escrow officer. Always allow extra closing time for any GTO transaction.

Information Collection Form

In order to comply with the GTO, an Information Collection Form must be completed and signed by the buyer and returned to the settlement agent on or before the date of closing for any transactions which appears to be Covered Transaction as described above.