



Agency Bulletin: 2018-05

Date: November 26, 2018

To: All Texas and Florida Agents

From: Chris Phillips, CEO

RE: FinCEN Extends Order for Counties in Texas and Florida thru May 15, 2019

Dear Agents:

On November 15, 2018, the Financial Crimes Enforcement Network (FinCEN) once again has issued a Geographic Targeting Order (GTO) to extend the expiration date thru **May 15, 2019**, unless otherwise extended.

The link to the most recent GTO:

https://www.fincen.gov/sites/default/files/shared/Real%20Estate%20GTO%20GENERIC_111518_FINAL.pdf

The previous GTO issued was CONFIDENTIAL, effective May 21, 2018, thru November 16, 2018, and First National Title Insurance Company issued a confidential letter to owners and/or managers of the Texas and Florida agents on May 17, 2018, detailing the requirements of said GTO.

As it relates to the agents of First National Title Insurance Company, please note the following changes to the requirements of the newly issued GTO:

1. The confidentiality provision included in the previous GTO has been removed.
2. The term "trust" is no longer included in the definition of a "legal entity" for purposes of identifying a "Covered Business Transaction."

In all other respects, the requirements of the GTO set forth in our May 17 letter are unchanged.

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).