



TO: Alliant National Colorado, District of Columbia, Florida, Illinois, Maryland, Nevada, Texas, and Virginia Agents

DATE: April 15, 2025

SUBJECT: ***FinCEN Geographic Targeting Order Effective April 15, 2025***

The Financial Crimes Enforcement Network (“FinCEN”) of the United States Department of the Treasury has extended its Geographic Targeting Orders (“GTO’s”) requiring Alliant National and its agents to collect and report information on certain residential real estate purchases in specifically identified cities and counties through October 9, 2025. See attached copy. All previously identified geographic locations remain the same, without any additions or deletions.

Unless renewed or otherwise extended, the new GTO expires on October 9, 2025, for all identified geographic locations. The new GTO still imposes the same potential civil and criminal penalties for noncompliance by Alliant National or its agents.

As with the prior GTOs, “Covered Transactions” must be reported. A “Covered Transaction” is one in which:

- 1) The purchase price is either \$300,000 or more; or \$50,000 or more if the property is located in either the City or County of Baltimore, Maryland.
- 2) The property is located in one of the following states, and its counties or cities:

State	Counties						Cities		
District of Columbia									
Colorado	Adams	Arapahoe	Clear Creek	Denver	Douglas	Eagle			
	Elbert	El Paso	Fremont	Jefferson	Mesa	Pitkin			
	Pueblo	Summit							
Florida	Broward	Miami-Dade	Palm Beach	Hillsborough	Pasco	Pinellas			
	Manatee	Sarasota	Charlotte	Lee	Collier				
Illinois	Cook								
Maryland	Anne Arundel	Howard	Montgomery	Prince George’s	Baltimore		Baltimore		
Nevada	Clark								
Texas	Bexar	Dallas	Tarrant	Harris	Montgomery	Webb			
	Travis								
Virginia	Arlington	Fairfax					Alexandria	Falls Church	Fairfax

- 3) The property is residential;
- 4) The purchase is made without a bank loan or other similar form of external financing (hard money loans are non-institutional so they do not qualify as bank loans);

5) The purchaser is a “Legal Entity” (a corporation, limited liability company, partnership, or other similar business entity, whether formed under the laws of a state in the U.S. or a foreign jurisdiction; this term no longer includes Trusts or Trustees of Trusts); and

6) The purchase is made, at least in part, using currency or a cashier’s check, a certified check, a traveler’s check, a personal check, a business check, or a money order in any form, a funds transfer (wired funds), or virtual currency.

For a Covered Transaction, the GTO requires that certain information be reported on FinCEN’s Currency Transaction Report. This information includes:

1) The identity of the Purchaser (the Legal Entity that is purchasing the residential real estate in a Covered Transaction);

2) The identity of the “Beneficial Owners” of the Legal Entity (defined as each individual who directly or indirectly owns 25% or more of the equity interests in a corporation, partnership or other business entity; and

3) The identity of the person primarily responsible for representing the Purchaser.

All Alliant National search reports/commitments involving any land in the above-referenced states and counties must include the following requirement in Schedule B for Colorado, the District of Columbia, Florida, Illinois, Maryland, Nevada, Virginia, and in Schedule C for Texas:

State / Schedule	Language for Requirement
Colorado, on Schedule B	When 1) the land is residential real property and is located in Adams, Arapahoe, Clear Creek, Denver, Douglas, Eagle, Elbert, El Paso, Fremont, Jefferson, Mesa, Pitkin, Pueblo, and Summit counties, Colorado; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated April 14, 2025 or any renewal thereof.
District of Columbia, on Schedule B	When 1) the land is residential real property and is located in the District of Columbia; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated April 14, 2025 or any renewal thereof.
Florida, on Schedule B	When 1) the land is residential real property and is located in Broward, Miami-Dade, Palm Beach, Hillsborough, Pasco, Pinellas, Manatee, Sarasota, Charlotte, Lee or Collier counties, Florida; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated April 14, 2025 or any renewal thereof.
Illinois, on Schedule B	When 1) the land is residential real property and is located in Cook county, Illinois; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity,

	the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated April 14, 2025 or any renewal thereof.
Maryland, on Schedule B	When 1) the land is residential real property and is located in Anne Arundel, Howard, Montgomery, or Prince George’s counties, Maryland; and the total purchase price is \$300,000 or more; or 2) the land is residential real property and is located in the city or county of Baltimore, Maryland, and the total purchase price is \$50,000 or more; and 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated April 14, 2025 or any renewal thereof.
Nevada, on Schedule B	When 1) the land is residential real property and is located in Clark county, Nevada; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated April 14, 2025 or any renewal thereof.
Texas, on Schedule C	When 1) the land is residential real property and is located in Bexar, Dallas, Tarrant, Harris, Montgomery, Travis or Webb counties, Texas; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated April 14, 2025 or any renewal thereof.
Virginia, on Schedule B	When 1) the land is residential real property and is located in Arlington or Fairfax counties, Virginia; or located in the cities of Alexandria, Falls Church or Fairfax; 2) the total purchase price is \$300,000 or more; 3) the purchase is made without a loan from a financial institution; and 4) the purchaser is a corporation, limited liability company, partnership, or other business entity, the Title Agent must provide the Company with the information required by the FinCEN Geographic Targeting Order dated April 14, 2025 or any renewal thereof.

Upon request, purchaser must provide certain required information to the Title Agent prior to closing. Please refer to the GTO Questionnaire and GTO Information Gathering Form to assist you in determining whether a transaction is a Covered Transaction and how to report a Covered Transaction.

[CLICK HERE](#) to download the GTO Questionnaire.

[CLICK HERE](#) to download the GTO Information Gathering Form.

As a courtesy to our Title Agents, Alliant National will prepare and submit the required FinCEN filing for you upon your submission to us of the completed GTO Questionnaire, GTO Information Gathering Form, and legible photo-copies of government-issued identification for the parties involved in the Covered Transaction. Please deliver these documents to us no later than 5 days after closing via our secure electronic portal, accessible from our Agent Resource Center (for which you will need your user name and password to enter), and then click on the tab called “Resource Center,” and select “FinCEN” from the drop-down menu. That will take you to a webpage from which you can download the above-referenced forms, and into which you can

drag the forms, once completed, to upload to Alliant National. To assist you in properly preparing these forms and submitting the information to us, please refer to our tutorial for detailed instructions and depictions.

[CLICK HERE](#) to download the Compliance Tutorial.

If you have elected to prepare and submit the required FinCEN filing, yourself, via the [BSA E-Filing System](#), then please provide us with a copy of the CTR 112 Report and photo-copies of government-issued identification for the parties involved in the Covered Transaction. Our secure electronic portal, accessible via the Agent Resource Center (as described above), should also be used for this transmission in order to protect Non-Public Personal Information (NPI).

If you have difficulty accessing the secure electronic portal, or have any questions, please contact our Regulatory Compliance Officer, Elyce Schweitzer, at eschweitzer@alliantnational.com, or phone (303)682-9800, ext. 415, for assistance.

The GTO requires both Alliant National and its agents to retain copies of all records for a period of five (5) years after April 14, 2025 or longer if the GTO is renewed or otherwise extended. This is an extension of the prior GTO. To meet this requirement, you will need to keep copies of the completed GTO Questionnaires, and for Covered Transactions, copies of the GTO Information Gathering Forms and photo ID's of all parties shown on that form.

As always, please contact us with any questions or comments.