FIRMS | COMPLIANCE ASSISTANCE | OCTOBER 16 2026

AFIDA compliance assistance for law firms

Assess reporting questions and potential civil-penalty exposure with a source-linked calculator, filing analysis and documented workpapers.

FIRMS organizes the facts behind your compliance review. Explore a penalty scenario, examine the sample report, and request the analysis your matter needs. Counsel determines legal relevance, applicability and conclusions.

Three capabilities for compliance review

Capability	How a firm uses it
Penalty scenario calculator	Enter the relevant interest value and event timing; compare current late-filing policy with separately labeled proposed-rule scenarios. Review the resulting dollar estimate and assessment schedule.
Filing and holder analysis	Examine reported interests, source Owner IDs, country codes, acquisition years and independent value fields. Identify which facts require original filings, instruments or valuation evidence.
Documented workpapers	Receive the agreed record register, reconciliation notes, source references, unresolved questions and written findings for counsel’s review.

From a scenario to an engagement

1. Explore the free calculator and its assumptions. 2. Review our process and Aroostook sample. 3. Send a question, county or holder, reporting year and deadline. 4. Review the proposed deliverables, fee and delivery date before acceptance. An inquiry is free and does not create an engagement.

Access and cost

The calculator and public sample are free. The paid scopes combine filing analysis and documented workpapers: $750 proposed for a pilot on one agreed holder or county; $1,500 for a selected county and report year; $2,500 for one holder group across agreed counties. These prices describe the scope of research, not separate charges for the three capabilities. The final fee, records, deliverables and delivery date require a written quote and acceptance; online paid packs remain closed. The $29 AFIDA Watch report and book bundle is separate.

Request a research scope and written quote
info@firms.afidawatch.com

POLICY AND CALCULATOR | SOURCES CHECKED OCTOBER 16 2026

Why compliance review matters

Current AFIDA regulations contain reporting obligations and civil penalties. Section 781.3 generally requires reporting within 90 days for covered events. Under section 781.4, late-filed reports accrue 0.1% of the foreign person's interest value for each week or portion thereof, up to 25%; downward adjustments may apply. Other specified failures have separate 25% provisions. Counsel must determine the applicable facts and requirements. [1]

Executive policy also addresses foreign investment in agricultural land. The February 21, 2025 America First Investment Policy directs attention to adversary investment in farmland and sensitive real estate. USDA's National Farm Security Action Plan places agriculture within national-security policy. These policies provide context, not a finding that any particular holding poses a threat. [2, 3]

The June 25, 2026 AFIDA proposed rule would revise disclosures and enforcement. The calculator's proposed schedules are planning scenarios, not current law or an assumed final effective date. Policy objectives do not themselves establish an individual filing obligation. [4]

What the calculator does

Inputs are the rule scenario, reporting scenario, positive fair market value of the foreign person's interest, and event days. Proposed scenarios may also require adversary status or a hypothetical transition effective date. Outputs include modeled dollar exposure, a dated assessment schedule and the 25% ceiling. Incomplete or misleading filing scenarios show a maximum-only amount, not a weekly assessment prediction.

It assumes a reporting obligation and uninterrupted accrual. Disputed dates, appeal pauses, discretionary reductions and post-transition track changes are not modeled. A source acquisition year is not an exact event date; a reported value-at-filing is not automatically the required fair market value. FIRMS research identifies these evidence gaps for counsel.

Calculator build reference: web asset v=20261013; current-and-proposed model, tested against 108 existing calculator checks. This identifies the reviewed build, not regulatory certification. Open the free calculator.

[1] 7 CFR Part 781, especially sections 781.3 and 781.4
[2] White House America First Investment Policy, February 21 2025
[3] USDA National Farm Security Action Plan executive summary
[4] Proposed 91 FR 38315, USDA-2026-0001, RIN 0560-AI70

FIRMS | SERVICE CAPABILITIES | OCTOBER 16 2026

Research supporting compliance review

How we turn a defined research question into a traceable factual report for counsel.

FIRMS organizes AFIDA filing data, follows source identifiers through an agreed reporting snapshot, and documents the records supporting each finding. The work gives counsel a structured starting point for review, with unresolved questions and source limitations stated alongside the results.

Research a firm can request

Research scope	Result for counsel
Holder record tracing	A register of matching source Owner ID records across agreed counties, with acreage, dates, country/source codes and unresolved identity questions.
County comparisons	Consistent comparisons of reported acres, records, distinct parcels, holders, land use and independent value fields.
Filing and source checks	A finding-to-source register, reconciliation notes, missing documents and a defined list of further checks.

The reference report and the commissioned work

The AFIDA Watch Citizen Report demonstrates the existing county reporting engine. It covers the whole county and includes a labeled country focus, holder rollups, acquisition-year detail, a ledger and source notes. Its countywide CSV preserves the supporting source fields.

A FIRMS engagement would use an agreed question to define the geography, identifiers, source checks and additional written analysis. Selecting an Owner ID does not turn the Citizen Report into an owner-exclusive report. A separate holder register or research memo must be named in the engagement scope.

Present availability

The county reporting engine and downloadable artifacts are operational. FIRMS custom research packs remain proposed and are not open for online purchase. Availability, record limits, fees, additional sources and delivery dates must be agreed in writing before paid work begins.

