FINTRAC's compliance guidance

Reporting large virtual currency transactions to FINTRAC

From: Financial Transactions and Reports Analysis Centre of Canada (FINTRAC)

This guidance came into effect on June 1, 2021.

This guidance explains the requirement to report large virtual currency transactions to FINTRAC.

Note:

- Throughout this guidance, references to dollar amounts (such as $10,000) are in Canadian dollars unless otherwise specified.
- The examples and scenarios are meant to help explain reporting requirements.
- The details used in these examples and scenarios such as names of persons, names of entities, addresses, phone numbers and email addresses are fictitious.

In this guidance

Related links

- Related acts and regulations
- Related guidance
- Related resources

1. Who must comply

All reporting entities must comply with the large virtual currency transaction reporting requirements.

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 virtual currency transaction reporting requirements associated with your activities as an employee.

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).

A **service provider** can submit and correct a Large Virtual Currency Transaction Report on your behalf. However, as the reporting entity, you are ultimately responsible for meeting the requirements under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (the Act) and associated Regulations, even if a service provider is reporting on your behalf. This legal responsibility **cannot** be delegated.

▶ Legal references

2. What is a large virtual currency transaction

A large virtual currency transaction occurs when you receive virtual currency in an amount equivalent to $10,000 or more in a single transaction.

Virtual currency is a digital representation of value, or the private key of a cryptographic system that enables access to a digital representation of value, that can be used for payment or investment purposes.

Virtual currency **is not** a fiat currency but it can be readily exchanged for:

- funds, or
- another virtual currency that can be exchanged for funds

For greater clarity, this definition does not include certain digital currencies, such as:

- those that can only be used within a self-contained virtual environment, or
- a digital currency that can be redeemed for goods and services, but not easily converted into funds

For example, such digital currencies include:

- those used for online gaming, which are not exchangeable for funds or virtual currencies, or
- those that can only be redeemed for gift cards and loyalty programs

▶ Legal references

3. When to submit a Large Virtual Currency Transaction Report

You must submit a Large Virtual Currency Transaction Report to FINTRAC when you receive virtual currency in an amount equivalent to $10,000 or more in a single transaction.

To determine if a transaction is reportable, you must:

- first determine when you are in receipt of virtual currency, and
- then determine if the amount of virtual currency received meets the reporting threshold of $10,000

Note:

- You are in **receipt of virtual currency** when the transaction can no longer be reversed or cancelled.
- You must submit a Large Virtual Currency Transaction Report to FINTRAC within **5 working days** after the day on which you receive the amount.

▶ Legal references

24-hour rule

You must also submit a Large Virtual Currency Transaction Report to FINTRAC in accordance with the 24-hour rule. That is, you must submit a report when:

- you receive 2 or more amounts of virtual currency, that total $10,000 or more within a consecutive 24-hour window, **and**
- you know that the transactions are:
  - 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, please refer to:

- Reporting transactions to FINTRAC: The 24-hour rule

▶ Legal reference

Exchange rates

You must use the exchange rate you establish in the normal course of your business to determine whether you have reached the reporting threshold amount, as the Bank of Canada does not publish exchange rates for virtual currency.

Your process for establishing an exchange rate must be outlined in your compliance policies and procedures.

▶ Legal references

4. How to submit a report to FINTRAC

You must submit a Large Virtual Currency Transaction Report to FINTRAC **electronically** using the following options:

- FINTRAC Web Reporting System (FWR) (geared towards reporting entities with lower reporting volumes)
- FINTRAC API report submission (secure system-to-system transfer of report information)

Note about paper form: If you **do not have the technical capability** to submit reports electronically to FINTRAC, you must submit reports in paper form.

▶ Legal references

5. The form for reporting large virtual currency transactions

In this section

Note

- For details about **submission limits** (for reports submitted electronically), refer to:
  - Transaction submission limits (FINTRAC API report submission)
- To find out how to **create subject profiles** (for reports submitted through FINTRAC Web Reporting System), refer to:
  - Creating subject profiles

Form structure

The form for reporting large virtual currency transactions has 4 sections:

Structure of the Large Virtual Currency Transaction Report form: Main sections and types of information for each section

Main sections of the form	Type of information for each section
General information	Information about: • you (the reporting entity), and • your 24-hour period for reviewing aggregate transactions
Transaction information	Information about each transaction being reported
Starting action	Information about how the transaction started
Completing action	Information about how the transaction was completed
Note: To access most fields and their category (mandatory, mandatory for processing or reasonable efforts), refer to: • Annex A: Field instructions to complete a Large Virtual Currency Transaction Report (which provides instructions on completing the form)	

Form highlights

The structure of the form allows you to include:

- 1 or more transactions in virtual currency that total an equivalent amount of $10,000 or more within a consecutive 24-hour period **in a single report**
  - These transactions can be below $10,000 or $10,000 or more (as long as they total $10,000 or more within a consecutive 24-hour period). For more information, refer to:

        - Reporting transactions to FINTRAC: The 24-hour rule
    - The transactions can also occur at the same or different locations.
- 1 or more starting actions and completing actions **in a single transaction**

  Note: Because you must provide a date and time for each transaction, it is understood that all starting and completing actions within the transaction also occur at this date and time. If it does not, you should add a new transaction to the report.

- multiple conductors, sources of virtual currency and third parties **within each starting action**
- multiple account holders, beneficiaries and other persons or entities involved in the completing action **within each completing action**

Important information about the number of transactions, starting actions and completing actions in a report

- You must complete the General information section of the report and provide information for each transaction.
- A Large Virtual Currency Transaction Report must include at least 1 transaction.
- Every transaction must contain a:
    - location of receipt
    - sending virtual currency address
    - receiving virtual currency address
    - transaction identifier (transaction hash)
    - completing action where the virtual currency is:
        - added to a virtual currency wallet
        - exchanged to another virtual currency, or
        - an outgoing virtual currency transfer

- A report can have multiple transactions and within each transaction, you can include multiple starting and completing actions.
- When completing the report, you must ensure that the information you provide reflects your client's instructions and is consistent with your policies and procedures.

