

WFG Underwriting Bulletin



To: All Florida Policy Issuing Agents; All WFG Title Examiners and Officers

From: WFG Underwriting Department

Date: November 15, 2023

Bulletin No.: FL 2023-64 (FinCEN 2023-04)

Subject: FinCEN GTO Questionnaire Handout Resource

On October 19, 2023, the Director of the Financial Crimes Enforcement Network (“FinCEN”) issued a Geographic Targeting Order (“GTO”) requiring insurers and their agents to collect and report information about persons involved in certain residential real estate transactions.

On October 30, 2023, we issued [Bulletin No. 2023-60](#) explaining the new GTO and the expansion of the Counties governed under the new GTO, which expanded to cover more Florida counties.

To assist you in determining whether the FinCEN Reporting will need to be done for a transaction, we created a [FinCEN Questionnaire](#) that will assist in determining if the transaction is subject to FinCEN.

Once the questionnaire is completed, keep the completed Questionnaire in your file.

Links to other FinCEN resources:

- [FL 2023-60 \(FinCEN 2023-03\) Florida GTO Extended and Expanded](#)
- [FinCEN Questionnaire](#)
- [GTO Oct 19, 2023](#)
- [Process Bulletin](#)

NOTE: The information contained in this Bulletin is intended solely for the use of employees of WFG National Title Insurance Company, its title insurance agents and approved attorneys. Disclosure to any other person is expressly prohibited unless approved in writing by the WFG National Title Insurance Company’s Underwriting Department.

The Agent may be held responsible for any loss sustained as a result of the failure to follow the standards set forth above.