



Financial Transactions and  
Reports Analysis Centre  
of Canada

Centre d'analyse des opérations  
et déclarations financières  
du Canada

## **Guideline 3B: Submitting Suspicious Transaction Reports to FINTRAC by Paper**

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**December 2016**

This replaces the previous version of *Guideline 3B: Submitting Suspicious Transaction Reports to FINTRAC by Paper* issued in July 2016. The Upcoming changes made to this guideline are described below.

- Field B1.11, “ID number of the person initially identifying a suspicious transaction”, will be removed. As of June 17, 2017, FINTRAC will no longer collect this information
- Regulatory amendments come into force on June 17, 2017, that clarify what is to be reported in fields for information about individual clients and corporations. Fields D14, D15, F15 and F16 will refer to “jurisdiction” of issue instead of “place” of issue. Fields E10 and E11 will refer to “jurisdiction” of incorporation instead of “place” of incorporation.

The field descriptions will be updated to reflect these changes once they are in force in June 2017.

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# 1 General

The objective of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (the Act) is to help detect and deter money laundering and the financing of terrorist activities. It is also to facilitate investigations and prosecutions of money laundering and terrorist activity financing offences. This includes reporting, record keeping, client identification and compliance regime requirements for individuals and entities described in section 2.

If you are such an individual or entity, this guideline has been prepared to help you submit suspicious transaction reports by paper. 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.

This guideline uses plain language to explain the most common reporting situations under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* as well as 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. There are two different versions of Guideline 3, by reporting method.
- *Guideline 4: Implementation of a Compliance Regime* explains the requirement for reporting 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 entities when and how to submit terrorist property reports.
- *Guideline 6: Record Keeping and Client Identification* explains the requirement for reporting entities to identify their clients and keep records. There are several different versions of Guideline 6, with each one applicable to a particular sector.

- *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC* explains when and how to submit large cash transaction reports. There are two different versions of Guideline 7, by reporting method.
- *Guideline 8: Submitting Electronic Funds Transfer Reports to FINTRAC* explains when and how to submit electronic funds transfer reports. There are three different versions of Guideline 8, by type of electronic funds transfer and reporting method.
- *Guideline 9: Submitting Alternative to Large Cash Transaction Reports to FINTRAC* explains when and how financial entities can choose the alternative to large cash transaction reports. This is only applicable to financial entities.
- *Guideline 10: Submitting Casino Disbursement Reports to FINTRAC* explains when and how to submit casino disbursement reports. There are two different versions of Guideline 10, by reporting method.

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 this guideline, 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. The links provided are based on information available at the time of publishing of this guideline.

Throughout this guideline, any references to dollar amounts (such as \$10,000) refer to the amount in Canadian dollars or its equivalent in foreign currency. Furthermore, all references to cash mean money in circulation in any country (bank notes or coins). In this context, cash does not include cheques, money orders or other similar negotiable instruments.

For information about what is a suspicious transaction, please refer to *Guideline 2: Suspicious Transactions*.

## **2 Who Has to Send a Suspicious Transaction Report to FINTRAC?**

If you are one of the following individuals or entities (called reporting entities), you must report suspicious transactions to FINTRAC.

### **2.1 Financial entities**

Financial entities are banks (that is, those listed in Schedule I or II of the *Bank Act*) or authorized foreign banks with respect to their operations in Canada, credit unions, caisses populaires, financial services cooperatives, credit union centrals (when they offer financial services to anyone other than a member entity of the credit union central), trust companies, loan companies and agents of the Crown that accept deposit liabilities.

If you are a financial entity and you have foreign subsidiaries or foreign branches, the suspicious transaction reporting requirement does not apply to their operations outside Canada.

### **2.2 Life insurance companies, brokers and agents**

A life insurance company means one regulated by provincial legislation, or a life company or foreign life company under the *Insurance Companies Act*. A life insurance broker or agent means an individual or entity registered or licensed provincially to carry on the business of arranging contracts of life insurance.

If you are a life insurance company and you have foreign subsidiaries or foreign branches, the suspicious transaction reporting requirement does not apply to their operations outside Canada.

### **2.3 Securities dealers**

A securities dealer is an individual or entity authorized under provincial legislation to engage in the business of dealing in securities or any other financial instruments or to provide portfolio management or investment advising services.

If you are a securities dealer and you have foreign subsidiaries or foreign branches, the suspicious transaction reporting requirement does not apply to their operations outside Canada.

### **2.4 Money services businesses**

A money services business means an individual or entity engaged in the business of any of the following activities:

- foreign exchange dealing;

- remitting or transmitting funds by any means or through any individual, entity or electronic funds transfer network; or
- issuing or redeeming money orders, traveller's cheques or other similar negotiable instruments. This does not include redeeming cheques payable to a named individual or entity. In other words, cashing cheques made out to a particular individual or entity is not included.

Money services businesses include alternative money remittance systems, such as Hawala, Hundi, Chitti, etc.

For more information about who is engaged in the money services business, see the FINTRAC Interpretation Notice No. 1, available under "General publications" on the Publications page of FINTRAC's Web site (<http://www.fintrac-canafe.gc.ca>).

## **2.5 Agents of the Crown**

Agents of the Crown are government departments or agents of her Majesty in right of Canada or of a province. If you are an agent of the Crown that sells or redeems money orders in the course of providing financial services to the public, you are subject to the reporting requirements explained in this guideline.

If you are an agent of the Crown that accepts deposit liabilities in the course of providing financial services to the public, such as a provincial savings office, you are considered a financial entity (see subsection 2.1).

If you are an agent of the Crown that sells precious metals to the public, you are considered a dealer in precious metals and stones (see subsection 2.9).

## **2.6 Accountants and accounting firms**

An accountant means a chartered accountant, a certified general accountant or a certified management accountant. An accounting firm means an entity that is in the business of providing accounting services to the public and that has at least one accountant who is a partner, an employee or an administrator.