▶ Example 1

▶ Example 2

6. Other requirements associated with large virtual currency transactions

In this section

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 the receipt of virtual currency is reportable
- determining if you are dealing with a person or entity
- submitting reports to FINTRAC

If you have an automated or triggering system in place to detect when the threshold amount is reached for reporting, a person may still assess the transaction(s), as a best practice, to ensure the submission of a Large Virtual Currency Transaction Report.

Your compliance program must also include training on suspected money laundering and terrorist financing activities in relation to your business.

For more information:

- Compliance program requirements

Suspicious transactions

In addition to reporting large virtual currency transactions, you may also be required to submit Suspicious Transaction Reports to FINTRAC when you have reasonable grounds to suspect that a transaction is related to the commission, or the attempted commission, of a money laundering or terrorist activity financing offence. Therefore, you may be required to submit a Large Virtual Currency Transaction Report and a Suspicious Transaction Report for the same transaction.

For more information:

- Reporting suspicious transactions to FINTRAC
- Money laundering and terrorist financing indicators – Virtual currency transactions

Record keeping

When you submit a Large Virtual Currency Transaction Report to FINTRAC, you must keep a copy of it for at **least 5 years** from the date the report was created.

For more information:

- Consult your sector-specific guidance under All FINTRAC guidance – Record keeping requirements

▶ Legal references

Verifying the identity of persons and entities

There are requirements on when and how to verify the identity of persons and entities for large virtual currency transactions.

For specific information:

- Methods to verify the identity of persons and entities
- Consult your sector-specific guidance on when to verify the identity of persons and entities under All FINTRAC guidance – Know your client requirements

Third party determination

There are requirements to determine whether a person or entity is acting on behalf of another person or entity for the receipt of a large virtual currency transaction.

For more information:

- Third party determination requirements

Ministerial directives

You must consider all requirements issued under a ministerial directive along with your large virtual currency transaction reporting requirements.

For more information:

- Ministerial directives and transaction restrictions

Reporting non-compliance voluntarily

If you discover instances of non-compliance related to your large virtual currency transaction reporting requirements, FINTRAC strongly encourages you to report a voluntary self-declaration of non-compliance.

For more information:

- Voluntary self-declaration of non-compliance

7. Exceptions to reporting large virtual currency transactions

> **Note**: The following exceptions refer to the initial receipt of virtual currency, but any further transaction or activity may have reporting obligations, in addition to other obligations.

You are **not required** to submit a Large Virtual Currency Transaction Report if you receive:

- 2 or more amounts in virtual currency that are each individually equivalent to less than $10,000, but together total $10,000 or more with

24 consecutive hours, when you know the amounts are for a beneficiary that is:
    - a public body
    - a very large corporation or trust, or
    - an administration of a pension fund that is regulated under federal or provincial legislation
- virtual currency in an amount equivalent to $10,000 or more in a single transaction if the virtual currency is received as:
    - compensation for the validation of a transaction that is recorded in a distributed ledger, or
    - a nominal amount of virtual currency for the sole purpose of validating another transaction or a transfer of information
- virtual currency for your own operational purposes

For example, you do not need to report the receipt of virtual currency when it is received or purchased as holdings for your business.

▶ Legal references

Annex A: Field instructions to complete a Large Virtual Currency Transaction Report

This annex contains instructions on how to complete the fields in a Large Virtual Currency Transaction Report.

In this annex

- Specific field instructions

Note

- Some fields only become applicable on the completion of other fields.
- Some field instructions may only apply to the electronic report submissions and not paper submissions.
- 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
  - **do not substitute** any other abbreviations, special characters ("x", "-" or "*") or words ("unknown") in the field
- **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:
  - Penalties for non-compliance

Standardized field instructions

This section contains instructions for:

- the expected level of effort to obtain the prescribed information for the reporting fields
- completing some fields that appear in multiple sections of the form

In this section

- Field categories

Field categories

In this guidance, fields are categorized as either:

- mandatory
- mandatory for processing
- mandatory if applicable, or
- reasonable measures

Instructions for field categories

Field categories	Instructions

Mandatory	These fields are indicated with an asterisk symbol **(*)** and **must** be completed. Because a Large Virtual Currency Transaction Report can include multiple transactions conducted within 24 consecutive hours that total an amount equivalent to $10,000 or more, the information for some mandatory fields may not have been obtained at the time of the transaction. In this case, the fields become “reasonable measures” fields, and the instructions for reasonable measures (below in this table) must be applied. **Note:** If a Large Virtual Currency Transaction Report contains multiple transactions conducted within 24 consecutive hours and 1 of these transactions is equivalent to $10,000 CAD (Canadian dollar) or more, then the mandatory fields will apply. ▶ Legal references
Mandatory for processing	These fields are indicated with a double dagger symbol **(‡)** and **must** be completed.
Mandatory if applicable	These fields are indicated with a dagger symbol **(†)** and **must** be completed if they are applicable to you or the transaction being reported.

Reasonable measures	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 you obtain the information, you must report it. You must also provide the information if it is contained within your systems or records. ▶ Legal references

Name fields

Instructions for the name fields

Name fields	Instructions
Surname	Provide the last name of the person.
Given name	Provide the first name of the person. **Note:** If a person has only a single name, enter "XXX" in the "Given name" field and the person's single name in the "Surname" field.
Other/Initial	Provide the middle or other name(s) of the person, or their initial(s) if no other names apply.

Alias	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.

Address fields

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

Structured address fields

Structured address fields include:

- Apartment/Room/Suite/Unit number
- House/Building number
- Street address
- City
- District
- Country
- Province or state (code) – For provinces or states in Canada, the United States or Mexico, select from the list of options.
- Province or state (name) – For provinces or states outside Canada, the United States or Mexico, provide the name of the province or state.
- Sub-province and/or sub-locality
- Postal or zip code

▶ **If you have the ability to separate the information**

▶ **If you are unable to separate the address information into the structured address fields**

▶ **If there is no civic address**

Note: 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 and the data originates from outside your organization. For example, when you are in final receipt of an electronic funds transfer and the foreign address of the person who requested the transfer information cannot be easily populated into the structured address fields.

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

Invalid addresses

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.

