**FinCEN GTO Update**

CATIC Title has received notice that the Financial Crimes Enforcement Network (FinCEN) will be renewing the Geographic Targeting Order (GTO) in an effort to identify money laundering schemes involving purchases of real estate. This new order is **effective April 25, 2023 until October 21, 2023**. You can find a copy of the order on [CATIC Title’s website](https://catictitle.com/new-york/resources/fincen-gto).

**The renewed GTO features substantive changes to prior GTOs, including the addition of Litchfield County, Connecticut, to the areas covered by the GTO.** **The effective period of the GTOs for purchases in newly added areas, including Litchfield County, begins on May 24, 2023.**

**Key Takeaways for the new GTO:**

* The GTO reporting requirements apply to:
  + Purchases of ***residential real property*** in, *inter alia*:
    - The Boroughs of Brooklyn, Queens, Bronx, Staten Island, or Manhattan in New York City, New York;
    - Fairfield or Litchfield Counties, Connecticut;
    - Suffolk or Middlesex Counties, Massachusetts;
    - Miami-Dade, Broward, or Palm Beach Counties, Florida;
    - Cook County, Illinois;
  + By ***Legal Entities*** **only** – purchases by U.S. publicly-traded companies, individuals, and trusts do not need to be reported;
  + Purchase price is ***$300,000*** or more;
  + Purchase is made ***without a bank loan*** or other similar form of external financing; and
  + The purchase is made, at least in part, using ***currency*** or a ***cashier’s check, certified check, traveler’s check, personal check, business check, money order in any form, funds transfer,*** or ***virtual currency***
* The terms of the renewed GTO are **NOT confidential**

During the effective period, you are expected to comply with the terms of the order, including requirements to collect certain information and report said information to FinCEN and CATIC Title.

CATIC Title has provided a number of resources on its [website](https://catictitle.com/new-york/resources/fincen-gto) to assist you in the process. These tools include:

* ***FinCEN GTO Guide*** – provides a detailed description of the GTO reporting requirements
* ***FinCEN GTO Instructional Overview*** – provides instruction for filling out the GTO report
* ***Covered Transaction Worksheet*** – helps agents determine whether a transaction is reportable
* ***Information Collection Form*** – helps agents collect information necessary for completing the GTO report
* ***Blank Currency Transaction Report Template*** – blank copy of the Currency Transaction Form provided by FinCEN
* ***GTO Frequently Asked Questions*** – provides guidance from FinCEN regarding common questions asked about the GTO

It is important to note that failure to comply with this order may result in civil and/or criminal penalties.

Should you have any questions, please contact Steve Maggiola, CATIC Title’s Senior Vice President & Counsel, at [SMaggiola@catictitle.com](mailto:SMaggiola@catictitle.com).