

**Guideline 5: Submitting Terrorist Property Reports to  
FINTRAC**

# Guideline 5: Submitting Terrorist Property Reports to FINTRAC

December 24 2003

This replaces the previous version of *Guideline 5: Submitting Terrorist Property Reports to FINTRAC Electronically* issued in July 2003. The changes made to this version are indicated by a side bar to the right of the modified text.

## Table of Contents

<b>1</b>	<b>General</b> .....	<b>4</b>
<b>2</b>	<b>Terrorist Property Reporting Requirements</b> .....	<b>6</b>
2.1	When Does a Terrorist Property Report Have to be Made under the <i>Proceeds of Crime (Money Laundering) and Terrorist Financing Act</i> ?.....	6
2.2	Other Criminal Code Requirements.....	7
2.3	Method of Reporting to FINTRAC.....	7
2.4	Information to be Contained in a Terrorist Property Report.....	7
<b>3</b>	<b>Sending Terrorist Property Reports to FINTRAC</b> .....	<b>8</b>
3.1	How to Complete Paper Reports.....	8
3.2	How to Send a Terrorist Property Report to FINTRAC.....	8
<b>4</b>	<b>Instructions for Completing a Terrorist Property Report</b> .....	<b>9</b>
	<b>Part A: Information about the person or entity filing this report</b> .....	<b>10</b>
	<b>Part B: Reason for filing this report</b> .....	<b>12</b>
	<b>Part C: Information about the property</b> .....	<b>14</b>
	<b>Part D: Account information (if the property involves an account)</b> .....	<b>16</b>
	<b>Part E1: Information about any transaction or proposed transaction (where applicable)</b> .....	<b>18</b>
	<b>Part E2: Information about the transaction or proposed transaction disposition(s) (where applicable)</b> .....	<b>21</b>
	<b>Part F: Information about the individual who conducted or proposed to conduct transaction(s) (where applicable)</b> .....	<b>23</b>
	<b>Part G: Information about the entity on whose behalf the transaction was conducted or proposed to be conducted (where applicable)</b> .....	<b>25</b>

**Part H: Information about the individual on whose behalf the transaction was conducted or proposed to be conducted (where applicable) ..... 26**

**5 Comments? .....29**

**6 How to Contact FINTRAC .....29**

# 1 General

If you are a reporting person or entity, this guideline has been prepared to help you submit terrorist property reports. It explains reporting timelines, how reports have to be sent to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), and what information has to be included in these reports.

You are a reporting person or entity if you are one of the following:

- a financial entity (such as a bank, credit union, caisse populaire, trust and loan company or an agent of the Crown that accepts deposit liabilities);
- a life insurance company, broker or agent;
- a securities dealer, portfolio manager or investment counsellor;
- an individual or entity engaged in the business of foreign exchange dealing;
- a money services business (including alternative remittance systems, such as Hawala, Hundi, Chitti, etc.);
- Canada Post for money orders;
- an accountant or accounting firm (when carrying out certain activities on behalf of your clients);
- a real estate broker or sales representative (when carrying out certain activities on behalf of your clients); and
- a casino (including those authorized to do business in Canada, with a slot machine or roulette or card games, but excluding certain temporary charity casinos).

This guideline uses plain language to explain the most common terrorist property reporting situations under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and the related Regulations. It is provided as general information only. It is not legal advice, and is not intended to replace the Act and Regulations. For more information about money laundering, terrorist financing or other requirements under the Act and Regulations, see the guidelines in this series:

- *Guideline 1: Background* explains money laundering and terrorist financing and their international nature. It also provides an outline of the legislative requirements as well as an overview of FINTRAC's mandate and responsibilities.
- *Guideline 2: Suspicious Transactions* explains how to report a suspicious transaction. It also provides guidance on how to identify a suspicious transaction, including general and industry-specific indicators that may help when conducting or evaluating transactions.
- *Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC* explains when and how to submit suspicious transaction reports.
- *Guideline 4: Implementation of a Compliance Regime* explains the requirement for reporting persons and entities to implement a regime to ensure compliance with their obligations under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and associated Regulations.
- *Guideline 5: Submitting Terrorist Property Reports to FINTRAC* explains to reporting persons and entities when and how to submit a terrorist property report.

- *Guideline 6: Record Keeping and Client Identification* explains the requirement for reporting persons and entities to identify their clients and keep records. There are eight different versions of Guideline 6, by sector.
- *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC* explains when and how to submit large cash transaction reports.
- *Guideline 8: Submitting Electronic Funds Transfer Reports to FINTRAC* explains when and how to submit EFT reports.

If you need more help after you read this or other guidelines, call FINTRAC's national toll-free enquiries line at 1-866-346-8722.

Throughout these guidelines, several references are provided to additional information that may be available on external Web sites. FINTRAC is not responsible for the accuracy or reliability of the information contained on those external Web sites.