Persons who are transient or have no fixed address

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 information:

Address information to provide for persons who are transient or have no fixed address

Type of person	What to provide
Canadian residents	Their permanent Canadian address, even if that is not where they are currently residing
Foreign clients travelling in Canada for a short period of time	Their foreign residential address
Foreign clients living in Canada for a longer period of time (such as a student)	The person's temporary Canadian address

Occupation/business fields

Instructions for the occupation/business fields

Occupational/business fields	Instructions

Occupation	When entering occupation information, you should be as descriptive as possible. For example, if the person is: • a manager, provide the area of management, such as “hotel reservations manager” or “retail clothing store manager” • a consultant, provide the type of consulting, such as “IT consultant” or “forestry consultant” • a professional, provide the type of profession, such as “petroleum engineer” or “family physician” • a labourer, provide the type of labour performed, such as “road construction worker” or “landscape labourer” • not working, you should still be as descriptive as possible, and indicate “student,” “unemployed,” “retired,” etc. You can enter a numeric classification code and the code title in this field (for example, NOC – National Occupational Classification). However, a numeric code on its own is not sufficient as you need a written description of the occupation as explained above. **Note**: If your client indicates that they are the manager of Blue Moon Auto Parts Ltd., you would enter “manager of auto parts company” in the occupation field

	and "Blue Moon Auto Parts Ltd." in the name of employer field as explained below.
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 numeric classification code **and** the code title in this field (for example, NAICS – North American Industry Classification System). However, a numeric code on its own is not sufficient, as you need a written description of the nature of the entity’s principal business as explained above.

Identification fields

Instructions for the identification fields

Identification fields	Instructions

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. **Note**: Don't report a Social Insurance Number (SIN) 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.

How to provide the jurisdiction that issued the documentation used for identification

<table>
<tr><th>Type of jurisdiction</th><th>What and how to provide</th></tr>
<tr><td>A country</td><td>Enter that country as the jurisdiction of issue.</td></tr>
<tr><td>A province or state in Canada, the United States or Mexico</td><td>Select the province or state code from the list of options.</td></tr>
<tr><td>A province or state outside Canada, the United States or Mexico</td><td>Provide:
that province or state name as the jurisdiction of issue, and
the corresponding country information</td></tr>
</table>

Telephone number fields

Instructions for the telephone number fields

Location of telephone number	Instructions
Canada or the United States	Enter the area code and local number (for example, 999-999-9999).

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 2-digit country code • a 3-digit city code, and • an 8-digit local number

Specific field instructions

This section contains instructions for the report fields and are laid out in the same order as they appear on the Large Virtual Currency Transaction Report form.

Note: For some fields, the instructions:

- have not been provided and are indicated as “Instructions not specified”
- refer to the Standardized field instructions section

In this section

- Completing action

General information

Instructions for the fields under "General information"

Fields	Instructions
*** Reporting entity number**	You must enroll in FINTRAC Web Reporting System (FWR) to submit reports electronically. Provide the 7-digit identifier number assigned to you by FINTRAC at enrolment.
‡ Reporting entity report reference number	A number assigned to each **report** by: • you (the reporting entity), or • the individual or organization submitting the report on your behalf This number must be **unique to your business, meaning it can only be used once**.

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

Instructions for the question related to the type of reporting entities best describing you

Field	Instructions

*** Activity sector**	Enter your business activity sector. If you are involved in more than 1 type of business activity, indicate the one applicable to the transaction being reported. If there is more than 1 business activity for 1 or more transactions on the report, select only 1 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 FINTRAC Web Reporting System (FWR) prior to submitting your report(s).

Report information

Indicate whether the report is related to 1 or multiple transactions that occurred within a consecutive 24-hour period.

When you provide a date and time, you must include the time zone. The fields below provide instructions for formatting.

Instructions for the fields under "Report information"

Fields	Instructions

‡ Aggregation type	Indicate the type of aggregation used when multiple transactions occur within a consecutive 24-hour period: • conductor • on behalf of (third party) • beneficiary If the report is for 1 transaction only, or for a ministerial directive, then aggregating transactions does not apply and you should select “Not applicable”. **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 (Coordinated Universal Time) offset) in the 24-hour period start time field. You must enter the start time in the following format: **HH:MM:SS±ZZ:ZZ**. For example, 1:25:06 pm in Ottawa, Ontario 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. The field above provides instructions 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	If a transaction is being reported to FINTRAC under a ministerial directive, then indicate this by selecting the ministerial directive in the report. Leave this field blank if the transaction(s) are not part of a ministerial directive. **Note**: • A Large Virtual Currency Transaction Report submitted under a ministerial directive can contain only 1 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" in the '24-hour aggregation type' field. • Only 1 ministerial directive (IR2020) is available for a Large Virtual Currency Transaction Report.

Transaction information

Information about the transaction

Instructions for the fields under "Information about the transaction"

Fields	Instructions

*** Date and time virtual currency was received**	Enter the date and time that the virtual currency was received for the transaction. It cannot be a future date and must not be earlier than June 1, 2021. 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 period start date and time and the 24-hour period end date and time in the report. ▶ Examples
*** Method of transaction**	Select the method that describes how you received the virtual currency. If the method is not listed, select "Other."
† If "Other," please specify	Provide a brief description on how you received the virtual currency.
‡ Threshold indicator	Indicate whether the value of the virtual currency 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 • "below threshold" if it is under $10,000
*** Transaction identifier**	This is a unique identifier. It is commonly represented by a hash consisting of mixed numerical and alphabetical characters.

‡ Reporting entity transaction reference number	This is a unique number assigned to **each transaction** by: • you (the reporting entity), or • the individual or organization submitting the report on your behalf
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. For example: • Etherium was transferred into Flashy Coin's staking program to be held for passive income. • Bitcoin was exchanged into Canadian funds and sent to Sam's connected bank account to pay for their monthly rent. • Litecoin was received at Flashy coin to be used for investment on the Flashy Coin trading platform. You may be able to determine the purpose of a transaction by asking the client.

Information about where the virtual currency was received

Provide information about the physical location where the virtual currency was received.

For example if the virtual currency was received at a virtual currency ATM, provide the reporting entity location number of that ATM.

If no physical location is applicable (for instance the transaction was conducted online), provide the location number of your main location, such as a head office or headquarters.

Instructions for the field under “Information about where the virtual currency was received”

Field	Instructions
*** 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 enrolment process to FINTRAC Web Reporting System (FWR), and • maintained by your FWR administrator. For more information about this, contact your FWR administrator.

