

# Amendment to the Federal Law for the Prevention and Identification of Transactions Involving Illicit Proceeds



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## New Anti-Money Laundering Obligations for the Real Estate Sector



On July 16, 2025, a significant reform to the Federal Law for the Prevention and Identification of Transactions Involving Illicit Proceeds (the "Anti-Money Laundering Law") was published in the Diario Oficial de la Federación. This reform directly affects individuals and entities involved in real estate transactions and related financial operations. The amendments entered into force the day after their publication (the "Reform"), with certain exceptions. The authorities are expected to issue General Rules within the next 12 months.

### Designation of Vulnerable Activities

One of the key aspects of the Reform is the expansion of the catalog of vulnerable activities, along with stricter requirements for identification, documentation, and reporting of high-risk transactions. The following real estate-related operations are now deemed Vulnerable Activities, provided they meet or exceed certain thresholds based on the Unidad de Medida y Actualización (UMA).

- Construction, development, or professional brokerage of real estate when the value of the transaction is equal to or exceeds 8,025 UMAs (~\$907,950 MXN)
- Receipt of funds intended for real estate developments for sale or lease, subject to the same threshold of 8,025 UMAs
- Establishment or amendment of real estate trusts transferring ownership or guaranteeing obligations (except those created to secure financing from financial institutions or public housing agencies), when the transaction equals or exceeds 4,000 UMAs (~\$452,560 MXN)
- Establishment of rights of use or enjoyment (leases) over real estate with a monthly value exceeding 1,605 UMAs (~\$181,590 MXN), and mandatory reporting when the value exceeds 3,210 UMAs (~\$363,180 MXN)
- Appraisals and other notarized or formalized acts before public notaries or brokers involving properties exceeding 8,025 UMAs (~\$907,950 MXN)

These transactions must be reported to the Ministry of Finance and Public Credit ("SHCP") through the designated electronic system no later than the 17th day of the month following the transaction

## Cash Payment Restrictions

The Reform also introduced specific thresholds for the prohibition on the use of cash, foreign currency, or precious metals—even when processed through financial intermediaries—to settle or pay for real estate transactions, including:

creation or transfer of real rights over real estate when the value equals or exceeds 8,025 UMAS (~\$907,950 MXN)

establishment of rights of use or enjoyment (leases) for monthly payments exceeding 3,210 UMAS (~\$363,180 MXN)



## Enhanced Compliance Obligations

In addition to reporting requirements, the Reform introduces a more robust compliance framework for those engaged in Vulnerable Activities. These include:

- Identification of the Beneficial Owner: Parties must identify and document the individual who ultimately controls or benefits from the transaction, even if acting through a trust or other legal structure
- Registration in the Vulnerable Activities Registry: Individuals and legal entities must register in the electronic system designated by the SHCP and keep their information up to date
- Risk Assessment: Obligated parties must implement methodologies to identify, assess, and mitigate money laundering risks, including the identification of Politically Exposed Persons
- Internal Compliance Manual: Obligated parties must maintain an internal policy manual outlining procedures and controls to comply with the Anti-Money Laundering Law, including measures for high-risk clients

- Annual Training: Compliance officers, executives, and staff involved in vulnerable activities must undergo mandatory annual training
- Annual Audits: Depending on their level of assessed risk, obligated parties must undergo an internal or independent external audit each calendar year to assess their compliance with legal obligations
- Automated Monitoring: Obligated parties must implement automated systems to monitor client transactions continuously and detect activity that falls outside the client's risk profile

## Sanctions and Liability

The Reform introduces a stricter penalty regime. Fines for failing to submit required notices or submitting incorrect information may reach up to 65,000 UMAS (~\$7,354,100 MXN) or up to 100% of the transaction's value, whichever is higher. Specific penalties also apply for failure to identify or report the Beneficial Owner

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