



So Long, GTOs, Hello Forever Reporting

Presented by:

AGENCY EDUCATION

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So Long GTOs, Hello Forever Reporting

FinCEN's New Residential Real Estate Rule

February 12, 2026

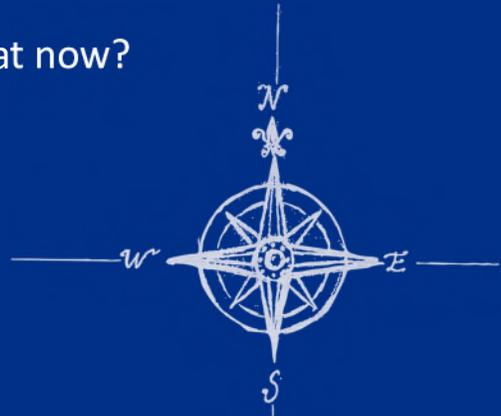


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Roadmap



- Where we started
- Where we're headed
- What's covered?
- Who must report?
- What's exempt?
- Meet the Report
- What can go wrong?
- What now?





Where We Started



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FinCEN's Anti-Money Laundering Mission



- Bank Secrecy Act – 1970 Anti-money laundering (AML) law
- Authorizes U.S. Dept. of Treasury to make regulations regarding financial crime including money laundering in order to
 - Safeguard the financial system from illicit activity
 - Counter money laundering
 - Stop financing of terrorism



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Geographic Targeting Orders (GTOs) - 2016

Required title insurance companies and agents to report on “Covered Transactions”

- Residential real property
- Purchased by a legal entity
- At or above \$300,000
- In specific geographic areas (now 11 FL counties)
- Without financing



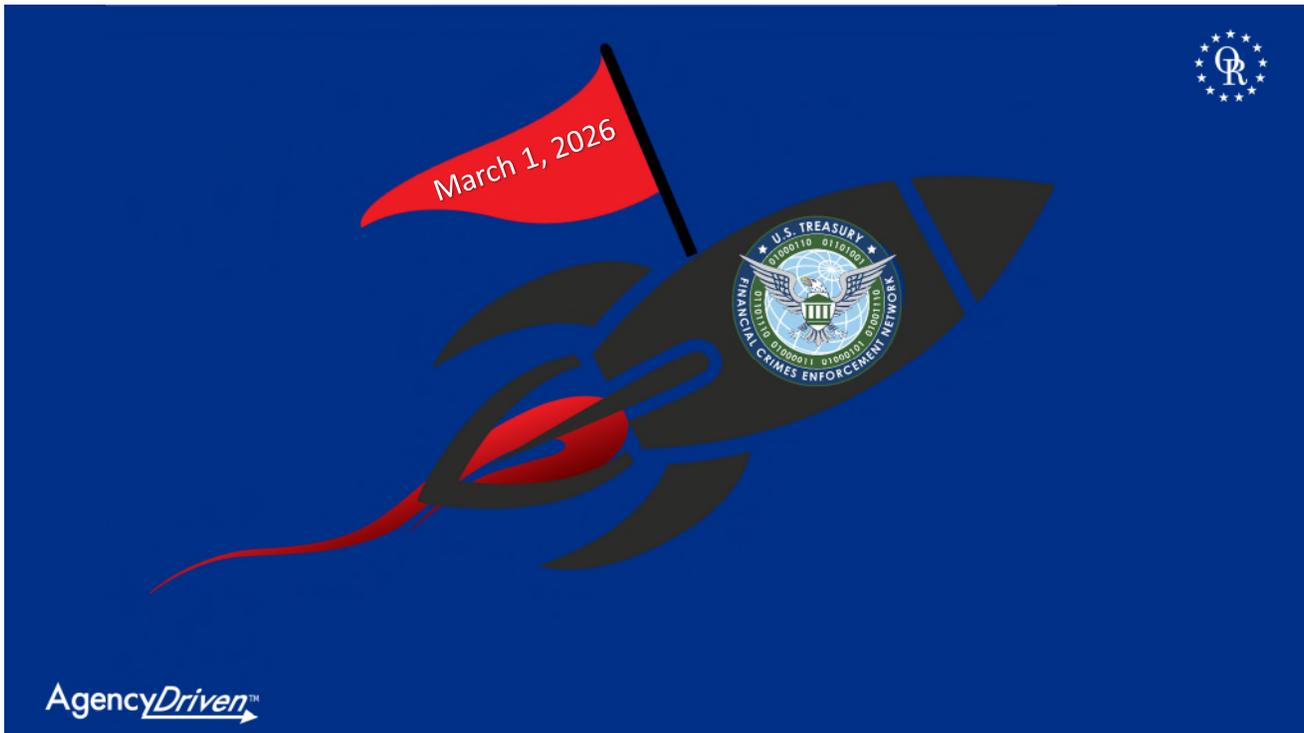
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Revealing the “Beneficial Owners”

- Title agent files a Currency Transaction Report (CTR) through the BSA E-filing system
- Naming each individual who directly or indirectly owns 25% or more of the equity interests in the entity purchasing the property



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FinCEN Final Rule



- Formal Name: “Anti-Money Laundering Regulations for Residential Real Estate Transfers” Title 31, Chapter X
- **Effective March 1, 2026**
- “Non-financed” (as with GTOs) closings of residential property in which an entity or a trust is the BUYER (“transferee”) **MUST BE REPORTED**
- No dollar amount – includes “gift” transfers
- Covers all U.S. States and Territories



What's covered?



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Covered Transferees



- Legal Entities – corporations, LLCs, partnerships
- Non-profit organizations
- Trusts (with limited exceptions)



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Covered Transfers



Transfers in ownership requiring reporting:

- Deeds
- Interests in residential cooperative housing via stock shares, memberships, or other contractual evidence of ownership



Covered Property

- Residential Real property designed for 1-4 families
- Vacant land on which the buyer intends to build a structure designed for 1-4 families
- Unit designed principally for 1-4 families within a structure on land
 - (ex. condo unit)
- Shares in a cooperative housing corporation



Who Must Report?



The “Reporting Cascade”



Highest on the list is responsible for reporting

- 1st tier: Settlement agent
- 2nd tier: Person who prepared closing or settlement statement
- 3rd tier: Person filing deed or other instrument of transfer
- 4th tier: The title insurance underwriter
- 5th tier: Person who disburses the greatest amount of funds
- 6th tier: Person who evaluates title, and finally
- 7th tier: Person who prepared the deed





What's exempt?

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Exempt Transferees

Exemption	Short Title
1	Securities reporting issuer
2	Governmental authority
3	Bank
4	Credit union
5	Depository institution holding company
6	Money services business
7	Broker or dealer in securities
8	Securities exchange or clearing agency
9	Other Exchange Act registered entity
10	Insurance company
11	State-licensed insurance producer
12	Commodity Exchange Act registered entity
13	Public utility
14	Financial market utility
15	A registered investment company
16	Subsidiary of an exempted entity

Exempt Transfers (“low-risk”)



- Transfer to individuals – just like GTOs
- Transfer of an easement
- Transfers resulting from the death of an owner
- Transfers due to divorce
- Transfers to a bankruptcy estate
- Transfers supervised by a U.S. court

Exempt Transfers (cont'd)



- Transfer for no consideration to a trust where grantor or spouse or both are grantors or settlors
- Transfer to a Qualified Intermediary (QI) for 1031 exchange (but not transfers FROM a 1031 QI)
- Transfers that do not involve a “reporting person”





Meet the Real Estate Report

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The Real Estate Report



- Must be filed electronically through BSA portal by later of
 - Final day of month following the month of closing or
 - 30 calendar days after closing
- Download PDF from BSA portal, complete in Adobe Acrobat ONLY, upload completed report to BSA portal
- Acrobat Reader v.9 or higher
- <https://bsaefiling.fincen.gov/>



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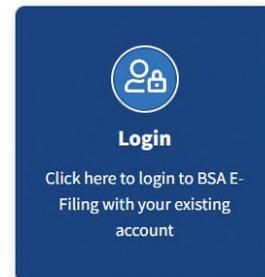
BSA E-Filing System



- Register for new account



- Log-in to account



Need an Account on LOGIN.GOV



- Download Real Estate Report Form from BSA E-Filing portal
- Go to <https://www.fincen.gov/rre> - click on

ATTENTION:

All enrolled users must now use a Login.gov account to sign in to their new or existing BSA E-Filing account. Click below to sign in with your existing Login.gov account or to create an account with Login.gov. Click [here](#) for more information.

Sign in or Create an Account with  LOGIN.GOV



Real Estate Report Form

Familiarize yourself with the Real Estate Report form.

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PAGE 1 – “HOME” PAGE

- Filing Information
- Type of Filing:
 - Initial Report
 - Corrected/Amended Report
 - Back-Filing

Page 2 – Reporting Person



- Category into which reporting person falls in reporting cascade
- Full legal name
- Street address of principal place of business in the U.S.
- Date of Closing

Page 2

Reporting Person

Real Estate Report

Home Reporting Person & Property information Transferee Information Transferor Information Payment Information



Part I. Reporting Person Information

4. • Reporting person category	<input type="text"/>
Legal name	<input type="text"/>
5. • Last name or entity legal name	<input type="text"/>
6. If entity	<input type="text"/>
7. First name	<input type="text"/>

Address: Principal place of business in the U.S.

