

Exemptions from Reporting

Exemptions for Types of Transfers

- Transfers involving easements — such as grants, transfers, or revocations of an easement
- Transfers due to an individual's death — including those pursuant to a will, trust terms, operation of law, or contractual provision
- Transfers incident to divorce or dissolution of a marriage or civil union
- Transfers to a bankruptcy estate
- Transfers supervised by a U.S. court
- Transfers made for no consideration by an individual (alone or with spouse) to a trust when that individual (or their spouse) is the grantor/settlor of the trust
- Transfers to a qualified intermediary for purposes of a like-kind (Section 1031) exchange under the Internal Revenue Code
- Transfers for which there is no reporting person designated or available to file the required report

Exemptions for Transferee Entities or Trusts

In addition to the above, certain low-risk transferees—both entities and trusts—are exempt from reportability:

- Exempt Transferee Entities (16 types):
 - Securities reporting issuers
 - Governmental authorities
 - Banks, credit unions, depository institution holding companies
 - Money services businesses
 - Brokers/dealers in securities
 - Securities exchanges or clearing agencies
 - Other Exchange Act-registered entities
 - Insurance companies and state-licensed insurance producers
 - Commodity Exchange Act-registered entities
 - Public utilities
 - Financial market utilities
 - SEC-registered investment companies
 - Subsidiaries of any exempted entity

- Exempt Transferee Trusts (4 types), Includes trusts such as: Securities reporting issuers, Trustees that are securities reporting issuers, Statutory trusts (treated as transferee entities, not trusts), Subsidiaries of an exempted trust