Starting action

Provide information about how the transaction was started, including:

- the type and amount of virtual currency
- where it came from
- who the conductor of the transaction was, and
- any third party involved (if applicable)

Instructions for the fields under “Starting action”

Fields	Instructions

*** Amount**	Enter the total amount of virtual currency involved in the starting action.
*** Virtual currency type**	Select the virtual currency type used in the transaction. If the virtual currency type is not in the list provided, you must select “Other” and provide the full name of the virtual currency.
† If “Other”, please specify	Instructions not specified
*** Exchange rate used for the transaction**	Provide the rate of exchange to Canadian dollars that you used for the transaction.
*** Sending virtual currency address**	Provide the sending virtual currency address(es) for every starting action for the transaction. The sending virtual currency address is made up of a number of alpha-numeric characters and its length is determined by the type of virtual currency used. The sending virtual currency address is associated with whoever is sending the virtual currency (typically the conductor).

How was the virtual currency obtained?	This field requires information on the source of the virtual currency. This is how the conductor initially obtained the virtual currency used for the transaction, not where the virtual currency may have been transferred from. For example, the virtual currency was obtained through: • rewards withdrawal from a mining pool • the sale of a non-fungible token • the sale of Bitcoin on a peer-to-peer (P2P) platform This information must be reported if obtained.
‡ Was information about the source of virtual currency 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 virtual currency** involved in the transaction • 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 virtual currency

If you have information on any source of virtual currency involved in the transaction, you must report it.

If there are multiple sources, you must provide information for each source. This includes their name and the following:

- account number
- policy number, or
- identifying number, if there is no account or policy number

You must report this information if you obtained it in the ordinary course of business. This means you must report the information if you obtained it for any reason related to the services you provide to clients.

Source of virtual currency – person

Instructions for the fields under "Source of virtual currency – person"

Fields	Instructions
† Surname	Refer to Name fields under "Standardized field instructions".
† Given name	Same instructions (Name fields)
Other/initial	Same instructions (Name fields)
Account number	Provide the account number for the source of virtual currency. It is acceptable to include the financial institution number and branch number as part of an account number.
Policy number	Instructions not specified
Identifying number	If there is no account or policy number, provide an identifying number if available.

Source of virtual currency – entity

Instructions for the fields under “Source of virtual currency – entity”

Fields	Instructions
† Name of entity	Refer to Name fields under “Standardized field instructions”.
Account number	Provide the account number for the source of virtual currency. It is acceptable to include the financial institution number and branch number as part of an account number.
Policy number	Instructions not specified
Identifying number	If there is no account or policy number, provide an identifying number if available.

Note about the source of virtual currency fields

Although the following 3 fields are all about the source of virtual currency, they are different:

- How was the virtual currency obtained?
- Was information about the source of virtual currency obtained?
- Source of virtual currency – person or entity

The following examples demonstrate their differences.

▶ Example 1

▶ Example 2

For more information on completing these fields, please refer to Starting action and Source of virtual currency under the “Specific field instructions”.

Conductor indicator

Instructions for the field under “Conductor indicator”

Field	Instructions
‡ Have you obtained any conductor information related to this transaction?	If the conductor is a client or if you have information about a conductor that is not your client, you **must** answer “Yes”. You must select “No” **only if**, despite taking reasonable measures to do so, you were not able to obtain any information on the conductor that was not your client.

Conductor – person

Provide all the information you have on 1, or multiple persons specified as the conductors of the transaction.

Instructions for the fields under “Conductor – person”

Fields	Instructions
† Is the conductor a client of the reporting entity?	Instructions not specified
† Surname	Refer to Name fields under “Standardized field instructions”.

† Given name	Same instructions (Name fields)
Other/Initial	Same instructions (Name fields)
Alias	Same instructions (Name fields)
Username	A username is how a person refers to themselves online.
† Client number	A unique identifying number assigned by the reporting entity to the person conducting the transaction.
Apartment/Room/Suite/Unit number	Refer to Address fields under “Standardized field instructions”.
House/Building number	Same instructions (Address fields)
† Street address	Same instructions (Address fields)
† City	Same instructions (Address fields)
District	Same instructions (Address fields)
† Country	Same instructions (Address fields)
† Province or state (code)	Same instructions (Address fields)
† Province or state (name)	Same instructions (Address fields)
Sub-province and/or sub-locality	Same instructions (Address fields)
Postal or zip code	Same instructions (Address fields)
Unstructured address details	Refer to Unstructured address field under “Standardized field instructions”.

Telephone number	Refer to Telephone number fields under “Standardized field instructions”.
Extension	Same instructions (Telephone number fields)
Email address	Instructions not specified
† Date of birth	Instructions not specified
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	Refer to Occupation/business fields under “Standardized field instructions”.
Name of employer	Same instructions (Occupation/business fields)

Identification of the conductor – person

Instructions for the fields under “Identification of the conductor – person”

Fields	Instructions
† Identifier type	Refer to Identification fields under “Standardized field instructions”.
† If “Other”, please specify	Same instructions (Identification fields)

† Number associated with identifier type	Same instructions (Identification fields)
† Jurisdiction of issue (country)	Same instructions (Identification fields)
† Jurisdiction of issue (province or state) (code)	Same instructions (Identification fields)
† Jurisdiction of issue (province or state) (name)	Same instructions (Identification fields)

Information about conducting the transaction online – person

Note: Information for this section is required only when the transaction occurs online.

Instructions for the fields under "Information about conducting the transaction online – person"

Fields	Instructions
Type of device used	Select which device was used to conduct the transaction online.
† If "Other", please specify	Provide the type of device used.

Device identifier number	The device identifier number is a number assigned to the device, such as: • a Media Access Control (MAC) address, or • International Mobile Equipment Identity (IMEI) number
Internet protocol (IP) address	Instructions not specified
Date/time of online session in which request was made	This is the date and time the conductor accessed the online environment where the transaction was requested.

On behalf of indicator – person

Instructions for the field under "On behalf of indicator – person"

Field	Instructions
† Was this transaction conducted on behalf of another person or entity?	This 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 – entity

Provide all the information you have on 1, or multiple entities specified as the conductors of the transaction.