In addition to making a terrorist property report to FINTRAC, there is also a requirement under the *Criminal Code* for anyone in Canada and any Canadian outside Canada to disclose, to the Royal Canadian Mounted Police (RCMP) and the Canadian Security Intelligence Service (CSIS), the existence of property in their possession or control that they know is owned or controlled by or on behalf of a terrorist or a terrorist group. For more information about this, refer to Section 2.

## 2 Terrorist Property Reporting Requirements

### 2.1 When Does a Terrorist Property Report Have to be Made under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*?

Since June 12, 2002, if you are a reporting person or entity (see Section 1), you have to send a terrorist property report to FINTRAC if you have property in **your possession or control** that you **know** is owned or controlled by or on behalf of a terrorist or a terrorist group. This includes information about any transaction or proposed transaction relating to that property.

In this context, property means any type of real or personal property in your possession or control. This includes any deed or instrument giving title or right to property, or giving right to money or goods. For example, cash, bank accounts, insurance policies, money orders, real estate, securities, and traveller's cheques, among other types of assets, are considered property.

A terrorist or a terrorist group includes anyone that has as one of their purposes or activities facilitating or carrying out any terrorist activity. This can be an individual, a group, a trust, a partnership or a fund. It can also be an unincorporated association or organization. A terrorist group will also include anyone on a list published in Regulations issued under the *Criminal Code*. More information about this list is available from the following Web sites:

- [http://www.osfi-bsif.gc.ca/osfi/index\\_e.aspx?DetailID=525](http://www.osfi-bsif.gc.ca/osfi/index_e.aspx?DetailID=525) (This site contains a consolidated list of names subject to the *Regulations Establishing a List of Entities* made under the *Criminal Code* or the *United Nations Suppression of Terrorism Regulations*.)
- <http://www.psepc-sppcc.gc.ca/prg/ns/le/cle-en.asp>

Once you know that any property in your possession or control is owned or controlled by or on behalf of a terrorist or a terrorist group, or after any transaction is proposed for such a property, a terrorist property report must be sent to FINTRAC without delay.

If you do not know that you are dealing with a terrorist, but suspect that you might be, then a suspicious transaction report is required if a transaction was completed.

For more information about submitting reports to FINTRAC relating to suspicions of terrorist financing, terrorist-related offences or other Government of Canada efforts to combat terrorism and terrorist activities, refer to *Guideline 1: Backgrounder*, *Guideline 2: Suspicious Transactions* or the following Web sites:

- [http://www.fintrac.gc.ca/reporting--declaration/1\\_e.asp](http://www.fintrac.gc.ca/reporting--declaration/1_e.asp)
- [http://canada.justice.gc.ca/en/anti\\_terr/index.html](http://canada.justice.gc.ca/en/anti_terr/index.html)
- [http://canada.gc.ca/wire/2001/09/110901-US\\_e.html](http://canada.gc.ca/wire/2001/09/110901-US_e.html)
- <http://www.dfait-maeci.gc.ca/anti-terrorism/campaign-e.asp>

## **2.2 Other Criminal Code Requirements**

The following section provides information with respect to other *Criminal Code* requirements for reporting terrorist property. Although these requirements do not form part of the PCMLTFA, it may be a useful reference as part of this guideline.

In addition to making a terrorist property report to FINTRAC about this type of property, there is also a requirement under the *Criminal Code* that applies to anyone in Canada and any Canadian outside Canada. Whether or not you are a reporting person or entity (as described in Section 1), you must disclose to the RCMP and CSIS, the existence of property in your possession or control that you know is owned or controlled by or on behalf of a terrorist or a terrorist group. This includes information about any transaction or proposed transaction relating to that property. Information is to be provided to them, without delay, as follows:

- RCMP, Financial Intelligence Branch, unclassified fax: (613) 993-9474
- CSIS Financing Unit, unclassified fax: (613) 231-0266

It is an offence under the *Criminal Code* to deal with any property if you know that it is owned or controlled by or on behalf of a terrorist or a terrorist group. It is also an offence to be involved in any transactions in respect of such property.

## **2.3 Method of Reporting to FINTRAC**

### **Paper Reporting Only**

Unlike other reports to FINTRAC, you must submit a terrorist property report on paper. You cannot send them electronically at this time. See Section 3 for more information.

## **2.4 Information to be Contained in a Terrorist Property Report**

The terrorist property report has to contain information that describes the property. The report also has to provide information about the terrorist or terrorist group and anyone who owns or controls the property on their behalf. In addition, if there were any transactions or proposed transactions related to the property, the report also has to contain information about them. In the case of a transaction or a proposed transaction, the information to be contained in the terrorist property report is very similar to a suspicious transaction report.

As explained in Section 2.2, it is an offence to deal with any property if you know that it is owned or controlled by or on behalf of a terrorist or a terrorist group. It is also an offence to be involved in any transactions in respect of such property.

See Section 4 for more information about what has to be included in a terrorist property report.

