



CHIEF FINANCIAL OFFICER
BLAISE INGOGLIA
STATE OF FLORIDA

February 25, 2026

Scott Merritt
Executive Director
Florida Land Title Association
P.O. Box 66145
St. Pete Beach FL 33736

RE: FinCen Residential Real Estate Rule

Scott,

The Residential Real Estate Rule, effective March 1, 2026, requires certain professionals involved in real estate closings and settlements to submit reports to FinCEN regarding certain non-financed transfers of residential real estate to legal entities or trusts.

The reports required by FinCEN are ancillary to the transfer of property ownership. While they must be completed for each qualifying transaction, they are not a requirement of the actual closing. Therefore, any fees or expenses associated with the research and preparation of these reports are separate from the title agent's or agency's closing services fee. These charges may appear separately on the settlement statement, provided they are accurately identified.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Ray Wenger".

Ray Wenger

DEPARTMENT OF FINANCIAL SERVICES
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