Instructions for the fields under “Conductor – entity”

Fields	Instructions
† Is the conductor a client of the reporting entity?	Instructions not specified
† Name of entity	Refer to Name fields under “Standardized field instructions”.
Username	A username is how an entity refers to themselves online.
† Client number	A unique identifying number assigned by the reporting entity to the entity conducting the transaction.
Apartment/Room/Suite/Unit number	Refer to Address fields under “Standardized field instructions”.
House/Building number	Same instructions (Address fields)
† Street address	Same instructions (Address fields)
† City	Same instructions (Address fields)
District	Same instructions (Address fields)
† Country	Same instructions (Address fields)
† Province or state (code)	Same instructions (Address fields)
† Province or state (name)	Same instructions (Address fields)
Sub-province and/or sub-locality	Same instructions (Address fields)

Postal or zip code	Same instructions (Address fields)
Unstructured address details	Refer to Unstructured address field under "Standardized field instructions".
Telephone number	Refer to Telephone number fields under "Standardized field instructions".
Extension	Same instructions (Telephone number fields)
† Nature of entity's principal business	Refer to Occupation/business fields under "Standardized field instructions".
† Is the entity registered or incorporated?	Instructions not specified
† Registration or incorporation number	Provide the registration or incorporation number of the entity conducting the transaction. You must provide the jurisdiction of issue if you provide a registration or incorporation number.
† Jurisdiction of issue (country)	Instructions not specified
† Jurisdiction of issue (province or state)	Instructions not specified

Identification of the conductor – 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.

Instructions for the fields under “Identification of the conductor – entity”

Fields	Instructions
† Identifier type	Refer to Identification fields under “Standardized field instructions”.
† If “Other”, please specify	Same instructions (Identification fields)
† Number associated with identifier type	Same instructions (Identification fields)
† Jurisdiction of issue (country)	Same instructions (Identification fields)
† Jurisdiction of issue (province or state) (code)	Same instructions (Identification fields)
† Jurisdiction of issue (province or state) (name)	Same instructions (Identification fields)

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 3 persons** who are authorized to:

- bind the entity, or
- act with respect to the account

Instructions for the fields under “Person authorized to bind the entity or act with respect to the account”

Fields	Instructions
† Surname	Refer to Name fields under “Standardized field instructions”.
† Given name	Same instructions (Name fields)
Other/Initial	Same instructions (Name fields)

Information about conducting the transaction online – entity

Note: Information for this section is required only when the transaction occurs online.

Instructions for the fields under “Information about conducting the transaction online – entity”

Fields	Instructions
Type of device used	Select which device was used to conduct the transaction online.
† If “Other”, please specify	Provide the type of device used.

Device identifier number	The device identifier number is a number assigned to the device, such as: • a Media Access Control (MAC) address, or • International Mobile Equipment Identity (IMEI) number
Internet protocol (IP) address	Instructions not specified
Date/time of online session in which request was made	This is the date and time the conductor accessed the online environment where the transaction was requested.

On behalf of indicator – entity

Instructions for the field under "On behalf of indicator – entity"

Field	Instructions
† 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 (person on whose behalf the transaction was conducted)

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

Instructions for the fields under “Information about the third party (person on whose behalf the transaction was conducted)”

Fields	**Instructions**
† Surname	Refer to Name fields under “Standardized field instructions”.
† Given name	Same instructions (Name fields)
Other/Initial	Same instructions (Name fields)
Alias	Same instructions (Name fields)
Client number	Instructions not specified
Apartment/Room/Suite/Unit number	Refer to Address fields under “Standardized field instructions”.
House/Building number	Same instructions (Address fields)
† Street address	Same instructions (Address fields)
† City	Same instructions (Address fields)
District	Same instructions (Address fields)
† Country	Same instructions (Address fields)
† Province or state (code)	Same instructions (Address fields)
† Province or state (name)	Same instructions (Address fields)
Sub-province and/or sub-locality	Same instructions (Address fields)
Postal or zip code	Same instructions (Address fields)

Unstructured address details	Refer to Unstructured address field under "Standardized field instructions".
Telephone number	Refer to Telephone number fields under "Standardized field instructions".
Extension	Same instructions (Telephone number fields)
Email address	Instructions not specified
Date of birth	Instructions not specified
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	Refer to Occupation/business fields under "Standardized field instructions".
Name of employer	Same instructions (Occupation/business fields)

Identification of the third party (person on whose behalf the transaction was conducted)

Instructions for the fields under "Identification of the third party (person on whose behalf the transaction was conducted)"

Fields	Instructions
Identifier type	Refer to Identification fields under “Standardized field instructions”.
† If “Other”, please specify	Same instructions (Identification fields)
Number associated with identifier type	Same instructions (Identification fields)
Jurisdiction of issue (country)	Same instructions (Identification fields)
Jurisdiction of issue (province or state) (code)	Same instructions (Identification fields)
Jurisdiction of issue (province or state) (name)	Same instructions (Identification fields)

Relationship of the third party (person named above) to the person or entity conducting the transaction

Instructions for the fields under “Relationship of the third party (person named above) to the person or entity conducting the transaction”

Fields	Instructions
† 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	Instructions not specified

Information about the third party (entity on whose behalf the transaction was conducted)

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

Instructions for the fields under “Information about the third party (entity on whose behalf the transaction was conducted)”

Fields	Instructions
† Name of entity	Refer to Identification fields under “Standardized field instructions”.
Client number	Instructions not specified
Apartment/Room/Suite/Unit number	Refer to Address fields under “Standardized field instructions”.
House/Building number	Same instructions (Address fields)
† Street address	Same instructions (Address fields)
† City	Same instructions (Address fields)
District	Same instructions (Address fields)
† Country	Same instructions (Address fields)
† Province or state (code)	Same instructions (Address fields)
† Province or state (name)	Same instructions (Address fields)

Sub-province and/or sub-locality	Same instructions (Address fields)
Postal or zip code	Same instructions (Address fields)
Unstructured address details	Refer to Unstructured address field under "Standardized field instructions".
Telephone number	Refer to Telephone number fields under "Standardized field instructions".
Extension	Same instructions (Telephone number fields)
Email address	Instructions not specified
Nature of entity's principal business	Refer to Occupation/business fields under "Standardized field instructions".
Is the entity registered or incorporated?	Instructions not specified
Registration or incorporation number	Provide the registration or incorporation number of the entity on whose behalf the transaction was conducted. You must provide the jurisdiction of issue if you provide a registration or incorporation number.
Jurisdiction of issue (country)	Instructions not specified

Jurisdiction of issue (province or state) (code)	Instructions not specified
Jurisdiction of issue (province or state) (name)	Instructions not specified

Identification of the third party (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.