## **3 Sending Terrorist Property Reports to FINTRAC**

### **3.1 How to Complete Paper Reports**

As explained above, you must submit paper terrorist property reports to FINTRAC. Forms are available as follows:

- A file can be accessed and printed from the Publications section of FINTRAC's Web site (choose "reporting forms" from [http://www.fintrac.gc.ca/publications/pub\\_e.asp](http://www.fintrac.gc.ca/publications/pub_e.asp)). If you do not have a computer or access to the Internet, you may be able to do this at your local library or any other public place with Internet access.
- Call 1-866-346-8722 for a copy to be faxed or mailed to you.

To ensure that the information provided is legible and to facilitate data entry, it would be preferable if the free-text areas of the paper report (such as, fields 1 and 2 of Part B) were completed using word-processing equipment or a typewriter. For the parts of the report that must be completed by hand, the use of black ink and CAPITAL LETTERS is recommended.

See Section 4 for completion instructions. It includes details of what each field must contain for a terrorist property report and indicates which parts of the form you may need to make copies of before you complete your report.

### **3.2 How to Send a Terrorist Property Report to FINTRAC**

There are two ways to send a terrorist property report to FINTRAC in such a way as to obtain an acknowledgement of receipt of a paper report:

- Fax: 1-866-226-2346; or
- Registered mail to the following address:  
Financial Transactions and Reports Analysis Centre of Canada  
Section A  
234 Laurier Avenue West, 24<sup>th</sup> Floor  
Ottawa, ON  
Canada K1P 1H7

In addition, you may also send your report by mail to the FINTRAC address above. You should note that you will not receive any acknowledgement from FINTRAC when your paper report has been received.



## 4 Instructions for Completing a Terrorist Property Report

The fields in this section refer to the numbered areas on the *Terrorist Property Report* form. As explained in Section 2.3, these reports can only be completed and sent to FINTRAC on paper. There is no mechanism to report electronically.

All fields of the report marked with an asterisk (\*) **must be completed**. Some fields have both an asterisk and “where applicable” next to them. These must be completed if they are applicable to you or to the property or the transaction being reported. For all other fields, you have to make reasonable efforts to get the information. “Reasonable efforts” means that you tried to get the information requested on the report. If the information is available to you, you must provide it in the report. In the case of a transaction or a proposed transaction, if the information is not contained in your files or records, and it was not available at the time of the transaction, the field may be left blank.

Enter the date and time when you begin completing the report at the top of the form. If you have to file a correction to a report on paper, follow the instructions on the first page of the form. If you need to get a paper form, see Section 3.

There are eight parts on the *Terrorist Property Report* form, but some are only to be completed if applicable. To make a terrorist property report, follow the following four steps:

- Step 1 — Complete Part A to provide information about you as the reporting entity.
- Step 2 — Complete Part B to provide details about the terrorist or terrorist group, and anyone who owns or controls the property on their behalf. Part B is also for you to explain what led you to file the report, as well as how you came to know that the property is owned or controlled by or on behalf of a terrorist or terrorist group.
- Step 3 — Complete Part C to provide details about the property. If the property involves an account, also complete Part D. If there were no transactions or proposed transactions related to the property, do not complete the rest of the report.
- Step 4 — If there was a transaction relating to the property, complete Parts E1 and E2 to provide information about how the transaction was initiated and completed. Provide the same information if there was a proposed transaction relating to the property. Complete Part F to provide information about the individual who conducted or proposed to conduct the transaction. If the transaction or proposed transaction was on behalf of an entity (such as a corporation or trust), also complete Part G **or**, if it was on behalf of an individual, complete Part H.

The rest of this section will cover each part of the *Terrorist Property Report* form.

## **Part A: Information about the person or entity filing this report**

This part is for information about you, the reporting person or entity creating the report. If you have multiple branch or office locations, the information in this Part should be about the branch or office location where you possess or control the property.

### **Field 1\* Reporting person or entity's identifier number (where applicable)**

This is your institution or license number, or other identification number as outlined below. If you have several branch locations, the identification number should refer to the branch or office where you possess or control the property.

- If you are an **accountant**, enter your provincial chartered accountant (CA), provincial certified management accountant (CMA), or provincial certified general accountant (CGA) number.
- If you are a **bank, caisse populaire, cooperative credit society** or **credit union**, enter your financial institution number issued by the Canadian Payments Association (CPA).
- If you are **Canada Post**, enter your post office number.
- If you are a **life insurance broker or agent**, enter your provincial broker or agent license number.
- If you are a **federally regulated life insurance company**, enter your institution code issued by the Office of the Superintendent of Financial Institutions (OSFI).
- If you are a **life insurance company that is not federally regulated**, enter your provincial license number.
- If you are a **provincial savings office**, enter your financial institution number issued by the CPA.
- If you are a **real estate broker or sales representative**, enter your provincial broker number.
- If you are a **securities dealer**, enter your provincial dealer license number.
- If you are a **trust and loan company**, enter your financial institution number issued by the CPA.
- If you are a **provincial trust and loan** that is not a member of the CPA, enter your registration number.

If you are a **foreign exchange dealer** or a **money services business**, an identifier number is not applicable to you. Leave this field blank.

