**FinCEN GTO Covered Transaction Worksheet**

This worksheet was designed to assist CATIC agents determine whether a transaction meets the criteria of a Covered Transaction under the FinCEN GTO. To determine whether a transaction is a Covered Transaction, please answer the questions below.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Question** | | **Yes** | **No** |
|  | Is the property ***residential*** real property? | |  |  |
|  | Is the residential real property located in, inter alia:   * ***the Massachusetts counties of Suffolk, Middlesex, Bristol, Essex, Norfolk, or Plymouth***; * ***the Connecticut counties of Fairfield or Litchfield***; * ***the Boroughs of Brooklyn, Queens, Bronx, Staten Island, or Manhattan in New York City, New York***; * ***the Florida counties of Miami-Dade, Broward, Palm Beach, Hillsborough, Pasco, Pinellas, Manatee, Sarasota, Charlotte, Lee, or Collier;*** * ***the Illinois county of Cook;*** * ***the Maryland counties of Montgomery, Anne Arundel, Prince George’s, or Howard, or the city or county of Baltimore;*** OR * ***the Virginia counties of Arlington or Fairfax, or the cities of Alexandria, Falls Church, or Fairfax***? | |  |  |
|  | Is the purchase price ***$300,000 or more (or $50,000 for real property located in the City or County of Baltimore)***? | |  |  |
|  | Is the Property purchased by a ***Legal Entity***, defined as a corporation, limited liability company, partnership, or other similar business entity that is not a U.S. publicly traded company? *(Note that purchases by individuals and/or trusts do not trigger the GTO reporting requirement*) | |  |  |
|  | Is the purchase made ***without a bank loan*** or other similar form of external financing? | |  |  |
|  | Is the purchase made, at least in part, using: | |  |  |
| * ***currency*,** * ***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*** *(including a wire transfer)****, or*** * ***virtual currency?*** |

If **ALL** questions were answered “Yes,” the transaction is a Covered Transaction within the FinCEN GTO and the CATIC agent **MUST** submit a Currency Transaction Report in accordance with the order. A copy of the submitted Currency Transaction Report must be provided to CATIC by:

* Email to: [compliance@catic.com](mailto:compliance@catic.com) or
* Mail to: CATIC Corporate Headquarters

ATTN: GTO Filing

101 Corporate Place

Rocky Hill, CT 06067

If **ANY** question was answered “No,” the transaction is **NOT** a Covered Transaction and no report is necessary. CATIC recommends that agents retain evidence demonstrating why a report was not required for the subject transaction.