Instructions for the fields under "Identification of the third party (entity on whose behalf the transaction was conducted)"

Fields	Instructions
Identifier type	Refer to Identification fields under "Standardized field instructions".
† If "Other", please specify	Same instructions (Identification fields)
Number associated with identifier type	Same instructions (Identification fields)
Jurisdiction of issue (country)	Same instructions (Identification fields)
Jurisdiction of issue (province or state) (code)	Same instructions (Identification fields)
Jurisdiction of issue (province or state) (name)	Same instructions (Identification fields)

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

Instructions for the fields under “Person authorized to bind the third party (entity) or act with respect to the account”

Fields	Instructions
Surname	Refer to Name fields under “Standardized field instructions”.
Given name	Same instructions (Name fields)
Other/Initial	Same instructions (Name fields)

Relationship of the third party (entity named above) to the person or entity conducting the transaction

Instructions for the fields under “Relationship of the third party (entity named above) to the person or entity conducting the transaction”

Fields	Instructions
† 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	Instructions not specified

Completing action

Provide information about how the transaction was completed, including:

- the details of disposition
- the amount
- information on any other person or entity that may have been involved in the completing action
- information on any other person or entity that was a beneficiary of the transaction

The **first completing action** of each transaction in the report should indicate that the disposition is added to a virtual currency wallet.

Instructions for the “Completing action” fields

Fields	Instructions
*** Details of disposition**	This describes what happened to the virtual currency involved in the transaction. For example, if the disposition was an amount added to a virtual currency wallet at a money services business you would select “added to a virtual currency wallet” from the table. If the values provided do not adequately describe the disposition of the transaction, indicate “Other” and provide details in that field.
† If “Other”, please specify	If the disposition is “Other”, provide details that describe the disposition of the transaction.
† Amount	Instructions not specified

† Virtual currency type	Instructions not specified
† If "Other", please specify	Instructions not specified
† Receiving virtual currency address	Provide the virtual currency address for the person or entity receiving the virtual currency. The **first completing action** of each transaction must have **at least one** receiving virtual currency address listed in the report. The receiving virtual currency address could: • be associated with the beneficiary of the virtual currency, or • include the address in which you (the reporting entity) received the virtual currency, if that is how your business operates
† Currency	Instructions not specified
† Value in Canadian dollars	Provide the Canadian dollar value of the disposition if it is not virtual currency. For example, provide the value of the virtual currency used to purchase jewellery.

† Reference number	If the transaction involved a reference number that is used as an equivalent to an account number, provide it, as well as any other number connected to the reference number. **Do not provide the account number information in this field**—instead, provide that information in the account number field. 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	Instructions not specified
† Branch number	Instructions not specified
† Account number	Provide the account number if the transaction involves an account at an account-based reporting entity (for example, a financial entity).
† Account type	Instructions not specified
† If "Other", please specify	Instructions not specified
† Account currency	Instructions not specified
† Account virtual currency type	Instructions not specified

† If “Other”, please specify	Instructions not specified
Date account opened	Instructions not specified
‡ Was there any other person or entity involved in the completing action?	Instructions not specified

Account holder – person

Instructions for the fields under “Account holder – person”

Fields	Instructions
† Surname	Refer to Name fields under “Standardized field instructions”.
† Given name	Same instructions (Name fields)
Other/Initial	Same instructions (Name fields)
† Username	A username is how a person refers to themselves online.

Account holder – entity

Instructions for the field under “Account holder – entity”

Field	Instructions
† Name of entity	Refer to Name fields under “Standardized field instructions”.

† Username	A username is how a person refers to themselves online.

Person involved in the completing action

If you have information about other persons involved in the completing action, you must include it.

Note: These persons **cannot be**:

- the conductor
- on behalf of party, or
- beneficiary of the transaction

Instructions for the fields under "Person involved in the completing action"

Fields	Instructions
† Surname	Refer to Name fields under "Standardized field instructions".
† Given name	Same instructions (Name fields)
Other/initial	Same instructions (Name fields)
Account number	Provide the account number of the person involved in the completing action. It is acceptable to include the financial institution number and branch number as part of an account number.
Policy number	Instructions not specified

Identifying number	Instructions not specified

Entity involved in the completing action

If you have information about other entities involved in the completing action, you must include it.

Note: These entities **cannot be**:

- the conductor
- on behalf of party, or
- beneficiary of the transaction

Instructions for the fields under "Entity involved in the completing action"

Fields	Instructions
† Name of entity	Refer to Name fields under "Standardized field instructions".
Account number	Provide the account number of the entity involved in the completing action. It is acceptable to include the financial institution number and branch number as part of an account number.
Policy number	Instructions not specified
Identifying number	Instructions not specified

Beneficiary

Provide beneficiary information for each completing action.

A beneficiary, for example, can be the person who receives the virtual currency.

The beneficiary **can be** the **same person or entity** that conducts the transaction or someone else.

The beneficiary **cannot be** the reporting entity.

Instructions for the field under "Beneficiary"

Field	Instructions
‡ Was there a beneficiary for this completing action?	There must always be a minimum of 1 beneficiary per transaction.