If there was a transaction or a proposed transaction relating to the property at a different location from where you possess or control the property, provide the details about that other location in field 1 of Part B.

### **Field 2\* Reporting person or entity's full name**

Enter the full legal (trade) name of your business or corporation. If you do not have a business name (for example, you are an individual), enter your full name.

**Fields 3\* to 6\* Reporting person or entity's full address**

Enter your civic address, town or city, province and postal code. If you have more than one location, this information should be about where the property is possessed or controlled.

**Fields 7\*, 8\* and 9 Contact name**

Enter the name of the individual FINTRAC can contact for clarification about this report.

**Field 10\* Contact telephone number**

Enter the telephone number, including the area code, of the individual named in fields 7 to 9 (above). Include the extension if applicable at field 10A.

**Field 11\* Type of reporting person or entity**

Enter the type of activity that best describes you. If you are involved in more than one activity type, indicate the one applicable to the property being reported. If there is more than one activity for one or more properties on the report, check only one box to indicate your principal type of activity, and provide additional details in Part B, field 1.

## **Part B: Reason for filing this report**

This part is to provide details of why you are filing a report about property in your possession or control. You have to explain how you came to know that the property is owned or controlled by or on behalf of a terrorist or terrorist group. This part is also for you to provide information about the terrorist or a terrorist group and anyone (besides you) who possesses or controls the property on their behalf.

### **Field 1\* Reason for filing this report**

This section explains what led you to make this report. The more information that you provide to explain this, the more valuable your report will be.

Include a clear and complete description of the events that led you to make this report, with as many details as possible. Include an explanation of how you came to be in possession or control of the property.

If there is not enough room on the form, attach a separate sheet to provide all the relevant information. Make sure you indicate on the separate sheet that this information belongs in Field 1 of Part B.

If you can use word-processing software to write out this information, attach the printed text to Part B. Make sure you indicate that it belongs in Field 1 of Part B.

### **Field 2 How you came to know that the property is terrorist property**

Provide as many details as possible about how you know this property is owned or controlled by or on behalf of a terrorist or a terrorist group.

If there is not enough room on the form, attach a separate sheet to provide all the relevant information. Make sure you indicate on the separate sheet that this information belongs in Field 2 of Part B.

### **Field 3 Full name of terrorist or terrorist group**

Enter the full name of the terrorist or terrorist group that owns or controls the property, or on whose behalf the property is owned or controlled. As explained in Section 2.1, a terrorist or a terrorist group can be an individual, a group, a trust, a partnership, or a fund.

If it is a group (that is, not an individual), enter the complete name of the terrorist group in field 3. If it is an individual, enter the terrorist's surname, given name, and other name or initial (if known) in fields 3A, 3B and 3C.

If the property is owned or controlled by an individual or entity other than the terrorist or terrorist group, provide the details at fields 10 through 16 below. For example, if you know you are dealing with a terrorist group through a front

organization, provide information about the front organization in fields 10 through 16.

**Fields 4 to 8 Terrorist or terrorist group address**

Enter the civic address, town or city, province and postal code for the terrorist or terrorist group named in field 3 above.

**Field 9 Telephone number**

Enter the telephone number, including the area code, of the terrorist or terrorist group named in field 3 above. Include the extension, if applicable, at field 9A.

**Field 10 Name of individual or entity that owns or controls the property on behalf of the terrorist or terrorist group**

Enter the full name of the individual or entity that owns or controls the property on behalf of the terrorist or terrorist group named in field 3 above.

If it is an entity (that is, not an individual), enter the complete name of the entity in field 10. If it is an individual, enter the individual's surname, given name, and other name or initial (if known) in fields 10A, 10B and 10C.

**Fields 11 to 15 Individual or entity address**

Enter the civic address, town or city, province and postal code for the individual or entity named in field 10 above.

**Field 16 Telephone number**

Enter the telephone number, including the area code, of the individual or entity named in field 10 above. Include the extension if applicable at field 16A.

## **Part C: Information about the property**

This part is for information about the property in your possession or control.

If there is more than one property associated with the terrorist or terrorist group named in field 3 of Part B, complete a separate Part C for each property. To do this, you can copy Part C. At the top of Part C, complete the “Property (number) of (total number of properties in Part C)” area to distinguish between each property. If there was a transaction or a proposed transaction related to a property described in Part C, provide the details of the transaction in Parts E1, E2 and F, as well as Parts G or H, as applicable. For each of these, indicate to which property the transaction information applies.

### **Field 1\* Type of property**

Check the appropriate box to indicate which of the seven types listed best describes the property. Follow the instructions next to the applicable description on the form for the rest of the fields in Part C.

If none of the seven types is appropriate for the type of property, check the box for “Other”. This would include, for example, commercial business assets (other than funds such as bank accounts). Provide a description in the space provided to the right. Follow the instructions underneath for the rest of the fields in Part C.

If the property involves an account, complete Part D to provide information about the account.

### **Field 2 Property identifier**

Follow the instructions for the applicable property type in field 1. For example, if the property is “cash”, indicate the type of currency in field 2.