If you are an accountant or an accounting firm, you are subject to the reporting requirements explained in this guideline when conducting any of the following activities on behalf of any individual or entity (other than your employer) or giving instructions in respect of those activities on behalf of any individual or entity (other than your employer):

- receiving or paying funds;
- purchasing or selling securities, real property or business assets or entities; or
- transferring funds or securities by any means.

You are not subject to these obligations for the receipt of professional fees. This means that the receipt of professional fees does not trigger your obligations. However, you are subject to the reporting requirements when you engage in any of the activities mentioned above, regardless of whether or not you received any fees or have a formal letter of engagement to do so. In other words, you are subject to the obligations even if you were doing the activities on a volunteer basis.

Activities of accountants or accounting firms other than those listed above, such as audit, review or compilation engagements carried out according to the recommendations in the Canadian Institute of Chartered Accountants (CICA) Handbook, do **not** trigger reporting obligations.

Giving advice to a client, in the context of your accountant-client relationship, is not considered providing instructions. If you need further clarification about this, refer to FINTRAC Interpretation Notice No. 2, available under “General Publications” on the Publications page of FINTRAC’s Web site (<http://www.fintrac-canafe.gc.ca>).

Providing bankruptcy services or acting as an insolvency practitioner does not trigger reporting obligations. If you need further clarification about this, refer to FINTRAC Interpretation Notice No. 7, available under “General Publications” on the Publications page of FINTRAC’s Web site.

## **2.7 Real estate**

### **Real estate brokers or sales representatives**

Real estate brokers or sales representatives are individuals or entities that are registered or licensed in a province to sell or purchase real estate. They are subject to the reporting requirements explained in this guideline when they act as an agent regarding the purchase or sale of real estate. This includes the buying or selling of land, buildings, houses, etc. Such activities trigger these obligations whether or not the real estate broker or sales representative gets a commission for the real estate transaction and whether or not they have fiduciary duties regarding it.

If you are a real estate broker or sales representative, these obligations do not apply to you for activities related to property management. This means that if you only deal in property management transactions, such as leases or rental management, not purchases or sales, the obligations explained in this guideline do not apply to you.



## **Real estate developers**

A real estate developer means an individual or an entity other than a real estate broker or sales representative, who in any calendar year after 2007 has sold one of the following to the public:

- at least five new houses or condominium units;
- at least one new commercial or industrial building;
- at least one new multi-unit residential building each of which contains five or more residential units; or
- at least two new multi-unit residential buildings that together contain five or more residential units.

If you are a real estate developer, you are subject to the reporting requirements explained in this guideline when you sell any of the following to the public:

- a new house;
- a new condominium unit;
- a new commercial or industrial building; or
- a new multi-unit residential building.

If you are an entity that is a corporation, you are subject to this whether you sell those buildings on your own behalf or on behalf of a subsidiary or affiliate. In this context, an entity is affiliated with another entity if one of them is wholly-owned by the other, both are wholly-owned by the same entity or their financial statements are consolidated.

## **2.8 Casinos**

Casinos are those authorized by a Canadian provincial, territorial or federal government to do business and that conduct their business in a permanent establishment. It only includes those where roulette or card games are played in the establishment, or where there is a slot machine. For these purposes, a slot machine does not include a video lottery terminal.

Registered charities may be authorized to carry on business temporarily as a casino for charitable purposes. If this type of business is carried out in the establishment of a casino for no more than two consecutive days at a time under the supervision of the casino, the activities are considered to be the supervising casino's. In this case, the supervising casino is responsible for the reporting requirements and other obligations related to the charity casino.

## **2.9 Dealers in precious metals and stones**

A dealer in precious metals and stones (DPMS) means an individual or an entity that buys or sells precious metals, precious stones or jewellery, in the course of its business activities. Precious metals include gold, silver, palladium or platinum whether in coins, bars, ingots, granules or in any other similar form. Precious stones include diamonds, sapphires, emeralds, tanzanite, rubies or alexandrite.

Jewellery means objects made of precious metals, precious stones or pearls intended for personal adornment.

If you are a DPMS, you are subject to the reporting requirements explained in this guideline if you engage in the purchase or sale of precious metals, precious stones or jewellery in an amount of \$10,000 or more in a single transaction. However, you are not subject to the reporting requirements when you engage in a purchase or sale carried out for, in connection with, or for the purpose of manufacturing jewellery, extracting precious metals or precious stones from a mine or cutting or polishing precious stones.

An agent of the Crown (that is, a government department or an agent of her Majesty in right of Canada or of a province) is considered to be a DPMS when it sells precious metals to the public in an amount of \$10,000 or more in a single transaction.

## **2.10 British Columbia notaries**

A British Columbia notary means a British Columbia notary public or a British Columbia notary corporation. In this context, a notary public means an individual who is a member of the Society of Notaries Public of British Columbia. Also in this context, a notary corporation means an entity that provides notary services to the public in British Columbia under the *Notaries Act* of that province.

If you are a British Columbia notary, you are subject to the reporting requirements explained in this guideline when you engage in any of the following activities on behalf of any individual or entity (other than your employer), or give instructions on behalf of any individual or entity (other than your employer):

- receiving or paying funds (other than those received or paid for professional fees, disbursements, expenses or bail);
- purchasing or selling securities, real property or business assets or entities; or
- transferring funds or securities by any means.

## **2.11 Employees of a reporting entity**

For the purposes of suspicious transactions only, an employee of any of the reporting entities described above is also a “reporting entity”. This requires you to make a report to FINTRAC about a suspicious transaction unless you reported it to your superior.

If you are an employee and you have to submit a suspicious transaction report on your own behalf (that is, not on behalf of your employer), this guideline will explain how to submit the report.