10. • Street address	<input type="text"/>
11. • City	<input type="text"/>
12. • U.S./U.S. Territory	<input type="text"/>
13. • State/U.S. Territory	<input type="text"/>
14. • ZIP code	<input type="text"/>
15. • Date of closing	<input type="text"/>

Page 2 – Property Information



For each residential real property that is the subject of the reportable transfer, the reporting person shall report:

- Street address, if any, and
- Legal description, such as the section, lot, and block



Page 2

Property Information



Part II. Property Information 1 of 1

Address (U.S./U.S. Territory)

16. • Street address No street address

17. • City

18. • U.S./U.S. Territory

19. • State/U.S. Territory

20. • ZIP code

Legal description

21. • Legal description type

Other description

22. • Legal description

Lot and block
Subdivision
Metes and bounds
Other



Page 3 – Transferee Information



- Transferee Type – drop down menu – trust or entity
- Full legal name
- Trade name or “doing business as” name, if any
- Street address of principal place of business
- If principal place of business not in the U.S., street address of primary location U.S. location where transferee entity conducts business, if any, and
- Tax ID type, number and jurisdiction (if foreign)

Page 3 Transferee Information

*More than one
entity or trust –
use plus button
to add extra
pages*



Real Estate Report

Home Reporting Person & Property Information **Transferee Information** Transferor Information Payment Information

Part III. Transferee Information 1 of 1 + -

23. Transferee type: **Transferee Trust** 24. Date trust instrument executed: [] 25. If revocable trust:

26. Total consideration paid (U.S. dollars) (Paid or to be paid, by or on behalf of this transferee): **Transferee Entity** No consideration paid

Legal name | Alternate name (if entity)

27. Legal name: []

28. Alternate name: []

Address: Principal place of business (if entity) 29. Foreign principal place of business with no U.S. location

30. Address type: [] 33. Country/Jurisdiction: []

31. Street address (number, street, and apt. or suite no.): [] 34. State/U.S. Territory: []

32. City: [] 35. ZIP/Foreign postal code: []

Identification

36. Identification type: **Foreign taxpayer identification number** 38. Issuing jurisdiction (if foreign): []

37. Identification number: **SSN-ITIN Foreign taxpayer identification number**

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Page 3 – “Person(s) associated w/ Transferee”



- Person Type – Beneficial Owner, Signer, Trustee if Entity
 - *Beneficial Owner includes Individual Trustees*
- If Beneficial owner, category of person and citizenship
- If signing person, authorization capacity
- Full legal name
- Date of Birth
- Address
- Tax ID type, number and jurisdiction (if foreign)

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Page 3

Person(s)
associated
with this
Transferee

*More than one
person – use
plus button to
add extra pages*

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Person(s) associated with the Transferee 1 of 1

39. Person type Beneficial Owner Signing Individual Trustee that is a Legal Entity

If Beneficial Owner

40. Check if true Parent/Guardian information instead of minor child

41. Category (select all that apply)

<input type="checkbox"/> a. Individual trustee	<input type="checkbox"/> c. Sole permissible recipient of trust income or assets	<input type="checkbox"/> f. Beneficial owner of a legal entity or trust with authority to dispose of assets
<input type="checkbox"/> b. Individual with authority to dispose of assets	<input type="checkbox"/> d. Grantor or settlor with the right to revoke or withdraw assets	<input type="checkbox"/> g. Beneficial owner of a legal entity or trust that is the sole permissible recipient of trust income or assets
<input type="checkbox"/> e. Beneficial owner of a legal entity or trust that is a trustee	<input type="checkbox"/> h. Beneficial owner of legal entity or trust that is a grantor or settlor with the right to revoke or withdraw	

42. Country/jurisdiction of citizenship + -

If Signing Individual

43. Authorization capacity description

44. Name of employer, principal, or partnership

Legal name | Alternate name (if)

45. Last name or entity legal name

46. Alternate name

47. First name

48. Middle name

50. Date of birth

Address: Principal place of business (if entity) | Residential (if individual) 51. Foreign principal place of business with no U.S. location

52. Address type

53. Street address (number, street, and apt. or suite no.)

54. City

55. Country/Jurisdiction

Territory

ZIP postal code

Identification

58. Identification type

59. Identification number

Page 3 of 5



Page 4 – Transferor Information



- Transferor Type – individual, entity or trust
- Full legal name, including alternate names (d/b/a)
- Date of birth if individual
- Street address
- Tax ID type, number and jurisdiction
- If trust, additional info on trustee(s)

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Page 4

Transferor Information

More than one Transferor – use plus button to add extra pages

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Real Estate Report

Home Reporting Person & Property Information Transferee Information Transferor Information Payment Information

Part IV. Transferor Information 1 of 1

61. If Transferor is not an individual, select the appropriate type [dropdown] 62. Date trust instrument executed [text]

Legal name | Alternate name (if entity) | Date of birth (if individual)

63. * Last name or entity legal name [text]

64. Alternate name [text]

65. First name [text] 67. Suffix [text]

66. Middle name [text] 68. Date of birth [text]

Address: Principal place of business | Design principal place of business with no U.S. location

70. Address type [dropdown] Country/Jurisdiction [dropdown]

71. * Street address (number, street, and opt. or suite no.) [text] U.S. Territory [dropdown]

72. * City [text] 75. ZIP/Foreign postalcode [text]

Identification

76. * Identification type [dropdown] Jurisdiction [text]

77. * Identification number [text]

Dropdown 1: Principal place of business (U.S.), Foreign principal place of business (non-U.S.)

Dropdown 2: SSN-ITIN, EIN, Foreign passport, Foreign taxpayer identification number

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Page 4

Transferor Information – if Trust

More than one Trustee – use plus button to add extra pages



1 of 1

If the Transferor is a trust, then record the Trustee(s):

Legal name | Alternate name (if entity) | Date of birth (if individual)

79. * Last name or entity legal name

80. If entity

81. Alternate name

82. First name

83. Middle name

84. Suffix

Address: Principal place of business (if entity) | Residential (if individual) 85. Foreign principal place of business with no U.S. location

86. Address

87. * Street address (number, street, and apt. or suite no.)

88. * City

89. * Country/Jurisdiction

90. State/U.S. Territory

91. ZIP/Foreign postal code

Identification

92. * Identification type

93. * Identification number

94. Issuing jurisdiction

SSN-ITIN

EIN

Foreign passport

Foreign taxpayer identification number

Information to be Collected – Payments



As to each payment other than a payment disbursed from an escrow or trust account held by a transferee entity or transferee trust made by or on behalf of itself:

- Amount
- Method by which payment made
- As to any payment from an account held at a financial institution, the name of the financial institution and the account number
- Name of payor on any wire, check, or other type of payment if the payor is not the transferee entity or transferee trust



Information to be Collected – Payments



- Total consideration paid by or to be paid by all transferees regarding the reportable transfer, and
- Information concerning hard money, private, and other similar loans



Page 5

Payment Information



Real Estate Report

Home Reporting Person & Property Information Transferee Information Transferor Information Payment Information

Part V. Payment Information

95. Total consideration paid (in U.S. dollars) (paid or to be paid for the transfer as a whole) \$.00 No consideration paid

96. Check if true for the reportable transfer Hard money, private, or other similar loans involved in reportable transfer

97. Type of hard money, private, and other similar loans

Other description

Hard money loan
Private loan
Seller financed loan
Other

Page 5

Payment Information

More than one payment made – use plus button to add extras



Payment made by or on behalf of the Transferee entity/trust: 1 of 1

98. Payment amount (in U.S. dollars)

99. Payment method

Other description

100. If foreign payment method, select currency

Other description

101. Check if true for this payment

102. Account number

103. Financial Institution legal name

Transferee(s) associated with this payment

104. Check if true for this payment Payment is associated with all recorded transferees in Part III

105. Associated transferee legal name

106. Check if true for this payment All payors are all recorded transferees in Part III or all recorded transferees in item 105

Payor(s) associated with this payment (if item 106 is not checked)

107. Last name or entity legal name

108. If entity

109. First name

110. Middle name

111. Suffix

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Real Estate Report

Home Reporting Person & Property Information Transferee Information Transferee Information Payment Information

Real Estate Report OMB No. 1506-0080 Version Number: 1.0 Release Date: 12/22/2025

Report Preparation & Submission Instructions:

- Instructions
- Validate
- Finalize
- Save
- Print
- Ready To File

Filing Information

1. Type of filing: a. Initial report b. Correct/Amend prior report c. FinCEN directed back-filing

2. Date prepared

3. Note to FinCEN

When Complete – Go Back to Page 1 – “Home Page”

- Validate to ensure completion of all fields
- Finalize (with your PIN) to prepare for submission
- Save
- Click Ready to File

The Good News

- ALTA has created thorough collection forms
 - For ALTA members in good standing
- Cover the critical parts of the RRE Rule
- Include an explanation of excepted transactions
- Discuss both standard entity and trust transferees
- HOWEVER, all parties may not need all the information provided
- Buyer form may be overwhelming for some
- May need strategies for what/how to present



ALTA Anti-Money Laundering Information Collection & Certification Form - BUYERS
Pursuant to FinCEN Real Estate Report Rule 31 CFR 1031.320
2025 v. 01.01 (July 1, 2025)

BACKGROUND
Federal law requires that certain residential real estate transactions purchased with all cash or without institutional lender financing, where at least one buyer/transferee is a legal entity, LLC, corporation, partnership, trust, trustee or other non-natural person, be reported to United States Treasury Department's Financial Crimes Enforcement Network (FinCEN). This form requests information necessary to meet the reporting requirements. For more information about FinCEN's Real Estate Report and what transactions are covered go to alta.org/fincen.

