



# FinCEN GTO

REGTO1023

*How to Complete the Currency Transaction Report (CTR)*



# FinCEN GTO Criteria (5)

1. **Purchase** of one or more **residential real estate** (not vacant land) in **Miami-Dade, Broward, Palm Beach, Hillsborough, Pasco, Pinellas Manatee, Sarasota, Charlotte, Lee, and Collier Counties**; and
2. The total purchase price is **\$300,000.00** or more; and
3. The **Purchaser is a corporation, limited liability company (LLC), partnership, business trust**, or other similar legal entity. (The definition does not include natural persons, revocable trusts, or publicly traded entities and their wholly owned subsidiaries.); and
4. The purchase of the real estate is **without a bank loan** or other similar form of institutional financing (“cash”); and
5. The Purchaser pays any part of the purchase price **using currency, cashier’s checks, certified checks, traveler’s checks, money orders, business or personal checks, wire fund transfers or payments, or virtual currency** (no requirement to report check numbers or wire routing numbers).

# Filing Procedure

## 1. Create User Account.

Become a BSA E-Filer button at:

[https://bsaefiling.fincen.treas.gov/Enroll\\_Now.html](https://bsaefiling.fincen.treas.gov/Enroll_Now.html)

## 2. Gather information (use ALTA FinCEN Form).

## 3. Login to BSA E-Filing System.

## 4. Select Report 112-CTR (under File FinCEN Reports).

## 5. Choose Open Existing Report option.

a. Browse to the CTR template and open.

b. Enter Information on CTR.

c. Sign, Save, and Submit CTR.

d. Save Confirmation in file and send copy to:  
[FloridaLegal@oldrepublictitle.com](mailto:FloridaLegal@oldrepublictitle.com)

# Filing Procedure Help

BSA E-Filing Help 1-866-346-9478 or email  
[BSAEFilingHelp@fincen.gov](mailto:BSAEFilingHelp@fincen.gov)

Email Old Republic:  
[FloridaLegal@oldrepublictitle.com](mailto:FloridaLegal@oldrepublictitle.com)

Call Old Republic Underwriting: 813-228-0555

# CTR

- CTR Template available at:  
[https://bsaefiling.fincen.treas.gov/docs/GTO/RealEstate\\_GTOTemplate.pdf](https://bsaefiling.fincen.treas.gov/docs/GTO/RealEstate_GTOTemplate.pdf)
- May use ALTA FinCEN Form to collect information from Purchaser (Purchaser may complete and sign).
- May reasonably rely upon information provided by Purchaser.
- BSA will only accept the CTR in Adobe Acrobat, any other ".pdf" format will be rejected.



# CTR General Info


- Yellow fields must be completed.
- Gray fields are left blank.
- “Standard” language for specific fields recommended by FinCEN as shown in following slides.
- Hover cursor over field for explanation.
- Use of “+” to add pages for multiple properties, people, or legal entities.



# CTR Home Page

Currency Transaction Report

Home
Step 1. Filing Institution Contact Information
Step 2. Transaction Location(s) Information
Step 3. Person(s) Involved Information
Step 4. Amount and Type of Transaction(s)



## Currency Transaction Report

OMB No. 1506-0004, OMB No. 1506-0005, OMB No. 1506-0064

Version Number: 1.3

**Steps to Submit**

1. Complete the report in its entirety with all requested or required data known to the filer.
2. Click "Validate" to ensure proper formatting and that all required fields are completed.
3. Sign with PIN.
4. Click "Save"; filers may also "Print" a paper copy for their records.
5. Click "Submit".

**Filing Name**

**\*1 Type of filing**   
 ☐ Initial report   
 ☐ Correct/amend prior report   
 ☐ FinCEN directed Backfiling

**Prior report BSA Identifier**

Save
Validate
Submit
Print

By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.

Sign with PIN



# CTR Step 1 Filer's Info.

- Enter Fields 52, 43, and 45 as shown.
- Enter Filer's Name, EIN, and contact information in Fields 44, 46-51, and 55-56.

Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

**Part IV Filing Institution Contact Information**

\*52 Type of financial institution

Other (specify)

\*43 Primary federal regulator

53 If 52a - Casino/Card Club is checked, indicate type (check only one)

☐ State licensed casino ☐ Tribal authorized casino ☐ Card club ☐ Other

\*44 Legal name of filing institution

45 Alternate name, e.g. trade name, DBA

\*46 EIN

\*47 Address

\*48 City

\*49 State



# CTR Step 2 Property Info.

- Use “+” to add page for multiple properties.

Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part III Transaction Location 1 of 2 + -

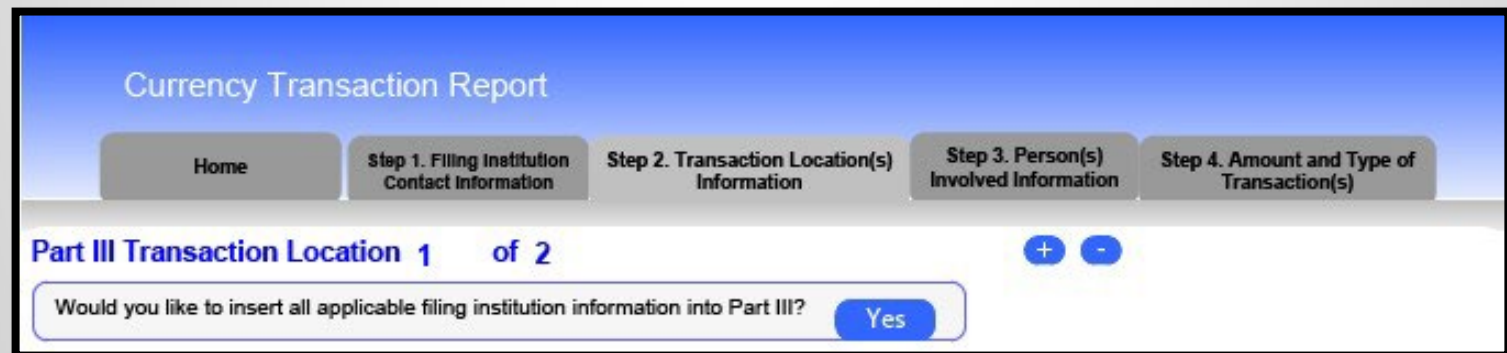
Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part III Transaction Location 2 of 2 + -

# CTR Step 2 Property Info.

- Do not select “Yes” – the information is for the real property, not an institution



The screenshot shows the 'Currency Transaction Report' interface. At the top, there is a navigation bar with five tabs: 'Home', 'Step 1. Filing Institution Contact Information', 'Step 2. Transaction Location(s) Information', 'Step 3. Person(s) Involved Information', and 'Step 4. Amount and Type of Transaction(s)'. The 'Step 2' tab is currently selected. Below the navigation bar, the text 'Part III Transaction Location 1 of 2' is displayed, followed by '+' and '-' buttons. A question is posed: 'Would you like to insert all applicable filing institution information into Part III?'. To the right of the question is a blue button labeled 'Yes'.

# CTR Step 2 Property Info.

- Enter Fields 38, 29, 30, and 32 as shown.

Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part III Transaction Location 1 of 2

Would you like to insert all applicable filing institution information into Part III? [Yes](#)

\*38 Type of financial institution Other

Other (specify) Enter Property Address Here

\*29 Primary federal regulator Unknown

39 If 38a - Casino/Card Club is checked, indicate type (check only one)

☐ State licensed casino ☐ Tribal authorized casino ☐ Card club ☐ Other

\*30 Legal name of financial institution N/A

31 Alternate name, e.g. trade name, DBA

\*32 EIN ☒ Unknown

\*33 Address Enter Property Address Here

# CTR Step 2 Property Info.

- Enter the Property's Address in Fields 33 - 37.
- Enter purchase price for the property in Field 41

*33 Address	<input type="text" value="Enter Property Address Here"/>
*34 City	<input type="text"/>
*35 State	<input type="text"/>
*36 ZIP Code	<input type="text"/>
*37 Country	<input type="text"/>
40 Financial institution ID type	<input type="text"/>
ID number	<input type="text"/>
*41 Cash in amount for transaction location	<input type="text" value="1,000,000"/>

# CTR Step 2 Property Info.

- For transactions with one property, the total purchase price in Step 2, Field 41 will be the same as the amount shown in Step 4, Field 25z.
- For transactions with multiple properties, the total purchase price for all properties will be shown in Step 4, Field 25z. The purchase price for each individual property will be shown in Step 2, Field 41. The total for all the entries on Step 2, Field 41 for all properties will equal the total purchase price shown on Step 4, Field 25z.



