



To: All Florida Policy Issuing Agents of WFG National Title Insurance Company
From: WFG Underwriting Department
Date: February 9, 2026
Bulletin No.: FL 2026-06
Subject: Reminder of New FinCEN Reporting - Effective on March 1, 2026
FR Bar Contract – New FinCEN Clause

YOU HAVE NO TIME LEFT – GET READY NOW!

We have no indication that there will be a delay in the implementation of the new FinCEN reporting requirements effective on March 1, 2026. Therefore, the new FinCEN reporting will be required for any files that close on or after March 1, 2026, if the conditions for reporting are met.

What Does The New FinCEN Reporting Cover

The new FinCEN reporting requirements will cover the entire Country including all counties in the State of Florida. The reporting pertains to all non-financed transfers of residential real property to entities and trusts. There is no dollar threshold. The responsibility for reporting is placed squarely on title agents by the Federal Government. The information to be reported pertains to both sellers and buyers regarding the beneficial owners of the entities and the beneficiaries of the trusts.

WFG's New FinCEN Reporting Webinar

WFG presented a webinar on October 7, 2025 regarding the new FinCEN reporting requirements. You can:

[Watch the playback](#)

[Download FinCEN webinar handouts](#)

[Download the presentation slides](#)

Vendor

WFG has arranged a discount with **FincenRealEstateReport.com**, a specialized platform designed to automate the entire process. Developed by compliance experts, it eliminates guesswork and removes the most time-consuming manual steps from your compliance workflow. Contact them now for a demonstration.

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Information Bulletins are designed to provide our agents with information we think will help in managing their business or just being better title professionals, but which does not rise to the level of being an underwriting mandate and are not within the scope of the agency agreement.

FR Bar Contract FinCEN Clause

On Saturday January 31, 2026, the Executive Council of the Real Property Probate and Trust Law Section of the Florida Bar passed a FinCEN Clause to be added to the FR Bar Contract replacing the old FinCEN clause dealing with the Geographic Targeting Orders in substantially the following form:

FinCEN REAL ESTATE REPORTING OBLIGATION. Section 1010.821 of Chapter 31 of the Code of Federal Regulations ("CFR") requires that certain residential real estate transactions without institutional lender financing, where at least one buyer/transferee is a legal entity, limited liability company, corporation, partnership, trust, trustee, or other non-natural person, must be reported (a "FinCEN Report") to FinCEN beginning March 1, 2026. If this transaction requires completion of a FinCEN Report, then Seller and Buyer shall, no later than the day prior to Closing, provide Closing Agent with all information and documentation necessary to enable Closing Agent to complete the FinCEN Report. Such information and documentation includes, without limitation, full legal names, dates of birth, residential street addresses, and the IRS taxpayer identification number of the beneficial owners of the parties, as further defined and described in the CFR. Each party agrees to promptly provide and consents to Closing Agent's collection and report of said information to FinCEN. Buyer shall pay all costs and fees charged by Closing Agent to prepare and file the FinCEN Report.

After approval by the Florida Realtors, this clause or substantially similar language will replace the existing FinCEN clause in the FR Bar contract. However, the clause will not be added to the FR Bar Contract until March 1, 2026. Until the clause is added to the FR Bar contract, we suggest that you provide the Realtor in the transaction with a copy of the forgoing FinCEN language so that the Realtor can inform the buyer and seller of the information that the Federal Government requires be disclosed by them and reported to FinCEN by the title agency.

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