

DRAFT

Reporting large cash transactions to FINTRAC

Overview

This guidance comes into effect on June **, 2023.

Large cash transaction reporting requirements under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) and associated Regulations apply to all reporting entity sectors.

If you are a person who is a reporting entity, and you are also an employee of a reporting entity, your employer is responsible for meeting the large cash transaction reporting requirements associated with your activities as an employee.¹

Similarly, if you are a reporting entity that is an agent of or authorized to act on behalf of another reporting entity, it is the responsibility of the reporting entity for which you are an agent or acting on behalf to meet the reporting requirements associated with the activities you conduct on its behalf. This does not apply if you are a life insurance broker or agent (unless you are an employee as explained above).²

A [service provider](#) can submit and correct a large cash transaction report (LCTR) on your behalf. However, as the reporting entity, you are ultimately responsible for meeting the requirements under the PCMLTFA and associated Regulations, even if a service provider is reporting on your behalf. This legal responsibility **cannot** be delegated.

Who is this guidance for

- All reporting entity sectors

In this guidance

1. What is cash?
2. When must I submit LCTRs?
3. How do I submit LCTRs?
4. What are the main considerations when submitting an LCTR?
5. Do I have other requirements associated with large cash transactions?

¹ Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations (PCMLTFR), SOR/2002-184, s. 133(1).

² PCMLTFR, SOR/2002-184, s. 133(2).

6. What are the exceptions to reporting large cash transactions?

You will also find field instructions to complete an LCTR in Annex 1 and scenario examples in Annex 2.

If you have questions on your large cash transaction reporting requirements, please contact FINTRAC by email at guidelines-lignesdirectrices@fintrac-canafe.gc.ca.

****Note:** Throughout this guidance, references to dollar amounts (such as \$10,000) are in Canadian dollars (CAD) unless otherwise specified.

1. What is cash?

Cash includes coins and bank notes issued by the Bank of Canada that are intended for circulation in Canada. It also includes coins and bank notes of countries other than Canada. In the context of this guidance, cash includes fiat currency but does **not** include other forms of funds such as cheques, money orders or other similar negotiable instruments. Cash does **not** include virtual currency.

2. When must I submit LCTRs?

You must submit an LCTR to FINTRAC when you receive \$10,000 or more in cash in a single transaction from a person or entity.³ If you are a foreign money services business, you must submit an LCTR only when you receive \$10,000 or more in cash in a single transaction from a person or entity in Canada.⁴

You must also submit an LCTR to FINTRAC in accordance with the 24-hour rule when you receive two or more amounts in cash that total \$10,000 or more within a consecutive 24-hour window, **and** you know that the transactions are:⁵

- conducted by the same person or entity;
- conducted on behalf of the same person or entity (third party); **or**
- for the same beneficiary.

For more information on reporting in accordance with the 24-hour rule, please see FINTRAC's [24-hour rule guidance](#).

If you receive cash in a foreign currency, you must convert the amount into Canadian dollars using the exchange rate published by the Bank of Canada in effect at the time of the transaction to determine whether you have reached the

³ PCMLTFR, SOR/2002-184, ss. 7(1)(a), 18, 25, 30(1)(a), 39, 48, 54, 60, 66, 70(1)(a), and 78.

⁴ PCMLTFR, SOR/2002-184, s. 33(1)(a).

⁵ PCMLTFR, SOR/2002-184, s.126,

reporting threshold amount.⁶ If an exchange rate is not published by the Bank of Canada, then you must use the rate you establish in the normal course of your business at the time of the transaction.⁷ Your process for establishing an exchange rate to determine if you have reached the reporting threshold amount should be outlined in your [compliance policies and procedures](#).

You must submit an LCTR to FINTRAC within 15 calendar days after the day on which you receive the cash.⁸

3. How do I submit LCTRs?

You must submit LCTRs to FINTRAC electronically if you have the technical capabilities to do so.⁹ If you do not have the technical capabilities to report electronically, you must submit paper reports.¹⁰

Electronic reporting

You must submit LCTRs to FINTRAC using the following options:

FINTRAC web reporting system (FWR)

FWR (formerly F2R) allows you to submit reports electronically to FINTRAC and is geared towards reporting entities with lower reporting volumes. [To access FWR, you must be enrolled for electronic reporting with FINTRAC.](#)

Once enrolled, you can submit new reports and modify previously submitted reports. When you submit your reports, you will receive a message acknowledging receipt of your report. The message will include the date and time your report was received and the report's identification number (FINTRAC report number).

The FWR user guide, which provides detailed reporting instructions, is available to reporting entities who have enrolled in FWR. If you would like to receive the FWR user guide, please send a request to f2r@fintrac-canafe.gc.ca.

Application Programming Interfaces (API)

(API Infrastructure being developed – endpoints not available at this time.)

⁶ PCMLTFR, SOR/2002-184, s.125 (a).

⁷ PCMLTFR, SOR/2002-184, s.125 (b).

⁸ PCMLTFR, SOR/2002-184, s.132 (3).

⁹ PCMLTFR, SOR/2002-184, s.131 (1).

¹⁰ PCMLTFR, SOR/2002-184, s.131 (2).

Paper reporting

If you do **not** have the technical capability to submit reports electronically, you must submit reports in paper form to FINTRAC. You can access and print the LCTR paper form on the [reporting forms](#) webpage, or request to have one faxed or mailed to you by calling 1-866-346-8722.

You can submit a paper LCTR form to FINTRAC either by

- fax to 1-866-226-2346, or
- mail to
Financial Transactions and Reports Analysis Centre of Canada
Section A
234 Laurier Avenue West, 24th floor
Ottawa, ON K1P 1H7
Canada

****Note:** There is no official acknowledgement of receipt when you submit a paper form to FINTRAC.

Changes to a report

Once you have submitted a report, it is possible to modify the report — for instance to add missing information or make corrections — but you must provide an explanation for the change.

FINTRAC may also notify you by email of reports that are missing information or contain incorrect information. These notices are labelled as “Reports returned for further action (RRFA).” For more information on how to respond to RRFAs, please refer to the FWR user guide that is available to reporting entities who have enrolled in FWR.

To modify a report that was submitted by:

- **FWR**, refer to the FWR user guide
- **API**, refer to (API Infrastructure being developed – endpoints not available at this time.)
- **Batch**, refer to the [batch documentation](#) for instructions, or use FWR to modify a report submitted by batch.

****Note: As of June ** 2023, new reports cannot be submitted by batch.** Batch will only be available for reporting entities to modify or

delete reports that were previously submitted in batch files before June **, 2023.

If you submitted an LCTR to FINTRAC and need to make a subsequent change to the report, or if FINTRAC notified you of an RRFA, you must make the change and submit the revised report to FINTRAC within 15 calendar days after you received the cash.

4. What are the main considerations when submitting an LCTR?

This section contains important considerations when submitting LCTRs to FINTRAC. Some of these considerations only apply to reports submitted electronically and will be indicated accordingly.

LCTR form

The LCTR form has four sections — General information, Transaction information, Starting action and Completing action — and the table below shows the type of information for each section.

| |
|---|
| General information |
| <ul style="list-style-type: none">• Contact details and information about your business• Aggregation type and 24-hour window for aggregation• Ministerial Directives• Reporting entity report reference number |
| Transaction information |
| <ul style="list-style-type: none">• Date and time of transaction• Method of transaction• Location where the transaction was conducted• Purpose of the transaction• Whether the transaction is below or above \$10,000 CAD• Reporting entity transaction reference number |
| Starting action |
| <ul style="list-style-type: none">• Amount and currency of cash received• Information about the source of cash |

- Conductor (person or entity that conducted the transaction and their associated information)
- Third party (person or entity on whose behalf the transaction is conducted and their associated information)

Completing action

- Details of disposition
- Amount and currency
- Account and/or reference information
- Any other person or entity involved in the completing action and their associated information
- Beneficiary (any person or entity that was the beneficiary of the transaction and their associated information)