COMPLETING THIS COLLECTION FORM
This collection form has 5 parts:

- Part 1 - information about the person completing this collection form.
- Part 2 - information about possible exemptions to reporting.
- Part 3 - information about the buyer/transferee in a covered real estate transaction - *Part 3 is broken into 2 parts: (a) for transferee entities and (b) for transferee trusts.*
- Part 4 - information about the origin of the funds used to acquire the subject real estate.
- Part 5 - certification of the accuracy of the information provided on behalf of the buyer/transferee. Note that the terms "buyer" and "transferee" are interchangeably used in this collection form.

TRANSFEEER ENTITIES AND TRUSTS
The regulation applies to purchases by:

- **Transferee entity** - any person other than a transferee trust or an individual. A transferee entity may be a corporation, partnership, estate, association, or limited liability company. Certain regulated entities are exempt from the reporting.
- **Transferee trust** - any legal arrangement created when a person places assets under the control of a trustee for the benefit of one or more persons or for a specified purpose, as well as any legal arrangement similar in structure or function, whether formed under the laws of the United States or a foreign jurisdiction.

TRANSFEEER ENTITY INFORMATION REQUIRED
This form collects information necessary to comply with the rule including information about the transferee entity including their legal name, current address, IRS taxpayer identification number if available (if not available other identifying information is required).
It also requires reporting of EACH beneficial owner of a transferee entity. Per the federal regulations, a beneficial owner of a transferee entity is someone who (i) exercises substantial control over the transferee entity, or (ii) owns or controls at least 25% of the transferee entity's ownership interests. This includes: full legal name, date of birth, complete current residential street address, citizenship and IRS taxpayer identification number if available (if not available other identifying information is required).

TRANSFEEER TRUST INFORMATION REQUIRED
This form collects information necessary to comply with the rule including information about the transferee trust including its legal name, date trust instrument executed, IRS taxpayer identification number if available (if not available other identifying information is required) and whether trust is revocable.
It also requires reporting of EACH beneficial owner of a transferee trust which includes (i) the trustee, (ii) a beneficiary of the trust who has the right to demand a distribution of, or withdraw, substantially all of the assets of the transferee trust, and (iii) a grantor or settlor who has the right to revoke the transferee trust. See Part 3(b) of this collection form for a complete list of who are beneficial owners of a transferee trust.

TRANSACTION EXEMPTIONS
Transactions do not have to be reported if (a) the buyer is obtaining some mortgage financing from a licensed mortgage lender or (b) the buyers are natural persons. Additionally, there are some transactional exemptions for transfers incident to a divorce, dissolution of civil union, death of the seller or court order.

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Custom 1-Page Seller Form

- Transaction information
- Individual Seller information
- Entity Seller information
- Trust Seller information
 - Including trustees



FinCEN REPORTING Seller Information Property Address

Closing Date / / Sales Price

Seller Legal Name

Current Mailing address

Post-Closing Mailing address

Phone - - Mobile - - Email

IF SELLER IS INDIVIDUAL

Seller #1 DOB / / Seller #2 DOB / /

Seller #1 SS # - - Seller #2 SS# - -

IF SELLER IS AN ENTITY

Entity TAX ID#

Trade Name (if different from Legal Name above)

IF SELLER IS A TRUST

Trust TAX ID# Date Trust Instrument Executed / /

Full Legal Name of Trustee(s) SS # - -

SS # - -

SS # - -

Address of Trustee(s)

Custom 3-Page Buyer Form

Basic Entity information

- Buyer Entity or Trust?
- Name
- Trade Name
- Place of Business
- Or Trust execution info



- Entity Buyer information



- Trust Buyer information



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FinCEN REPORTING Buyer Information		Property Address
Closing Date	____/____/____	Purchase Price
Buyer is [check one]	Entity <input type="checkbox"/> Trust <input type="checkbox"/>	
Buyer Legal Name	_____	
Trade Name (if any)	_____	
Principal Place of Business	_____	
Buyer Entity or Trust Tax ID#	_____	
If Trust, Date Executed	____/____/____	Is Trust Revocable Yes <input type="checkbox"/> No <input type="checkbox"/>
IF BUYER IS ENTITY Individuals who are Beneficial Owner(s) of Entity		
Full Legal Name	_____	
Street Address	_____	
DOB	____/____/____	Country of Citizenship
SS#	____-____-____	Non-US Persons <input type="checkbox"/> Foreign Tax ID or Passport _____ Country of Issuance _____
Capacity [check all that apply]	Controller <input type="checkbox"/>	Owner of 25% <input type="checkbox"/> Auth. Signer <input type="checkbox"/>
<small>(Additional Individuals on Page 2)</small>		
IF BUYER IS TRUST Individuals who are trustees, settlors who have right to revoke, and beneficiaries who are sole recipients of income/principal or who can demand distribution, or dispose of assets, or expect to sign for the trust.		
Full Legal Name	_____	
Street Address	_____	
DOB	____/____/____	Country of Citizenship
SS#	____-____-____	Non-US Persons <input type="checkbox"/> Foreign Tax ID or Passport _____ Country of Issuance _____
Capacity [check all that apply]	Settlor <input type="checkbox"/>	Trustee <input type="checkbox"/> Beneficiary <input type="checkbox"/>
<small>(Additional Individuals on Page 3)</small>		



What can go wrong?



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The Reasonable Reliance Standard



What if parties refuse to cooperate?

- Reporting person is still required to file the report
- No exception allowing for an incomplete report
- Reporting person generally may rely on info provided by any person for purposes of reporting info or to make a determination necessary to comply with the final rule
 - But only if the reporting person does not have knowledge of facts that would reasonably call into question the reliability of the information
- May rely on information provided by relevant lender as to whether the lender has an obligation to maintain an AML program



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Penalties



- Negligent violations - civil penalty not more than \$1,394 per violation
- Pattern of negligent activity - Additional civil penalty up to \$108,489
- Willful violations – Imprisonment of not more than 5 years or
 - Criminal fine of not more than \$250,000
 - Or both
- Additional civil penalty not more than the greater of the amount involved in the transaction (not to exceed \$278,937) or \$69,733



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Suggested Language for Parties



Schedule B of Old Republic commitments will include this language where the transaction appears to be reportable (final determination is up to the agent):

Old Republic Title Issuing Agent Suggested Language:

Effective March 1, 2026, the U. S. Department of Treasury's Financial Crimes Enforcement Network ("FinCEN") requires that a Real Estate Report ("FinCEN Report") be filed with FinCEN for certain residential real estate transfers, including purchases with all cash or without institutional lender financing, where at least one buyer or transferee is a legal entity, limited liability company, corporation, partnership, trust, trustee or other non-natural person. If the proposed transaction involves a reportable transfer, the buyer(s) and seller(s) must, prior to closing, provide all information and documentation necessary to complete and file the FinCEN Report. If the required information is not fully and timely provided, [Agent Name] expressly reserves the right to withdraw as the settlement agent for the transaction. Additional information regarding FinCen's reporting requirements is available at <https://www.fincen.gov/rre/>



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Upcoming FR/Bar FinCEN Provision



Standard I(iii) (formatted for readability):

(iii) FinCEN REAL ESTATE REPORTING OBLIGATION. Section 1010.821 of Chapter 31 of the Code of Federal Regulations ("CFR") requires that certain residential real estate transactions without institutional lender financing, where at least one buyer/transferee is a legal entity, limited liability company, corporation, partnership, trust, trustee or other non-natural person, must be reported to the U.S. Treasury Department's Financial Crimes Enforcement Network ("FinCEN") **beginning March 1, 2026 (a "FinCEN report")**.

If this transaction requires completion of a FinCEN Report, then **Seller and Buyer shall, no later than the day prior to Closing, provide Closing Agent with all information and documentation necessary** to enable Closing Agent to complete the FinCEN report. Such information and documentation includes, without limitation, full legal names, dates of birth, residential street addresses, and the IRS taxpayer identification number of the beneficial owners of the parties, as further defined and described in the Code.

Each party agrees to promptly provide and consents to Closing Agent's collection and report of said information to FinCEN. **Buyer shall pay all costs and fees charged by Closing Agent to prepare and file the FinCEN Report.**



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Can we charge for this?



YES

- DFS has confirmed that a separate line-item charge for expenses incurred to comply with RRE Rule reporting is acceptable
- Essentially a pass-through of your estimated costs to comply
- Best practice: Advise buyers in advance if the transaction requires RRE Rule compliance, or they are contemplating buying through an entity that will trigger reporting

HELP!

What can we do?

