

FinCEN Renews MONEY LAUNDERING GTO

On October 9, 2025, The Financial Crimes Enforcement Network (FinCEN) announced the renewal of its Geographic Targeting Order (GTO) focused on all-cash purchases of residential real estate. The GTO requires title insurers and their agents to collect information about the beneficial owners that purchase real estate corporate entities*.

Under the GTO, reports are required for cash transactions by corporate entities* in these covered areas when the purchase price equals or exceeds \$300,000, or the purchase price equals or exceeds the amount of \$50,000 in the City or County of Baltimore, Maryland. The extended GTO runs from October 10, 2025 to February 28, 2026.

FinCEN reported that previous GTOs provided valuable data on the purchase of residential real estate by persons implicated or allegedly involved in various illicit enterprises, including foreign corruption, organized crime, fraud, narcotics trafficking and other violations. Reissuing the GTO will further assist in tracking illicit funds and other criminal or illicit activities as well as inform FinCEN's future regulatory efforts in this sector.

FinCEN praised the continued assistance and cooperation of the title insurance companies and American Land Title Association in protecting the real estate markets from abuse by illicit actors.

COVERED AREAS INCLUDE:

- **TEXAS:** Bexar, Tarrant, Dallas, Harris, Montgomery, Webb or Travis counties;
- **FLORIDA:** Miami Dade, Broward, Palm Beach, Hillsborough, Pasco, Pinellas, Manatee, Sarasota, Charlotte, Lee, or Collier counties
- **NEW YORK:** Boroughs of Brooklyn, Queens, Bronx, Staten Island or Manhattan in New York City, New York
- **CALIFORNIA:** San Diego, Los Angeles, San Francisco, San Mateo or Santa Clara counties
- **HAWAII:** Hawaii, Maui, Kauai, or Honolulu, or the City of Honolulu
- **NEVADA:** Clark County
- **WASHINGTON:** King County
- **MASSACHUSETTS:** Suffolk, Middlesex, Bristol, Essex, Norfolk, or Plymouth counties;
- **ILLINOIS:** Cook County
- **MARYLAND:** Montgomery, Anne Arundel, Prince George's, or Howard counties
- **VIRGINIA:** Arlington or Fairfax counties, or the cities of Alexandria, Falls Church, or Fairfax
- **CONNECTICUT:** Fairfield, Litchfield counties
- **COLORADO:** Adams, Arapahoe, Clear Creek, Denver, Douglas, Eagle, Elbert, El Paso, Fremont, Jefferson, Mesa, Pitkin, Pueblo, or Summit; or
- **THE DISTRICT OF COLUMBIA**

* FinCEN exempts publicly traded companies and its wholly-owned subsidiaries.

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