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As a Title Insurance and Escrow Settlement professional I strongly oppose this proposed unfunded mandate on the real estate settlement industry. While i fully support and appreciate the mission of FinCEN, this vastly expanded data collection requirement is overly burdensome on small and large businesses alike. However, it is vastly more burdensome on small businesses, like the one I run, as it will require additional staffing and training that is extremely hard to absorb at the small business scale. Real estate records are public information, and should suspected criminal activity be uncovered by FinCEN the DOJ has the ability to obtain information from any settlement agent via subpoena on a limited case by case basis. Further, I believe that the time estimated for completing each RER is understated in the published analysis as it is dependent on obtaining additional information, beyond what is typically required for a a real estate closing, from 3rd parties over which settlement agents have no authority or control. The communication alone to obtain the necessary information from the parties will likely exceed the 45 minutes estimated, and that would not account for the time needed to actually compile the data and complete the RER submission.