Appendix A – FinCEN Client Pushback Scripts

1. **"Why do you need this information?"**

   > *"This information is required under a federal FinCEN reporting rule that applies to certain real estate transactions. Our software requires us to collect and retain it before closing, and we aren't able to complete the file without it."*

   If needed, add:

   > *"We don't have discretion to waive or modify these questions."*

2. **"I've never had to do this before."**

   > *"That's common. This is a newer federal requirement, and it only applies to certain transactions. When it applies, we're required to collect the information the same way every time."*

   Do not just say "it just started this year" or speculate on dates.

3. **"Can't I just tell you instead of filling this out?"**

   > *"The information has to be submitted through the secure FinCEN request in our system. We aren't allowed to collect it by email, phone, or handwritten form."*

   If pressed:

   > *"The system creates the audit record that we're required to keep."*

4. **"This feels intrusive / I don't want to give my SSN."**

   > *"I understand. The information is submitted through a secure FinCEN form, stored in our closing system, and used only to satisfy the federal reporting requirement. We don't have an alternative way to collect it."*

   Do not offer reassurance beyond this. No technical security explanations.

5. **"My lawyer/accountant says I don't have to do this."**

> *"We're not able to override the FinCEN requirements in our system. If the transaction is marked reportable, the information must be completed before we can proceed."*

If needed:

> *"Your attorney/accountant is welcome to contact the closing attorney directly."*

6. **"This is delaying closing."**

> *"We can proceed as soon as the FinCEN information request is completed. Until then, the file can't be finalized in our system."*

Full stop. No apologies that imply fault.

7. **"What happens if I don't complete it?"**

> *"If the information isn't provided, we won't be able to complete the closing."*

That's it. Not phrased as a threat and no "if" statements.

8. **Absolute Stop Phrases (Escalate to Closing Attorney)**

If a client says any of the following, stop and escalate to the closing attorney.

- "I'm not the real owner."
- "Put someone else down."
- "Just leave that part blank."
- "We'll fix it later."
- "Everyone does it this way."

> *"I'm going to pause here and have the closing attorney follow up so we make sure this is handled correctly."*

Then **stop communicating substantively** until resolved.

9. **Tone is important**

- Calm, neutral, repetitive if needed
- Do not debate federal law
- Do not explain thresholds, exemptions, or strategy
- Do not suggest workarounds
- Consistency beats persuasion

Appendix B – FinCEN Call + Email Script

This script is specifically designed to give clients nowhere interesting to push. The call establishes authority and urgency without inviting debate. The email becomes our paper trail that we have attempted to collect the information. Repetition without variation trains clients, realtors, etc., that this is procedural, not negotiable.

Never explain thresholds, exemptions, or strategy to clients. Stick to the script and escalate to your closing attorney if needed.

Phone Call Script (2-3 minutes, max)

1. **Opening (set authority, set frame):**

   "Hi, this is [Name] with Black & Hughston. I'm calling because your closing is flagged in our system as FinCEN-reportable, which means we're required to collect some additional information through a secure Qualia request before closing."

2. **What they need to do (no options):**

   "You should have received—or will shortly receive—an email from Qualia with a link to complete the FinCEN information request. It's a secure form and usually takes about 15–20 minutes."

3. **Preempt common pushback:**

   "I want to be clear upfront: this isn't optional on our end, and we aren't able to collect this information by phone or email."

4. **If they ask *why*:**

   "It's a federal reporting requirement, and the system requires the information to be submitted that way so there's an audit record."

5. **Close the call cleanly:**

> *"Once that form is completed, we can keep the file moving. I'll also send you a short follow-up email with the same information so you have it in writing."*

Do **not** stay on the line to walk them through answers. If they try, say:

> *"I'm not able to advise on how to answer the questions, but if anything is unclear you can flag it in the form and we'll review it."*

Follow-Up Email (Sent Immediately After the Call)

Subject: Action Required: FinCEN Information Needed for Your Closing

Body:

> *Hello [Name],*
>
> *As discussed by phone, your transaction has been identified in our system as subject to a federal FinCEN reporting requirement.*
>
> *To proceed, please complete the **FinCEN Information Request** sent to you through Qualia. The request must be completed through that secure link so it can be recorded properly in our closing system.*
>
> ***Important notes:***
>
> - ***The information request must be completed before we can finalize the closing***
> - ***We're unable to collect this information by phone, email, or handwritten form***
> - ***The questions may vary depending on whether you're acting individually, through an entity, or through a trust***
>
> *Once the form is submitted, it will automatically attach to the closing file and we can continue moving forward.*
>
> *If you believe you received the request in error, please let us know and we'll review it internally.*
>
> *Thank you,*
> *[Name]*

If They Haven't Responded (Email Only)

Subject: Reminder: FinCEN Information Required to Proceed

Body:

Review Cycle: As Needed   **Effective Date: 2/2/2026**

> *Hello [Name],*
>
> *This is a reminder that we're still awaiting completion of the FinCEN Information Request sent through Qualia.*
>
> *Until the request is completed, we're unable to finalize the closing in our system.*
>
> *Please let us know once it has been submitted, or if you believe the request was sent in error.*
>
> *Thank you,*
> *[Name]*

No apologies. No "just checking in." No soft language that implies discretion.