## 3 Suspicious Transaction Reporting Requirements

### 3.1 Suspicious transaction reporting timelines

If you are a reporting entity as described in section 2, you have to send a suspicious transaction report to FINTRAC when there are reasonable grounds to suspect that a transaction or an attempted transaction is related to the commission or the attempted commission of a money laundering offence or a terrorist financing offence.

There is no minimum threshold amount for reporting a suspicious transaction. *Guideline 2: Suspicious Transactions* has more information on how to identify a suspicious transaction.

You have to submit suspicious transaction reports to FINTRAC, containing specific information (see section 5). Once you have determined that there are reasonable grounds to suspect that the transaction or attempted transaction is related to a money laundering or terrorist financing offence, your report, including all required and applicable information, must be sent within 30 calendar days.

This 30-day reporting time limit begins when you or any one of your employees first detects a fact about a transaction that constitutes reasonable grounds to suspect that it is related to the commission of a money laundering or terrorist financing offence. If such a fact is detected at the time of the transaction, the reporting timeline begins at the time of the transaction. However, if the fact is not detected at the time of the transaction, the 30-day time limit could begin at some time after. For example, if the fact were detected during a review by corporate security after the transaction took place, the 30-day time limit would begin when corporate security first detected the fact.

### 3.2 Other reports

Information about other reporting requirements under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* that apply to reporting entities can be found in the following guidelines:

- *Guideline 5: Submitting Terrorist Property Reports to FINTRAC*
- *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC*
- *Guideline 8: Submitting Electronic Funds Transfer Reports to FINTRAC*
- *Guideline 10: Submitting Casino Disbursement Reports to FINTRAC*

### 3.3 Means of reporting to FINTRAC

#### Electronic reporting

As a reporting entity, you have to submit all reports on suspicious transactions to FINTRAC **electronically** if you have the technical capabilities to do so. The minimum technical capabilities are as follows:

- A personal computer with the following characteristics:
  - 32 MB memory
  - 640 x 480 VGA video display (800 x 600 or higher is preferable)
  - any operating system running a Web browser, such as Internet Explorer (version 5.x or greater) or its equivalent; and
- An Internet connection

See *Guideline 3A: Submitting Suspicious Transaction Reports to FINTRAC Electronically* for more information on submitting reports to FINTRAC electronically.

#### Exception for employees and suspicious transaction reports

If you are an employee of a reporting entity, you are a “reporting entity” yourself, for the purposes of suspicious transactions **only**. This requires you to make a report to FINTRAC about a suspicious transaction unless you reported it to your superior. In this situation, if you need to make a report about a suspicious transaction that you did not report to your superior, you are considered **not** to have the technical capabilities to report electronically. This means you must submit this type of report by paper, as explained below.

This exception does not apply if you are submitting a suspicious transaction report on behalf of your employer or anyone else that is a reporting entity.

#### Paper reporting

If you do **not** have the technical capabilities to send reports electronically, you must submit reports on paper. See section 4 for more information on submitting reports to FINTRAC by paper.

### 3.4 Information to be contained in a suspicious transaction report

Your suspicion about there being a relation to a money laundering or a terrorist financing offence may be as a result of more than one transaction. In this case, include all the transactions that contributed to your suspicion in the same report.

By completing all applicable fields in your reports, you make an important contribution to FINTRAC’s ability to isolate activity pointing to possible money laundering or terrorist activity financing. In the case of a suspicious transaction

report, your detailed explanation of what led to the suspicion is also extremely important to FINTRAC's analysis.

See section 5 for more information about what has to be included in a suspicious transaction report.

### **3.5 Suspicious transaction report records**

When you have to report a suspicious transaction to FINTRAC, you have to keep a copy of the report. See *Guideline 6: Record Keeping and Client Identification* for more information about obligations related to keeping records.

## **4 Paper Reporting**

### **4.1 How to complete paper reports**

If you do **not** have the technical capability (see subsection 3.3), you have to submit paper reports to FINTRAC. In this case, forms are available for paper filing as follows:

- A file can be accessed and printed from the Publications section (choose "Reporting forms" from "Reporting publications") of FINTRAC's Web site (<http://www.fintrac-canafe.gc.ca>). 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 reports (e.g., Part G) were completed using word-processing equipment or a typewriter. For reports completed by hand, the use of black ink and CAPITAL LETTERS is recommended.

See section 5 for completion instructions. It includes details of what each field must contain for a suspicious transaction report and indicates which parts of the form you may need to make copies of before you complete your report.

## 4.2 How to send paper reports to FINTRAC

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

- 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 K1P 1H7  
Canada

You may send your report by regular mail to the FINTRAC address above. However, FINTRAC will not send you any acknowledgement when your paper report has been received.

## 5 Instructions for Completing a Suspicious Transaction Report

The fields in this section correspond with the paper form called the *Suspicious Transaction Report*. As explained in subsection 3.3, completing a paper report is only permitted if you do not have the capability to report electronically.

Fields in reports are either mandatory, mandatory if applicable, or require “reasonable efforts” to complete, as follows:

- **Mandatory:** All fields of a report marked with an asterisk (\*) **have to be completed.**
- **Mandatory if applicable:** The fields that have both an asterisk and “if applicable” next to them have to be completed if they are applicable to you or the transaction being reported.
- **Reasonable efforts:** For all other fields that do not have an asterisk, 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. If the information was not available at the time of the transaction, and it is not contained in your files or records, the field may be left blank.

In certain circumstances, only as directed in the instructions for certain fields, if you need to indicate that a required field in a report is not applicable, enter “N/A” or “n/a”. Do not substitute any other abbreviations, special characters (for example, “x”, “-” or “\*”) or words (for example, “unknown”).

When completing the paper form, enter the date and time when you begin completing it 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 4.