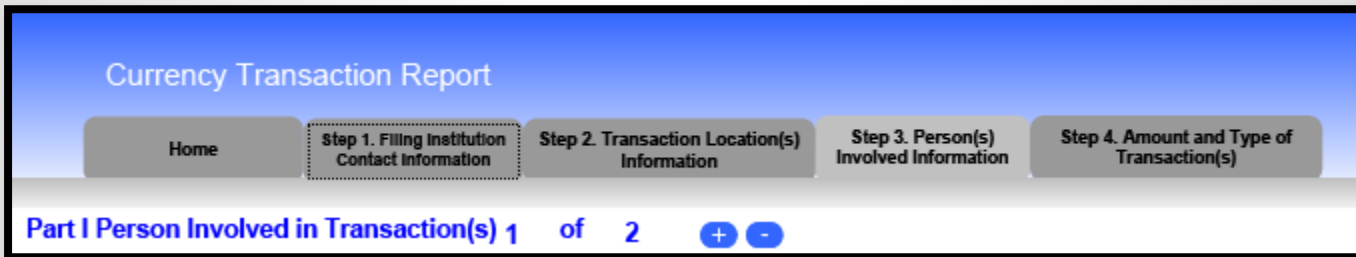
# CTR Step 3 Party Info. – Part I

## Two Groups to Step 3 Party Info. - Part I:

- Group A: Report for each Purchaser:
  - Report person acting on behalf of Legal Entity (Item 2a or Item 2b) AND
  - Report Legal Entity (Item 2c) purchasing the property.
- Group B: Report each Beneficial Owner(s) who owns 25% or more of the Purchaser(s).

# CTR Step 3 Party Info. – Part I Purchaser

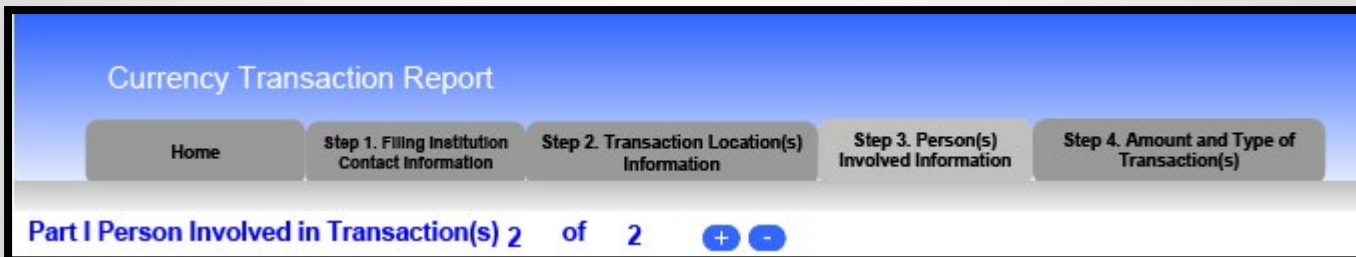
- Use “+” to add page for each Purchaser.



Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part I Person Involved in Transaction(s) 1 of 2 + -



Currency Transaction Report

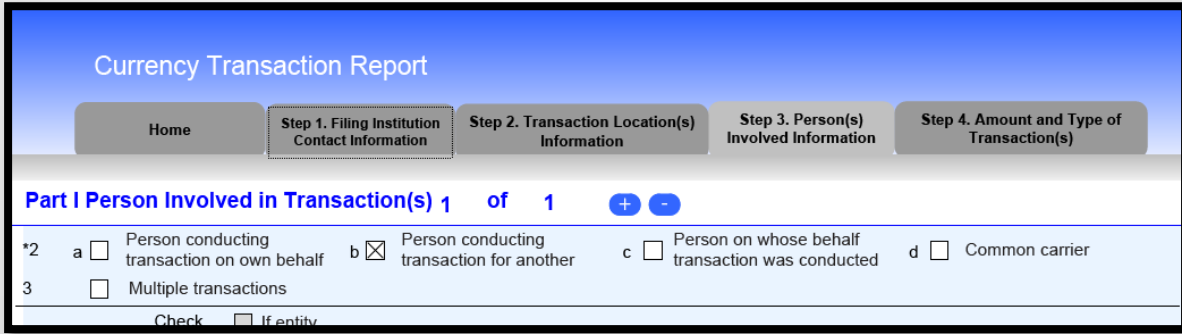
Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part I Person Involved in Transaction(s) 2 of 2 + -