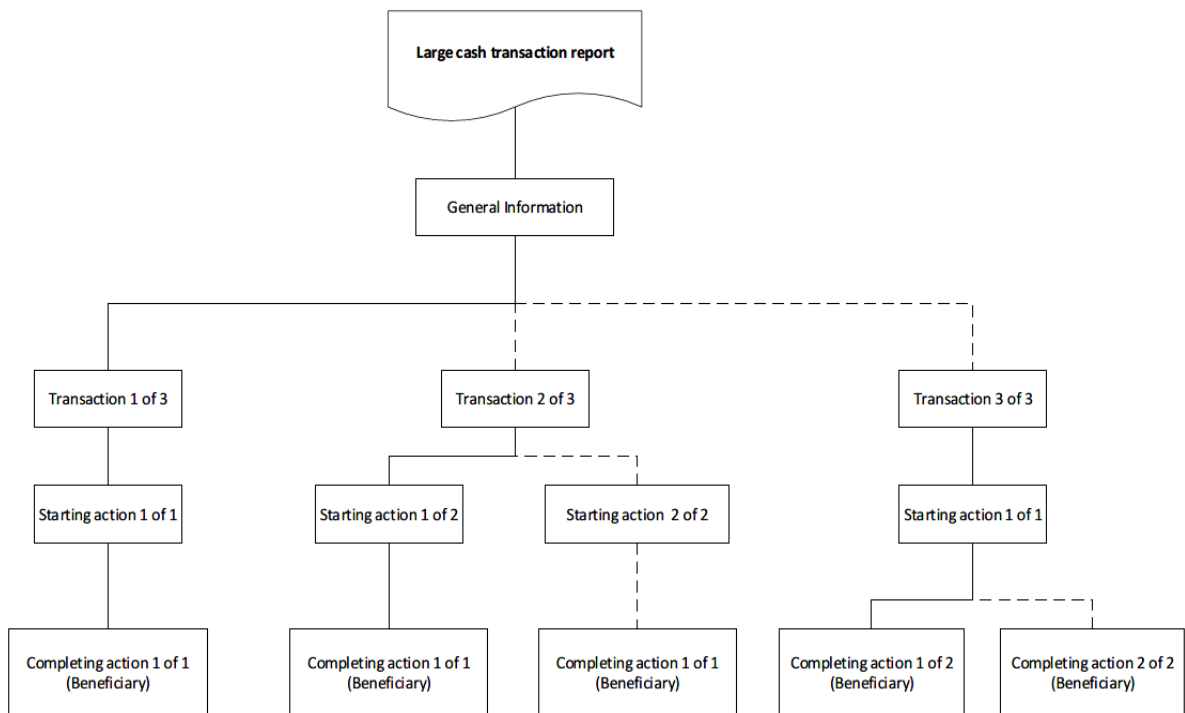
See Annex 1 and/or the LCTR form for the full list of fields in each section.

An LCTR must include at least one transaction, one starting action and one completing action. Every completing action must have at least one beneficiary. For example, Ms. Green walks into ABC Credit Union with \$10,000 CAD cash and instructs that the full amount be deposited into her savings account. Therefore, ABC Credit Union submits a report indicating that Ms. Green conducted a single transaction with one starting action (the receipt of \$10,000 CAD cash by the credit union) and one completing action (disposition of \$10,000 involving a deposit to an account) where Ms. Green is also the beneficiary.

A transaction can have multiple starting actions and/or completing actions—depending on the client’s instructions. For example, Mr. Blue walks into the General MSB Company in Calgary with \$11,000 CAD cash and instructs that \$5,000 be exchanged to USD and \$6,000 be sent to Ms. Brown in Toronto. In this example, the General MSB Company submits a report indicating that Mr. Blue conducted a transaction in Calgary with one starting action (the receipt of \$11,000 CAD cash by the MSB) and two completing actions (one disposition of \$5,000 involving exchange to fiat currency and a second disposition of \$6,000 involving an outgoing domestic funds transfer) where Mr. Blue and Ms. Brown are the respective beneficiaries. This example also demonstrates that the number of starting actions and completing actions in a report do not have to be the same.

An LCTR can have multiple transactions, starting actions and completing actions—depending on the client’s instructions. Specifically, the LCTR form allows you to enter multiple transactions that occur within a 24-hour period into a single report, **including transactions that occur at the same or different locations.** Further, within each starting action, you can include multiple conductors, sources of cash and third parties. Within each completing action, you can include multiple account holders, beneficiaries and other persons or entities involved in the completing action.

The following chart is an example of an LCTR with multiple transactions, starting actions and completing actions.



| Legend | |
|--------|---|
| ———— | Every LCTR must have at least one transaction. |
| ———— | Every transaction must have at least one starting action, one completing action and one beneficiary. |
| ----- | An LCTR can have multiple transactions and within each transaction, you can include multiple starting and completing actions. |

| | |
|--|--|
| | |
|--|--|

Specifically, this chart shows an LCTR with three transactions. You must complete the General information section of the LCTR and provide information for each transaction where:

- Transaction one has one starting action and one completing action.
- Transaction two has two starting actions, and each starting action has a completing action.
- Transaction three has one starting action and two competing actions.

LCTR submission limitations (applicable to reports submitted electronically)

A **report** must include at least one transaction and may include up to *** transactions. If there are more than *** transactions, you will have to use more than one report for your transactions. You must include the reporting entity report reference number so that FINTRAC is aware of linked reports. The reporting entity report reference number is the unique number you assign each report. If *** transactions are exceeded in a report, you may include a suffix (for example, -001, -002, etc.) to indicate that the report is linked to another report. See below for more information on linking reports.

A **transaction** must include one starting and one completing action and may include up to 50 starting and 50 completing actions per transaction. If a transaction has more than 50 starting or completing actions, you must start a new report to continue the reporting of the starting or completing actions. You will use the original reporting entity transaction reference number from the transaction in the report with the first 50 starting or completing actions. You must repeat this transaction reference number to allow FINTRAC to identify and link the starting or completing actions across reports for a given transaction.

If you need to link transactions in multiple reports, you can continue counting transactions incrementally with each report. For example, 250 transactions detailed over three (3) reports could be submitted as:

- Report 1 (LCTR999-01): Transactions 1 to 99;
- Report 2 (LCTR999-02): Transactions 100 to 198; and
- Report 3 (LCTR999-03): Transactions 199 to 250.

Validation of reports by FINTRAC

FINTRAC validates reports by applying the following rules to report fields to ensure the suitability and quality of information.

- **Presence** – is there information in the field?
- **Format** – is the information in the expected format according to the field type?
- **Content** – is the information consistent with the field label?

Using the occupation field as an example:

- If **teacher** is entered into the occupation field, then all of the validation rules are met because:
 - the field contains information (presence);
 - the information is in a text format (expected format); and
 - teacher is an occupation—that is, the information is consistent with the field label (content).
- If **ABC High School** is entered into the occupation field, then only the presence and format validation rules are met because:
 - the field contains information; and
 - the information is in a text format.

The content rule **is not met** because ABC High School is not an occupation—that is, the information is not consistent with the field label.
- If a telephone number (for example, **604-555-1234**) is entered into the occupation field, then only the presence validation rule is met because the field contains information. The format and content rules **are not met** because:
 - the information is numeric rather than text; and
 - 604-555-1234 is not an occupation—that is, the information is not consistent with the field label.
- If **no information** is entered in the occupation field, then the presence validation rule **is not met** and the format and content rules cannot be applied.

Summary of validation results for occupation field:

| Occupation field: | Presence | Format | Content |
|-----------------------------------|-----------------|----------------|----------------|
| teacher | yes | yes | yes |
| ABC High School | yes | yes | no |
| 604-555-1234 | yes | no | no |
| (blank – no information provided) | no | Not applicable | Not applicable |

FWR report validation (applicable to reports submitted electronically)

Reports submitted through FWR are immediately validated by the application. FWR will indicate where information is missing, incorrect or improperly formatted.

You **must** correct all errors for mandatory fields before you can submit a report in FWR.

API report validation (applicable to reports submitted electronically)

TBD - API Infrastructure being developed – endpoints not available at this time.

You should familiarize yourself with the [LCTR validation rules](#). These rules identify possible reporting problems or information gaps but do not cover all scenarios. While FINTRAC conducts a validation of report submissions to assess the quality of reports, you should have your own proactive quality assurance practices in place.

Creating subject profiles (applicable to reports submitted electronically)

A subject is a person or entity involved in a transaction and must be included in the report. Subjects can be conductors, third parties, beneficiaries, all sources of cash, others involved in the transaction, as well as account holders.

FWR and API allow you to create different subject profiles to help streamline the entry of their information in report fields.

- "Create person name" or "Create entity name" allows you to create a subject profile that is a source of cash, is involved in the completing action or is an account holder.
- "Create person details" or "Create entity details" allows you to create a subject profile for a conductor, third party or beneficiary.

Once you have created a subject profile, you can select it as you navigate through each section of the report and the subject's information will auto populate the fields accordingly. If a person or entity has more than one role in a report (for example, a person is both the conductor and beneficiary in the transaction), the subject profile can be selected to populate fields for all roles. Although a subject profile can be selected to populate fields for all transactions in the same report where it was created, it will **not** be available for selection in other reports due to privacy considerations.

5. Do I have other requirements associated with large cash transactions?

Compliance program

Your [compliance program's policies and procedures](#) must outline your process and criteria on selecting exchange rates and their source, aggregating transactions, determining if you are dealing with a person or entity, and

submitting reports to FINTRAC. If you have an automated or triggering system in place to detect when a threshold amount is reached for reporting, the transaction(s) may still be assessed by a person, as a best practice, to ensure that an LCTR must be submitted. Your compliance program must also include training on suspected money laundering (ML) and terrorist financing activities (TF) in relation to your business. For more information, see FINTRAC's [Compliance program requirements](#) guidance.