Person beneficiary

Instructions for the fields under "Person beneficiary"

Fields	Instructions
† Surname	Refer to Name fields under "Standardized field instructions".
† Given name	Same instructions (Name fields)
Other/Initial	Same instructions (Name fields)
Alias	Same instructions (Name fields)
Username	A username is how a person refers to themselves online.
Client number	Instructions not specified

Apartment/Room/Suite/Unit number	Refer to Unstructured address field under "Standardized field instructions".
House/Building number	Same instructions (Address fields)
† Street address	Same instructions (Address fields)
† City	Same instructions (Address fields)
District	Same instructions (Address fields)
† Country	Same instructions (Address fields)
† Province or state (code)	Same instructions (Address fields)
† Province or state (name)	Same instructions (Address fields)
Sub-province and/or sub-locality	Same instructions (Address fields)
Postal or zip code	Same instructions (Address fields)
Unstructured address details	Refer to Unstructured address field under "Standardized field instructions".
Telephone number	Refer to Telephone number fields under "Standardized field instructions".
Extension	Same instructions (Telephone number fields)
Email address	Instructions not specified
Date of birth	Instructions not specified

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	Refer to Occupation/business fields under “Standardized field instructions”.
Name of employer	Same instructions (Occupation/business fields)

Identification of the person beneficiary

Instructions for the fields under “Identification of the person beneficiary”

Fields	**Instructions**
† Identifier type	Refer to Identification fields under “Standardized field instructions”.
† If “Other”, please specify	Same instructions (Identification fields)
† Number associated with identifier type	Same instructions (Identification fields)
† Jurisdiction of issue (country)	Same instructions (Identification fields)
† Jurisdiction of issue (province or state) (code)	Same instructions (Identification fields)

† Jurisdiction of issue (province or state) (name)	Same instructions (Identification fields)

Entity beneficiary

Instructions for the fields under "Entity beneficiary"

Fields	Instructions
† Name of entity	Refer to Identification fields under "Standardized field instructions".
Username	A username is how an entity refers to themselves online.
Client number	Instructions not specified
Apartment/Room/Suite/Unit number	Refer to Address fields under "Standardized field instructions".
House/Building number	Same instructions (Address fields)
† Street address	Same instructions (Address fields)
† City	Same instructions (Address fields)
District	Same instructions (Address fields)
† Country	Same instructions (Address fields)
† Province or state (code)	Same instructions (Address fields)
† Province or state (name)	Same instructions (Address fields)
Sub-province and/or sub-locality	Same instructions (Address fields)
Postal or zip code	Same instructions (Address fields)

Unstructured address details	Refer to Unstructured address field under “Standardized field instructions”.
Telephone number	Refer to Telephone number fields under “Standardized field instructions”.
Extension	Same instructions (Telephone number fields)
Email address	Instructions not specified
Nature of entity’s principal business	Refer to Occupation/business fields under “Standardized field instructions”.
† Is the entity registered or incorporated?	Instructions not specified
† Registration or incorporation number	Provide the registration or incorporation number of the entity beneficiary. You must provide the jurisdiction of issue if you provide a registration or incorporation number.
† Jurisdiction of issue (country)	Instructions not specified
† Jurisdiction of issue (province or state)	Instructions not specified

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.

Instructions for the fields under “Identification of the entity beneficiary”

Fields	Instructions
† Identifier type	Refer to Identification fields under “Standardized field instructions”.
† If “Other”, please specify	Same instructions (Identification fields)
† Number associated with identifier type	Same instructions (Identification fields)
† Jurisdiction of issue (country)	Same instructions (Identification fields)
† Jurisdiction of issue (province or state) (code)	Same instructions (Identification fields)
† Jurisdiction of issue (province or state) (name)	Same instructions (Identification fields)

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

Instructions for the fields under “Person authorized to bind the entity beneficiary or act with respect to the account”

Fields	Instructions

† Surname	Refer to Name fields under "Standardized field instructions".
† Given name	Same instructions (Name fields)
Other/Initial	Same instructions (Name fields)

Annex B: Scenarios

The examples and scenarios used in this guidance are intended to help explain your reporting requirements. The following scenarios demonstrate form completion and the expected field information in a Large Virtual Currency Transaction Report based on the client's instructions and transaction(s) in each scenario.

Note about these scenarios

- All details described in these examples and scenarios such as names of persons, names of entities, addresses, phone numbers and email addresses are solely fictitious.
- Some fields have an added description to help clarify the information required for that entry.
- Not all fields of the Large Virtual Currency Transaction Report form are displayed. Only fields with completed information are displayed.
- Because some fields are mandatory and some are not, it has been assumed that the reporting entity had the information if a field has been completed.

Legend for symbols used in fields

Field categories	Instructions
Mandatory	These fields are indicated with an asterisk symbol **(*)** and **must** be completed.
Mandatory for processing	These fields are indicated with a double dagger symbol **(‡)** and **must** be completed.
Mandatory if applicable	These fields are indicated with a dagger symbol **(†)** and **must** be completed if they are applicable to you or the transaction being reported.