# CTR Step 3 Party Info. – Part I Group A - Purchaser - Person

- Report the person\* acting on behalf of the Legal Entity, such as an attorney, manager, member, officer, or partner of the Legal Entity, select Field 2b “Person conducting transaction for another.”



Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part I Person Involved in Transaction(s) 1 of 1

\*2 a ☐ Person conducting transaction on own behalf b ☒ Person conducting transaction for another c ☐ Person on whose behalf transaction was conducted d ☐ Common carrier

3 ☐ Multiple transactions

Check ☐ If entity

\*If more than one Item 2 applies to a person, complete only one Part I for that person.

# CTR Step 3 Party Info. – Part I Group

## A - Purchaser - Person

- Enter the Person's Name, Address, TIN, and Date of Birth in Fields 4, and 10-17.
- If no TIN, no explanation is entered.

Check	<input type="checkbox"/> If entity	
*4 Individual's last name or entity's legal name	<input type="checkbox"/> Unknown	Doe
*5 First name	<input type="checkbox"/> Unknown	J
6 Middle name		
Suffix		
7 Gender		
8 Alternate name		
9 Occupation or type of business		
9a NAICS Code		
*10 Address	<input type="checkbox"/> Unknown	123 Main
*11 City	<input type="checkbox"/> Unknown	
*12 State	<input type="checkbox"/> Unknown	
*14 Country	<input type="checkbox"/> Unknown	
*15 TIN	<input type="checkbox"/> Unknown	
*17 Date of birth	<input type="checkbox"/> Unknown	
*13 ZIP/Postal Code	<input type="checkbox"/> Unknown	
16 TIN type		

# CTR Step 3 Party Info. – Part I Group A - Purchaser - Person

- For any natural person listed in Field 2b select type of identification and enter identification number, Country, and State:

\*20 Form of identification used to verify identity ☐ Unknown

☒ Driver's license/State ID ☐ Passport ☐ Alien Registration ☐ Other

Number  Country  Issuing State

# CTR Step 3 Party Info. – Part I Group A - Purchaser – Legal Entity

- For the Legal Entity (Corporation, LLC, Partnership, or Business Trust) purchasing the property, select Field 2c “Person on whose behalf transaction was conducted” and check “if entity.”

Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part I Person Involved in Transaction(s) 1 of 1 + -

\*2 a ☐ Person conducting transaction on own behalf b ☐ Person conducting transaction for another c ☒ Person on whose behalf transaction was conducted d ☐ Common carrier

3 ☐ Multiple transactions

Check ☒ If entity

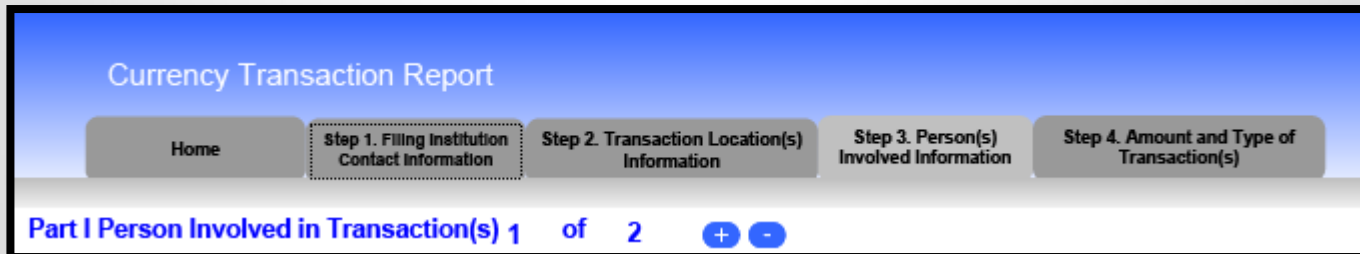
# CTR Step 3 Party Info. – Part I Group A - Purchaser - Person

- Enter the Legal Entity's Name, Address, and TIN in Fields 4, and 10-16.
- If no TIN, no explanation is entered.
- No identification is entered in Field 20.
- Add information to Fields 8 or 9 such as amount of beneficial interest or non-profit.