METHOD | FROM INTAKE TO RECONCILED RECORDS

How we conduct the research

1 Define the question and the boundary

We record the county or counties, five-digit county FIPS, report year, reported country/source code and source Owner ID where known. We agree the factual question, requested outputs, record limits, deadline and any additional documents to obtain. A holder name can start a search; it is not an identity determination.

2 Pin and preserve the input

The current reporting engine uses the cleaned USDA AFIDA FY2024 holdings file. We identify the exact input filename and calculate its SHA-256 fingerprint so later work can be tied to the same bytes. A reporting snapshot is not a live register of all land interests. Additional documents, if obtained, receive their own source references and retrieval notes.

3 Select and condition the records

We retain FIPS as five-character strings and preserve the report year, Owner ID and Parcel ID. County report rows are deduplicated using Report Year + Owner ID + Parcel ID within the selected county. We distinguish source filing records, distinct Parcel IDs and distinct Owner IDs. Missing values remain missing; reported zero is retained as a separate condition.

4 Match identifiers and build the requested groups

Holder rollups use source Owner ID rather than owner-name spelling. For a map connection or holder-location lookup, we match the same Owner ID, year and country/source code across county records. Name similarities and different country codes require separate review; neither alone proves common legal identity or corporate control.

We aggregate reported acres by county and country, calculate country share against the county total, and sum the recorded land-use fields. Acquisition events group by Report Year + Owner ID + Acquisition Year, counting distinct Parcel IDs. The acquisition year comes from the source field; it is not inferred from Purchase Price.

What the map contributes

The map supplies the same selection keys used to identify records in the report. Connections join county centers to show matching source identifiers. They do not locate individual parcels, establish a title chain or prove a parent-company relationship.

METHOD | VERIFICATION AND DELIVERY

How we check and present the work

5 Reconcile totals and inspect exceptions

We check that country totals reconcile to county totals and that the holder, timeline and ledger figures reconcile to the selected report rows. We record counts and grouping definitions so a reader can distinguish a filing count from a parcel or holder count. Missing identifiers, dates, conflicting matches or unavailable sources are described as exceptions to investigate, not filled with invented values.

Purchase Price, Estimated Value and Current Value are checked independently. For each, positive amounts, reported zero and blank entries remain separate. Current Value is a source value at filing, not a current market appraisal. We do not derive one source value field from another.

6 Carry out additional source checks when agreed

Where a question requires original FSA-153 filings, deeds, lease instruments, entity records or other documents, the engagement must identify which sources will be sought. We record availability, redactions, record references and unresolved discrepancies. The automated county report does not establish that these underlying documents have been obtained or verified.

7 Generate and verify the artifacts

The existing engine converts the selected data through Python to structured JSON, then HTML/CSS/JavaScript and a Chromium PDF rendered with Playwright. PDF integrity and page counts are checked. Publication uses versioned manifests and artifact hashes in private storage; earlier editions are preserved. The countywide filing CSV supplies the selected source columns for independent examination.

8 Deliver a report that counsel can follow

Agreed deliverable	What it should contain
Findings memo or report	Question, scope, principal factual findings, limitations and unresolved matters.
Record register and workpapers	Source identifiers, selected records, definitions, matching basis and reconciliation notes.
Source and artifact register	Dataset fingerprint, template/version details, artifact hashes and additional document references where obtained.
Further checks	Documents still needed, uncertain links and questions reserved for counsel or another specialist.

Counsel determines legal relevance and conclusions. These services do not by themselves establish filing obligations, violations, beneficial ownership, title status, privilege, admissibility or expert-witness qualification. Those determinations and any specialist role require separate consideration.

WORKED EXAMPLE | EXISTING COUNTY REPORT

Aroostook County reference example

This example uses an actual downloaded Citizen Report and countywide appendix. It demonstrates the record-to-report process; it is not a commissioned legal matter.

Reference key or measure	Verified result
County and reporting snapshot	Aroostook County, Maine | FIPS 23003 | FY2024
County reported acres	2,085,917.39
Filing records and distinct Parcel IDs	265 records | 265 distinct Parcel IDs
Distinct source Owner IDs	24
Downloaded artifacts	12-page county report | 265-row, 20-column filing CSV

A holder question within the example

A firm could ask which records in the FY2024 Canada-linked selection use source Owner ID 25669, displayed as ALLAGASH TIMBERLANDS LP. The process first fixes year 2024, country/source code 124 and that Owner ID, then lists matching records and counties. The display name does not replace the identifier or prove beneficial ownership.

For Aroostook, that selection contains 137 filing records, 137 distinct Parcel IDs and 1,044,228.82 reported acres. Further instrument or entity checks require an agreed scope.

How the example was checked

All 265 downloaded CSV rows matched the pinned source across all 20 exported columns, with no missing or additional rows and no duplicate county report keys. The CSV acreage sum matched the report headline. All 12 PDF pages rendered. Checks validate the generated output, not the accuracy or completeness of government submissions.

Source: afida_current_holdings_yr2024_clean.csv
SHA-256: 592664aaa9bb5328154b9d6f418ca212540b83e9b8a3855512c1c69261fb6fb2
Report template: citizen-report-expanded-v1.0.3
Example artifacts: AFIDA_Citizen_Report_Aroostook_Maine.pdf and its Filing_Appendix.csv.

Request a defined research scope

Provide a question, county or holder, year and deadline. Keep privileged or confidential documents out of the public form; agree transfer arrangements separately.

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