There are eight parts on the *Suspicious Transaction Report* form, but some are only to be completed if applicable. To report a suspicious transaction, follow the following five steps:

- Step 1 — Complete Part A to provide information about the reporting entity and about where the transaction took place or was attempted.
- Step 2 — Complete Part B1 to provide details about the transaction.
- Step 3 — Complete Part B2 to provide details about the transaction's disposition. If the transaction's disposition was related to an account, also complete Part C. If the transaction's disposition was on behalf of a business, a corporation or other entity (other than an employee depositing cash into his or her employer's business account), also complete Part E. If the transaction's disposition was on behalf of an individual (other than an employee depositing cash into his or her employer's business account), complete Part F.

If there was more than one disposition for the transaction, repeat this step for each disposition.

- Step 4 — Complete Part D to provide information about the individual conducting or attempting to conduct the transaction.
- Step 5 — Complete Part G to explain the reason for your suspicion. In the case of a report about attempted transactions, this must include the reason why they were not completed. Also, complete Part H to provide information about any action taken, if applicable.

If you have to include more than one transaction in your report, repeat steps 2, 3 and 4 for each one. You may need to use extra copies of Parts B1, B2, C, D, E or F to complete your report.

The rest of this section will cover each part of the *Suspicious Transaction Report* form.

### **Transaction status indicator**

To report a **completed** transaction, check "Completed" as the transaction status indicator. This applies to the entire report, so you should not include any other transactions in this report if they were attempted.

To report an **attempted** transaction, check “Attempted” as the transaction status indicator. This applies to the entire report, so you should not include any other transactions in this report if they were completed.

If you need more information about when a transaction is completed or attempted, see *Guideline 2: Suspicious Transactions*.

### **Part A: Information about where the transaction took place**

This part is for information about the reporting entity required to report the transaction to FINTRAC. It is also for information about the physical location where the transaction took place or was attempted.

If you need more information about what type of individual or entity is a reporting entity, see section 2 of this guideline.

If you have multiple branch or office locations, the information in this part should refer to the branch or office location where the transaction took place or was attempted. Transactions that happened or were attempted at different branch or office locations should be reported on separate reports.

Some reporting entities have contractual arrangements with someone outside their entity to conduct transactions on their behalf. For example, a money services business arranges for transactions, such as electronic funds transfers, to be conducted for them at a grocery store. If you have this type of arrangement, as the reporting entity, your name belongs in Part A. However, since the transaction was conducted at someone else’s place of business, it is that address that must appear in Part A.

If you are an **employee** of a reporting entity and you are making this report about a suspicious transaction that you did **not** report to your superior, there are special instructions for you to complete several of the fields in this part.

### **Field A1\* Reporting entity’s identifier number (if applicable)**

This is the institution or licence number, or other identification number for the reporting entity, as outlined below. If you are a reporting entity that has several branch locations, the identification number should refer to the branch or office where the transaction occurred.

- 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 an **agent of the Crown that sells or redeems money orders**, enter your post office or similar number.
- If you are a **life insurance broker or agent**, enter your provincial broker or agent licence number.
- If you are a **federally regulated life insurance company**, enter your Office of the Superintendent of Financial Institutions (OSFI) Institution Code.
- If you are a **life insurance company that is not federally regulated**, enter your provincial licence 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 licence 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 **money services business**, enter your money services business registration number issued by FINTRAC.
- If you are a **dealer in precious metals and stones**, leave this field blank.
- If you are a **British Columbia public notary**, enter your membership number. If you are a **notary corporation of British Columbia**, enter your permit number.
- If you are a **real estate developer**, enter your provincial licence number if you have one. Otherwise, leave this field blank.

If you are an **employee** of a reporting entity and you are making this report about a suspicious transaction that you did **not** report to your superior, enter “**EMPLOYEE**” in field A1.

#### **Field A2\* Reporting entity’s full name**

Enter the full legal name of the business or corporation that is the reporting entity. If you are a reporting entity that does not have a business name (for example, you are a reporting entity that is an individual), enter your full name.

If you are an **employee** of a reporting entity and you are making this report about a suspicious transaction that you did **not** report to your superior, enter your **own** name in field A2.

#### **Fields A3\* to A6\* Reporting entity’s full address**

Enter the civic address, town or city, province and postal code where the transaction took place or was attempted. If you have more than one

location, this information should refer to where the transaction took place or was attempted. As explained above, transactions that happened at different branch or office locations should be reported on separate reports.

If you are an **employee** of a reporting entity and you are making this report about a suspicious transaction that you did **not** report to your superior, enter the complete address of where the transaction took place or was attempted in fields A3 to A6.

**Field A6A Reporting entity report reference number**

If you use a reference number for your own internal purposes, you can enter it in your report to FINTRAC. This field can contain up to 20 alpha or numeric characters and must be unique for each of your reporting entity's reports.

If you do not wish to use such an internal reference number, leave this field empty.

**Fields A7\*, A8\* and A9 Contact name**

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

If you are an **employee** of a reporting entity and you are making this report about a suspicious transaction that you did **not** report to your superior, enter your **own** contact information in these fields.

**Field A10\* Contact telephone number**

Enter the telephone number, including the area code, of the individual FINTRAC can contact for clarification. Include the extension if applicable in field A10A.

**Field A11\* Which one of the following types of reporting entities best describes you?**

Enter the type of activity applicable to you. If you are involved in more than one activity type, indicate the one applicable to the transaction being reported. If there is more than one activity for one or more transactions on the report, check only one box to indicate your principal type of activity, and provide additional details in Part G.

If you are an **employee** of a reporting entity and you are making this report about a suspicious transaction that you did **not** report to your superior, enter they type of reporting entity **for your employer** in this field.

### **Part B1: Information about how the transaction was initiated**

This part is for information about how the transaction was initiated (i.e., where the money came from) for the transaction that led you to the suspicion of a connection to money laundering or terrorist financing. In the case of an attempted transaction, this would include information about how it was proposed to be initiated.