Check	<input checked="" type="checkbox"/> If entity	
*4 Individual's last name or entity's legal name	<input type="checkbox"/> Unknown	<input type="text"/>
*5 First name	<input type="checkbox"/> Unknown	<input type="text"/>
6 Middle name		<input type="text"/>
Suffix		<input type="text"/>
7 Gender		<input type="text"/>
8 Alternate name		<input type="text"/>
9 Occupation or type of business		<input type="text"/>
9a NAICS Code		<input type="text"/>
*10 Address	<input type="checkbox"/> Unknown	<input type="text"/>
*11 City	<input type="checkbox"/> Unknown	<input type="text"/>
*12 State	<input type="checkbox"/> Unknown	<input type="text"/>
*14 Country	<input type="checkbox"/> Unknown	<input type="text"/>
*15 TIN	<input type="checkbox"/> Unknown	<input type="text"/>
*13 ZIP/Postal Code	<input type="checkbox"/> Unknown	<input type="text"/>
16 TIN type		<input type="text"/>

# CTR Step 3 Party Info. – Part I Group B – Beneficial Owner

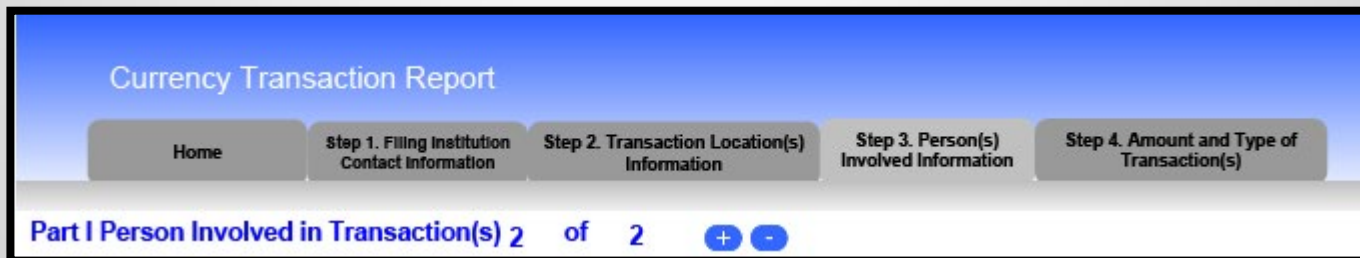
- Report each Beneficial Owner or Owners who has a 25% interest in Purchaser(s), back to
- ultimate beneficial owner. Use “+” to add page
- for each Beneficial Owner.



Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part I Person Involved in Transaction(s) 1 of 2 + -



Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part I Person Involved in Transaction(s) 2 of 2 + -

# CTR Step 3 Party Info. – Part I Group B – Beneficial Owner

- For the Beneficial Owner that is a Legal Entity (Corporation, LLC, Partnership, or Business Trust) select Field 2c “Person on whose behalf transaction was conducted” and check “if entity.”

Currency Transaction Report

Home
Step 1. Filing Institution Contact Information
Step 2. Transaction Location(s) Information
Step 3. Person(s) Involved Information
Step 4. Amount and Type of Transaction(s)

**Part I Person Involved in Transaction(s)** 1 of 1 + -

*2	a <input type="checkbox"/>	Person conducting transaction on own behalf	b <input type="checkbox"/>	Person conducting transaction for another	c <input checked="" type="checkbox"/>	Person on whose behalf transaction was conducted	d <input type="checkbox"/>	Common carrier
3	<input type="checkbox"/>	Multiple transactions						
<div style="display: flex; justify-content: space-between;"> <span>Check</span> <span><input checked="" type="checkbox"/> If entity</span> </div>								



