

FinCEN REAL ESTATE REPORTING CHECKLIST

For Notaries & Title Professionals

Effective: March 1, 2026

PART 1: INITIAL SCREENING

Complete for EVERY residential closing

Property Information: Property Address: _____

- Property Type:
- Single-family (1-4 units)
- Mixed-use with residential
- Undeveloped residential land
- Commercial only (EXEMPT)

Financing:

- Traditional mortgage from regulated lender? YES / NO
If YES → EXEMPT from FinCEN
- Cash purchase? YES / NO
- Seller financing? YES / NO
- Private/hard money loan? YES / NO

Buyer Type:

- Individual person(s)? YES / NO
If YES → EXEMPT from FinCEN
 - LLC? YES / NO
 - Corporation? YES / NO
 - Trust? YES / NO
 - Partnership? YES / NO
-

SCREENING RESULT:

- EXEMPT** - No FinCEN report required
Reason: _____
 - REPORT REQUIRED** - Proceed to Part 2
-

PART 2: REPORTING RESPONSIBILITY

If report is required, determine who files

- Our company is the closing agent/title company (WE FILE)
- Another party is filing (document below)

If someone else is filing:

Responsible Party: _____

Company: _____

Confirmation Received: YES / NO

Date Confirmed: _____

Method: Email Written Letter Other

Documentation attached? YES / NO

PART 3: INFORMATION COLLECTION

If YOUR company is filing, collect ALL of the following

A. REPORTING PERSON (You/Your Company):

- Full legal name
- Business name (if applicable)
- Complete address
- Email address
- Phone number
- Role in transaction

B. TRANSFEREE ENTITY (Buyer):

- Legal name of entity
- EIN/Tax ID
- State/country of formation
- Complete address
- Entity type (LLC, Corp, Trust, etc.)

C. BENEFICIAL OWNER(S):

For EACH person with 25%+ ownership OR substantial control

Beneficial Owner #1:

- Full legal name
- Date of birth
- Current residential address (NO P.O. boxes)
- Phone number
- Email address
- Unique ID number (SSN, passport, driver's license)
- Copy of ID document obtained
- Percentage ownership OR role/title

Beneficial Owner #2:

- Full legal name
- Date of birth
- Current residential address (NO P.O. boxes)
- Phone number
- Email address
- Unique ID number
- Copy of ID document obtained
- Percentage ownership OR role/title

Additional Beneficial Owners? YES / NO

If yes, use additional form

D. TRANSFEROR (Seller):

- Full legal name
- Complete address
- Individual or Entity?

E. PROPERTY DETAILS:

- Complete legal description
- Property address
- Parcel/Tax ID number

F. TRANSACTION DETAILS:

- Total purchase price/consideration
- Date of transfer
- Copy of recorded deed obtained

PART 4: FILING COMPLIANCE

- All information collected and verified
- Beneficial owner signatures obtained
- ID copies made and secured
- Report filed with FinCEN

Filing Date: _____

Confirmation Number: _____

- Confirmation saved to file
 - Client notification sent
-

PART 5: RECORD RETENTION

- Complete file saved for minimum 5 years
 - File includes:
 - This completed checklist
 - All beneficial owner information
 - ID copies
 - Filing confirmation
 - All correspondence
-

NOTES/SPECIAL CIRCUMSTANCES:

Completed By: _____

Date: _____

File Number: _____

This checklist is provided for informational purposes only and does not constitute legal advice. Consult with legal counsel regarding your specific compliance obligations.