Suspicious transactions

In addition to reporting large cash transactions, you may also be required to submit [Suspicious Transaction Reports \(STR\)](#) to FINTRAC when you have reasonable grounds to suspect that a transaction is related to the commission or the attempted commission of an ML/TF offence. Therefore, you may be required to submit an LCTR and an STR for the same transaction. For more information, see the following guidance:

- [Reporting suspicious transactions to FINTRAC](#) and
- [Money laundering and terrorist financing indicators](#).

Electronic funds transfers

If the disposition of a large cash transaction involves a reportable electronic funds transfer, you may have to submit an electronic funds transfer report to FINTRAC in addition to an LCTR. For more information on electronic funds transfer reports, see [Guideline 8A: Submitting Non-SWIFT Electronic Funds Transfer Reports to FINTRAC Electronically](#) or [Guideline 8B: Submitting SWIFT Electronic Funds Transfer Reports to FINTRAC](#).

Record keeping requirements

When you submit an LCTR to FINTRAC, you must keep a copy of it for at least five years from the date the LCTR was created.¹¹ For more information on your record keeping requirements for large cash transactions, see your sector's [record keeping guidance](#).

Verifying the identity of persons and entities

There are requirements to verify the identity of persons and entities for large cash transactions. For specific information on when and how to verify the identity of a person or an entity, see your sector's guidance on [When to verify the identity of persons and entities](#) and the guidance on [Methods to verify the identity of persons and entities](#).

¹¹ PCMLTFR, SOR/2002-184, ss.144 and 148(1)(c).

Third party determination

For more information on your requirements for determining whether a person is acting on behalf of a third party for the receipt of a large cash transaction, see the guidance on [Third party determination requirements](#).

Ministerial Directives

You must consider all requirements issued under a Ministerial Directive along with your large cash transaction reporting requirements. For more information, see FINTRAC's guidance on [Ministerial Directives and transaction restrictions](#).

Voluntary self-declaration of non-compliance

If you discover instances of non-compliance related to your large cash transaction reporting requirements, FINTRAC strongly encourages you to report a voluntary self-declaration of non-compliance. For more information, see [Voluntary self-declaration of non-compliance](#).

6. What are the exceptions to reporting large cash transactions?

You are not required to submit an LCTR if you receive an amount of \$10,000 or more in cash in a single transaction if the amount is received from: ¹²

- a [financial entity](#);
- a [public body](#); or
- a person who is acting on behalf of a client that is a financial entity or public body.

Furthermore, if you are a **life insurance company or life insurance broker or agent**, you are not required to submit an LCTR when you are dealing in reinsurance¹³ or if the transaction:¹⁴

- involves the sale of an immediate or deferred annuity that is paid for entirely with funds that are directly transferred from a registered pension plan or from a pension plan that is required to be registered under the [Pension Benefits Standards Act, 1985](#), or similar provincial legislation;
- involves the sale of a registered annuity policy or a registered retirement income fund;
- involves the sale of an immediate or deferred annuity that is paid for entirely with the proceeds of a group life insurance policy; or
- is part of a reverse mortgage or structured settlement.

If you are a **financial entity**, you are not required to submit an LCTR on certain clients that are corporations if you choose, in specific circumstances, to provide

¹² PCMLTFR, SOR/2002-184, ss. 7(2), 18(a), 25, 30(2),33(2), 39, 48, 54, 60, 66,70(2) and 78.

¹³ PCMLTFR, SOR/2002-184, s. 24.

¹⁴ PCMLTFR, SOR/2002-184, s. 18(b).

FINTRAC with specified information on those clients.¹⁵ For more information, see the guidance on [Alternative to Large Cash Transaction Reports to FINTRAC](#).

Annex 1: Field instructions to complete an LCTR

This annex contains instructions on how to complete the fields in an LCTR form. These instructions are organized into two sections, standardized field instructions and specific field instructions.

****Note:** Some fields only become applicable on the completion of other fields.

****Note:** Some field instructions may only apply to the electronic report submissions and not paper submissions.

Failure to provide applicable reporting information will result in non-compliance and may lead to criminal or administrative penalties. To learn more about potential enforcement actions, please see [Penalties for non-compliance](#).

Standardized field instructions

This section contains:

- standardized instructions for the level of effort that is expected in order to obtain the prescribed information for the reporting fields (**mandatory, mandatory for processing, mandatory if applicable** and **reasonable efforts**.)
- instructions for completing the following fields that appear in multiple sections of the form—**name, address, occupation/business, identification, and telephone number**.

1. In this guidance, fields are categorized as either **mandatory, mandatory for processing, mandatory if applicable**, or **reasonable measures**. You must complete these fields as described below:

a. **Mandatory:**

Mandatory fields are indicated with an asterisk symbol (*) and these fields **must** be completed. Because an LCTR can include multiple transactions conducted within 24 consecutive hours that total \$10,000 or more, the information for some mandatory fields may not have been obtained at the

¹⁵ PCMLTFR, SOR/2002-184, s. 8.

time of the transaction. In this case, the fields become “reasonable measures” fields, and the instructions below must be applied.¹⁶

****Note:** If an LCTR contains multiple transactions conducted within 24 consecutive hours and one of these transactions is \$10,000 CAD or more, then the mandatory fields will apply.

b. Mandatory for processing:

Mandatory for processing fields must be completed. These fields are indicated with a double dagger symbol (‡).

c. Mandatory if applicable:

Mandatory if applicable fields must be completed if they are applicable to you or the transaction being reported. These fields are indicated with a dagger symbol (†).

d. Reasonable measures:¹⁷

You must take [reasonable measures](#) to obtain the information for all non-mandatory fields in the report, **if they are applicable**. Reasonable measures are the steps that you must take, as outlined in your policies and procedures, to obtain the information that can include asking the person or entity involved in the transaction for the information. If the information is obtained, it must be reported. It also means that you must provide the information if it is contained within your systems or records.

****Note:** Fields that are not applicable are to be left blank. When a field is not applicable, do not enter “Not applicable”, “N/A” or “n/a” or substitute any other abbreviations, special characters (“x”, “-“ or “*”) or words (“unknown”) in these fields.

2. Name fields

Surname

Provide the last name of the person.

Given name

Provide the first name of the person.

Other/Initial

Provide the middle or other name(s) of the person, or their initial(s) if no other names apply.

Alias

¹⁶ PCMLTFR, SOR/2002-184, s. 152(2).

¹⁷ PCMLTFR, SOR/2002-184, s. 152(1).

Provide the name a person uses, or by which they are known, other than the name provided under surname, given name, or other/initial.

Name of entity

Provide the full name of the entity.

3. Address fields

Provide the address details in the structured or unstructured fields (as applicable) as explained below:

Structured address fields

Structured address fields include:

- Apt/Room/Suite/Unit number
- House/Building number
- Street address
- City
- District
- Country
- Province or state
- Sub-province and /or sub-locality
- Postal or zip code

If you have the ability to separate the information, you must report it in the structured address fields. For example, if a person lives at #10-123 Main Street, Richmond, BC, Canada A1B 2C3, complete the address fields as follows:

- Apt number is 10
- Building number is 123
- Street address is Main Street
- City is Richmond
- Province is BC
- Country is Canada
- Postal code is A1B 2C3

If you are unable to separate the address information into the structured address fields (for example, your system groups the Apt/Room/Suite/Unit number with the House/Building number and Street address), then provide all the address information in the Street address field and the city, province, country and postal code in their respective fields.

Similarly, if a person or entity's address is in an area where there is no civic address, provide a description of the physical location. For example, if a person lives in the third house to the right after the community center in Tinytown, SK, Canada X1Y 2Z2, complete the address fields as follows:

- Street address is third house to the right after the community center
- City is Tinytown
- Province is SK
- Country is Canada
- Postal code is X1Y 2Z2

If you use the structured address fields, you cannot use the unstructured address fields to provide additional information.

Unstructured address field

You should only use the unstructured address field when it is not possible to separate the address information—this typically occurs when you are uploading a large volume of reports. If possible, enter information about the country in the Country field and provide the unstructured address information in the following format:

- street address/city/province or state/postal code or zip code

****Note:** The following **are not valid addresses**, and **should not** be provided in either the structured or unstructured address fields:

- A post office box without a complete physical address (for example, PO Box 333)
- General delivery address
- Only a suite number (for example, Suite 256) without additional address information

A legal land description can be acceptable as long as the land description is specific enough to pinpoint the physical location of the client's address. If the legal land description refers to an area or a parcel of land on which multiple properties are located, the legal land description would not be sufficient.