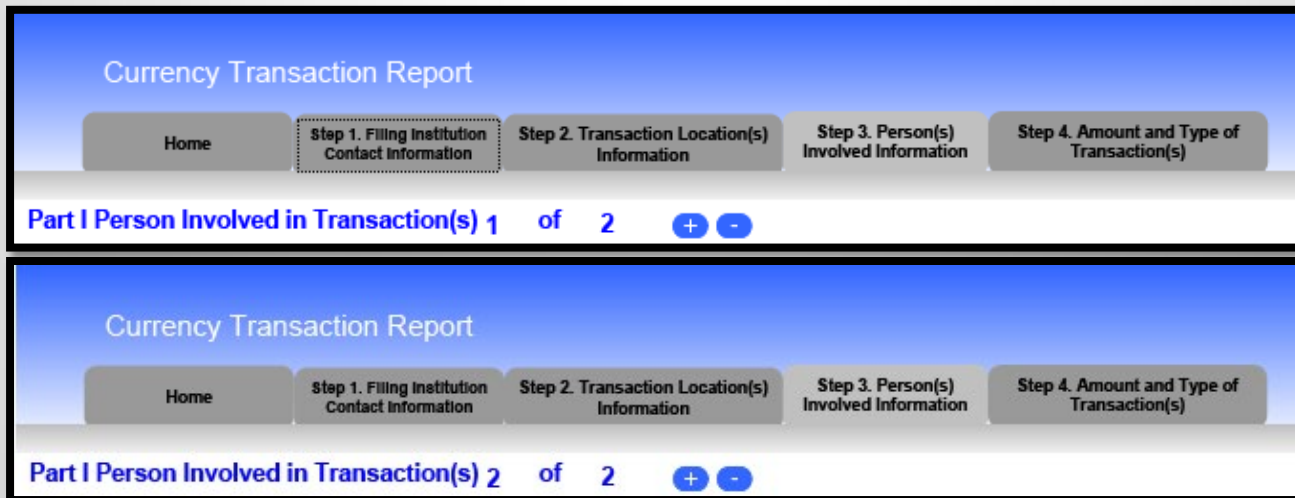
# CTR Step 3 Party Info. – Part I Group B – Beneficial Owner

- Enter the Legal Entity's Name, Address, and TIN in Fields 4, and 10-16.
- If no TIN, no explanation is entered.
- No identification is entered in Field 20.
- Add information to Fields 8 or 9 such as amount of beneficial interest.

Check <input checked="" type="checkbox"/> If entity	
*4 Individual's last name or entity's legal name	<input type="checkbox"/> Unknown <input type="text"/>
*5 First name	<input type="checkbox"/> Unknown <input type="text"/>
6 Middle name	<input type="text"/>
Suffix	<input type="text"/>
7 Gender	<input type="text"/>
8 Alternate name	<input type="text"/>
9 Occupation or type of business	<input type="text"/>
9a NAICS Code	<input type="text"/>
*10 Address	<input type="checkbox"/> Unknown <input type="text"/>
*11 City	<input type="checkbox"/> Unknown <input type="text"/>
*12 State	<input type="checkbox"/> Unknown <input type="text"/>
*14 Country	<input type="checkbox"/> Unknown <input type="text"/>
*15 TIN	<input type="checkbox"/> Unknown <input type="text"/>
*13 ZIP/Postal Code	<input type="checkbox"/> Unknown <input type="text"/>
16 TIN type	<input type="text"/>

# CTR Step 3 Party Info. – Part I Group B – Beneficial Owner

Separate entry for each Beneficial Owner or Owners who has/have a 25% interest in Purchaser(s), back to ultimate beneficial owner. Use of “+” to add page for each Beneficial Interest.



Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part I Person Involved in Transaction(s) 1 of 2 + -

Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part I Person Involved in Transaction(s) 2 of 2 + -

# Step 3 Party Info.- Part I

## Group B – Beneficial Owner - Trust

If the Trustee or Settlor of a Revocable Trust is a Beneficial Owner, select Field 2c “Person on whose behalf transaction was conducted.”

Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part I Person Involved in Transaction(s) 1 of 2 + -

\*2 a ☐ Person conducting transaction on own behalf b ☐ Person conducting transaction for another c ☒ Person on whose behalf transaction was conducted d ☐ Common carrier

3 ☐ Multiple transactions

Check ☒ If entity

\*4 Individual's last name or entity's legal name ☐ Unknown

\*5 First name ☐ Unknown

6 Middle name

Suffix

7 Gender

8 Alternate name

9 Occupation or type of business

# CTR Step 3 Party Info. Part I

## Group B – Beneficial Owner - Trust

- Enter the Name, Address, TIN, and Date of Birth in Fields 4, and 10-17 for the Trustee or Settlor of the Revocable Trust.
- If no TIN, no explanation is entered.

Check	<input type="checkbox"/> If entity	
*4 Individual's last name or entity's legal name	<input type="checkbox"/> Unknown	<input type="text" value="Doe"/>
*5 First name	<input type="checkbox"/> Unknown	<input type="text" value="J"/>
6 Middle name		<input type="text"/>
Suffix		<input type="text"/>
7 Gender		<input type="text" value=""/>
8 Alternate name		<input type="text"/>
9 Occupation or type of business		<input type="text"/>
9a NAICS Code		<input type="text"/>
*10 Address	<input type="checkbox"/> Unknown	<input type="text" value="123 Main"/>
*11 City	<input type="checkbox"/> Unknown	<input type="text"/>
*12 State	<input type="checkbox"/> Unknown	<input type="text" value=""/>
*14 Country	<input type="checkbox"/> Unknown	<input type="text" value=""/>
*15 TIN	<input type="checkbox"/> Unknown	<input type="text" value=""/>
*17 Date of birth	<input type="checkbox"/> Unknown	<input type="text" value=""/>
*13 ZIP/Postal Code	<input type="checkbox"/> Unknown	<input type="text" value=""/>
16 TIN type		<input type="text" value=""/>

# CTR Step 3 Party Info. – Part I

## Group B – Beneficial Owner - Trust

- For any Trustee or Settlor of the Revocable Trust that is a natural person listed in Field 2c select type of identification and enter identification number, Country, and State:

\*20 Form of identification used to verify identity ☐ Unknown

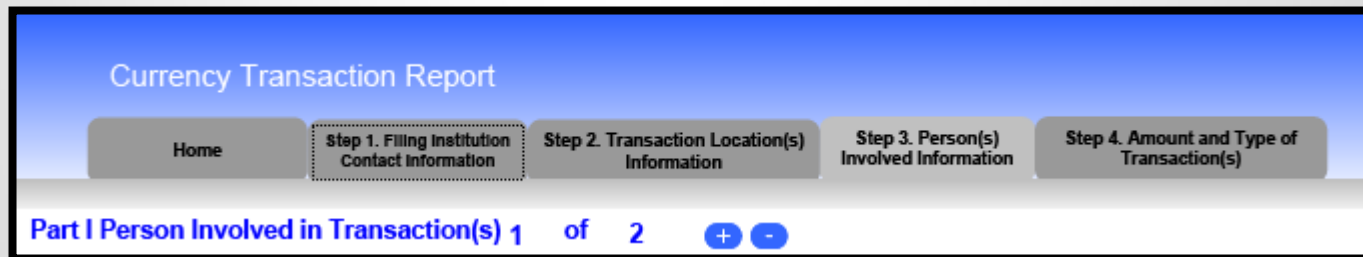
☒ Driver's license/State ID ☐ Passport ☐ Alien Registration ☐ Other

