



CTR Geographic Targeting Order: Imposing Additional Recordkeeping and Reporting Requirements on Money Services Businesses Along the Southwest Border

Background:

The Geographic Targeting Order (GTO) was issued by the Financial Crimes Enforcement Network (FinCEN) to address the significant risks posed by drug cartels and other criminal actors along the southwest border of the United States. It aims to combat illicit finance activities, including money laundering, and the flow of deadly drugs into the country.

Impact on existing CTR requirement of transaction(s) greater than \$10,000:

The Order does not alter any existing BSA obligations of a Covered Business.

Note: GTO is in addition to the current CTR requirements.

Who is impacted: Money Service Businesses (MSBs) as defined by [31 CFR 1010.100\(ff\)](#).

New CTR Requirement: Certain MSBs along the southwest border of the United States to report and retain records of transactions in currency of more than \$200, but not more than \$10,000, and to verify the identity of persons presenting such transactions. Part IV of the CTR shall contain the following information in Field 45: "MSB0325GTO".

Covered Transactions: Deposit, withdrawal, exchange of currency or other payment or transfer, by, through or to the Covered Business which involves a transaction in currency, of more than \$200, but not more than \$10,000.

Verification Requirement: Before concluding a Covered Transaction, the Covered Business must comply with the identification requirements set forth at 31 CFR 1010.312, including the requirement that the specific identifying information (e.g., the account number of the credit card, the driver's license number) used in verifying the identity of the customer shall be recorded on the CTR.

Impacted counties and zip codes:

- Imperial County, California: 92231, 92249, 92281, 92283
- San Diego County, California: 91910, 92101, 92113, 92117, 92126, 92154, 92173
- Cameron County, Texas: 78520, 78521
- El Paso County, Texas: 79901, 79902, 79903, 79905, 79907, 79935
- Hidalgo County, Texas: 78503, 78557, 78572, 78577, 78596
- Maverick County, Texas: 78852
- Webb County, Texas: 78040, 78041, 78043, 78045, 78046



CTR Reporting Requirement: CTRs should be reported to FinCEN within 15 days following the day on which the Covered Transaction occurred.

Note: This is the same as the existing CTR requirement for transactions above \$10,000.

Order Effective between: April 14, 2025 and September 9, 2025

Note: This can be extended if deemed necessary.

Retention Period: Five years from the last day of this order. Store all such records in a manner accessible within a reasonable period of time.

Note: Regular CTR requirement is 5 years from the transaction date.

Further Information or questions: If an MSB has questions about the order or needs additional information, contact FinCEN's Regulatory Support by submitting an inquiry .

Penalties for Noncompliance: The Covered Business, and any of its officers, directors, employees and agents, may be liable, without limitation, for civil or criminal penalties for violating any of the terms of this Order.

NICE Actimize's CTR solution provides full coverage for all FinCEN CTR requirements, providing fully automated filing to enhance report quality and timeliness.

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