

October 20, 2023

## National Title Bulletin 2023-10

### New Expanded FinCEN Geographic Targeting Order Effective October 22, 2023; New Jurisdictions Effective November 21, 2023

Doma Title Insurance, Inc. (Doma) continues to support our agents by assisting them in meeting the filing requirements of the newly issued Geographic Targeting Order (GTO), issued on April 21, 2023, by the Director of the Financial Crimes Enforcement Network of the U.S. Treasury Department (FinCEN).

The term of the new FinCEN GTO for jurisdictions already covered by an earlier GTO is **October 22, 2023 to April 18, 2024**.

Additionally, the term of the GTO with regard to the newly added Texas county of Travis; the Massachusetts counties of Bristol, Essex, Norfolk, and Plymouth; and the Florida counties of Hillsborough, Pasco, Pinellas, Manatee, Sarasota, Charlotte, Lee, and Collier is **November 21, 2023 to April 18, 2024**.

A copy of the new GTO is attached for your review.

#### I. The GTO Effective Dates: New Jurisdictions

The current GTO is another 180-day order. It runs from **October 22, 2023 to April 18, 2024**. This timeframe applies to all counties which were impacted by an earlier GTO order.

This new GTO has also expanded its coverage area to include the jurisdictions of Texas county of Travis; the Massachusetts counties of Bristol, Essex, Norfolk, and Plymouth; and the Florida counties of Hillsborough, Pasco, Pinellas, Manatee, Sarasota, Charlotte, Lee, and Collier. For these newly impacted areas, the GTO is effective from **November 21, 2023 to April 18, 2024**.

With these new coverage areas, the chart below reflects all impacted counties, cities and jurisdictions which are subject to the new GTO:

States	Counties, Cities and Boroughs					
TX	Bexar	Tarrant	Dallas	Harris	Montgomery	Webb
	Travis					
FL	Miami-Dade	Broward	Palm Beach	Hillsborough	Pasco	Pinellas
	Manatee	Sarasota	Charlotte	Lee	Collier	

States	Counties, Cities and Boroughs					
NY	Brooklyn	Queens	Bronx	Staten Island	Manhattan	
CA	San Diego	Los Angeles	San Mateo	San Francisco	Santa Clara	
CO	Adams	Arapahoe	Clear Creek	Denver	Douglas	Eagle
	Elbert	El Paso	Fremont	Jefferson	Mesa	Pitkin
	Pueblo	Summit				
CT	Fairfield					
HI	Hawaii	Maui	Kauai	Honolulu	City of Honolulu	
NV	Clark					
WA	King					
MA	Suffolk	Middlesex	Bristol	Essex	Norfolk	Plymouth
IL	Cook					
MD	Montgomery	Anne Arundel	Prince George's	Howard	Baltimore*	
VA	Arlington	Fairfax	Alexandria**	Falls Church**	Fairfax**	
DC	District					

\*If the purchase price of the residential real property is in the amount of **\$50,000 or more in the city or county of Baltimore in Maryland**, it will be a Covered Transaction under the GTO.

\*\*The cities of Alexandria, Falls Church and Fairfax, Virginia, are covered as well.

The GTO maintains a uniform purchase price of **\$300,000** for reporting a transaction in all other affected cities, counties and jurisdictions, exclusive of Baltimore City and Baltimore County, Maryland.

A “Covered Transaction” under the new GTO continues to mean a transaction in which:

- i. Residential real property is purchased by a Legal Entity (as this term is defined in Section III.A of the GTO);
- ii. The purchase price of the residential real property is in the amount of \$50,000 or more in the city or county of Baltimore in Maryland, or in the amount of \$300,000 or more in any of the other areas listed in Section I above;
- iii. Such purchase is made without a bank loan or other similar form of external financing; and
- iv. Such 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, a money order in any form, a funds transfer or virtual currency.

Any questions about whether your transaction is a Covered Transaction under the terms of the GTO should be directed to your Doma underwriting counsel, [DomaUnderwriting@doma.com](mailto:DomaUnderwriting@doma.com). There is also a webinar on NATIC University/Doma Academy for your review in understanding the FinCEN reporting process. We will be updating it shortly to include the newly added jurisdictions.