For persons who are transient (for example, travelling in a recreational vehicle or temporarily working in a camp) and have no fixed address, you are required to provide the following:

- For Canadian residents, their permanent address is required, even if that is not where they are currently residing.
- For non-Canadian residents travelling in Canada for a short period of time, their foreign residential address is required.
- For non-Canadian residents living in Canada for a longer period of time (for example, a student), then the person's temporary Canadian address should be provided.

4. Occupation/business fields

Occupation

When entering occupation information, you should be as descriptive as possible. If the person is a manager, provide the area of management, such as “hotel reservations manager” or “retail clothing store manager.” If the person is a consultant, provide the type of consulting, such as “IT consultant” or “forestry consultant.” If the person is a professional, provide the type of profession, such as “petroleum engineer” or “family physician.” If the person is a labourer, provide the type of labour performed, such as “road construction worker” or “landscape labourer.” If the person is not working, you should still be as descriptive as possible, and indicate “student,” “unemployed,” “retired,” etc.

You can enter a full numeric classification code and the code title (for example NAICS - North American Industry Classification System or NOC - National Occupational Classification), followed by a text description of the occupation. A numeric code on its own is not sufficient. For example, if the occupation is secondary school teacher, you can enter “NAICS 611110 – Elementary and secondary schools, secondary school teacher” or “NOC 4031 – Secondary school teacher”.

Name of employer

Enter the name of the person’s employer. Do not provide the name of a supervisor or manager. This field is meant to capture the name of the business that employs the person. If the person has multiple employers, you only need to provide one but it should be the person’s primary employer. Providing the name of employer can augment the description of a person’s occupation. For example, “retail clothing store manager for ABC high-end clothing store” and “retail clothing store manager for XYZ discount clothing store” are more descriptive than “retail clothing store manager” on its own.

Nature of entity’s principal business

You should be as descriptive as possible when entering the entity’s principal business. If the entity’s principal business is “sales,” provide the type of sales, such as “pharmaceutical sales” or “retail clothing sales.”

You can enter a full numeric classification code and the code title (for example NAICS - North American Industry Classification System), followed by a text description of the entity’s principal business. A numeric code on its own is not sufficient. For example, if the entity is a golf equipment store, you can enter “NAICS 451111 – Golf equipment and supplies specialty stores.”

5. Identification fields

Identifier type

Select the identifier type for the person or entity as applicable. If the identifier type is not listed, select “Other” and provide details. If you use the dual process

method to identify a person, you must provide details of both sources of information in the identifier type fields.

Please note that a Social Insurance Number (SIN) must not be reported to FINTRAC. In addition, you cannot use documentation for identification purposes where it is prohibited by provincial legislation.

For more information on how to identify persons and entities, refer to FINTRAC's guidance on [Methods to verify the identity of persons and entities](#).

Number associated with identifier type

This is the number indicated on the identifier type that was used to verify the identity of the person or entity. For example, on a driver's licence, the licence number is the identification number and on a Certificate of Incorporation, the incorporation number is the identification number.

Jurisdiction of issue (country, province or state)

Provide the country, province, or state that issued the documentation used to identify the person or entity. If the documentation is issued by a country, enter that country as the jurisdiction of issue. If the documentation is issued by a province or state, enter that province or state as the jurisdiction of issue, and provide the corresponding country information.

6. Telephone number fields

If the telephone number is from Canada or the United States, enter the area code and local number (for example, 999-999-9999).

If the telephone number is from outside Canada or the United States, enter the country code, city code and local number using 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.

Specific field instructions

This section contains instructions for specific fields and are laid out in the same order and section as they appear on the LCTR form. If a field does not have instructions, it may be that none has been provided, or they can be found in the standardized field instructions section.

General information

***Reporting entity number**

You must enroll in FWR to submit reports electronically. Provide the seven-digit identifier number assigned to you by FINTRAC at enrolment.

‡Reporting entity report reference number

A unique report reference number assigned by you, your organization or your service provider who submits reports on your behalf, as applicable.

Which one of the following types of reporting entities best describes you?

***Activity sector**

Enter your business activity sector. If you are involved in more than one type of business activity, indicate the one applicable to the transaction being reported. If there is more than one business activity for one or more transactions on the report, select only one to indicate your principal type of business activity.

Whom can FINTRAC contact about this report?

Enter the contact information of the person you would like FINTRAC to liaise with in the event that a follow up is required. You must ensure that all of your contacts' information is up to date in FWR prior to submitting your report(s).

Report information

Indicate whether the report is related to one or multiple transactions that occurred within a consecutive 24-hour period. When you provide a date and time, you must include the time zone. See below for formatting.

‡24-hour aggregation type

Indicate the type of aggregation — conductor, on behalf of (third party), beneficiary — used when multiple transactions occur within a consecutive 24-hour period. If the report is for one transaction only, or for a Ministerial Directive, aggregating transactions does not apply and 'Not applicable (N/A)' should be selected.

****Note:** You must provide a start date/time and end date/time in the fields below, even if there is no aggregation and you select "not applicable" in the aggregation type field.

‡24-hour period start date and time

Provide the start date and time of the 24-hour period. You must include the time zone (that is, UTC offset) in the 24-hour period start time field. The start time must be entered in the following format: HH:MM:SS±ZZ:ZZ. For example, 1:25:06 pm in Ottawa, ON would be reported as 13:25:06-05:00.

‡24-hour period end date and time

Provide the end date and time of the 24-hour period. If your 24-hour period starts at 8:00 am, it would end at 7:59 am the following day. You must include the time zone (that is, UTC offset) in the 24-hour period end time field. See the above field for formatting.

****Note:** The start date/time and end date/time that you provide will establish the 24-hour period in which you look for possible aggregate transactions, and report all applicable transactions within. Because you must aggregate on each party separately (conductor, on behalf of [third party], or beneficiary), it is possible to have multiple 24-hour windows (for example, a 24-hour window for conductors that is different than your 24-hour window for beneficiaries).

Ministerial Directive

You must indicate whether the transaction being reported in your LCTR is being submitted under a Ministerial Directive. Leave this field blank if the transaction(s) are not part of a Ministerial Directive.

An LCTR submitted under a Ministerial Directive can contain only one transaction and it must be below threshold. Therefore, if you indicate that the transaction is being submitted under a Ministerial Directive, you must also select 'Not applicable (N/A)' in the '24-hour aggregation type' field.

****Note:** Only **one** Ministerial Directive (IR2020) is available for an LCTR report, which can contain only one transaction.

Transaction information

†Date and time of transaction

Enter the date and time of the large cash transaction. The date of the transaction must be no earlier than January 31, 2003. It cannot be a future date and must be the same as or earlier than the posting date.

Select the time zone based on the location where the transaction took place (for example, the location of where the cash was received). A report can contain multiple transactions that took place in different time zones, but these transactions should all be within your 24-hour aggregation window that is indicated by the 24-hour start and end times in the report. See the [24-hour rule guidance](#) for more information.

This field is mandatory, unless you are a financial entity and indicate that the transaction was a night deposit in the night deposit indicator field. In this case, if you do not provide the date of transaction in this field, you **must** provide the date of posting.

***Method of transaction**

Select the method that describes how you received the cash. If the method is not listed, select "Other."

****Note:** "Night deposit" and "quick drop" are **only applicable to financial entities** and if you select either of these methods of transaction, you will not be required to complete the conductor information fields.

***If "Other," please specify**

Provide a brief description on how you received the cash.

Date of posting (if different from date of transaction)

Enter the date the transaction cleared, if this differs from the date of the transaction. The date must be no earlier than January 31, 2003. It cannot be a future date and must be later than the transaction date. This field is mandatory if the transaction was a night deposit and the date of transaction was not provided or differs from the posting date. In all other cases, this is a reasonable efforts field.

#Threshold indicator

Indicate whether the value of the cash received for the transaction was above or below \$10,000 at the time of receipt. Select "above threshold" if the transaction is equal to \$10,000 or more and "below threshold" if it is under \$10,000.

#Reporting entity transaction reference number

This is a unique reference number assigned to the transaction by you, your organization or your service provider who submits reports on your behalf as applicable.

Purpose of transaction

This is the reason for the transaction and it may not be the same as the information provided in the details of disposition field. However, your narrative on the purpose of transaction should expand on the disposition. The **bolded text** below are examples of purpose of transaction:

- A client brings cash tips from his job as a server for deposit into his bank account to **save for the purchase of a home.**
- A client pays cash to purchase jewellery that will be **a gift for a friend.**
- A client brings in cash to exchange CAD to GBP for **vacation purposes.**
- A client brings in cash to purchase a bank draft in order to **buy a boat.**

Information about where the transaction was conducted

Provide information about the physical location where the transaction took place. For example, if the transaction was conducted at a branch, provide the reporting entity location number of that branch. If the transaction was conducted at an ATM, provide the reporting entity location number of that ATM.