If there is not enough room on the form to provide all the property identifier information for this property, attach a separate sheet to provide all the relevant information. It is very important that you indicate clearly on the separate sheet that this information belongs in Field 2 of Part C.

### **Field 3 Property identifier number**

Follow the instructions for the applicable property type in field 1. For example, if the property is an insurance policy, indicate the policy number in field 3.

If there is not enough room on the form to provide all the property identifier information for this property, attach a separate sheet to provide all the relevant information. It is very important that you indicate clearly on the separate sheet that this information belongs in Field 3 of Part C.

### **Field 4\* Actual or approximate value**

Provide the actual or approximate value of the property. Provide the currency code applicable to this amount in field 4A. If the amount is in Canadian dollars, enter

CAD as the currency code. If it is in United States dollars, enter USD. If the amount is in another type of foreign currency, see Appendix 1 in *Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC* for the code to use.

**Field 5 Description of property**

Provide any additional information about the property that is not already provided in the rest of the fields in Part C (and in Part D if the property involves an account).

If there is not enough room on the form to provide all the property identifier information for this property, attach a separate sheet to provide all the relevant information. It is very important that you indicate clearly on the separate sheet that this information belongs in Field 5 of Part C.

**Part D: Account information (if the property involves an account)**

This part is for information about any account associated with the terrorist property. As explained earlier, it is possible to have more than one property per report. Provide the account information, where applicable, for each property included in the report.

If there is more than one account, complete a separate Part D for each one. To do this, you can copy Part D. Complete the “Account (number) of (total number of accounts in Part D)” area at the top to distinguish between each account, and identify the applicable property in the “Property (number)” area.

If none of the property in this report is associated to an account, do not complete Part D.

**Field 1\* Branch or transit number (if this Part is applicable)**

Enter the branch number, transit number or other appropriate identifying number of the entity where the relevant account is held, if applicable to the property.

**Field 2\* Account number (if this Part is applicable)**

Enter the number of the relevant account.

**Field 3\* Type of account (if this Part is applicable)**

Indicate the type of the relevant account. If the selections provided do not cover this particular account, indicate “Other” and provide details in field 3D.

**Field 4\* Currency code (if this Part is applicable)**

Enter the code for the type of currency for the relevant account. Enter CAD if Canadian dollars, or USD for United States dollars. If the account is another type of currency, see Appendix 1 in *Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC* for the currency code to use.

**Field 5\* Full name(s) of account holder(s) (if this Part is applicable)**

Enter the full name of each account holder (up to three). If there are more than three, you need not provide more.

**Field 6 Date opened**

Enter the date (yyyy-mm-dd) the account was opened.

**Field 7 Date closed**

Enter the date (yyyy-mm-dd) the account was closed, if applicable.

**Field 8\* Status of the account (if this Part is applicable)**

Indicate whether the account was active, inactive or dormant at the time you came to know that the property was terrorist property. If there was a transaction or a proposed transaction relating to the account, indicate the status of the account at the time the transaction was initiated or proposed.



The status of an account is determined by your policies and procedures. For example, your policy may be to assign inactive status to all accounts if there is no client activity for an account over a certain period of time, and dormant status if that inactivity is prolonged.

If you do not have such policies or procedures to assign inactive or dormant status to unused accounts, simply leave this field blank.

## **Part E1: Information about any transaction or proposed transaction (where applicable)**

If there were any transactions or proposed transactions related to the terrorist property, you will have to complete Parts E1, E2 and F. Part E1 is for information about how the transaction was initiated or proposed to be initiated (that is, where the money or property came from). Part E2 is for information about how the transaction was completed or proposed to be completed (that is, where the money went). Part F is for information about the individual who conducted the transaction or proposed to conduct the transaction.

If the transaction was completed or proposed to be completed on behalf of anyone other than the individual in Part F, you will also have to complete Part G or H, as appropriate.

If there is more than one property in this report, you will have assigned a number to each property at the top of Part C. In this case, indicate to which one each transaction applies by completing the “Property (number)” area at the top of Part E1.

If there is more than one transaction to report, complete a separate Part E1 for each one. To do this, you can copy Part E1. Complete the “Transaction (number) of (total number of transactions in Part E)” area at the top of Part E1 to distinguish between each transaction. When you complete Parts E2 and F, as well as Parts G or H, as applicable, indicate to which transaction that information applies.

If there was no transaction or proposed transaction related to any of the property described in Part C, Part E1 is not applicable. In this case, Parts E2, F, G and H would not be applicable either.

### **Field 1\* Date of the transaction (if this Part is applicable)**

Enter the date (yyyy-mm-dd) of the transaction. If the transaction was not completed, enter the date that the transaction was proposed.

The date of transaction field is mandatory. If the transaction was outside normal business hours, and you are not certain of the date, use the night deposit indicator field below (field 3).

### **Field 2 Time of transaction**

Enter the time (hh:mm) of the transaction. If the transaction was not completed, enter the time that the transaction was proposed. The time of transaction field can be left blank if it is not available after reasonable efforts have been made.