Your suspicion could be based on a series of transactions. In that case, include in this report the information for each transaction that led to the suspicion.

When you need to report more than one transaction, complete a separate Part B1 for each transaction. To do this, you can copy Part B1. Fill in the "Transaction \_\_\_ of \_\_\_" area at the top of Part B1 to distinguish between each transaction. When you provide the details of the transaction in Part D, the details of disposition in Part B2, as well as the additional details of disposition in Parts C, E, and F, as applicable, indicate to which transaction that information applies.

### **Fields B1\*, B2 and B3\* When the transaction took place**

Enter the date (yyyy-mm-dd) and time (hh:mm:ss) of the suspicious transaction. Use a 24-hour format for time. For example, enter "15:30:00" to represent 3:30 p.m.

The time of the transaction (field B2) can be left blank if it is not available from the moment of the transaction or in your records.

The date of the transaction (field B1) is mandatory. However, if the transaction was a night deposit, and you do not provide the date, you can leave field B1 blank. In this case, make sure to indicate that it was a night deposit at field B3.

If the transaction being reported was attempted and, because of this, information for field B1 or B3 is not available, you can leave the field blank.

### **Field B4 Date of posting**

Enter the date (yyyy-mm-dd) the transaction cleared, if this differs from the date of the transaction provided above. In the case of an attempted transaction, this field would not apply.

### **Field B5\* Detail of funds involved in initiating transaction**

Check the appropriate box to describe the type of funds involved in initiating the transaction. For example, if your client brought in cash, "Cash in" is the type of funds, or if your client is cashing in a life insurance policy, "Negotiated life insurance policy" is the description of funds. If the selections provided do not cover the particular transaction, indicate "Other" and provide details in the field provided. For example, if annuities were

involved in initiating the transaction, indicate “Other” and provide information about the type of annuity in the “Other” field.

If there was more than one type of funds, indicate only one that best represents how the transaction was initiated. Provide information about the rest of the types of funds in Part G.

If the transaction being reported was attempted and, because of this, information for field B5 is not available, you can leave the field blank.

If you are a dealer in precious metals and stones, select the type of funds in field B5 that best describes what you received in the transaction, or what you were supposed to receive in an attempted transaction. If you were buying precious metals or stones, indicate the type of funds that best describes what you bought or attempted to buy. The same would apply if you were to receive precious metals or stones from a client for a trade-in sale. If you were selling precious metals or stones to a client, indicate the type of funds based on how the client paid or attempted to pay. For example, if the client paid cash, indicate “cash in” or if the client paid by debit card or credit card, indicate “Other” and provide details in the “Other” field.

**Field B6\* Amount of transaction**

Enter the total amount of funds involved in the transaction. This is the total amount received to start the transaction. What happens as a result of that amount will be explained in Part B2 as one or more dispositions.

If this amount was not in Canadian funds, you do not have to convert it but you have to provide the currency information in field B7.

If the transaction being reported was attempted and, because of this, information for field B6 is not available, you can leave the field blank.

**Field B7\* Transaction currency code**

Enter the currency code applicable to the transaction, even if it was in Canadian funds. Enter CAD for Canadian dollars or USD for United States dollars. If the transaction was in another type of currency, see the list of [currency codes](#).

If the transaction being reported was attempted and, because of this, information for field B7 is not available, you can leave the field blank.

**Fields B8\* and B9\* Other institution, entity or person name, number and account number (if applicable)**

These fields are for additional information about the funds described in field B5. Where applicable, in field B8, provide the name (including the

institution identification number if applicable) of any other institution, entity or individual involved in the transaction. In addition, where applicable, in field B9, provide the account number of any other individual or entity involved in the disposition. If more than one other individual or institution was involved, put the information about the others in Part G.

**Field B10\* How was the transaction was conducted?**

Check the appropriate box to indicate how the transaction was conducted or attempted. For example, if the transaction was done through an automated banking machine, check that box. If the selections provided do not cover this particular transaction, indicate "Other" and provide details in the field provided.

If the transaction being reported was attempted and, because of this, information for field B10 is not available, you can leave the field blank.

**Field B11 ID number of the person initially identifying a suspicious transaction**

Enter the identification number of the individual who first identified the suspicious behaviour leading to the report. If that individual does not have an ID number, this field may be left blank.

## **Part B2: Information about how the transaction was completed**

This part is for information about how the transaction was completed (i.e., where the money went). In the case of an attempted transaction, this would include information about how it was proposed to be completed.

### **“On behalf of” indicator**

At the top of Part B2, you have to indicate whether the individual who conducted or attempted the transaction was doing so on anyone else’s behalf. You have to select one of the following for this entry:

- **Not applicable**  
This means that **neither** Part E **nor** Part F applies to this report. “Not applicable” indicates that, to your knowledge, none of the other “On behalf of” selections is applicable to the transaction. For example, the transaction was a night deposit or a quick drop, or the disposition was not on anyone else’s behalf (i.e., it was on behalf of the individual that conducted or attempted it).
- **On behalf of an entity**  
This indicates that the disposition was on behalf of an entity, such as a business, a partnership, a corporation, a trust or other entity, but was **not** an employee depositing cash to his or her employer’s business account. For a transaction that was conducted or attempted on behalf of an entity, complete Part E for this report to provide the information about that entity.
- **On behalf of another individual**  
This indicates that the disposition was on behalf of another individual but was **not** an employee depositing cash to his or her employer’s business account. For a transaction that was conducted or attempted on behalf of another individual, complete Part F to provide the information about that other individual.
- **Employee depositing cash to employer’s business account**  
This indicates that the disposition was an employee depositing cash to his or her employer’s **business** account. If it was an employee depositing cash to his or her employer’s business account, **neither** Part E **nor** Part F applies for this report. Do not use this indicator if the employee deposited other than cash or if the employer’s account was other than a business account.