***Reporting entity location number**

This represents information about where the transaction took place.

The location number is created and assigned to you by FINTRAC during the FWR enrolment process and maintained by your FWR administrator. For more information about this, contact your FWR administrator.

Starting action

***Amount**

Enter the total amount of cash involved in the starting action. If this amount was not in Canadian dollars, do not convert it to CAD but provide the currency type in the next field.

***Currency**

Enter the currency of the starting action, including if it was in Canadian dollars. If the currency type is not in the list provided, you must select “Other” and provide the full name of the currency.

****Note: Source of cash**

The following fields are about how the conductor obtained the cash and the source of cash:

- How was the cash obtained?
- Was information about the source (person /entity) of cash obtained?
- Source of cash – person or entity

Although the information in these fields are related, they are different as demonstrated by the example below:

Vicky Violet brings in \$12,000 cash for deposit into her bank account and tells the bank that she obtained this cash when she sold her car to Griffin Grey. She was only able to provide Griffin Grey’s name to the bank because she did not have information on his account number, policy number or identifying number. As such, the source of cash fields would be completed as follows:

- How was the cash obtained? **“Sale of car”**
- Was information about the source (person / entity) of cash obtained? **“Yes”**
- Source of cash – **“Griffin Grey”**

Please see the specific field instructions that follow for more information on completing these fields.

How was the cash obtained?

This is how the conductor initially acquired the cash used for the transaction, not where the funds may have been transferred from. For example, you can obtain cash from activities such as employment, sale of a large asset and gifts. This information must be reported if obtained.

‡Was information about the source (person / entity) of cash obtained?

This field is a “Yes/No” question. Select “yes” if you have the name of any person or entity that is the **source of the cash** their account number or policy number, or an identifying number if there is no account number or policy number. Otherwise, select “no” to indicate that you do not have the information.

Source of cash

If you have information on any source of the cash involved in the transaction, you must report it. If there are multiple sources, you must provide information for each source.

Source of cash - person

†Surname

†Given name

Other/initial

Account number

Policy number

Identifying number

If there is no account or policy number, provide an identifying number if available.

Source of cash - entity

†Name of entity

Account number

Policy number

Identifying number

If there is no account or policy number, provide an identifying number if available.

‡Does this transaction involve a deposit to a business account?

This field is a “Yes/No” question. “Yes” should only be selected if a transaction involves a deposit to a business account at a financial entity, securities dealer or casino (account-based reporting entities).

Conductor - person

Provide all the information you have on one, or multiple persons specified as the conductors of the transaction.

†Surname**†Given name****Other/Initial****Alias****†Client number**

A unique identifying number assigned by the reporting entity to the person conducting the transaction.

Apt/Room/Suite/Unit number**House/Building number****†Street address****†City****District****†Country****†Province or state****Sub-province and/or sub-locality****Postal or zip code****Unstructured address details****Telephone number**

Extension**Email address****†Date of birth****Country of residence**

Enter the primary country of residence for the person. It can be the same or different from the country entered in the address section.

†Occupation**Name of employer****Identification of the person****†Identifier type**

†If “Other”, please specify

†Number associated with identifier type**†Jurisdiction of issue (country)****†Jurisdiction of issue (province or state)****Conductor - entity**

Provide all the information you have on one, or multiple entities specified as the conductors of the transaction.

†Name of entity**†Client number**

A unique identifying number assigned by the reporting entity to the entity conducting the transaction.

Apt/Room/Suite/Unit number**House/Building number****†Street address****†City****District**

†Country

†Province or state

Sub-province and/or sub-locality

Postal or zip code

Unstructured address details

Telephone number

Extension

Email address

†Nature of entity's principal business

†Is the entity registered or incorporated?

†Incorporation number / †Jurisdiction of issue (country, province or state)

Provide the incorporation number and jurisdiction of issue of the entity conducting the transaction for each jurisdiction where the entity is incorporated.

†Registration number / †Jurisdiction of issue (country, province or state)

Provide the registration number and jurisdiction of issue of the entity conducting the transaction for each jurisdiction where the entity is registered.

Identification of the entity

Provide the following information that was used to verify the identity of the entity. For some entities, this information may be the same as the registration or incorporation information provided above.

†Identifier type

†If "Other", please specify

†Number associated with identifier type

†Jurisdiction of issue (country)

†Jurisdiction of issue (province or state)

Person authorized to bind the entity or act with respect to the account (maximum 3)

If the conductor is an entity, you must provide the information for up to three persons who are authorized to bind the entity or act with respect to the account.

†Surname

†Given name

Other/Initial

On behalf of indicator

†Was this transaction conducted on behalf of another person or entity?

This field is a “Yes/No” question. Select “yes” if the transaction was conducted on behalf of another person or entity. The “on behalf of” party is also known as the “third party” or the party providing instructions for the transaction.

Conductor (business account)

Provide the name of conductor (person or entity) if you indicated that this transaction involves a deposit to a business account. A deposit into a business account is only applicable to financial entities, securities dealers and casinos (account-based reporting entities).

†Surname

†Given name

Other/Initial

†Name of entity

On behalf of indicator

†Was this transaction conducted on behalf of another person or entity?

This field is a “Yes/No” question. Select “yes” if the transaction was conducted on behalf of another person or entity. The “on behalf of” party is also known as the “third party” or the party providing instructions for the transaction.

Information about the third party on whose behalf the transaction was conducted

If the transaction was conducted **on behalf of another person**, you must include the relevant information.

†Surname

†Given name

Other/Initial

Alias

Client number

Apt/Room/Suite/Unit number

House/Building number

†Street address

†City

District

†Country

†Province or state

Sub-province and/or sub-locality

Postal or zip code

Unstructured address details

Telephone number

Extension

Email address

Date of birth

Country of residence

†Occupation

Name of employer

Identification of the person on whose behalf the transaction was conducted

Identifier type

†If “Other”, please specify

Number associated with identifier type

Jurisdiction of issue (country)

Jurisdiction of issue (province or state)

Relationship of the person named above to the person or entity conducting the transaction

†Relationship

Select the relationship of the “on behalf of” party to the person or entity conducting the transaction. The “on behalf of” party is understood to be the person or entity that instructs the person or entity conducting the transaction.

†If “Other”, please specify

If the transaction was conducted **on behalf of another entity**, you must include the relevant information.

†Name of entity

Client number

Apt/Room/Suite/Unit number

House/Building number

†Street address

†City

District

†Country

†Province or state

Sub-province and/or sub-locality

Postal or zip code

Unstructured address details

Telephone number

Extension

Email address

†Nature of entity's principal business

†Is the entity registered or incorporated?

†Incorporation number / †Jurisdiction of issue (country, province or state)

Provide the incorporation number and jurisdiction of issue of the entity on whose behalf the transaction was conducted for each jurisdiction where the entity is incorporated.

†Registration number / †Jurisdiction of issue (country, province or state)

Provide the registration number and jurisdiction of issue of the entity on whose behalf the transaction was conducted for each jurisdiction where the entity is registered.

Identification of the entity on whose behalf the transaction was conducted

Provide the following information that was used to verify the identity of the entity on whose behalf the transaction was conducted. For some entities, this information may be the same as the registration or incorporation information provided above.

Identifier type

†If "Other," please specify

Number associated with identifier type

Jurisdiction of issue (country)

Jurisdiction of issue (province or state)

**Person authorized to bind the entity or act with respect to the account
(maximum 3)**

Surname

Given name

Other/Initial

**Relationship of the entity named above to the person or entity conducting
the transaction**

†Relationship

Select the relationship of the “on behalf of” party to the person or entity conducting the transaction. The “on behalf of” party is understood to be the person or entity that instructs the person or entity conducting the transaction.