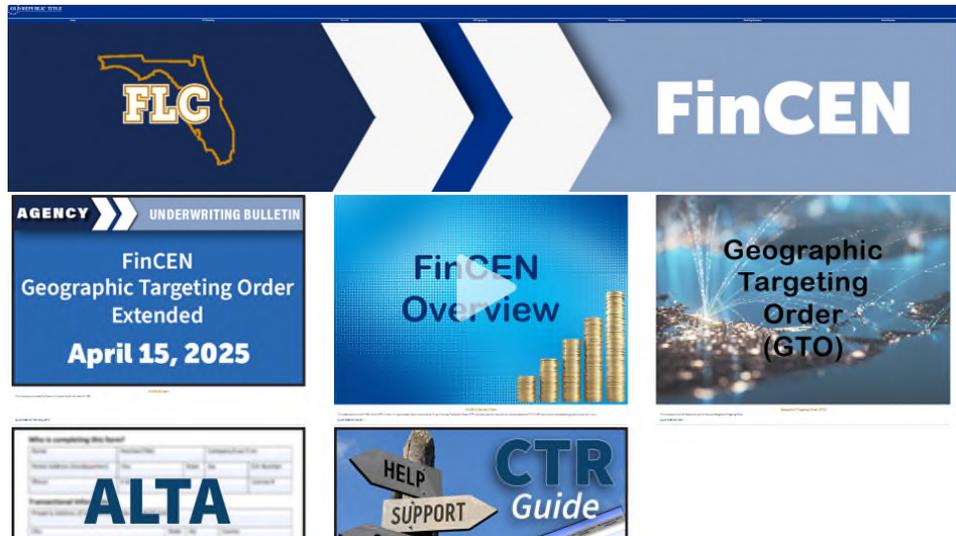


Resources



Old Republic Starslink

<https://www.starslink.com/flc/university/fincen/>



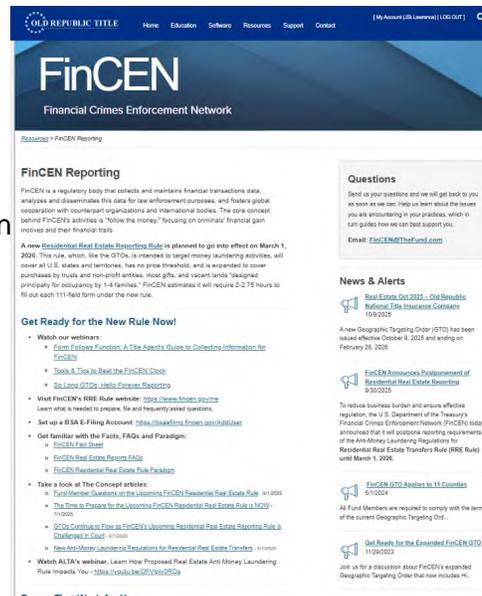
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Resources (cont'd)



- Florida OR (formerly Fund) Resources Page
 - <https://fl.oldrepublictitle.com/resources/fincen-reporting>
- On-demand webinars
 - So Long, GTOs – Comprehensive overview
 - Form Follows Function – How to collect information
 - How to Set up a BSA e-filing account
- Downloadable Collection forms
- FinCEN Fact Sheet
- Articles on
 - Common questions
 - How to Prepare



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Old Republic Partnered Vendor



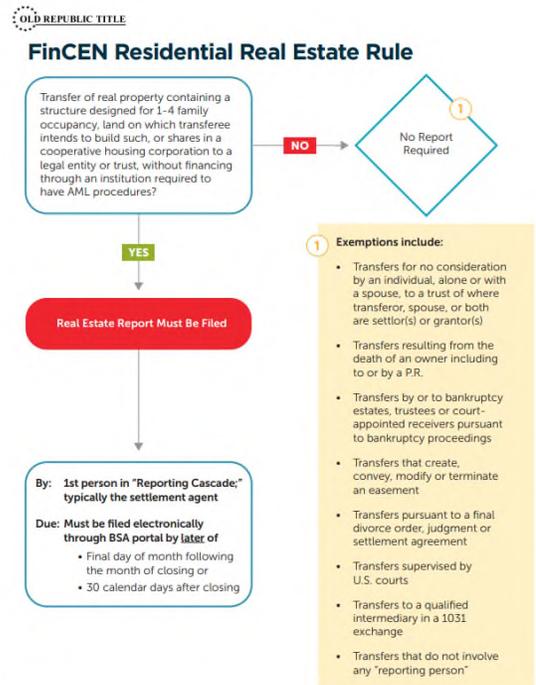
- Advalis
- <https://fincenrealestatereport.com/>
- Offers full assistance to settlement agents in filing required FinCEN RRE Rule Reports
- Vetted Old Republic partner
- Discounted fees



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Quick Reference Paradigm (available on Resources Page)



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Stay up to date

- Subscribe to FinCEN for updates:
<https://service.govdelivery.com/accounts/USFINCEN/subscriber/new>



Any questions?





**So Long GTOs,
Hello Forever Reporting**

**THANK
YOU**



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OLD REPUBLIC INSURANCE GROUP

Real Estate Report



Real Estate Report

OMB No. 1506-0080

Version Number: 1.0

Release Date: 12/22/2025

Report Preparation & Submission Instructions:

Instructions

1. Complete the report in its entirety with all required information. Click **Instructions** for help.

Validate

2. Click **Validate** to ensure all entered data is properly formatted and that all required fields are completed.

Finalize

3. Click **Finalize** to sign with your PIN and lock the entries in the report in preparation for submission.
(Click **Edit Report** to unlock and make edits as needed)

Save

4. Click **Save** to retain a local copy of the report (this can be done at any time during report preparation).

Print

5. (Optional) Click **Print** to print a hard copy of your finalized report.

Ready To File

6. Click **Ready to File** (activated after the report is finalized and saved locally) to begin the submission process.

* Filing name

Filing Information

1. * Type of filing:

a. Initial report

b. Correct/Amend prior report

Prior report BSA Identifier (BSA ID)

c. FinCEN directed back-filing

2. * Date prepared

Auto-filled when report is finalized

3. Note to FinCEN

This PDF is for REFERENCE purposes only.

On September 30, 2025, FinCEN issued exemptive relief from the requirements of the Residential Real Estate Rule until March 1, 2026. Accordingly, reporting persons are exempt from the requirement to file reports for reportable transfers that close prior to March 1, 2026.

PAPERWORK REDUCTION ACT NOTICE

Public reporting and record keeping burden for this collection of information (which includes the recordkeeping burden associated with a designation agreement, if applicable) is estimated to average 4 hours and 20 minutes per response. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. Send comments regarding this burden estimate or any other aspect of this collection of information to the Department of Treasury, Financial Crimes Enforcement Network, PO Box 39, Vienna, VA 22183.

Real Estate Report

Home

Reporting Person & Property Information

Transferee Information

Transferor Information

Payment Information

Part I. Reporting Person Information

4. Reporting person category

Legal name

5. Last name or entity legal name

6. If entity

7. First name

8. Middle name

9. Suffix

Address: Principal place of business in the U.S.

10. Street address

11. City

12. U.S./U.S. Territory

13. State/U.S. Territory

14. ZIP code

15. Date of closing

Part II. Property Information

1 of 1



Address (U.S./U.S. Territory)

16. Street address No street address

17. City

18. U.S./U.S. Territory

19. State/U.S. Territory

20. ZIP code

Legal description

21. Legal description type

Other description

22. Legal description

Real Estate Report

Home

Reporting Person & Property Information

Transferee Information

Transferor Information

Payment Information

Part III. Transferee Information

1 of 1



23. * Transferee type 24. Date trust instrument executed 25. If revocable trust

26. * Total consideration paid (U.S. dollars) \$.00 No consideration paid

(Paid or to be paid, by or on behalf of this transferee)

Legal name | Alternate name (if entity)

27. * Legal name

28. Alternate name

Address: Principal place of business (if entity)

30. Address type

31. * Street address
(number, street, and apt. or suite no.)

32. * City

29. Foreign principal place of business with no U.S. location

33. * Country/Jurisdiction

34. State/U.S. Territory

35. ZIP/Foreign postal code

Identification

No identification

36. * Identification type

37. Identification number

38. Issuing jurisdiction (if foreign)

Person(s) associated with the Transferee

1 of 1



39. * Person type Beneficial Owner Signing Individual Trustee that is a Legal Entity

If Beneficial Owner

40. Check if true Parent/Guardian information instead of minor child

41. Category (select all that apply)

a. Individual trustee

b. Individual with authority to dispose of assets

c. Sole permissible recipient of trust income or assets

d. Grantor or settlor with the right to revoke or withdraw assets

e. Beneficial owner of a legal entity or trust that is a trustee

f. Beneficial owner of a legal entity or trust with authority to dispose of assets

g. Beneficial owner of a legal entity or trust that is the sole permissible recipient of trust income or assets

h. Beneficial owner of legal entity or trust that is a grantor or settlor with the right to revoke or withdraw

42. Country/Jurisdiction of citizenship

If Signing Individual

43. Authorization capacity Other description

44. Name of employer, principal, or partnership

Legal name | Alternate name (if entity) | Date of birth (if individual)

45. * Last name or entity legal name

46. Alternate name

47. First name

48. Middle name

49. Suffix

50. Date of birth

Address: Principal place of business (if entity) | Residential (if individual)

52. Address type

53. * Street address
(number, street, and apt. or suite no.)