### **More than one disposition**

There could be more than one disposition for a particular transaction. For example, your client could initiate a transaction in cash, send an electronic funds transfer (EFT) for part of it (disposition 1), order a bank draft for another part (disposition 2) and deposit the rest (disposition 3). In that case, make sure you include the information for each disposition. If you are including more than one

transaction in this report, you have to complete Part B2 for all dispositions for each transaction.

If you have to include more than one disposition, complete a separate Part B2 for each one. To do this, you can copy Part B2. Fill in the “Transaction \_\_\_\_ Disposition \_\_\_\_ of \_\_\_\_” area at the top of Part B2 to distinguish between each disposition. If you have to include more than one transaction in this report, indicate to which transaction the disposition information applies, based on the number you assigned the transaction in Part B1. When you provide the details of disposition in Parts C, E, and F, as applicable, also indicate to which disposition and which transaction that information applies.

### **Field B12\* Disposition of funds**

This describes what happened to the funds involved in the transaction.

If the disposition of funds was a life insurance policy purchase or deposit, check that box and provide the life insurance policy number in the appropriate field. If the selections provided do not cover this particular disposition, indicate “Other” and provide details in the appropriate field.

If the transaction being reported was an employee depositing cash to an employer’s business account (as indicated by the “on behalf of” indicator at the top of Part B2), the disposition of funds in field B12 should be “deposit to an account”.

If the transaction being reported was attempted and, because of this, information for field B12 is not available, you can leave the field blank.

If you are a dealer in precious metals and stones, select the disposition of funds in field B12 that best describes what you paid or sold (or what you attempted to pay or sell) to the conductor of the transaction. If you were buying precious metals or stones, select the disposition of funds that best describes how you paid or attempted to pay for them. For example, if you paid in cash, indicate “cash out” or if you paid by cheque, indicate “Other” and provide details in the “Other” field. If you were selling precious metals or stones (including a trade-in sale), select the disposition of funds that best describes what your client purchased or attempted to purchase.

### **Field B13\* Amount of disposition**

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 have to provide the currency information in field B14.

If the transaction being reported was attempted and, because of this, information for field B13 is not available, you can leave the field blank.

**Field B14\* Disposition currency code**

Enter the code for the currency of the disposition, even if it was in Canadian funds. Enter CAD for Canadian dollars or USD for United States dollars. If the transaction was in another type of currency, see the list of [currency codes](#).

If the transaction being reported was attempted and, because of this, information for field B14 is not available, you can leave the field blank.

**Fields B15\* and B16\* Other institution, entity or person name, number and account or policy number (if applicable)**

These fields are for additional information about the disposition described in field B12. Where applicable, in field B15, provide the name (including the institution identification number if applicable) of any other institution, individual or entity involved in the disposition. In addition, where applicable, in field B16, provide the account number of any other individual or entity involved in the disposition. Also provide any policy number related to the other entity or individual in field B16, if applicable.

If more than one other individual, entity or institution was involved, put the information about the others in Part G.



**Part C: Account information, if the transaction involved an account**

This part is for information about the account involved in the transaction, if it in fact involved an account. In the case of an attempted transaction, this would include information about the account that was proposed to be involved.

As explained earlier, it is possible to have more than one transaction per report, and more than one disposition per transaction. Provide the account information, if applicable, for each disposition included in the report.

If you have to include account information for more than one disposition, complete a separate Part C to provide information for each account involved. To do this, you can copy Part C. Fill in the “Transaction \_\_\_\_ Disposition \_\_\_\_” area at the top of Part C to distinguish between each disposition, based on the number you assigned the disposition in Part B2.

**Field C1\* Branch or transit number where the account is held (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 an account is applicable to the transaction.

If the transaction being reported was attempted and, because of this, information for field C1 is not available, you can leave the field blank.

**Field C2\* Account number (if this part is applicable)**

Enter the number of the relevant account.

If the transaction being reported was attempted and, because of this, information for field C2 is not available, you can leave the field blank.

**Field C3\* Type of account (if this part is applicable)**

Indicate the type of the relevant account. For example, a business account would be one that, at the time it was opened, was for a business or for a non-profit organization, etc. (i.e., other than a personal or trust account). If the selections “personal, business or trust” do not cover this particular account, indicate “Other” and provide details in the field provided.

If the transaction being reported was an employee depositing cash to an employer’s business account (as indicated by the “on behalf of” indicator at the top of Part B2), the account type in field C3 should be “business”.

If the transaction being reported was attempted and, because of this, information for field C3 is not available, you can leave the field blank.

**Field C4\* Account currency code (if this part is applicable)**

Enter the code of the currency for the relevant account. Enter CAD for Canadian dollars or USD for United States dollars. If the account is in another type of currency, see the list of [currency codes](#).

If the transaction being reported was attempted and, because of this, information for field C4 is not available, you can leave the field blank.

**Field C5\* Full name of the individual(s) or entity that hold the account (if this part is applicable)**

Enter the full name of each account holder (up to three).

This is for information about each individual or entity that holds the account. For example, in the case of a joint account for husband and wife, include the names of each spouse at field C5.

The account holder might be different from the individual(s) authorized to give instructions for the account. For example, an account for a corporation will have one or more individuals authorized to give instructions for that account. In this case, it is the name of the corporation that holds the account that is required in field C5. Information about individuals authorized to bind the entity or to act with respect to the account belongs in Part E, if applicable, in field E12.

If the transaction being reported was attempted and, because of this, information for field C5 is not available, you can leave the field blank.

**Field C6 Date opened**

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

**Field C7 Date closed**

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

**Field C8\* Status of the account at the time the transaction was initiated (if this part is applicable)**

Indicate whether the account was active, inactive or dormant at the time the transaction was initiated.

