



GEOGRAPHIC TARGETING ORDERS NOW EXTENDED TO OCTOBER 31, 2022

On April 29, 2022, the Financial Crimes Enforcement Network (FinCEN) announced the renewal and expansion of its Geographic Targeting Orders (GTOs) that require U.S. title insurance companies to identify the natural persons behind shell companies used in all-cash purchases of residential real estate. The terms of the GTOs are effective beginning April 30, 2022, and ending on October 26, 2022. The GTOs continue to provide valuable data on the purchase of residential real estate by persons possibly involved in various illicit enterprises. Renewing the GTOs will further assist in tracking illicit funds and other criminal or illicit activity, as well as inform FinCEN's future regulatory efforts in this sector.

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 30, 2022 through October 26, 2022; 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. Purchase is made without a bank loan by a financial institution; and
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.

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

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.

This information is proudly brought to you by:

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.