### **Field 3\* Night deposit indicator (if this Part is applicable)**

If the transaction was outside normal business hours and you cannot provide the date in field 1, use the night deposit indicator field.

**Field 4 Date of posting**

Enter the date (yyyy-mm-dd) the transaction cleared, if this differs from the date of the transaction provided in field 1.

**Field 5\* Type of funds or other property involved in initiating transaction (if this Part is applicable)**

Check the appropriate box to show the type of funds or other property involved in the transaction or the proposed transaction. For example, if your client brought in cash, “cash” is the type of funds or, if your client wanted to cash a life insurance policy, “life insurance policy” is the description of funds.

If none of the selections provided cover the particular transaction, indicate “Other” and provide details in field 5L. For example, if annuities were involved in initiating the transaction, indicate “Other” and provide information about the type of annuity in field 5L.

If there was more than one type of funds, indicate the one that best represents how the transaction was initiated or proposed to be initiated. Provide information about the rest of the types of funds on a separate sheet attached to the report. It is very important that you indicate clearly that this information belongs in Field 5 of Part E1.

**Field 6\* Amount of transaction (if this Part is applicable)**

Enter the total of funds or value of the property involved in the transaction. This is the total amount received to initiate the transaction. If this amount was not in Canadian funds, you do not have to convert it but you must provide the currency information in field 7.

You will provide details about what happened or was proposed to happen to that amount (that is, the disposition(s) of the transaction) in Part E2.

**Field 7\* Currency code (if this Part is applicable)**

Enter the code for the currency of the transaction, even if it was in Canadian funds. Enter CAD if Canadian dollars, or USD for United States dollars. If the account is another type of currency, see Appendix 1 in *Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC* for the currency code to use.

**Fields 8\* and 9\* Other institution, entity or individual name, number and account number (if this Part is applicable)**

Provide the name (including the identification number, if applicable) and account number of any other institution or individual related to the funds or other property described in field 5, if applicable. For example, if cheques were involved in initiating the transaction, you would provide the name and number of the financial institution in field 8, and the chequing account number in field 9.

If more than one other individual or institution was involved, attach a separate sheet with the information for fields 8 and 9 for each additional individual or institution. It

is very important that you indicate clearly on the separate sheet that this information belongs in Part E1, and clearly indicate what applies to field 8 and what applies to field 9.

**Field 10\* How was the transaction conducted? (if this Part is applicable)**

Check the appropriate box to indicate how the transaction was conducted, or proposed to be conducted. For example, if the transaction was done through an automated banking machine, check the “ABM” box. If none of the selections provided cover this particular transaction, indicate “Other” and provide details in field 10G.

**Field 11 ID number of the individual initially identifying a transaction for terrorist property**

Enter the identification number of the individual who first identified the transaction relating to property owned or controlled by or on behalf of a terrorist or a terrorist group. If that individual does not have an ID number, this field may be left blank.

## **Part E2: Information about the transaction or proposed transaction disposition(s) (where applicable)**

This Part is for information about how the transaction was completed or proposed to be completed.

If there is more than one transaction in this report, indicate to which property and which transaction this disposition applies in the “Property (number) Transaction (number)” area at the top of Part E2. These numbers should be the same as the ones assigned to the transaction in Part E1.

There could be more than one disposition for a particular transaction. For example, your client could propose to initiate a transaction in cash, send half of it as an electronic funds transfer (EFT) (disposition 1), and use the rest to purchase a bank draft (disposition 2). In that case, make sure you include the information for each disposition. If there is more than one disposition to report for any transaction, complete a separate Part E2 for each one. To do this, you can copy Part E2. Complete the “Disposition (number) of (total number of dispositions in this transaction)” area at the top of Part E2 to distinguish between each disposition.

You have to provide information about the individual conducting or proposing to conduct the transaction in Part F. If the disposition was on behalf of that same individual, check that box at the top of this Part.

If the disposition was on behalf of an entity (other than an individual), such as a partnership, corporation, trust or other entity, check that box and complete Part G to provide the information about the entity. If the disposition was on behalf of another individual, check that box and complete Part H to provide the information about the individual.

### **Field 12\* Disposition of funds (if this Part is applicable)**

This describes what happened, or what was proposed to happen, to the funds involved in the transaction.

Check the appropriate box to indicate how the transaction was completed, or proposed to be completed. If the disposition of funds was a life insurance policy, check that box and provide the life insurance policy number in field 12H.

If none of the selections provided cover this particular disposition, indicate “Other” and provide details in field 12L. For example, if annuities were involved in the disposition of funds, indicate “Other” and provide information about the type of annuity in field 12L.

### **Field 13\* Amount of disposition (if this Part is applicable)**

Enter the amount of funds involved in the disposition. If the amount was not in Canadian funds, you do not have to convert it but you must provide the currency information in field 14.

**Field 14\* Currency code (if this Part is applicable)**

Enter the code for the currency of the transaction, even if it was in Canadian funds. Enter CAD if Canadian dollars, or USD for United States dollars. If the account is another type of currency, see Appendix 1 in *Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC* for the currency code to use.