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.

If the transaction being reported was attempted and, because of this, information for field C8 is not available, you can leave the field blank.

## **Part D: Information about the individual conducting the transaction**

This part is for information about the individual who conducted or attempted to conduct the transaction. As explained earlier, it is possible to have more than one transaction per report. Provide this information for each transaction included in the report.

If you need to report more than one transaction, complete a separate Part D for each transaction. To do this, you can copy Part D. Fill in the “Transaction \_\_\_\_” area at the top of Part D to distinguish between each transaction, based on the number you assigned the transaction in Part B1.

If you are a dealer in precious metals and stones, the individual who conducted or attempted to conduct the transaction is the one from whom you were buying or to whom you were selling precious metals or stones.

### **Fields D1 to D3 Individual’s full name**

Enter the last name, first name and middle initial (if applicable) of the individual who conducted or attempted to conduct the transaction.

### **Field D4\* Entity client number (if applicable)**

Enter the client number you issued to the individual who conducted or attempted to conduct the transaction, if applicable.

### **Fields D5 to D9 Individual’s full address**

Enter the civic address, town or city, province or state, country and postal code of the individual who conducted or attempted to conduct the transaction.

### **Field D10 Country of residence**

Enter the country of permanent residence of the individual who conducted or attempted to conduct the transaction.

### **Field D10A Country of citizenship**

Enter the country of citizenship of the individual who conducted or attempted to conduct the transaction.

### **Field D11 Home telephone number**

Enter the home telephone number, including the area code, of the individual who conducted or attempted to conduct the transaction.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: “999-999-9999”.

If the number is from outside Canada or the United States, provide the country code, city code and local number components. As each of those

components can vary in length, use a dash (-) to separate each one. For example, “99-999-9999-9999” would indicate a two-digit country code, a three-digit city code and an eight digit local number.

**Field D12 Individual’s identifier**

Check the appropriate box to show the document used to identify the individual who conducted or attempted to conduct the transaction.

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 the field provided.

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 D12, but do not provide the number in field D13.

**Field D13 ID Number**

Enter the number of the document described in field D12 that was used to identify the individual who conducted or attempted to conduct the transaction. Remember that a health card number is not acceptable for this purpose in some provinces. Furthermore, as explained above, a SIN should not be provided on this form. If the identifier document in field D12 (and D12A) is a SIN card, enter “N/A” in field D13 to indicate the number is not applicable.

**Fields D14 and D15 Place of issue of individual’s identifier**

Enter the province or state and country of issue of the document used to identify the individual who conducted or attempted to conduct the transaction. If the document was issued nationally and there was no province or state included in the place of issue, leave the province or state field blank.

**Field D16 Individual’s date of birth**

Enter the date (yyyy-mm-dd) of birth of the individual who conducted or attempted to conduct the transaction.

**Field D17 Individual’s occupation**

Enter the occupation of the individual who conducted or attempted to conduct the transaction.

Be as descriptive as possible regarding occupation. Provide information that clearly describes it, rather than use a general term. For example, in the case of a consultant, the occupation should reflect the area of consulting, such as “IT consultant” or “consulting forester”. As another example, in the case of a professional, the occupation should reflect the nature of the work, such as “petroleum engineer” or “family physician”.

If the individual is not employed or engaged in any type of business or profession, provide information that best describes their situation, such as “student”, “unemployed”, “retired”, etc.

**Field D18 Individual’s business telephone number**

Enter the business telephone number, including the area code, of the individual who conducted or attempted to conduct the transaction. Include the extension if applicable at field D18A.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: “999-999-9999”.

If the number is from outside Canada or the United States, provide the country code, city code and local number components. As each of those components can vary in length, use a dash (-) to separate each one. For example, “99-999-9999-9999” would indicate a two-digit country code, a three-digit city code and an eight digit local number.

**Field D19 Individual’s employer**

Enter the name of the entity or individual who is the employer of the individual who conducted or attempted to conduct the transaction.

**Fields D20 to D24 Employer’s business address**

Enter the civic address, town or city, province or state, country and postal code of the employer of the individual who conducted or attempted to conduct the transaction.

**Field D25 Employer’s business telephone number**

Enter the business telephone number, including the area code, of the employer of the individual who conducted or attempted to conduct the transaction. Include the extension if applicable at field D25A.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: “999-999-9999”.

If the number is from outside Canada or the United States, provide the country code, city code and local number components. As each of those

components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

**Part E: Information about the entity on whose behalf the transaction was conducted (if applicable)**

This part only applies if the transaction's disposition was conducted or attempted on behalf of a third party that is an entity, as indicated in Part B2. If an employee deposited cash in his or her employer's business account, Part E does not apply.

Complete a separate Part E for each disposition that was conducted or attempted on behalf of a business, corporation or other entity. To do this, you can copy Part E. Fill in the "Transaction \_\_\_\_ Disposition \_\_\_\_" area at the top of Part E to distinguish between each disposition, based on the number you assigned the disposition in Part B2.

**Field E1 Name of corporation, trust or other entity**

Enter the full name of the business, corporation, trust or other entity on whose behalf the transaction was conducted or attempted.

**Field E2 Type of business**

Describe the type of business or entity on whose behalf the transaction was conducted or attempted.

**Fields E3 to E7 Full address of business or corporation**

Enter the civic address, town or city, province or state, country and postal code of the business, corporation or other entity on whose behalf the transaction was conducted or attempted.

**Field E8 Business telephone number**

Enter the telephone number, including the area code, of the business, corporation or other entity on whose behalf the transaction was conducted or attempted. Include the extension, if applicable, at field E8A.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, provide the country code, city code and local number components. As each of those components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

**Fields E9 to E11 Incorporation information**

If the transaction was conducted or attempted on behalf of an entity that is a corporation, provide the incorporation number. Also provide the province or state and country of the incorporation number's place of issue. If an incorporation number does not exist for the corporation, enter "N/A" in fields E9, E10 and E11. If the incorporation number was issued nationally



and there was no province or state included in the place of issue, leave the province or state field blank.

