

January 24, 2022

The Honorable Himamauli Das
Acting Director
Financial Crimes Enforcement Network (FinCEN)
Regulatory Identification Number (RIN) 1506-AB54
P.O. Box 39
Vienna, Virginia 22183

Dear Acting Director Das:

On behalf of the 1.5 million members of the National Association of REALTORS® (NAR) and the undersigned groups, we are respectfully requesting a 60-day extension of the comment period for Financial Crime Enforcement Network's (FinCEN) [Advance Notice of Proposed Rulemaking](#) (ANPRM; RIN-1506-AB54) Anti-Money Laundering Regulations for Real Estate Transactions soliciting public comments on the rulemaking process for the real estate sector to address money laundering and illicit financial crimes.

Our groups recognize that money laundering, terrorist financing, and illicit financial crimes in real estate remain a challenge. FinCEN's efforts in issuing this ANPRM to better understand real estate industry threats, risks, challenges, concerns, and recommendations are commendable; however additional time is needed to ensure the public can provide FinCEN with comprehensive and substantive responses. The scope and nature of this ANPRM requires thoughtful and insightful information from stakeholders across multiple industries and sectors. FinCEN's inquiries cited in the ANPRM necessitate detailed responses from numerous subject matter experts and industry practitioners. Extending the February 7, 2022, deadline for comments will allow for greater participation, engagement, and robust commentary on this matter to provide FinCEN with accurate, relevant, and current data and information.

It is imperative that FinCEN continues to engage with representatives from the law enforcement, real estate, title, banking, and legal communities as it works to explore viable solutions to this complex issue. We plan to provide a comment in response to the ANPRM and hope to continue to serve as a resource in working collaboratively to combat money laundering, terrorist financing, and other illicit crimes in real estate. Thank you for your time and consideration, and we hope that you will honor this request.

Sincerely,

National Association of REALTORS®
Asian American Real Estate Association of America (AREAA)
American Escrow Association (AEA)
Real Estate Services Providers Council (RESPRO)®