

Author Full Name : Joe Kee**Received Date :** 06/06/2025 02:27 PM**Comments Received :**

Pressing title insurance agents into service to act as agents for Treasury is not only dangerous and poorly thought out (and, potentially, unconstitutional), it is an unfair burden on small business owners. The selective collection and reporting of the information is cumbersome. We are title insurance agents. We conduct settlements, hold funds in escrow, record documents in land records, and issue title insurance policies. We are not agents for the government in the covert domestic war on terrorism and money laundering. We do not source funds. We do not pass judgment about why properties are bought and sold. We are neutral and impartial. Working under threat of penalty for failing to recognize a national security threat is not part of the job description and is not a burden we should bear. We are not scapegoats.

The government should not be pressing private businesses and individuals into service as spies. "If you see something, say something" is one thing, but forced compliance with FinCEN "GTO Information Collection" reporting on a selective subset of purchasers of real estate is on a completely different level. Government agencies should do government agency work.

"We need to collect your personal information so we can report you and your purchase to the Department of Treasury and the Financial Crimes Enforcement Network so you and your transaction can be entered in a federal database because your source of funds has been determined to be suspect and our failure to comply with reporting would make us subject to punishment from the government" is not a statement we should be forced to explain and justify to a cash or hard money purchaser. This is simply not what we do nor should we be required to.