

Date: May 22, 2019

To: All Texas and Florida Agents

From: Chris Phillips, President & CEO

RE: Fin CEN Extends Order for Counties in Texas and Florida through November 11, 2019

Dear Agents:

On May 14, 2019, the Financial Crimes Enforcement Network (FinCEN) once again issued a Geographic Targeting Order (GTO) to extend the expiration date thru November 11, 2019, unless otherwise extended. Link to the most recent GTO:

https://www.fincen.gov/sites/default/files/shared/Real%20Estate%20GTO%20Order%20FINAL%20GENERIC%205.15.2019_508.pdf

You may recall that the Geographic Targeting Orders have been in place since 2015. Please remember that a GTO in the affecting counties places obligations upon the title agent to collect certain information and electronically file a Currency Transaction Report, and the GTO allows for criminal and/or civil penalties in the event of non-compliance with the Order.

FNTI continues to monitor all communications from FinCEN, the American Land Title Association, and the Texas Land Title Association regarding the GTO and may amend the above information should we become aware of necessary and/or needed changes. Not only are we at FNTI available for questions, there is a FinCEN Resource Center which may be contacted at 800-767-2825, (Monday thru Friday from 8 a.m. to 6 p.m. Eastern time).

This Underwriting Bulletin becomes a part of the principles and practices with which you are to comply under the terms of your Underwriting Agreement with First National Title Insurance Company. Should the content of this bulletin address the closing and escrow function, this information should be considered a directive and part of the principles and practices if non-compliance would result in liability to FNTI under either the insured closing service letter or policy of title insurance notwithstanding that the Underwriting Agreement does not include the closing and escrow functions of your agency.