54. * City

51. Foreign principal place of business with no U.S. location

55. * Country/Jurisdiction

56. State/U.S. Territory

57. ZIP/Foreign postal code

Identification

No identification (if trustee entity with no identification)

58. * Identification type

59. Identification number

60. Issuing jurisdiction (if foreign)

Real Estate Report

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Reporting Person & Property Information

Transferee Information

Transferor Information

Payment Information

Part IV. Transferor Information

1 of 1



61. If Transferor is not an Individual, select the appropriate type

62. Date trust instrument executed

Legal name | Alternate name (if entity) | Date of birth (if individual)

63. * Last name or entity legal name

64. Alternate name

65. First name

67. Suffix

66. Middle name

68. Date of birth

Address: Principal place of business (if entity) | Residential (if individual)

69. Foreign principal place of business with no U.S. location

70. Address type

73. * Country/Jurisdiction

71. * Street address (number, street, and apt. or suite no.)

74. State/U.S. Territory

72. * City

75. ZIP/Foreign postalcode

Identification

No identification (if true of transferor entity or trust only)

76. * Identification type

78. Issuing jurisdiction

77. * Identification number

If the Transferor is a trust, then record the Trustee(s):

1 of 1



Legal name | Alternate name (if entity) | Date of birth (if individual)

79. * Last name or entity legal name

80. If entity

81. Alternate name

82. First name

83. Middle name

84. Suffix

Address: Principal place of business (if entity) | Residential (if individual)

85. Foreign principal place of business with no U.S. location

86. Address

89. * Country/Jurisdiction

87. * Street address (number, street, and apt. or suite no.)

90. State/U.S. Territory

88. * City

91. ZIP/Foreign postal code

Identification

No identification (if true of trustee entity only)

92. * Identification type

94. Issuing jurisdiction

93. * Identification number

Real Estate Report

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Payment Information

Part V. Payment Information

95. Total consideration paid (in U.S. dollars) (paid or to be paid for the transfer as a whole) \$.00 No consideration paid

96. Check if true for the reportable transfer Hard money, private, or other similar loans involved in reportable transfer

97. Type of hard money, private, and other similar loans

Other description

Payment made by or on behalf of the Transferee entity/trust:

1 of 1



98. Payment amount (in U.S. dollars) \$.00

99. Payment method

Other description

100. If foreign payment method, select currency code

Other description

101. Check if true for this payment Payment is not from financial institution account

102. Account number

103. Financial Institution legal name

Transferee(s) associated with this payment

104. Check if true for this payment Payment is associated with all recorded transferees in Part III

105. Associated transferee legal name



106. Check if true for this payment All payors are all recorded transferees in Part III or all recorded transferees in item 105

Payor(s) associated with this payment (if item 106 is not checked)



107. Last name or entity legal name

108. If entity

109. First name

110. Middle name

111. Suffix

FinCEN REPORTING Buyer Information

Property Address _____

Closing Date ___/___/___ Purchase Price _____

Buyer is [check one] Entity Trust

Buyer Legal Name _____

Trade Name (if any) _____

Principal Place of Business _____

Buyer Entity or Trust Tax ID# _____

If Trust, Date Executed ___/___/___ Is Trust Revocable Yes No

IF BUYER IS ENTITY Individuals who are Beneficial Owner(s) of Entity

Full Legal Name _____

Street Address _____

DOB ___/___/___ Country of Citizenship _____

SS# ___-___-___ Non-US Persons Foreign Tax ID or Passport _____
Country of Issuance _____

Capacity [check all that apply] Controller Owner of 25% Auth. Signer

(Additional Individuals on Page 2)

IF BUYER IS TRUST Individuals who are trustees, settlors who have right to revoke, and beneficiaries who are sole recipients of income/principal or who can demand distribution, or dispose of assets, or expect to sign for the trust.

Full Legal Name _____

Street Address _____

DOB ___/___/___ Country of Citizenship _____

SS# ___-___-___ Non-US Persons Foreign Tax ID or Passport _____
Country of Issuance _____

Capacity [check all that apply] Settlor Trustee Beneficiary

(Additional Individuals on Page 3)

FinCEN REPORTING

Buyer Information - Additional Beneficial Owners Of Entity

Full Legal Name _____

Street Address _____

DOB ___/___/___ Country of Citizenship _____

SS# ___-___-___ Non-US Persons Foreign Tax ID or Passport _____
Country of Issuance _____

Capacity [check all that apply] Controller Owner of 25% Auth. Signer

Full Legal Name _____

Street Address _____

DOB ___/___/___ Country of Citizenship _____

SS# ___-___-___ Non-US Persons Foreign Tax ID or Passport _____
Country of Issuance _____

Capacity [check all that apply] Controller Owner of 25% Auth. Signer

Full Legal Name _____

Street Address _____

DOB ___/___/___ Country of Citizenship _____

SS# ___-___-___ Non-US Persons Foreign Tax ID or Passport _____
Country of Issuance _____

Capacity [check all that apply] Controller Owner of 25% Auth. Signer

Full Legal Name _____

Street Address _____

DOB ___/___/___ Country of Citizenship _____

SS# ___-___-___ Non-US Persons Foreign Tax ID or Passport _____
Country of Issuance _____

Capacity [check all that apply] Controller Owner of 25% Auth. Signer

FinCEN REPORTING

Buyer Information - Additional Trustees, Settlers, Beneficiaries

Full Legal Name _____

Street Address _____

DOB ___/___/___ Country of Citizenship _____

SS# ___-___-___ Non-US Persons Foreign Tax ID or Passport _____

Country of Issuance _____

Capacity [check all that apply] Settlor Trustee Beneficiary

Full Legal Name _____

Street Address _____

DOB ___/___/___ Country of Citizenship _____

SS# ___-___-___ Non-US Persons Foreign Tax ID or Passport _____

Country of Issuance _____

Capacity [check all that apply] Settlor Trustee Beneficiary

Full Legal Name _____

Street Address _____

DOB ___/___/___ Country of Citizenship _____

SS# ___-___-___ Non-US Persons Foreign Tax ID or Passport _____

Country of Issuance _____

Capacity [check all that apply] Settlor Trustee Beneficiary

Full Legal Name _____

Street Address _____

DOB ___/___/___ Country of Citizenship _____

SS# ___-___-___ Non-US Persons Foreign Tax ID or Passport _____

Country of Issuance _____

Capacity [check all that apply] Settlor Trustee Beneficiary

FinCEN REPORTING Seller Information

Property Address _____

Closing Date ___/___/___ Sales Price _____

Sellers Legal Name _____

Current Mailing address _____

Post-Closing Mailing address _____

Phone ___-___-___ Mobile ___-___-___ Email _____

IF SELLER IS INDIVIDUAL

Seller #1 DOB ___/___/___ Seller #2 DOB ___/___/___

Seller #1 SS # ___-___-___ Seller #2 SS# ___-___-___

IF SELLER IS AN ENTITY

Entity TAX ID# _____

Trade Name (if different from Legal Name above) _____

IF SELLER IS A TRUST

Trust TAX ID# _____ Date Trust Instrument Executed ___/___/___

Full Legal Name of Trustee(s) _____ SS # ___-___-___

_____ SS # ___-___-___

_____ SS # ___-___-___

Address of Trustee(s) _____

FinCEN REPORTING Certification

Property Address _____

Buyer Name _____

Seller Name _____

I hereby certify, to the best of my knowledge and belief, that the information I have provided to the settlement agent in compliance with FinCEN's Residential Real Estate Rule, be it verbally or in writing, is complete, true and correct. I certify that the settlement agent or other reporting person may reasonably rely upon the information provided by me when submitting the required report to the U.S. Department of Treasury's Financial Crimes Enforcement Network (FinCEN).

Signature _____

Print Name _____

Capacity (ex. President, Trustee) _____

Date ___/___/___



New FinCEN Rule: Mandatory Buyer & Seller Reporting for Residential “Cash” Deals

Information gained now can **prevent surprises later!**

Who’s behind this new rule and why is it in place?

The Financial Crimes Enforcement Network (FinCEN) is part of the U.S. Treasury Department and creates rules, like the Residential Real Estate Rule, to safeguard the financial system from illicit use. The new rule, **which goes into effect March 1, 2026**, is designed to collect financial intelligence to combat money laundering in the residential real estate market.

Who and what does FinCEN’s Residential Real Estate Rule affect?

Starting March 1, 2026, settlement agents will have to report to FinCEN detailed information about the buyer, the seller, the property, and all payments made by the buyer, *in all residential real property transactions, regardless of dollar amount, where the buyer is a “transferee entity” (e.g., LLC, corporation, partnership) or “transferee trust” (e.g., revocable trust, land trust) and is paying cash or is getting a private or non-institutional mortgage loan.*

How is “residential real property” defined in the new rule?

The rule primarily focuses on properties designed for 1-4 families, including single-family homes, townhomes, condos, co-ops, and mixed-use properties where a residential component exists. The rule also covers vacant land intended for residential construction for 1-4 families.

How is this different than the Geographic Targeting Orders (GTOs)?

The Residential Real Estate Rule will replace the GTOs and differ in many ways, including:

- The rule is not limited to certain counties and affects all of the United States.
- There is no dollar threshold - the new rule applies to the sale of all residential real estate regardless of the selling price.
- The rule requires reporting on the seller.
- The rule extends to vacant land intended for residential construction for 1-4 families.
- The rule applies to most trusts.

Are there any exemptions or exceptions to the new rule?

There are, but not for the typical residential transaction involving real estate agents.

Are there penalties for ignoring this rule or providing false information?

Yes, and they are severe. For unintentional violations, a civil penalty of \$1,394 per violation. For a pattern of negligent activity, additional penalties up to \$108,489. For willful violations, 5 years in prison and criminal fines of \$250,000.