**Fields 15\* and 16\* Other institution, entity or individual name, number and account number (where applicable, if this Part is applicable)**

Provide the name (including the identification number, if applicable) and account number of any other institution or individual related to the disposition of funds described in field 12, if applicable. For example, if cheques were involved in the transaction's disposition, you would provide the name and number of the financial institution in field 15, and the chequing account number in field 16.

Also provide any policy number related to the other institution, entity or individual, in field 16, if applicable.

If more than one other individual or institution was involved, attach a separate sheet with the information for fields 15 and 16 for each additional individual or institution. It is very important that you indicate clearly on the separate sheet that this information belongs in Part E2, and clearly indicate what applies to field 15 and what applies to field 16.

## **Part F: Information about the individual who conducted or proposed to conduct transaction(s) (where applicable)**

This part is for information about the individual who conducted the transaction, or who proposed to conduct the transaction.

If there is more than one transaction in this report, indicate to which property and which transaction this information applies by completing the “Property (number) Transaction (number)” area at the top of Part F. These numbers should be the same as the ones assigned to the transaction in Part E1. If there is more than one transaction to include in this report and they were not all conducted or proposed to be conducted by the same individual, complete a separate Part F for each individual. To do this, you can copy Part F. Complete the “Property (number) Transaction (number)” area at the top of Part F to distinguish between each individual who conducted or proposed to conduct a transaction.

### **Fields 1 to 3 Individual’s full name**

Enter the surname, given name and other name or initial (if known) of the individual who conducted or proposed to conduct the transaction.

### **Fields 1A to 3A Alias**

Enter any alias that you know is used by the individual named in fields 1 to 3.

### **Field 4 Entity client number (where applicable)**

Enter the client number you issued to the individual named in fields 1 to 3, if applicable.

### **Fields 5 to 9 Individual’s full address**

Enter the civic address, town or city, province or state, country and postal code of the individual named in fields 1 to 3.

### **Field 10 Country of residence**

Enter the country of permanent residence of the individual named in fields 1 to 3.

### **Field 11 Home telephone number**

Enter the home telephone number, including the area code, of the individual named in fields 1 to 3.

### **Field 12 Individual’s identifier**

Check the appropriate box to show the document used to identify the individual named in fields 1 to 3.

You can refer to an individual’s provincial health card, provided there is no provincial or territorial legislation preventing you from using or requesting it.

If the selections provided do not cover the identifier used, indicate “Other” and provide details in field 12F.

Please note that although a Social Insurance Number (SIN) card can be used for identification purposes for transactions such as the opening of an account, the SIN (i.e., the number) should not be provided on this form. If you used a SIN card and no other identifying document for the individual, indicate **SIN card** in the “Other” area of field 12, but do not provide the number in field 13.

**Field 13 ID number**

Enter the number of the document described in field 12 that was used to identify the individual named in fields 1 to 3. Remember that a Social Insurance Number is not acceptable for this purpose, and neither is a health card number in some provinces.

**Field 13A Citizenship**

Enter the name of the country of citizenship of the individual named in fields 1 to 3.

**Fields 14 and 15 Place of issue**

Enter the province or state and country of issue of the document used to identify the individual named in fields 1 to 3.

**Field 16 Date of birth**

Enter the date (yyyy-mm-dd) of birth of the individual named in fields 1 to 3.

**Field 17 Individual’s occupation**

Enter the occupation of the individual named in fields 1 to 3.

**Field 18 Individual’s business telephone number**

Enter the business telephone number, including the area code, of the individual named in fields 1 to 3. Include the extension, if applicable, at field 18A.

**Field 19 Individual’s employer**

Enter the name of the entity or individual who is the employer of the individual named in fields 1 to 3.

**Fields 20 to 24 Employer’s business address**

Enter the civic address, town or city, province or state, country and postal code of the employer of the individual named in fields 1 to 3.

**Field 25 Employer’s business telephone number**

Enter the business telephone number, including the area code, of the employer of the individual named in fields 1 to 3. Include the extension if applicable at field 25A.



## **Part G: Information about the entity on whose behalf the transaction was conducted or proposed to be conducted (where applicable)**

This part only applies if the transaction's disposition was conducted, or proposed to be conducted, on behalf of a third party other than an individual, as you indicated in Part E2, above field 12. This includes an entity such as a business, corporation or trust, or any other entity that is not an individual.

Complete a separate Part G for each entity on whose behalf a disposition was conducted or proposed to be conducted. To do this, you can copy Part G. Complete the "Property (number) Transaction (number) Disposition (number)" area at the top of Part G to distinguish between each disposition, based on the number you assigned the disposition in Part E2.

### **Field 1 Name of corporation, trust or other entity**

Enter the full name of the corporation, trust or other entity (such as a partnership, etc.) on whose behalf the transaction was conducted or proposed to be conducted.

### **Field 2 Type of business**

Describe the type of business for the entity named in field 1.

