

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



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## December 2016

This replaces the previous version of *Guideline 5: Submitting Terrorist Property Reports to FINTRAC* issued in July 2016. Upcoming changes to this guideline are described below.

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 F14, F15, H14 and H15 will refer to "jurisdiction" of
issue instead of "place" of issue. Fields G10 and G11 will refer to
"jurisdiction" of incorporation instead of "place" of incorporation.

The field descriptions will be updated to reflect this change once it is 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 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.

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: Backgrounder 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 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 EFT reports. There are three different versions of Guideline 8, by report type 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.

In addition to making a terrorist property report to FINTRAC, there is also a requirement under the *Criminal Code* and the *Regulations Implementing the United Nations Resolutions on the Suppression of Terrorism* 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 or believe is owned or controlled by or on behalf of a terrorist, a terrorist group or a listed person. For more information about this, refer to section 3.

# 2 Who Has to Send a Terrorist Property Report to FINTRAC?

If you are one of the following individuals or entities (called reporting entities), you must report terrorist property 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 terrorist property 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 terrorist property 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 terrorist property 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 (<a href="http://www.fintrac-canafe.gc.ca">http://www.fintrac-canafe.gc.ca</a>).

# 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.

In addition, 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 (<a href="http://www.fintrac-canafe.gc.ca">http://www.fintrac-canafe.gc.ca</a>).

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 terrorist property 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 terrorist property 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.

# 3 Terrorist Property Reporting Requirements

# 3.1 When does a terrorist property report have to be made?

Two situations can trigger the requirement to send a terrorist property report to FINTRAC. They are explained below.

# 3.1.1 Knowing that property is owned or controlled by or on behalf of a terrorist or a terrorist group

If you are a reporting entity described in section 2, 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.

# **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 recover or receive money or goods, including funds, financial assets or economic resources. For example, cash, bank accounts, insurance policies, money orders, real estate, securities, and traveller's cheques, precious metals and stones among other types of assets, are considered property.

### **Terrorist group**

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 also includes anyone on a list published in the *Regulations Establishing a List of Entities* issued under the *Criminal Code*. You can consult that list of entities as follows:

- by typing "currently listed entities" in the Search box on the Public Safety Canada Web site (<a href="http://www.ps-sp.gc.ca">http://www.ps-sp.gc.ca</a>); or
- by referring to the "Terrorist Listings and Sanctions" link on the Office of the Superintendent of Financial Institutions' Web site (<a href="http://www.osfi-bsif.gc.ca">http://www.osfi-bsif.gc.ca</a>).

You may also have other information that leads you to know that an individual or an entity is a terrorist, a terrorist group or associated with any of them.

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 made or proposed for such a property, a terrorist property report must be sent to FINTRAC without delay. If you know that a transaction is related

to property owned or controlled by or on behalf of a terrorist or a terrorist group, you should not complete it. This is because such property must be frozen under the *Criminal Code*.

If you are not sure that you are dealing with a terrorist or terrorist group, but suspect that you might be, then a suspicious transaction report is required if a transaction was completed. You also have to complete a suspicious transaction report if the suspicious transaction was attempted. For more information about this, see *Guideline 2: Suspicious Transactions*. For background information related to money laundering, terrorist financing or Canada's efforts to combat these, refer to *Guideline 1: Backgrounder*.

# 3.1.2 Believing that property is owned or controlled by or on behalf of a listed person

If you are a reporting entity described in section 2, you have to send a terrorist property report to FINTRAC if you have property in **your possession or control** that you **believe** is owned or controlled by or on behalf of a listed person. This includes information about any transaction or proposed transaction relating to that property.

# **Property**

For information about what is considered property in this context, see subsection 3.1.1.

# Listed person

A listed person includes an individual, a corporation, a trust, a partnership or fund or an unincorporated association or organization that is believed to:

- have carried out, attempted to carry out, participated in or facilitated a terrorist activity; or
- be controlled directly or indirectly by, be acting on behalf of, at the direction of, or in association with any individual or entity conducting any of the above activities.

A listed person means anyone on a list published in the *Regulations Implementing the United Nations Resolutions on the Suppression of Terrorism* issued under the *United Nations Act*. You can consult that list of names on the Office of the Superintendent of Financial Institutions' Web site (<a href="http://www.osfibsif.gc.ca">http://www.osfibsif.gc.ca</a>) by referring to the "Terrorist Listings and Sanctions" link.

You may also have other information that leads you to believe that an individual or an entity is a listed person or associated with such a person.

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

owned or controlled by or on behalf of a listed person, you should not complete it. This is because such property must be frozen under the *Regulations Implementing the United Nations Resolutions on the Suppression of Terrorism.* 

If you are not sure that you are dealing with a listed person, but suspect that you might be, then a suspicious transaction report is required if a transaction was completed. You also have to complete a suspicious transaction report if the suspicious transaction was attempted. For more information about this, see *Guideline 2: Suspicious Transactions*. For background information related to money laundering, terrorist financing or Canada's efforts to combat these, refer to *Guideline 1: Backgrounder*.

# 3.2 Other requirements

The following provides information with respect to other *Criminal Code* and *Regulations Implementing the United Nations Resolutions on the Suppression of Terrorism* 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 are also requirements to disclose to the RCMP and CSIS under the following:

- the Criminal Code, if you know that property in your possession or control
  is owned or controlled by or on behalf of a terrorist or a terrorist group. It is
  also an offence under the Criminal Code to deal with such property; and
- the Regulations Implementing the United Nations Resolutions on the Suppression of Terrorism if you believe that property in your possession or control is owned or controlled by or on behalf of a listed person. It is also an offence under the United Nations Act to deal with such property.