New FinCEN Rule: Mandatory Buyer & Seller Reporting for Residential “Cash” Deals

***** BE PREPARED TO NOTIFY THESE *BUYERS & SELLERS* ***
THEY WILL BE ASKED FOR THIS INFORMATION!**

What information will the **TRANSFEREE/BUYER** need to share with the settlement agent?

Entity transferees will need to disclose to the settlement agent at or prior to closing:

- Full legal name, incl. trade name and DBA of the entity, and street address (not a P.O. Box)
- Unique ID (TIN, foreign entity registration # for foreign entity)
- “Beneficial Owner” information. This means:
 - Each individual who exercises control over the entity (e.g., CEO, CFO, President, Managing Member, Manager, General Partner)
 - Each individual owning 25% or more of the equity interests of the entity
 - Each individual who will be signing documents for the entity

The settlement agent must be timely provided everyone’s legal name, residence address, country of citizenship, date of birth, social security number or foreign tax ID /foreign passport number.

Trust transferees will need to disclose to the settlement agent at or prior to closing:

- Full legal name of the Trust and date Trust instrument was signed
- Unique ID (IRS TIN)
- Whether Trust is revocable
- “Beneficial Owner” information. This is defined to include, but is not limited to:
 - An individual who is trustee of the transferee trust
 - A grantor or settlor who has the right to revoke the transferee trust
 - Certain beneficiaries of the transferee trust
 - An individual who will be signing for the transferee trust

Each transferee’s legal name, address, country of citizenship and date of birth (if individual), Social Security number or foreign tax ID number or foreign passport number, and the reason for reporting the person must be provided to the settlement agent in a timely manner.

What information will the **SELLER** need to share with the settlement agent?

Sellers subject to the new rule will need to disclose to the settlement agent at or prior to closing:

- Full legal name and physical mailing address (not a P.O. Box)
- Phone number and email address
- DOB (if individual)
- Unique number (SS# or TIN)
- If seller is a trust, information on the transferor trust, including name of trustee

Each transferee’s legal name, residence address, country of citizenship, date of birth, Social Security number or foreign tax ID / foreign passport number must be provided to the settlement agent in a timely manner.

NOTICE regarding use of ALTA FinCEN Collection Forms

The following American Land Title Association forms are copyrighted and intended for use only by ALTA licensees and members in good standing as of the date of use

BACKGROUND

Federal law requires that certain residential real estate transactions purchased with all cash or without institutional lender financing, where at least one buyer/transferee is a legal entity, LLC, corporation, partnership, trust, trustee or other non-natural person, be reported to United States Treasury Department's Financial Crimes Enforcement Network (FinCEN). This form requests information necessary to meet the reporting requirements. *For more information about FinCEN's Real Estate Report and what transactions are covered go to alta.org/fincen.*

COMPLETING THIS COLLECTION FORM

This collection form has 5 parts:

- *Part 1* - information about the person completing this collection form.
- *Part 2* - information about possible exemptions to reporting.
- *Part 3* - information about the buyer/transferee in a covered real estate transaction – *Part 3 is broken into 2 parts: (a) for transferee entities and (b) for transferee trusts.*
- *Part 4* - information about the origin of the funds used to acquire the subject real estate.
- *Part 5* - certification of the accuracy of the information provided on behalf of the buyer/transferee. Note that the terms “buyer” and “transferee” are interchangeably used in this collection form.

TRANSFEREE ENTITIES AND TRUSTS

The regulation applies to purchases by:

- **Transferee entity** - any person other than a transferee trust or an individual. A transferee entity may be a corporation, partnership, estate, association, or limited liability company. Certain regulated entities are exempt from the reporting.
- **Transferee trust** - any legal arrangement created when a person places assets under the control of a trustee for the benefit of one or more persons or for a specified purpose, as well as any legal arrangement similar in structure or function, whether formed under the laws of the United States or a foreign jurisdiction.

TRANSFEREE ENTITY INFORMATION REQUIRED

This form collects information necessary to comply with the rule including information about the transferee entity including their legal name, current address, IRS taxpayer identification number if available (if not available other identifying information is required).

It also requires reporting of EACH **beneficial owner** of the transferee entity. Per the federal regulations, a **beneficial owner** of a transferee entity is someone who (i) exercises substantial control over the transferee entity, or (ii) owns or controls at least 25% of the transferee entity's ownership interests. This includes: full legal name, date of birth, complete current residential street address, citizenship and IRS taxpayer identification number if available (if not available other identifying information is required).

TRANSFEREE TRUST INFORMATION REQUIRED

This form collects information necessary to comply with the rule including information about the transferee trust including its legal name, date trust instrument executed, IRS taxpayer identification number if available (if not available other identifying information is required) and whether trust is revocable.

It also requires reporting of EACH **beneficial owner** of a transferee trust which includes (i) the trustee, (ii) a beneficiary of the trust who has the right to demand a distribution of, or withdraw, substantially all of the assets of the transferee trust, and (iii) a grantor or settlor who has the right to revoke the transferee trust. See Part 3(b) of this collection form for a complete list of who are beneficial owners of a transferee trust.

TRANSACTION EXEMPTIONS

Transactions do not have to be reported if (a) the buyer is obtaining some mortgage financing from a licensed mortgage lender or (b) the buyers are natural persons. Additionally, there are some transactional exemptions for transfers incident to a divorce, dissolution of civil union, death of the seller or court order.

Transaction Data	
Address of property being acquired by the Transferee Entity or Transferee Trust ("Property")	
Anticipated settlement date for the Property acquisition	
Sale Price	
Settlement Agent/Reporting Person File Number	

Part 1: INFORMATION ABOUT THE PERSON COMPLETING THIS FORM

1	Full Legal Name (First, M.I., Last)	
2	Physical Mailing Address - Street Address, City, State ZIP (do not list a P.O. Box)	
3	Phone Number	
4	Email	
5	Relationship to the Transferee Entity (if you complete box 5 you don't need to complete box 6)	<input type="checkbox"/> Owner/LLC Member <input type="checkbox"/> Corporate officer/LLC Manager <input type="checkbox"/> Accountant <input type="checkbox"/> Attorney <input type="checkbox"/> Real Estate Agent <input type="checkbox"/> Other _____
6	Relationship to the Transferee Trust (if you complete box 6 you don't need to complete box 5)	<input type="checkbox"/> Trustee <input type="checkbox"/> Beneficiary <input type="checkbox"/> Accountant <input type="checkbox"/> Attorney <input type="checkbox"/> Real Estate Agent <input type="checkbox"/> Other _____

Part 2: Reporting Exemptions

If an exemption applies, complete this page and sign the certification in part 5. If none, skip to part 3.

1	Does an EXEMPTION from FinCEN reporting apply?	<input type="checkbox"/> No <input type="checkbox"/> Yes a transactional exemption (must complete box 2 below) <input type="checkbox"/> Yes an entity exemption (must complete box 3 below) <input type="checkbox"/> Yes a trust exemption (must complete box 4 below)
2	The reason for the transfer is one of the following TRANSACTIONAL exemptions? (see 31 CFR 1031.320(b)(2))	<input type="checkbox"/> Death of an individual including transfer pursuant to the terms of a will or trust <input type="checkbox"/> Divorce or dissolution of a marriage or civil union <input type="checkbox"/> Transfer to a bankruptcy estate <input type="checkbox"/> Court order or supervised by a court
3	The Transferee ENTITY is one of the following exempt entities? (including a wholly owned subsidiary)	<input type="checkbox"/> Securities reporting issuer defined in 31 CFR 1010.380(c)(2)(i) <input type="checkbox"/> Governmental authority defined in 31 CFR 1010.380(c)(2)(ii) <input type="checkbox"/> Bank defined in 31 CFR 1010.380(c)(2)(iii) <input type="checkbox"/> Credit union defined in 31 CFR 1010.380(c)(2)(iv) <input type="checkbox"/> Depository institution holding company defined in 31 CFR 1010.380(c)(2)(v) <input type="checkbox"/> Money service business defined in 31 CFR 1010.380(c)(2)(vi) <input type="checkbox"/> Broker or dealer in securities defined in 31 CFR 1010.380(c)(2)(vii) <input type="checkbox"/> Securities exchange or clearing agency defined in 31 CFR 1010.380(c)(2)(viii) <input type="checkbox"/> Exchange Act registered entity defined in 31 CFR 1010.380(c)(2)(ix) <input type="checkbox"/> Insurance company defined in 31 CFR 1010.380(c)(2)(xii) <input type="checkbox"/> State-licensed insurance producer defined in 31 CFR 1010.380(c)(2)(xiii) <input type="checkbox"/> Commodity Exchange Act registered entity defined in 31 CFR 1010.380(c)(2)(xiv) <input type="checkbox"/> Public utility defined in 31 CFR 1010.380(c)(2)(xvi) <input type="checkbox"/> Financial market utility defined in 31 CFR 1010.380(c)(2)(xvii) <input type="checkbox"/> Investment company as defined 15 U.S.C. 80a-3(a)
4	The Transferee TRUST is one of the following exempt trusts?	<input type="checkbox"/> A trust that is a securities reporting issuer defined in 31 CFR 1010.380(c)(2)(i) <input type="checkbox"/> A trust in which the trustee is a securities reporting issuer defined in 31 CFR 1010.380(c)(2)(i) <input type="checkbox"/> A statutory trust - defined as any trust created or authorized under the Uniform Statutory Trust Entity Act or as enacted by a State <input type="checkbox"/> Estate planning trust where (1) the transfer is for no consideration and (2) the transferor/seller (and/or their spouse) is the also the settlor or grantor of the trust