†If “Other,” please specify

Completing action

***Details of disposition**

This describes what happened to the cash involved in the transaction. Select the following disposition(s) based on the client’s instructions:

- **Added to virtual currency wallet** - To be used when virtual currency is added to a virtual currency wallet. **This cannot be the first disposition.** For example, the cash received must be exchanged to virtual currency (first disposition) before it can be added to a virtual currency wallet (subsequent disposition).
- **Denomination exchange** - To be used when the cash received is exchanged from one unit value to another (for example, 20s to 100s) within the same currency.
- **Deposit to account** – To be used when cash is deposited into an account at an account-based reporting entity, such as a bank or credit union.
- **Exchange to fiat currency** - To be used for a fiat-to-fiat currency exchange (for example, CAD to USD) or a virtual currency-to-fiat exchange (for example, BTC to CAD). **A virtual currency-to-fiat exchange cannot be the first disposition.** The cash received must be exchanged to virtual currency (first disposition) before the virtual currency can be exchanged to fiat (subsequent disposition).
- **Exchange to virtual currency** - To be used for a fiat-to-virtual currency exchange (for example, CAD to BTC) or a virtual currency-to-virtual currency exchange (for example, BTC to ETH). **A virtual currency-to-virtual currency exchange cannot be the first disposition.** The cash

- received must be first exchanged to virtual currency (first disposition) before the virtual currency can be exchanged to another virtual currency.
- **Holding funds** - To be used when a non-account-based reporting entity (for example, a money services business) receives cash and holds these funds for a client for the purpose of a future transaction (for example, buy virtual currency when it hits a certain threshold).
 - **Investment product purchase or deposit** - To be used when a client buys or makes a deposit to a Guaranteed Investment Contract (GIC), RRSP, stock from an exchange (for example, TSX), or any other such investments.
 - **Issued cheque** - To be used for the issuance of a certified cheque, a disbursement through a casino cheque, etc.
 - **Life insurance policy purchase or deposit** - To be used when a client buys or puts a deposit down to purchase a life insurance policy.
 - **Outgoing domestic funds transfer** - To be used when the transaction instructions are for the transfer of funds within Canada.
 - **Outgoing email/mobile money transfer** - To be used when the funds are transferred using a recipient's email address or phone number.
 - **Outgoing international funds transfer** - To be used when the transaction instructions are for the transfer of funds outside of Canada.
 - **Outgoing virtual currency transfer** - To be used when a reporting entity transfers virtual currency from a client's virtual currency wallet to another virtual currency wallet. **This cannot be the first disposition.** For example, the cash received must be exchanged to virtual currency (first disposition) before it can be added to a virtual currency wallet (second disposition) and then transferred to another virtual currency wallet.
 - **Purchase of bank draft** - To be used when a client purchases a bank draft from a financial entity. The term bank draft refers to a negotiable instrument that can be used as payment (similar to a cheque). Unlike a cheque though, a bank draft is guaranteed by the issuing bank.
 - **Purchase of casino product** - To be used when a client purchases a casino product. A casino product can include, but is not limited to, chips, plaques and tokens.
 - **Purchase of jewellery** - To be used when a client purchases jewellery from a dealer in precious metals and precious stones (DPMS). Jewellery means objects made of precious metals, precious stones or pearls that are intended for personal adornment.
 - **Purchase of money order** - To be used when a client purchases a money order. A money order is a certificate, usually issued by a government or financial institution that allows the stated payee to receive cash on demand. A money order functions much like a cheque as the purchaser of the money order may stop the payment.
 - **Purchase of precious metals** - To be used when a client purchases precious metals from a DPMS. Precious metals means gold, silver, palladium and platinum in the form of coins, bars, ingots, granules or in other similar forms.

- **Purchase of precious stones** - To be used when a client purchases precious stones from a DPMS. Precious stones means diamonds, sapphires, emeralds, tanzanites, rubies or alexandrites.
- **Purchase of prepaid payment product/card** - To be used when a client purchases a prepaid payment product (PPP). The PPP must be tied to a PPP account held by a financial entity. A PPP is a product that is issued by a financial entity that enables a person or entity to engage in a transaction by giving them electronic access to funds or to virtual currency paid into a PPP account held with the financial entity in advance of a transaction taking place.
- **Real estate purchase or deposit** - To be used when a client purchases or puts a deposit down on real estate.
- **Purchase of / Payment for goods** – To be used when a client purchases or pays for goods not already captured by any other disposition type included in the list above (for example, car, yacht).
- **Purchase of / Payment of services** – To be used when a client purchases or pays for services not already captured by any other disposition type included in the list above (for example, cable, internet, hydro).
- **Other** - To be used when the disposition is not captured by any other disposition type included in the list above. Upon selecting “Other,” you must provide a description of the disposition. “Other” should not be used to combine multiple dispositions that are listed above. Specifically, if the completing action has multiple dispositions that are included in the list above, then each disposition should be selected and not combined under “Other”.

A completing action may have one or more dispositions, depending on the client’s instructions and your business process.

Example 1: A single disposition

Your client brings in \$12,000 cash and instructs that the entire amount be deposited into the client’s savings account. There is only one disposition – “deposit to account.”

Example 2: Multiple dispositions

Your client brings in \$12,000 cash and instructs that \$5,000 be deposited into the client’s savings account and \$7,000 be exchanged to bills in a larger denomination. There are two dispositions—“deposit to account” and “denomination exchange.”

Example 3: A single disposition or multiple dispositions (Depending on your business process)

Your client brings in \$12,000 cash and instructs that \$12,000 be transferred to a friend outside Canada.

- If you are financial entity, you may have a business process to deposit the cash into the client’s account before the amount is sent to the client’s friend. In this case, there are two dispositions—“deposit to account” and “outgoing international funds transfer.” If your business process is to send the amount to the friend without depositing into an account, then there is one disposition—“outgoing international funds transfer.”
- If you are an MSB, you may have a process to hold the funds until a later date on which you send the amount. In this case, there are two dispositions — “holding funds” and “outgoing international funds transfer,” If your business process is to send the amount to the friend without holding the funds, then there is one disposition—“outgoing international funds transfer.”

†If “Other”, please specify

If the disposition is “Other”, provide details that describe the disposition of the transaction.

†Amount

Enter the amount involved in the completing action. For example, this may be the amount of:

- virtual currency after an exchange to virtual currency
- funds being initiated for an outgoing international funds transfer
- funds indicated on the bank draft

†Currency

If the disposition involves a fiat currency, enter the currency even if it was in Canadian dollars. If the currency type is not in the list provided, you must select “Other” and provide the name of the currency.

†Virtual currency type

†If “Other”, please specify

Exchange rate

Provide the rate of exchange that you used for the transaction.

†Value in Canadian dollars

Provide the Canadian dollar value of the disposition if it is not funds. For example, provide the value of the virtual currency, jewellery, precious metals or precious stones that was purchased. This may be the market, retail or other value that you would use in the ordinary course of your business at the time of transaction, and as detailed by and in accordance with your policies and procedures.

†Reference number

If the transaction involved a reference number, provide it in this field.

If the transaction involves an account at a financial entity, securities dealer or casino (account-based reporting entity), **do not provide the account number information in this field**—instead, provide that information in the account number field.

For all other reporting entities, if you have an internal account number that is used as a reference number, then provide the internal account number in this field.

†Other number related to reference number

Provide any other number related to the reference number as applicable.

†Financial institution number**†Branch number****†Account number**

If the transaction involves an account at a financial entity, securities dealer or casino (account-based reporting entities), provide that account number.

If you are not an account-based reporting entity, but the transaction involves an account at an account-based reporting entity, provide that account number in this field.

†Account type

†If “Other”, please specify

†Account currency**Date account opened****Account holder****†Surname****†Given name****Other/Initial****†Name of entity**

Involved in the completing action

‡Was there any other person or entity involved in the completing action?

Person involved in the completing action

If you have information about other persons involved in the completing action, you must include it. These persons cannot be the conductor, on behalf of party, or beneficiary of the transaction.

†Surname

†Given name

Other/Initial

†Account number

†Policy number

†Identifying number

Entity involved in the completing action

If you have information about other entities involved in the completing action, you must include it. These entities cannot be the conductor, on behalf of party, or beneficiary to the transaction.

†Name of entity

†Account number

†Policy number

†Identifying number

Beneficiary

Provide [beneficiary](#) information for each completing action. A beneficiary, for example, can be the person who receives the virtual currency, the person named on a money order, or the person who receives the jewellery. The beneficiary can be the same person or entity that conducts the transaction or someone else. The beneficiary cannot be the reporting entity.

Person beneficiary

†Surname

†Given name

Other/Initial

Alias

Client number

Apt/Room/Suite/Unit number

House/Building number

Street address

City

District

Country

Province or state

Sub-province and/or sub-locality

Postal or zip code

Unstructured address details

Telephone number

Extension

Email address

Date of birth

Country of residence

Occupation

Name of employer

Identification of the person beneficiary

Identifier type

†If “Other”, please specify

Number associated with identifier type

Jurisdiction of issue (country)

Jurisdiction of issue (province or state)

Relationship of the person named above to the person or entity conducting the transaction

Relationship

The relationship of the beneficiary to the person or entity conducting the transaction. If the beneficiary and conductor are the same, select “self.”

†If “Other,” please specify

Entity beneficiary

†Name of entity

Client number

Apt/Room/Suite/Unit number

House/Building number

Street address

City

District

Country

Province or state

Sub-province and/or sub-locality

Postal or zip code

Unstructured address details

Telephone number

Extension

Email address

Nature of entity's principal business

Is the entity registered or incorporated?

Incorporation number / Jurisdiction of issue (country, province or state)

Provide the incorporation number and jurisdiction of issue of the entity that is the beneficiary for each jurisdiction where the entity is incorporated.

