**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 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.