Number  Country  Issuing State

# CTR Step 3 Party Info. – Part I

## Group B – Beneficial Owner - Trust

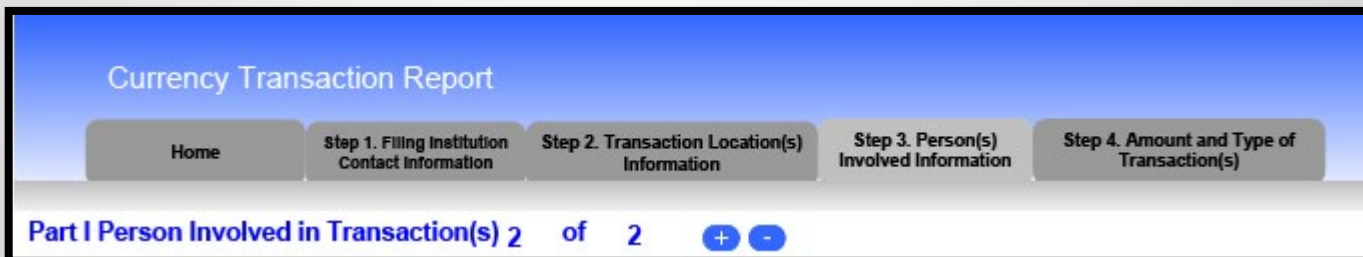
Separate entry for each Trustee or Settlor of a Revocable Trust who has a 25% interest in Purchaser(s). Use of “+” to add page for each Trustee or Settlor of the Revocable Trust.



Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part I Person Involved in Transaction(s) 1 of 2 + -



Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part I Person Involved in Transaction(s) 2 of 2 + -



# CTR Step 4 Money – Part II

- Enter Closing Date in Field 23.

Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

**Part II Amount and Type of Transaction(s). Check all boxes that apply.**

\*23 Date of transaction |  ▼





# CTR Step 4 Money – Part II

- Fields 25a – i are blank.
- Field 25z (matches Field 41):  
–Other: enter each method used to send funds  
– no routing number or wire confirmation needed  
–Enter Total Purchase Price.
- Remainder of Step 4 is blank.

*25 CASH IN: (in U.S. dollar equivalent)	
a Deposit(s)	\$ <input type="text"/> .00
b Payment(s)	<input type="text"/> .00
c Currency received for funds transfer(s) out	<input type="text"/> .00
d Purchase of negotiable instrument (s)	<input type="text"/> .00
e Currency exchange(s)	<input type="text"/> .00
f Currency to prepaid access	<input type="text"/> .00
g Purchases of casinos chips, tokens and other gaming instruments	<input type="text"/> .00
h Currency wager(s) including money plays	<input type="text"/> .00
i Bills inserted into gaming devices	<input type="text"/> .00
z Other (specify):	
Personal Check, Wire Transfer	<input type="text"/> 1,000,000.00
Total cash in	\$ <input type="text"/> 1,000,000.00

# CTR Home Page

Once CTR Complete:

1. Save CTR.
  2. Validate CTR.
  3. Sign (with PIN) CTR.
  4. Submit CTR.
  5. Print CTR.
  6. File CTR & Confirmation.
- AND
7. Send copy to Old Republic.



The screenshot shows the "Currency Transaction Report" web application. At the top, there is a navigation bar with five tabs: "Home", "Step 1. Filing Institution Contact Information", "Step 2. Transaction Location(s) Information", "Step 3. Person(s) Involved Information", and "Step 4. Amount and Type of Transaction(s)". The "Home" tab is currently selected. Below the navigation bar, the page title "Currency Transaction Report" is displayed next to the OMB No. 1506-0004, OMB No. 1506-0005, and OMB No. 1506-0064. A version number of 1.3 is shown in the top right corner. The main content area is titled "Steps to Submit" and lists five steps: 1. Complete the report in its entirety with all requested or required data known to the filer. 2. Click "Validate" to ensure proper formatting and that all required fields are completed. 3. Sign with PIN. 4. Click "Save"; filers may also "Print" a paper copy for their records. 5. Click "Submit". Below the steps, there is a "Filing Name" field with a placeholder "Enter File Name or Number Here". Underneath, there are three checkboxes for "Type of filing": "Initial report", "Correct/amend prior report", and "FinCEN directed Backfiling". Below these is a "Prior report BSA Identifier" field. At the bottom of the form area, there are four buttons: "Save", "Validate", "Submit", and "Print". A footer section contains a statement: "By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted." and a "Sign with PIN" button.

# Questions?

BSA E-Filing Help 1-866-346-9478 or email  
[BSAEFilingHelp@fincen.gov](mailto:BSAEFilingHelp@fincen.gov)

Email Old Republic:  
[FloridaLegal@oldrepublictitle.com](mailto:FloridaLegal@oldrepublictitle.com)

Call Old Republic Underwriting: 813-228-0555