Registration number / Jurisdiction of issue (country, province or state)

Provide the registration number and jurisdiction of issue of the entity that is the beneficiary for each jurisdiction where the entity is registered.

Identification of the entity beneficiary

Provide the following information that was used to verify the identity of the entity that is a beneficiary. For some entities, this information may be the same as the registration or incorporation information provided above.

Identifier type

***If "Other," please specify**

Number associated with identifier type

Jurisdiction of issue (country)

Jurisdiction of issue (province or state)

**Person authorized to bind the entity or act with respect to the account
(maximum 3)**

Surname

Given name

Other/Initial

Relationship of the entity named above to the person or entity conducting the transaction

Relationship

The relationship of the beneficiary to the person or entity conducting the transaction. If the beneficiary and conductor are the same, select “self.”

***If “Other,” please specify**

Annex 2 – Scenarios

The following scenarios demonstrate the expected field information in an LCTR based on the client’s instructions and transaction(s) in each scenario.

For large cash transaction scenarios related to the 24-hour rule, See Annex 2 of the 24-hour rule guidance.

Scenario 1: Multiple transactions

Benny Brown walked into XYZ Bank and instructed the bank to deposit \$5,000 CAD into the Happy Harmony Music Company’s business account and \$5,000 USD into his personal account. Benny Brown advised the bank that he was a customer of Happy Harmony Music Company. XYZ Bank was not able to obtain the source of cash for the \$5,000 CAD nor the \$5,000 USD. Because XYZ Bank’s process is to treat these instructions as two transactions, the bank submits an LCTR with the following information.

General information

Information about XYZ Bank

- **Reporting entity number:** The reporting entity number assigned to XYZ Bank when it enrolled with FWR
- **Reporting entity report reference number:** The unique number for this report that was assigned by XYZ Bank or its service provider
- **Activity sector:** Bank

- **Contact information for this report:** Information about the person at XYZ Bank that FINTRAC can liaise with in the event that a follow up is required
- **Aggregation type:** Conductor
- **24-hour period for aggregation:** XYZ Bank's 24-hour window for aggregation as indicated by the start and end times

Transaction 1 of 2

Information about transaction 1 of 2

- **Date and time of transaction:** The date and time the cash was received by XYZ Bank
- **Method of transaction:** In person
- **Threshold indicator:** Below threshold
- **Reporting entity transaction reference number:** The unique number for this transaction that was assigned by XYZ Bank or its service provider
- **Reporting entity location number:** Information about where the transaction took place

Starting action 1 of transaction 1

Information about starting action 1 of transaction 1

- **Amount:** 5,000
- **Currency:** CAD
- **Was information about the source (person /entity) of cash obtained?** No
- **Does this transaction involve a deposit to a business account?** Yes
- **Conductor name:** Benny Brown
- **Was this transaction conducted on behalf of another person or entity?** No

Completing action 1 of transaction 1

Information about completing action 1 of transaction 1

- **Details of disposition:** Deposit to account

- **Amount:** 5,000
- **Currency:** CAD
- **Financial institution number and branch number:** For XYZ Bank
- **Account number and account information:** For the business account of Happy Harmony Music Company
- **Account holder:** Happy Harmony Music Company
- **Was there any other person or entity involved in the completing action?** No
- **Beneficiary information:** Information about Happy Harmony Music Company including client number, address, telephone number, email address, nature of principal business, registration/incorporation details, identification details, person(s) authorized to bind the entity or act with respect to the account
- **Relationship of the entity named above (beneficiary) to the person conducting the transaction:** Vendor / Supplier

Transaction 2 of 2

Information about transaction 2

- **Date and time of transaction:** The date and time the cash was received by XYZ Bank
- **Method of transaction:** In person
- **Threshold indicator:** Below threshold
- **Reporting entity transaction reference number:** The unique number for this transaction that was assigned by XYZ Bank or its service provider
- **Reporting entity location number:** Information about where the transaction took place

Starting action 1 of transaction 2

Information about starting action 1 of transaction 2

- **Amount:** 5,000
- **Currency:** USD
- **Was information about the source (person /entity) of cash obtained?** No

- **Does this transaction involve a deposit to a business account?** No
- **Conductor information:** Information about Benny Brown including client number, address, telephone number, email address, date of birth, country of residence, occupation, name of employer, and identification details
- **Was this transaction conducted on behalf of another person or entity?** No

Completing action 1 of transaction 2

Information about completing action 1 of transaction 2

- **Details of disposition:** Deposit to account
- **Amount:** 5,000
- **Currency:** USD
- **Financial institution number and branch number:** For XYZ Bank
- **Account number and account information:** For the personal account of Benny Brown
- **Account holder:** Benny Brown
- **Was there any other person or entity involved in the completing action?** No
- **Beneficiary information:** Information about Benny Brown including client number, address, telephone number, email address, date of birth, country of residence, occupation, name of employer and identification details
- **Relationship of the person named above (beneficiary) to person conducting the transaction:** Self

Scenario 2 – Multiple completing actions

Poppy Red brings \$10,500 cash to ABC Credit Union. The credit union follows its policies and procedures on reasonable measures and asks Poppy Red where the money came from. Poppy Red tells the credit union that she obtained the cash when she sold her boat to Barry Black. Although Poppy Red is able to provide Barry Black's name to the credit union, she is not able to provide any

other source of cash information (account number, policy number or identifying number). Poppy Red instructs the teller to:

- deposit \$5,500 into her account so she can save for a vacation;
- exchange the remaining \$5,000 into Euro; and
- send the Euro amount to Olive Green in Ireland for a wedding gift.

The exchange rate to convert CAD into Euro is 0.680586 and Olive Green has an account at The Celadon Bank in Dublin, Ireland. In order to complete Poppy Red's instructions, the teller follows the credit union's business process and deposits the entire cash amount of \$10,500 into Poppy Red's account, withdraws \$5,000 to exchange into Euro then sends the Euro amount to Olive Green. Therefore, ABC Credit Union submits an LCTR with the following information.

General information

Information about ABC Credit Union

- **Reporting entity number:** The reporting entity number assigned to ABC Credit Union when it enrolled with FWR
- **Reporting entity report reference number:** The unique number for this report that was assigned by ABC Credit Union or its service provider
- **Activity sector:** Credit Union
- **Contact information for this report:** Information about the person at ABC Credit Union that FINTRAC can liaise with in the event that a follow up is required
- **Aggregation type:** Not applicable
- **24 hour period for aggregation:** ABC Credit Union's 24-hour window for aggregation as indicated by the start and end times

Transaction 1 of 1

Information about transaction 1

- **Date and time of transaction:** The date and time the cash was received by ABC Credit Union
- **Method of transaction:** In person
- **Threshold indicator:** Above threshold
- **Reporting entity transaction reference number:** The unique number for this

transaction that was assigned by ABC Credit Union or its service provider

- **Purpose of transaction:** Saving for vacation and wedding gift for friend in Ireland
- **Reporting entity location number:** Information about where the transaction took place

Starting action 1 of transaction 1

Information about starting action 1 of transaction 1

- **Amount:** 10,500
- **Currency:** CAD
- **How was the cash obtained?** Sale of boat
- **Was information about the source (person /entity) of cash obtained?** Yes
- **Source of cash:** Barry Black
- **Does this transaction involve a deposit to a business account?** No
- **Conductor information:** Information about Poppy Red including client number, address, telephone number, email address, date of birth, country of residence, occupation, name of employer, and identification details
- **Was this transaction conducted on behalf of another person or entity?** No

Completing action 1 of transaction 1

Information about completing action1 of transaction 1

- **Details of disposition:** Deposit to account
- **Amount:** 10,500
- **Currency:** CAD
- **Financial institution number and branch number:** For ABC Credit Union
- **Account number and account information:** For the personal account of Poppy Red
- **Account holder:** Poppy Red
- **Was there any other person or entity involved in the completing action?** No
- **Beneficiary information:** Information about Poppy Red including client number,

address, telephone number, email address, date of birth, country of residence, occupation, name of employer and identification details

- **Relationship of the person named above (beneficiary) to person conducting the transaction:** Self

Completing action 2 of transaction 1

Information about completing action 2 of transaction 1

- **Details of disposition:** Exchange to fiat currency
- **Amount:** 3,402.93
- **Currency:** EUR
- **Exchange rate:** 0.680586
- **Was there any other person or entity involved in the completing action?:** No
- **Beneficiary information:** Information about Poppy Red including client number, address, telephone number, email address, date of birth, country of residence, occupation, name of employer and identification details
- **Relationship of the person named above (beneficiary) to person conducting the transaction:** Self

Completing action 3 of transaction 1

Information about completing action 3 of transaction 1

- **Details of disposition:** Outgoing international funds transfer
- **Amount:** 3,402.93
- **Currency:** EUR
- **Account number and account information:** For Olive Green's account at The Celadon Bank in Dublin, Ireland
- **Account holder:** Olive Green
- **Was there any other person or entity involved in the completing action?:** No
- **Beneficiary information:** Olive Green's name. Also, if obtained, information about Olive Green including client number, address, telephone number, email address, date of birth, country of residence, occupation, name of employer and

identification details

- **Relationship of the person named above (beneficiary) to person conducting the transaction:** Friend

Scenario 3 – Virtual Currency Exchange

Vicky Violet walked into the ABC Exchange Company and exchanged \$20,000 in cash for Litecoin. ABC Exchange Company submits an LCTR with the following information.