**Field E12 Individual(s) authorized to bind the entity or act with respect to the account (up to three)**

Provide the names of up to three individuals who have authority to conduct transactions through the account.

**Part F: Information about the individual on whose behalf the transaction was conducted (if applicable)**

This part only applies when the transaction's disposition was conducted or attempted on behalf of a third party that is an individual, as indicated in Part B2.

If the individual conducted or attempted the transaction's disposition on his or her own behalf, this Part does not apply. In that case, information about the individual should be put in Part D.

If an employee deposited cash in his or her employer's business account, Part F does not apply. If the transaction's disposition was conducted or attempted on behalf of a business, corporation or other entity, Part E should be completed.

Complete a separate Part F for each disposition that was conducted or attempted on behalf of an individual. To do this, you can copy Part F. Fill in the "Transaction \_\_\_\_ Disposition \_\_\_\_" area at the top of Part F to distinguish between each disposition, based on the number you assigned the disposition in Part B2.

**Fields F1 to F3 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 attempted.

**Fields F4 to F8 Individual's full address**

Enter the civic address, town or city, province or state, country and postal code of the individual on whose behalf the transaction was conducted or attempted.

**Field F9 Home telephone number**

Enter the home telephone number, including the area code, of the individual on whose behalf the transaction was conducted or attempted.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, provide the country code, city code and local number components. As each of those components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

**Field F10 Business telephone number**

Enter the business telephone number, including the area code, of the individual on whose behalf the transaction was conducted or attempted. Include the extension if applicable in field F10A.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, provide the country code, city code and local number components. As each of those components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

**Field F11 Individual's date of birth**

Enter the date of birth (yyyy-mm-dd) of the individual on whose behalf the transaction was conducted or attempted.

**Field F12 Individual's identifier**

Check the appropriate box to show the document used to identify the individual on whose behalf the transaction was conducted or attempted.

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 the field provided.

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 F12, but do not provide the number in field F13.

**Field F13 ID number**

Enter the number of the document described in field F12 that was used to identify the individual on behalf of whom the transaction was conducted or attempted. Remember that a health card number is not acceptable for this purpose in some provinces. Furthermore, as explained above, a SIN should not be provided on this form. If the identifier document in field F12 (and F12A) is a SIN card, enter "N/A" in field F13 to indicate the number is not applicable.

**Field F14 Country of residence**

Enter the country of permanent residence of the individual on whose behalf the transaction was conducted or attempted.

**Field F14A Country of citizenship**

Enter the country of citizenship of the individual on whose behalf the transaction was conducted or attempted.

**Fields F15 and F16 Place of issue**

Enter the province or state and country of issue of the document used to identify the individual on whose behalf the transaction was conducted or attempted. If the document was issued nationally and there was no province or state included in the place of issue, leave the province or state field blank.

**Field F17 Individual's occupation**

Enter the occupation of the individual on whose behalf the transaction was conducted or attempted.

Be as descriptive as possible regarding occupation. Provide information that clearly describes it, rather than use a general term. For example, in the case of a consultant, the occupation should reflect the area of consulting, such as "IT consultant" or "consulting forester". As another example, in the case of a professional, the occupation should reflect the nature of the work, such as "petroleum engineer" or "family physician".

If the individual is not employed or engaged in any type of business or profession, provide information that best describes their situation, such as "student", "unemployed", "retired", etc.

**Field F18 Individual's employer**

Enter the name of the entity or individual who is the employer of the individual on whose behalf the transaction was conducted or attempted.

**Fields F19 to F23 Employer's business address**

Enter the civic address, town or city, province or state, country and postal code of the employer of the individual on whose behalf the transaction was conducted or attempted.

**Field F24 Employer's business telephone number**

Enter the business telephone number, including the area code, of the employer of the individual on whose behalf the transaction was conducted or attempted. Include the extension if applicable in field F24A.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, provide the country code, city code and local number components. As each of those components can

vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

**Field F25 Relationship of the individual named in Part D to the individual named above**

Check the appropriate box to indicate the relationship of the individual conducting or attempting the transaction to the individual on whose behalf the transaction was conducted or attempted.

If the selections provided do not cover the relationship, indicate "Other" and provide details in the appropriate field.

## **Part G: Description of Suspicious Activity**

This Part is to provide details of why you suspected that the transaction or the series of transactions were related to money laundering or terrorist financing.

### **Field G1\* Description of suspicious activity**

This section explains what led you to believe there was something suspicious about the transaction. The more information that you provide to explain the basis of your suspicion, the more valuable your report will be. The ideal response would clearly and completely describe all of the factors or unusual circumstances which led you to a suspicion of money laundering or terrorist financing, and would provide as many relevant details as possible to support this determination.

Do not leave information about the description of suspicious activity out of your report by referring to any other files or documents. FINTRAC will not have access to that information unless you provide the details in your report.

If this report is about one or more transactions that were attempted, also describe why each one was not completed.

## **Part H: Action Taken (if applicable)**

This Part is for you to describe what action, if any, was taken by you, as a result of the suspicious transaction.

### **Field H1\* Action taken (if this Part is applicable)**

Identify whether you have taken or will take any action as a result of the suspicious transaction, in addition to reporting to FINTRAC. For example, if you are also making a report to a law enforcement agency, indicate this in Part H.

## 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-lignesdirectrices@fintrac-canafe.gc.ca](mailto:guidelines-lignesdirectrices@fintrac-canafe.gc.ca).

## 6 How to Contact FINTRAC

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

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

Toll-free: 1-866-346-8722