



## FINCEN: How Do I Know When I Must Report a Transaction?

### Part I

Is this a transaction involving the **purchase** of “**residential real property**” (including individual units of condominiums and cooperatives) designed principally for the occupancy of from one to four families?

YES

NO

Is the **purchaser a legal entity**?  
**Defined as: a corporation, limited liability company, partnership or other similar business entity**, whether formed under the laws of a state, or of the United States, or a foreign jurisdiction, other than a business whose common stock or analogous equity interests are listed on a securities exchange regulated by the Securities Exchange Commission (“SEC”) or a self-regulatory organization registered with the SEC, or an entity solely owned by such a business.

YES

NO

Is this an **all-cash** transaction? Meaning, the transaction will **not** result in funding by a financial institution. (Reminder: private lenders and businesses lending money that are not subject to anti-money laundering policies result in reportable transactions as these do not fall under the definition of “financial institution”).

YES

NO

Continue to  
“Part II”

**Transaction is not subject to FinCEN reporting**

### Part II

Is the property located in one of the counties subject to reporting?  
(see “Table I”)

YES

NO

Does the purchase price of the transaction meet the threshold requirement of the particular county for reporting?  
(see “Table I”)

YES

NO

**Transaction is not subject to  
FinCEN reporting**

**Transaction must be  
reported to FinCEN**



**TABLE I**

**Covered Counties**

<b>STATES AND TERRITORIES</b>	<b>COUNTIES</b>	<b>TRANSACTION PURCHASE PRICE</b>
New York	Brooklyn, Queens, Bronx, Staten Island, or Manhattan in New York City, New York	\$300,000 or more
Texas	Bexar, Tarrant, Dallas, Harris, Montgomery, or Webb	\$300,000 or more
California	San Diego, Los Angeles, San Francisco, San Mateo, or Santa Clara	\$300,000 or more
Florida	Miami-Dade, Broward, or Palm Beach	\$300,000 or more
Nevada	Clark	\$300,000 or more
Washington	King	\$300,000 or more
Massachusetts	Suffolk or Middlesex	\$300,000 or more
Illinois	Cook	\$300,000 or more
Hawaii	Hawaii, Maui, Kauai, or Honolulu, or the City of Honolulu	\$300,000 or more
Maryland	Montgomery, Anne Arundel, Prince George's, Howard, or Baltimore	\$300,000 or more <b>OR</b> <b>\$50,000 or more in the City or County of Baltimore in Maryland</b>
Virginia	Arlington or Fairfax, or the cities of Alexandria, Falls Church, or Fairfax	\$300,000 or more
District of Columbia	Territory of District of Columbia	\$300,000 or more
Connecticut	Fairfield	\$300,000 or more