### **Fields 3 to 7 Full address of entity**

Enter the civic address, town or city, province or state, country and postal code of the entity named in field 1.

### **Field 8 Business telephone number**

Enter the telephone number, including the area code, of the entity named in field 1. Include the extension, if applicable, at field 8A.

### **Fields 9 to 11 Incorporation information (where applicable)**

Provide the incorporation number, where applicable, for the corporation named in field 1. Also provide the province or state and country of the incorporation number's place of issue.

### **Field 12 Signing authority names**

Provide the names of up to three individuals who have authority to conduct transactions through the account of the entity (if an account is involved in the transaction).

## **Part H: Information about the individual on whose behalf the transaction was conducted or proposed to be conducted (where applicable)**

This part only applies when the transaction's disposition was conducted, or proposed to be conducted, on behalf of a third party that is an individual, as you indicated in Part E2, above field 12.

If the individual conducted or proposed to conduct the transaction's disposition on his or her own behalf, this part does not apply. In that case, information about the individual should be provided in Part F. If the transaction's disposition was conducted on behalf of an entity (that is, not an individual), Part G should be completed.

Complete a separate Part H for each individual on whose behalf a disposition was conducted or proposed to be conducted. To do this, you can copy Part H. Complete the "Property (number) Transaction (number) Disposition (number)" area at the top of Part H to distinguish between each disposition, based on the number you assigned the disposition in Part E2.

### **Fields 1 to 3 Individual's full name**

Enter the last name, first name and middle initial (if applicable) of the individual on whose behalf the transaction was conducted or proposed to be conducted.

### **Fields 1A to 3A Individual's alias (where applicable)**

Enter any alias that you know is used by the individual named in fields 1 to 3.

### **Fields 4 to 8 Individual's full address**

Enter the civic address, town or city, province or state, country and postal code of the individual named in fields 1 to 3.

### **Field 9 Home telephone number**

Enter the home telephone number, including the area code, of the individual named in fields 1 to 3.

### **Field 10 Office telephone number**

Enter the office telephone number, including the area code, of the individual named in fields 1 to 3. Include the extension if applicable at field 10A.

### **Field 11 Date of birth**

Enter the date (yyyy-mm-dd) of birth of the individual named in fields 1 to 3.

### **Field 12 Individual's identifier**

Check the appropriate box to show the document used to identify the individual named in fields 1 to 3.

You can refer to an individual's provincial health card, provided there is no provincial or territorial legislation preventing you from using or requesting it.

If the selections provided do not cover the identifier used, indicate “Other” and provide details in field 12F.

Please note that although a Social Insurance Number (SIN) card can be used for identification purposes for transactions such as the opening of an account, the SIN (i.e., the number) should not be provided on this form. If you used a SIN card and no other identifying document for the individual, indicate **SIN card** in the “Other” area of field 12, but do not provide the number in field 13.

**Field 13 ID number**

Enter the number of the document described in field 15 that was used to identify the individual named in fields 1 to 3. Remember that a Social Insurance Number is not acceptable for this purpose, and neither is a health card number in some provinces.

**Fields 14 and 15 ID place of issue**

Enter the province or state and country of issue of the document used to identify the individual named in fields 1 to 3.

**Field 16 Country of residence**

Enter the country of permanent residence of the individual named in fields 1 to 3.

**Field 16A Citizenship**

Enter the name of the country of citizenship of the individual named in fields 1 to 3.

**Field 17 Individual’s occupation**

Enter the occupation of the individual named in fields 1 to 3.

**Field 18 Individual’s employer**

Enter the name of the entity or individual who is the employer of the individual named in fields 1 to 3.

**Fields 19 to 23 Employer’s business address**

Enter the civic address, town or city, province or state, country and postal code of the employer of the individual named in fields 1 to 3.

**Field 24 Employer’s business telephone number**

Enter the business telephone number, including the area code, of the employer of the individual named in fields 1 to 3. Include the extension if applicable at field 24A.

**Field 25 Relationship of the individual named in Part F to the individual named above (fields 1 to 3)**

Check the appropriate box to indicate the relationship of the individual who conducted or proposed to conduct the transaction (that is, the individual named in fields 1 to 3 of Part F) to the individual named in fields 1 to 3 (of Part H).

If none of the selections provided cover the relationship, indicate “Other” and provide details in field 25J.

## **5 Comments?**

These guidelines will be reviewed on a periodic basis. If you have any comments or suggestions to help improve them, please send your comments to the mailing address provided below, or by email to [guidelines@fintrac.gc.ca](mailto:guidelines@fintrac.gc.ca).

## **6 How to Contact FINTRAC**

For further information on FINTRAC and its activities, and report submission, please go to FINTRAC's Web site (<http://www.fintrac.gc.ca>) or contact FINTRAC:

Financial Transactions and Reports Analysis Centre of Canada  
234 Laurier Avenue West, 24<sup>th</sup> floor  
Ottawa, Ontario  
Canada K1P 1H7

Toll-free: 1-866-346-8722