Part 3(a) – TRANSFEREE ENTITIES – Entity Information
 (Skip to Part 3(b) if the transferee is a trust)

1	Full Legal Name of Entity	
2	Trade name or “doing business as” name (if none, write N/A)	
3	Street Address for Principal Place of Business (do not list a P.O. Box)	
4	Unique ID: <i>For US entities:</i> use Taxpayer ID Number <i>For non-US entities:</i> use foreign Taxpayer ID Number or foreign entity registration number and name of jurisdiction	

TRANSFeree ENTITY – Beneficial Owner Information

- List each individual who exercises substantial **control** over a reporting company, including executive officer or senior manager (e.g., Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President, Treasurer) as defined in 31 CFR 1010.380(d)(1).
- List each individual, if any, who on the date of closing, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, **owns** 25 percent or more of the equity interests of the legal entity listed above as defined in 31 CFR 1010.380(d).
- List each individual who expects to **sign** documents on behalf of the transferee entity AND the signer’s capacity. *Must have at least one person listed as a signor.*

**If beneficial owner is a minor child and you are a parent/guardian please add “parent/guardian” in Full Legal Name*

Full Legal Name	Date of Birth	Residential Street Address	Country of Citizenship	For U.S. Persons: Taxpayer ID Number <i>(commonly Social Security Number)</i> For Non-U.S. Persons: Foreign Tax ID number or, Passport Number and Country of Issuance ^a	Reason for Reporting Individual Control, Own or Sign (if signer, include signer’s capacity) – select all that apply
					<input type="checkbox"/> Control <input type="checkbox"/> Owns <input type="checkbox"/> Sign: _____
					<input type="checkbox"/> Control <input type="checkbox"/> Owns <input type="checkbox"/> Sign: _____
					<input type="checkbox"/> Control <input type="checkbox"/> Owns <input type="checkbox"/> Sign: _____
					<input type="checkbox"/> Control <input type="checkbox"/> Owns <input type="checkbox"/> Sign: _____
					<input type="checkbox"/> Control <input type="checkbox"/> Owns <input type="checkbox"/> Sign: _____
					<input type="checkbox"/> Control <input type="checkbox"/> Owns <input type="checkbox"/> Sign: _____
					<input type="checkbox"/> Control <input type="checkbox"/> Owns <input type="checkbox"/> Sign: _____

^a In lieu of a passport number, Non-U.S. Persons may also provide a Social Security Number, an alien identification card number, or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

Part 3(b) – TRANSFEREE TRUST – Trust Information

1	Full Legal Name of Trust (as listed on trust instrument)	
2	Date Trust instrument was executed (this is commonly the date on the trust document)	
3	Unique ID: <i>For US trusts, IRS TIN</i> <i>For foreign trusts, a tax identification number issued by a foreign jurisdiction and the name of such jurisdiction</i>	
4	Is the Trust revocable?	<input type="checkbox"/> No <input type="checkbox"/> Yes

TRANSFeree TRUST – Beneficial Owner Information

List each individual who, on the date of closing, is any of the following of the transferee trust:

- a. An individual who is a trustee of the transferee trust
- b. An individual other than a trustee with the authority to dispose of transferee trust assets
- c. A beneficiary who is the sole permissible recipient of income and principal from the transferee trust or who has the right to demand a distribution of, or withdraw, substantially all of the assets from the transferee trust
- d. A grantor or settlor who has the right to revoke the transferee trust or otherwise withdraw the assets of the transferee trust
- e. A beneficial owner of a legal entity or trust that is a trustee or the transferee trust
- f. A beneficial owner of a legal entity or trust with authority to dispose of transferee trust assets in a manner other than as a trustee of a transferee trust
- g. A beneficial owner of a legal entity or trust that is the sole permissible recipient of income and principal from the transferee trust or who has the right to demand a distribution of, or withdraw, substantially all of the assets from the transferee trust
- h. A beneficial owner of legal entity or trust that is a grantor or settlor with the right to revoke the transferee trust or otherwise withdraw the assets of the transferee trust
- i. An individual who expects to sign documents on behalf of the transferee trust

**If beneficial owner is a minor child and you are a parent/guardian please add "parent/guardian" in Full Legal Name*

Full Legal Name (for trustees who are legal entities, include Trade/Doing Business Name)	Date of Birth (N/A if trustee is a legal entity)	Address – residential street address for individuals; Principal place of business for legal entities (must be a US address)	Country of Citizenship – for individuals, N/A for legal entities	For U.S. Persons: IRS TIN (usually Social Security Number) For Non-U.S. Persons: Unique ID, Passport Number and Country of Issuance ^b	Reason for Reporting Individual using the categories in a-i above (if signer, include <u>signer's capacity</u>) – include all that apply

^b In lieu of a passport number, Non-U.S. Persons may also provide a Social Security Number, an alien identification card number, or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

Part 4 – FUNDS USED FOR ACQUISITION OF THE PROPERTY

Complete this section with information about each account that has or is expected to transmit funds on behalf of the buyer/transferee to the settlement agent to complete the acquisition of the Property. Please include any amounts not transmitted to the Settlement Agent's/Reporting Person's escrow/trust account (paid outside of closing).

If this is a gratuitous transfer that is not an exempt transfer, then indicate N/A in the first box below.

Originating financial institution name	Account number	Payor (name listed on account)	Method of payment (wire, check, other)	Dollar amount of payment	Funds transmitted to Settlement Agent escrow/trust account
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No

Part 5 – CERTIFICATION

I acknowledge on behalf of the buyer/transferee that:

- No funds have been, or will be, transferred or paid outside of the control of the Settlement Agent/Reporting Person who is facilitating the acquisition of the Property.
- Any funds that have been or will be transferred between the parties outside of the control of the Settlement Agent/Reporting Person who is facilitating the acquisition of the Property have been reported in Part 4.

I hereby certify, to the best of my knowledge, that the information provided in this document is complete and correct. I acknowledge that the settlement agent or other reporting person will rely upon the information provided on this form to (a) determine whether the transaction is reportable and (b) submit the required report to the U.S. Department of Treasury's Financial Crimes Enforcement Network (FinCEN). I agree to indemnify, defend and hold harmless the settlement agent or other reporting person against any and all losses, liabilities, damages, claims, fines, causes of action related to the reporting of information contained in this form to FinCEN under this regulation.

Signature: _____

Type Name: _____

Date: _____

Legal Entity Identifier _____ (Optional)

BACKGROUND

Federal law requires that certain residential real estate transactions purchased with all cash or without institutional lender financing, where at least one buyer/transferee is a legal entity, LLC, corporation, partnership, trust, trustee or other non-natural person, be reported to United States Treasury Department's Financial Crimes Enforcement Network (FinCEN). This form requests information necessary to meet the reporting requirements. *For more information about FinCEN's Real Estate Report and what transactions are covered go to alta.org/fincen.*

COMPLETING THIS COLLECTION FORM

This collection form has 4 parts:

- *Part 1* - information about the person completing this collection form.
- *Part 2* - information about potential exempt transactions
- *Part 3* – information about the seller in a covered real estate transaction – *Part 3 is broken into three sections, (a) for individual transferors (b) for transferor entities and (c) for transferor trusts.*
- *Part 4* - certification of the accuracy of the information provided on behalf of the seller/transferor. Note that the terms “seller” and “transferor” are interchangeably used in this collection form.

WHY DID I RECEIVE THIS FORM?

If a transaction is subject to the rule described above, then the settlement agent is required to report some limited information about the seller.

ARE THERE ANY EXEMPTIONS?

Transactions do not have to be reported if (a) the buyer is obtaining some mortgage financing from a licensed mortgage lender or (b) the buyers are natural persons. Additionally, there are some transactional exemptions for transfers incident to a divorce, dissolution of civil union, death of the seller or court order. If you think an exemption applies please reach out to us at [insert settlement company email].

