

**To Our Clients,**

**03/01/2026**

As of March 1, 2026, we are required to report residential real estate transaction information to the Financial Crimes Enforcement Network on transactions where the Buyer is an entity (corporation, LLC, etc.) or a trust and there is no lender with an anti-money laundering program involved. It is imperative that we know well in advance of closing whether the Buyer is a corporation, LLC, other legal entity, or trust.

To comply with the reporting requirements, we are asking Sellers and Buyers for information concerning beyond what we typically gather including the following:

- Entity/Trust Information
- Person(s) associated with the transferee (authorized signers and beneficial owners)
- Transferor/Seller information
- If the Seller is Trust, provide the trustee's information
- Payment Information, including bank account details for sourcing funds
- Detailed payment information for payments made on behalf of the Transferee/Buyer

This information is required by FinCEN, and we do not have a choice because non-compliance can result in civil and criminal penalties, including incarceration.

We wanted to share this information with you to prepare you and your customers for the information we are now gathering.

**Sincerely,**

*Jettie L. Bergman*



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NOTE: This information is for your reference only and is not intended to represent the only approach to any particular issue. These guidelines should not be construed as legal, financial or business advice. We recommend you consult your legal counsel and subject-matter experts to determine appropriate policies, procedures and strategies applicable to your office or organization.