



Exemptive Relief Order for the Geographic Targeting Order Imposing Recordkeeping and Reporting Requirements on Certain Financial Institutions in Minnesota

Issue Date: February 27, 2026

By Order, pursuant to the authority set forth in 31 U.S.C. § 5318(a)(7) and 31 C.F.R. § 1010.970(a), the U.S. Department of the Treasury’s Financial Crimes Enforcement Network (FinCEN) is granting tailored exemptive relief related to the geographic targeting order (GTO) imposing recordkeeping and reporting requirements on certain financial institutions in Minnesota, which came into effect on February 12, 2026.¹ This relief is targeted to exempt certain categories of funds transfers that are lower risk for government benefits fraud, and to allow banks sufficient time to report certain information required by the GTO. This Order: (1) exempts Covered Businesses that are banks from the GTO’s requirement to report funds transfers where the originator is described in 31 C.F.R. §§ 1010.230(e)(2)(i)-(xvi); and (2) exempts Covered Businesses that are banks from recording or reporting certain information for account holder customers until May 13, 2026.

Background

On January 13, 2026, FinCEN published the GTO, as part of a series of Department of the Treasury actions aimed at combatting rampant government benefits fraud in Minnesota. The GTO requires all banks and money transmitters located in Hennepin County and Ramsey County, Minnesota, to file reports with FinCEN of certain international funds transfers of \$3,000 or more. The terms of the GTO are effective beginning February 12, 2026, and ending August 10, 2026. Government benefits fraud is a widespread issue in Minnesota, and this GTO will enhance ongoing investigations, generate new leads and investigations, assist efforts to track funds laundered internationally, and facilitate efforts to recover fraudulently obtained funds. Extensive schemes have fraudulently diverted billions in state and Federal benefits, a portion of which have been laundered overseas.

Exemptive Relief

Pursuant to 31 U.S.C. § 5318(a)(7) and 31 C.F.R. § 1010.970(a), the Secretary may “prescribe an appropriate exemption” from the requirements of the Bank Secrecy Act and its

¹ FinCEN, *Geographic Targeting Order Imposing Recordkeeping and Reporting Requirements on Certain Financial Institutions in Minnesota*, 91 FR 1246 (Jan. 13, 2026).

implementing regulations.² Such exemptions, made by written order or authorization, may be either conditional or unconditional, may apply to particular persons or to classes of persons, and may apply to particular transactions or classes of transactions.³ FinCEN may revoke exemptions at its discretion.

Consistent with this authority, FinCEN, through this Order, exempts Covered Businesses that are banks from the GTO's requirement to report funds transfers where the originator is described in 31 C.F.R. §§ 1010.230(e)(2)(i)-(xvi). Also, through this Order, FinCEN exempts, until May 13, 2026, Covered Businesses that are banks from the GTO's requirement to record or report information that is not required to be retained under 31 C.F.R. § 1020.410(a)(1) and (2), if the originator is an account holder customer of the bank. For the purpose of this exemptive relief Order, "account" has the meaning provided in 31 C.F.R. § 1020.100(a)(1), and "customer" has the meaning provided in 31 C.F.R. § 1020.100(b)(1).

For questions concerning this Order, please contact FinCEN's Regulatory Support Section by submitting an inquiry at www.fincen.gov/contact.

² This authority has been delegated to the Director of FinCEN. *See* U.S. Department of the Treasury Order 180-01 (Jan. 14, 2020); *see also* 31 U.S.C. § 310(b). Under 31 U.S.C. § 5318(a)(7), the Secretary can "prescribe an appropriate exemption from a requirement under this subchapter and regulations prescribed under this subchapter." Under 31 C.F.R. § 1010.970(a), the "Secretary, in his sole discretion, may by written order or authorization make exceptions to or grant exemptions from the requirements of this chapter. Such exceptions or exemptions may be conditional or unconditional, may apply to particular persons or to classes of persons, and may apply to particular transactions or classes of transactions. They shall, however, be applicable only as expressly Stated in the order of authorization, and they shall be revocable in the sole discretion of the Secretary."

³ 31 C.F.R. § 1010.970(a).