Transaction Data	
Address of property being acquired by the Transferee Entity or Transferee Trust ("Property")	
Anticipated settlement date for the Property acquisition	
Sale Price	
Settlement Agent/Reporting Person File Number	

Part 1: INFORMATION ABOUT THE PERSON COMPLETING THIS FORM

1	Full Legal Name (First, M.I., Last)			
2	Physical Mailing Address - Street Address, City, State ZIP (do not list a P.O. Box)			
3	Phone Number			
4	Email			
5	Relationship to the Seller/Transferor	<input type="checkbox"/> Individual Seller <input type="checkbox"/> Accountant <input type="checkbox"/> Attorney <input type="checkbox"/> Real Estate Agent <input type="checkbox"/> Other _____		
6	If Seller is a Trust or Entity- Relationship to the Transferor Entity or Trust	<table border="0"> <tr> <td> Transferor Entity <input type="checkbox"/> Owner/LLC Member <input type="checkbox"/> Corporate Officer/LLC Manager <input type="checkbox"/> Accountant <input type="checkbox"/> Attorney <input type="checkbox"/> Real Estate Agent <input type="checkbox"/> Other _____ </td> <td> Transferor Trust <input type="checkbox"/> Trustee <input type="checkbox"/> Beneficiary <input type="checkbox"/> Accountant <input type="checkbox"/> Attorney <input type="checkbox"/> Real Estate Agent <input type="checkbox"/> Other _____ </td> </tr> </table>	Transferor Entity <input type="checkbox"/> Owner/LLC Member <input type="checkbox"/> Corporate Officer/LLC Manager <input type="checkbox"/> Accountant <input type="checkbox"/> Attorney <input type="checkbox"/> Real Estate Agent <input type="checkbox"/> Other _____	Transferor Trust <input type="checkbox"/> Trustee <input type="checkbox"/> Beneficiary <input type="checkbox"/> Accountant <input type="checkbox"/> Attorney <input type="checkbox"/> Real Estate Agent <input type="checkbox"/> Other _____
Transferor Entity <input type="checkbox"/> Owner/LLC Member <input type="checkbox"/> Corporate Officer/LLC Manager <input type="checkbox"/> Accountant <input type="checkbox"/> Attorney <input type="checkbox"/> Real Estate Agent <input type="checkbox"/> Other _____	Transferor Trust <input type="checkbox"/> Trustee <input type="checkbox"/> Beneficiary <input type="checkbox"/> Accountant <input type="checkbox"/> Attorney <input type="checkbox"/> Real Estate Agent <input type="checkbox"/> Other _____			

Part 2: Reporting Exemptions

If an exemption applies, complete this page and sign the certification in part 4. If none, skip to part 3.

1	Does an EXEMPTION from FinCEN reporting apply?	<input type="checkbox"/> No <input type="checkbox"/> Yes a transactional exemption (must complete box 2 below)
2	Which of the following TRANSACTIONAL exemptions is the reason you are selling the property? (see 31 CFR 1031.320(b)(2))	<input type="checkbox"/> Death of an individual including transfer pursuant to the terms of a will or trust <input type="checkbox"/> Divorce or dissolution of a marriage or civil union <input type="checkbox"/> Transfer to a bankruptcy estate <input type="checkbox"/> Court order or supervised by a court

Part 3(a) –TRANSFEROR - Individual Information

(Skip to Part 3(b) if the transferor is an entity or Part 3(c) if transferor is a trust)

1	Full Legal Name (First, MI, Last)	
2	Date of Birth	
3	Residential Street Address after settlement (do not list a P.O. Box)	
4	Unique ID: For U.S. Persons: Taxpayer ID Number <i>(commonly Social Security Number)</i> For Non-U.S. Persons: Unique ID, Passport Number and Country of Issuance ^a	

Part 3(b) –TRANSFEROR ENTITY INFORMATION

1	Full Legal Name of Entity	
2	Trade name or “doing business as” name (if none, write N/A)	
3	Street Address for Principal Place of Business (do not list a P.O. Box)	
4	Unique ID: For U.S. entities: Taxpayer ID Number For Non-U.S. Entities: Foreign Tax ID number or entity registration and name of the jurisdiction	

^a In lieu of a passport number, Non-U.S. Persons may also provide a Social Security Number, an alien identification card number, or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

Part 3(c) –TRANSFEROR TRUST INFORMATION

1	Full Legal Name of Trust (as listed on trust instrument)	
2	Date Trust instrument was executed (this is commonly the date on the trust document)	
3	Unique ID: <i>For US trusts, IRS TIN</i> <i>For foreign trusts, a tax identification number issued by a foreign jurisdiction and the name of such jurisdiction</i>	

TRANSFEROR TRUST – Trustee Information

List each individual or entity who is a trustee of the transferor trust

Full Legal Name (for trustees who are legal entities, include Trade/Doing Business Name)	Address – residential street address for individuals; Principal place of business for legal entities (must be a US address)	For U.S. Persons: IRS TIN (usually Social Security Number) For Non-U.S. Persons: Unique ID, Passport Number and Country of Issuance ^b

^b In lieu of a passport number, Non-U.S. Persons may also provide a Social Security Number, an alien identification card number, or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

Part 4 – CERTIFICATION

I hereby certify, to the best of my knowledge, that the information provided in this document is complete and correct. I acknowledge that the settlement agent or other reporting person will rely upon the information provided on this form to (a) determine whether the transaction is reportable and (b) submit the required report to the U.S. Department of Treasury’s Financial Crimes Enforcement Network (FinCEN). I agree to indemnify, defend and hold harmless the settlement agent or other reporting person against any and all losses, liabilities, damages, claims, fines, causes of action related to the reporting of information contained in this form to FinCEN under this regulation.

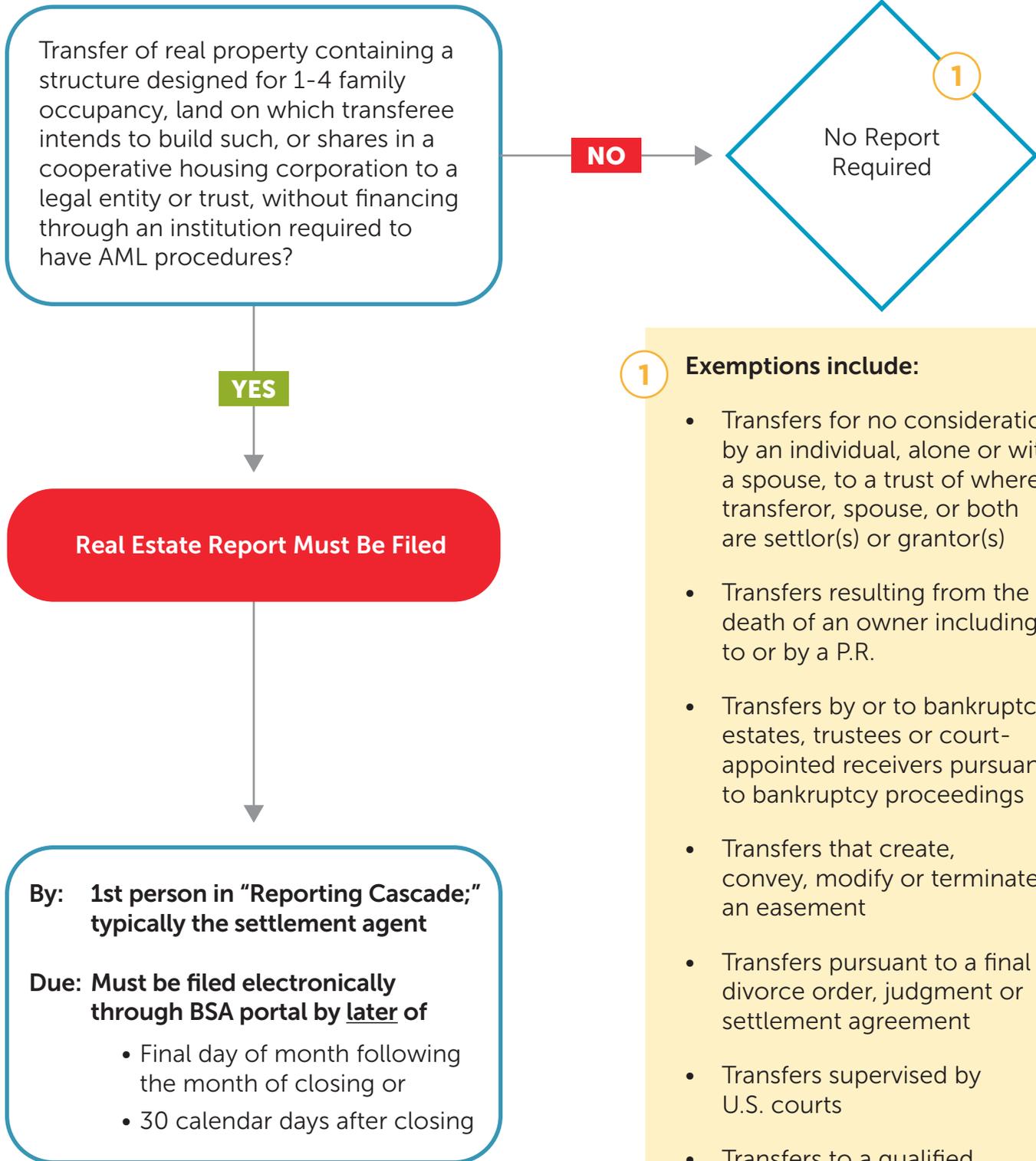
Signature: _____

Type Name: _____

Date: _____

Legal Entity Identifier _____ (Optional)

FinCEN Residential Real Estate Rule



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Exemptions include:

- Transfers for no consideration by an individual, alone or with a spouse, to a trust of where transferor, spouse, or both are settlor(s) or grantor(s)
- Transfers resulting from the death of an owner including to or by a P.R.
- Transfers by or to bankruptcy estates, trustees or court-appointed receivers pursuant to bankruptcy proceedings
- Transfers that create, convey, modify or terminate an easement
- Transfers pursuant to a final divorce order, judgment or settlement agreement
- Transfers supervised by U.S. courts
- Transfers to a qualified intermediary in a 1031 exchange
- Transfers that do not involve any "reporting person"



FL BAR Reference Number: 2507049N

**Title: So Long GTOS; Hello Forever Reporting:
FinCEN's New Residential Real Estate Rule**

Level: Intermediate

Approval Period: 07/16/2025 - 01/31/2027

CLE Credits

General 1.0

Certification Credits

Real Estate 1.0