Both requirements apply to anyone in Canada and any Canadian outside Canada, whether or not you are an individual or entity described in section 2. This includes information about any transaction or proposed transaction relating to that property.

In either situation, information is to be provided to them, without delay, as follows:

- RCMP, Anti-Terrorist Financing Team, unclassified fax: (613) 949-3113
- CSIS Financing Unit, unclassified fax: (613) 369-2303

# 3.3 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 4 for more information.

## 3.4 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, the terrorist group or the listed person 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 subsection 3.2, 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 or if you believe that it is owned or controlled by or on behalf of a listed person. It is also an offence to be involved in any transactions in respect of such property.

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

# 4 Sending Terrorist Property Reports to FINTRAC

# 4.1 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 the Publications page (<a href="http://www.fintrac-canafe.gc.ca">http://www.fintrac-canafe.gc.ca</a>). 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 5 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.

# 4.2 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 K1P 1H7
   Canada

In addition, you may also send your report by regular 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.

# 5 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 subsection 3.3, these reports can only be completed and sent to FINTRAC on paper. There is no mechanism to report electronically.

Fields of this report are either mandatory, mandatory where applicable, or require "reasonable efforts" to complete, as follows:

- Mandatory: All fields of the report marked with an asterisk (\*) have to be completed.
- Mandatory where applicable: The fields have both an asterisk and "where applicable" next to them have to be completed if they are applicable to you or to the property or the transaction or proposed 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. 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, terrorist group or listed person, 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 or how you came to believe that the property is owned or controlled by or on behalf of a listed person.
- 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 licence 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 an **agent of the Crown that sells or redeems money orders**, enter your post office 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 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 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 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 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 or believe that the property is owned or controlled by or on behalf of a terrorist, terrorist group or listed person. This part is also for you to provide information about the terrorist, terrorist group or listed person 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 or believe that the property is terrorist property or believe that property is listed person

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 or how you believe this property is owned or controlled by or on behalf of a listed person.

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, terrorist group or listed person

Enter the full name of the terrorist, terrorist group or listed person that owns or controls the property, or on whose behalf the property is owned or controlled. As explained in subsection 3.1, a terrorist or a terrorist group can be an individual, a group, a trust, a partnership, or a fund. It can also be an unincorporated association or organization. A listed person can be an individual, a corporation, a trust, a partnership, a fund or an unincorporated association or organization.

If it is an entity (that is, not an individual), enter the complete name of the terrorist group or listed person in field 3. If it is an individual, enter the terrorist's or listed person'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, terrorist group or listed person, 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, terrorist group or listed person address

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

## Field 9 Telephone number

Enter the telephone number, including the area code, of the terrorist, terrorist group or listed person 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, terrorist group or listed person

Enter the full name of the individual or entity that owns or controls the property on behalf of the terrorist, terrorist group or listed person 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, terrorist group or listed person 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 Part 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.

If the transaction being reported was proposed and, because of this, information for field 1 is not available, you can leave the field blank.

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

Enter the number of the relevant account.

If the transaction being reported was proposed and, because of this, information for field 2 is not available, you can leave the field blank.

# 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.

If the transaction being reported was proposed and, because of this, information for field 3 is not available, you can leave the field blank.

# 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.

If the transaction being reported was proposed and, because of this, information for field 4 is not available, you can leave the field blank.

# 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 do not need to provide more.

If the transaction being reported was proposed and, because of this, information for field 5 is not available, you can leave the field blank.

### 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.

If the transaction being reported was proposed and, because of this, information for field 8 is not available, you can leave the 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 Part 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, "negotiated 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 5P. For example, if annuities were involved in initiating the transaction, indicate "Other" and provide information about the type of annuity in field 5P.

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.

If the transaction being reported was proposed and, because of this, information for field 5 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 a proposed transaction. If you were buying precious metals or stones, indicate the type of funds that best describes what you bought or proposed 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 proposed to pay. For example, if the client paid cash, indicate "cash" or if the client paid by debit card or credit card, indicate "Other" and provide details in field 5P.

# 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.

If the transaction being reported was proposed and, because of this, information for field 6 is not available, you can leave the field blank.

# 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.

If the transaction being reported was proposed and, because of this, information for field 7 is not available, you can leave the field blank.

# 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 "Automated bank machine" 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 purchase or deposit, check that box and provide the life insurance policy number in field 12D.

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

If the transaction being reported was proposed and, because of this, information for field 12 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 proposed 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 proposed 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 field 12P. 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 proposed to purchase.

# 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.

If the transaction being reported was proposed and, because of this, information for field 13 is not available, you can leave the field blank.

# 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.

If the transaction being reported was proposed and, because of this, information for field 14 is not available, you can leave the field blank.

# 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.

If the transaction being reported was proposed and, because of this, information for fields 15 and 16 is not available, you can leave them blank.

# 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 (<u>number</u>) Transaction (<u>number</u>)" 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.

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 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.

# 6 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 <a href="mailto:guidelines-lignesdirectrices@fintrac-canafe.gc.ca">guidelines-lignesdirectrices@fintrac-canafe.gc.ca</a>.

# 7 How to Contact FINTRAC

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