**FinCEN GTO Covered Transaction Worksheet**

This worksheet was designed to assist CATIC Title agents in determining whether a transaction meets the criteria of a Covered Transaction under the FinCEN GTO, effective November 6, 2020.

To determine whether a transaction is a Covered Transaction, please answer the questions below.

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Question** | **Yes** | **No** |
|  | Is the property ***residential*** real property? |  | - STOP |
|  | Is the residential real property located in, inter alia:   * ***the Boroughs of Brooklyn, Queens, Bronx, Staten Island, or Manhattan in New York City, New York*** |  | - STOP |
|  | Is the purchase price ***$300,000 or more***? |  | - STOP |
|  | Is the Property purchased by a ***Legal Entity***, defined as a corporation, limited liability company, partnership, or other similar business entity? |  | - STOP |
|  | Is the purchase made ***without a bank loan*** or other similar form of external financing? |  | - STOP |
|  | Is the purchase made, at least in part, using:   * ***currency*,** * ***a cashier’s check,*** * ***a certified check,*** * ***a traveler’s check,*** * ***a personal check,*** * ***a business check,*** * ***a money order in any form,*** * ***a funds transfer, or*** * ***virtual currency?*** |  | - STOP |

If **ALL** questions were answered “Yes,” the transaction is a Covered Transaction within the FinCEN GTO and the CATIC Title agent **MUST** submit a Currency Transaction Report in accordance with the order. That CATIC Title agent must provide a copy of the Currency Transaction Report to CATIC Title within ***5 days*** of submitting the report to FinCEN by:

* Email to: RPicone@catictitle.com or
* Mail to: CATIC Title Insurance Company

ATTN: GTO Filing

660 White Plains Road, Suite 570

Tarrytown, NY 10591

If **ANY** question was answered “No,” the transaction is **NOT** a Covered Transaction and no report is necessary. CATIC Title recommends that agents retain evidence demonstrating why a report was not required for the subject transaction.