



Florida
LEARNING★CENTER
People and Resources Empowering Your Success

FinCEN GTO REGT00425

How to Complete the Currency Transaction Report (CTR)

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OLD REPUBLIC INSURANCE GROUP

FinCEN GTO Criteria (5)

1. Purchase of one or more residential real estate as defined by RESPA (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

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:
FloridaFinCEN@oldrepublictitle.com



Filing Procedure Help

BSA E-Filing Help 1-866-346-9478 or email
BSAEFilingHelp@fincen.gov

Email Old Republic:
FloridaFinCEN@oldrepublictitle.com

Call Old Republic Underwriting: 813-228-0555



CTR

- CTR Template available at:
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** Version Number: 1.3
OMB No. 1506-0004, OMB No. 1506-0005, OMB No. 1506-0064

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

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



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

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



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

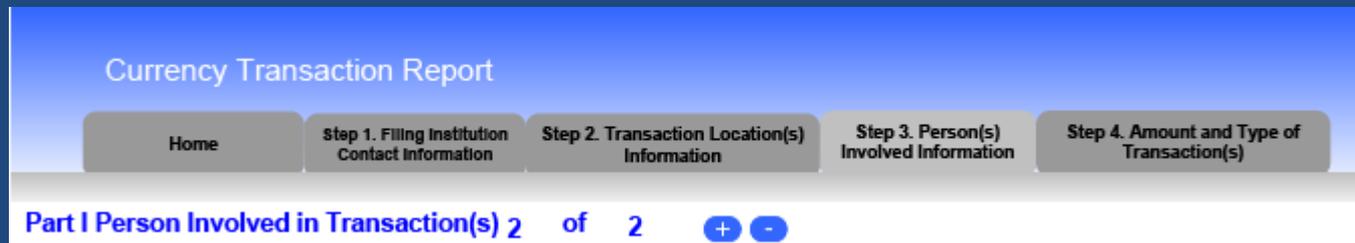
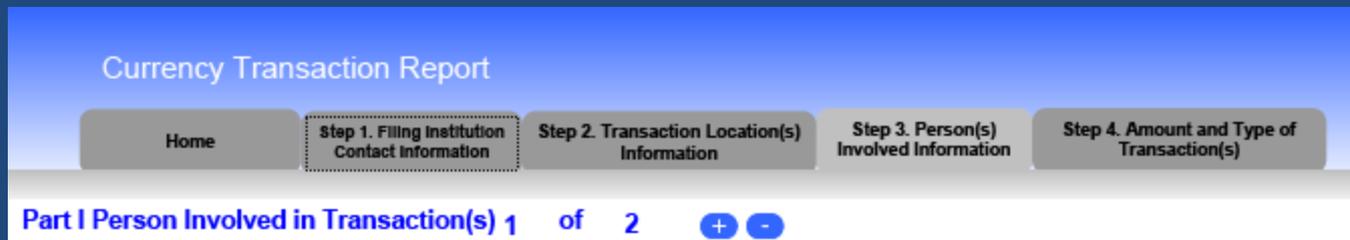
Two Groups to Step 3 Party Info. - Part I:

- 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) – all the “layers.”



CTR Step 3 Party Info. – Part I Purchaser

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



*



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.”

*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 or SSN, and Date of Birth in Fields 4, and 10-17.
- Select Unknown only if Person has not been issued a TIN or SSN.

	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"/>
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"/>
*14 Country	<input type="checkbox"/> Unknown	<input type="text"/>
*15 TIN	<input type="checkbox"/> Unknown	<input type="text"/>
*17 Date of birth	<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 A - Purchaser - Person

- For any natural person listed in Field 2b select type of identification and enter identification number, Country, and State (and retain legible copy of said identification):

*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 <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						
Check		<input checked="" type="checkbox"/>	If entity					



CTR Step 3 Party Info. – Part I

Group A - Purchaser – Legal Entity

- Enter the Legal Entity's Name, Address, and TIN in Fields 4, and 10-16.
- Select Unknown only if Legal Entity has not been issued a TIN or EIN.
- No identification is entered in Field 20.
- Add information to Fields 8 or 9 such as amount of beneficial interest or non-profit.

Check 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"/>
*13 ZIP/Postal Code	<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"/>
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 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 B – Beneficial Owner

- Enter the Legal Entity's Name, Address, and TIN (EIN) in Fields 4, and 10-16.
- Select Unknown only if TIN (EIN or SSN) has not been issued to Beneficial Owner.
- No identification is entered in Field 20.
- Add information to Fields 8 or 9 such as amount of beneficial interest.

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

9a NAICS Code

*10 Address Unknown

*11 City Unknown

*12 State Unknown

*13 ZIP/Postal Code Unknown

*14 Country Unknown

*15 TIN Unknown

16 TIN type



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.

The image shows two screenshots of the Currency Transaction Report (CTR) interface. Both screenshots display a navigation bar with five steps: 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 first screenshot shows 'Part I Person Involved in Transaction(s) 1 of 2' with a '+' button to add another page. The second screenshot shows 'Part I Person Involved in Transaction(s) 2 of 2' with a '-' button to remove the page.



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.
- Select Unknown only if TIN (EIN or SSN) has not been issued to the Beneficial Owner.

	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"/>
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"/>
*14 Country	<input type="checkbox"/> Unknown	<input type="text"/>
*15 TIN	<input type="checkbox"/> Unknown	<input type="text"/>
*17 Date of birth	<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 - 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" value=""/> .00
b Payment(s)	<input type="text" value=""/> .00
c Currency received for funds transfer(s) out	<input type="text" value=""/> .00
d Purchase of negotiable instrument (s)	<input type="text" value=""/> .00
e Currency exchange(s)	<input type="text" value=""/> .00
f Currency to prepaid access	<input type="text" value=""/> .00
g Purchases of casinos chips, tokens and other gaming instruments	<input type="text" value=""/> .00
h Currency wager(s) including money plays	<input type="text" value=""/> .00
i Bills inserted into gaming devices	<input type="text" value=""/> .00
z Other (specify):	<input type="text" value=""/>
Personal Check, Wire Transfer	1,000,000.00
Total cash in	\$ <input type="text" value="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 and
Confirmation.
AND
7. Send copy to Old
Republic.

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** Version Number: 1.3
OMB No. 1506-0004, OMB No. 1506-0005, OMB No. 1506-0064

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

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



Questions?

BSA E-Filing Help 1-866-346-9478 or email
BSAEFilingHelp@fincen.gov

Email Old Republic:
FloridaFinCEN@oldrepublictitle.com

Call Old Republic Underwriting: 813-228-0555