General information

Information about ABC Exchange Company

- **Reporting entity number:** The reporting entity number assigned to ABC Exchange Company when it enrolled with FWR
- **Reporting entity report reference number:** The unique number for this report that was assigned by ABC Exchange Company or its service provider
- **Activity sector:** Money services business
- **Contact information for this report:** Information about the person at ABC Exchange Company that FINTRAC can liaise with in the event that a follow up is required
- **Aggregation type:** Not applicable
- **24 hour period for aggregation:** ABC Exchange Company's 24-hour window for aggregation as indicated by the start and end times

Transaction 1 of 1

Information about transaction 1

- **Date and time of transaction:** The date and time the cash was received by ABC Exchange Company
- **Method of transaction:** In person
- **Threshold indicator:** Above threshold

- **Reporting entity transaction reference number:** The unique number for this transaction that was assigned by ABC Exchange Company or its service provider
- **Reporting entity location number:** Information about where the transaction took place

Starting action 1 of transaction 1

Information about starting action 1 of transaction 1

- **Amount:** 20,000
- **Currency:** CAD
- **Was information about the source (person /entity) of cash obtained?** No
- **Does this transaction involve a deposit to a business account?** No
- **Conductor information:** Information about Vicky Violet including client number, address, telephone number, email address, date of birth, country of residence, occupation, name of employer, and identification details
- **Was this transaction conducted on behalf of another person or entity?** No

Completing action 1 of transaction 1

Information about completing action1 of transaction 1

- **Details of disposition:** Exchange to virtual currency
- **Amount:** 279.18
- **Virtual currency type:** Litecoin
- **Exchange rate:** 0.013959
- **Reference number and other related numbers:** Reference number assigned by ABC Exchange Company or its service provider, if applicable, and any other related numbers
- **Was there any other person or entity involved in the completing action?** No
- **Beneficiary information:** Information about Vicky Violet including client number, address, telephone number, email address, date of birth, country of residence, occupation, name of employer and identification details
- **Relationship of the person named above (beneficiary) to person conducting**

the transaction: Self

Scenario 4(a) – Outgoing international funds transfer – Person conductor

Tommy Tangerine walked into One Stop Money Shop with €10,000 and requested that the funds be sent to ABC Enterprises in Italy to pay for pots and pans. Tommy Tangerine told One Stop Money Shop that he was sending the funds on behalf of his employer, Kitchen Supply Company. One Stop Money Shop submits an LCTR with the following information.

General information

Information about One Stop Money Shop

- **Reporting entity number:** The reporting entity number assigned to One Stop Money Shop when it enrolled with FWR
- **Reporting entity report reference number:** The unique number for this report that was assigned by One Stop Money Shop or its service provider
- **Activity sector:** Money services business
- **Contact information for this report:** Information about the person at One Stop Money Shop that FINTRAC can liaise with in the event that a follow up is required
- **Aggregation type:** Not applicable
- **24 hour period for aggregation:** One Stop Money Shop’s 24-hour window for aggregation as indicated by the start and end times

Transaction 1 of 1

Information about transaction 1 of 1

- **Date and time of transaction:** The date and time the cash was received by One Stop Money Shop
- **Method of transaction:** In person
- **Threshold indicator:** Above threshold

- **Reporting entity transaction reference number:** The unique number for this transaction that was assigned by One Stop Money Shop or its service provider
- **Purpose of transaction:** Payment for kitchen supplies — pots and pans
- **Reporting entity location number:** Information about where the transaction took place

Starting action 1 of transaction 1

Information about starting action 1 of transaction 1

- **Amount:** 10,000
- **Currency:** EUR
- **Was information about the source (person/entity) of cash obtained?** No
- **Does this transaction involve a deposit to a business account?** No
- **Conductor information:** Information about Tommy Tangerine including client number, address, telephone number, email address, date of birth, country of residence, occupation, name of employer identification details
- **Was this transaction conducted on behalf of another person or entity?** Yes
- **Information about the third party on whose behalf the transaction was conducted:** Information about Kitchen Supply Company including client number, address, telephone number, email address, nature of principal business, registration/incorporation details, identification details, and person(s) authorized to bind the entity or act with respect to the account
- **Relationship of the entity named above (third party) to the person conducting the transaction:** Employer

Completing action 1 of transaction 1

Information about completing action1 of transaction 1

- **Details of disposition:** Outgoing international funds transfer
- **Amount:** 10,000
- **Currency:** EUR
- **Reference number and other related numbers:** Reference number assigned by One Stop Money Shop or its service provider, if applicable, and any other

related numbers

- **Account number and account information:** For ABC Enterprises' bank account in Italy
- **Account holder:** ABC Enterprises
- **Was there any other person or entity involved in the completing action?** No
- **Beneficiary information:** Name of ABC Enterprises. Also, if obtained, information about ABC Enterprises including client number, address, telephone number, email address, nature of principal business, registration/incorporation details, identification details, and person(s) authorized to bind the entity or act with respect to the account
- **Relationship of the entity named above (beneficiary) to the person conducting the transaction:** Vendor / Supplier

Scenario 4(b) – Outgoing international funds transfer – Entity conductor

Bailey Blue, CEO of Kitchen Supply Company, walked into One Stop Money Shop with €10,000 and advised One Stop Money Shop that she was representing Kitchen Supply Company. According to One Stop Money Shop's policies and procedures, an entity will be reported as the conductor when the CEO of the entity conducts a transaction **and** the CEO informs them that he/she is representing the company — in other words, the company is conducting the transaction.

Bailey Blue instructed One Stop Money Shop to transfer the money to ABC Enterprises in Italy to pay for pots and pans that she had ordered for her company. One Stop Money Shop submits an LCTR with the following information.

General information

Information about One Stop Money Shop

- **Reporting entity number:** The reporting entity number assigned to One Stop Money Shop when it enrolled with FWR
- **Reporting entity report reference number:** The unique number for this report

that was assigned by One Stop Money Shop or its service provider

- **Activity sector:** Money services business
- **Contact information for this report:** Information about the person at One Stop Money Shop that FINTRAC can liaise with in the event that a follow up is required
- **Aggregation type:** Not applicable
- **24 hour period for aggregation:** One Stop Money Shop's 24-hour window for aggregation as indicated by the start and end times

Transaction 1 of 1

Information about transaction 1 of 1

- **Date and time of transaction:** The date and time the cash was received by One Stop Money Shop
- **Method of transaction:** In person
- **Threshold indicator:** Above threshold
- **Reporting entity transaction reference number:** The unique number for this transaction that was assigned by One Stop Money Shop or its service provider
- **Purpose of transaction:** Payment for kitchen supplies — pots and pans
- **Reporting entity location number:** Information about where the transaction took place

Starting action 1 of transaction 1

Information about starting action 1 of transaction 1

- **Amount:** 10,000
- **Currency:** EUR
- **Was information about the source of cash obtained?** No
- **Does this transaction involve a deposit to a business account?** No
- **Conductor information:** Information about the Kitchen Supply Company including client number, address, telephone number, email address, nature of principal business, registration/incorporation details, identification details and person(s) authorized to bind the entity or act with respect to the account

- **Was this transaction conducted on behalf of another person or entity?** No

Completing action 1 of transaction 1

Information about completing action1 of transaction 1

- **Details of disposition:** Outgoing international funds transfer
- **Amount:** 10,000
- **Currency:** EUR
- **Reference number and other related numbers:** Reference number assigned by One Stop Money Shop or its service provider, if applicable, and any other related numbers
- **Account number and account information:** For ABC Enterprises' bank account in Italy
- **Account holder:** ABC Enterprises
- **Was there any other person or entity involved in the completing action?** No
- **Beneficiary information:** Name of ABC Enterprises. Also, if obtained, information about ABC Enterprises including client number, address, telephone number, email address, nature of principal business, registration/incorporation details, identification details, and person(s) authorized to bind the entity or act with respect to the account
- **Relationship of the entity named above (beneficiary) to the entity conducting the transaction:** Vendor / Supplier

****Note:** If Bailey Blue advised One Stop Money Shop that she was not representing the Kitchen Supply Company for this transaction but instead was acting on behalf of the company, Bailey Blue would be the conductor and the Kitchen Supply Company would be the third party — similar to scenario 4(a).