In this annex

Scenario B.1: Virtual currency exchange to fiat currency

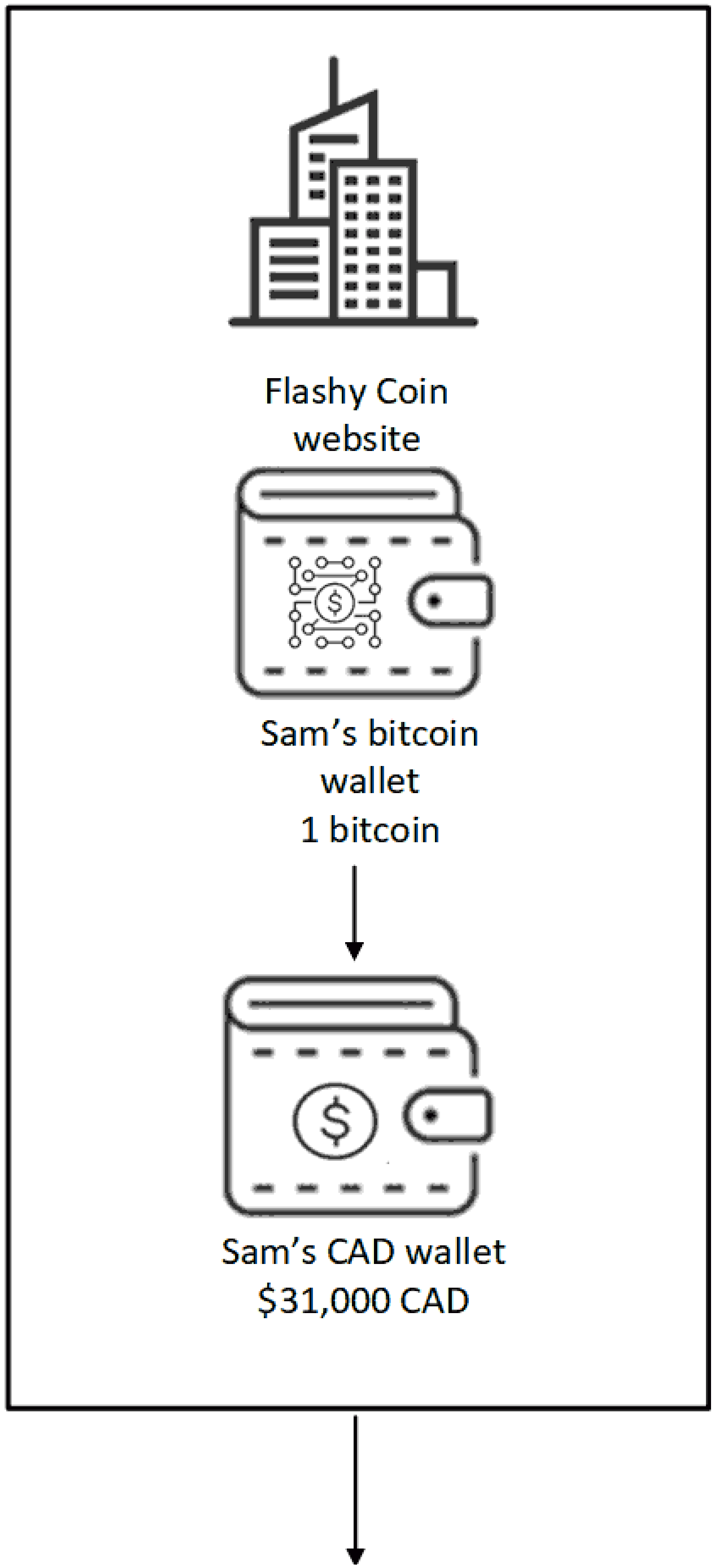
Scenario

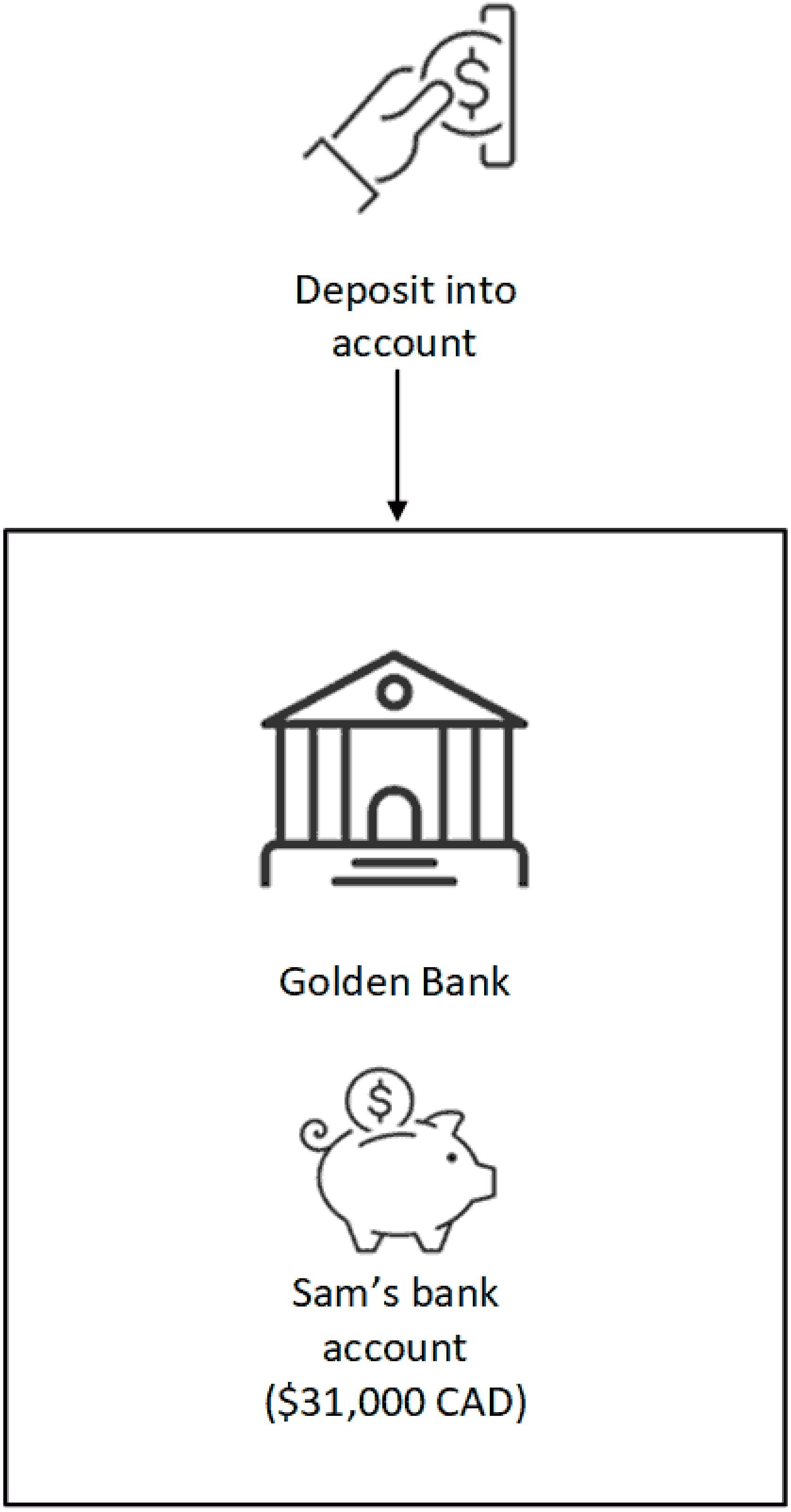
On June 29, 2021, Sam Pepper logged into the Flashy Coin website and sold 1 Bitcoin (BTC) for Canadian dollars ($31,000) and then deposited it into his connected bank account (held at Golden Bank Financial Services).

Large Virtual Currency Transaction Report requirement

- No report is required since no reporting entity is “in receipt” of virtual currency during this transaction.
- The virtual currency was already held in Sam Pepper’s wallet at Flashy Coin prior to the transaction.

Infographic summarizing scenario B.1


Flashy Coin
website
Sam's bitcoin
wallet
1 bitcoin
Sam's CAD wallet
$31,000 CAD



Infographic summarizing scenario B.1: Virtual currency exchange to fiat currency

Scenario B.2: Receipt of virtual currency

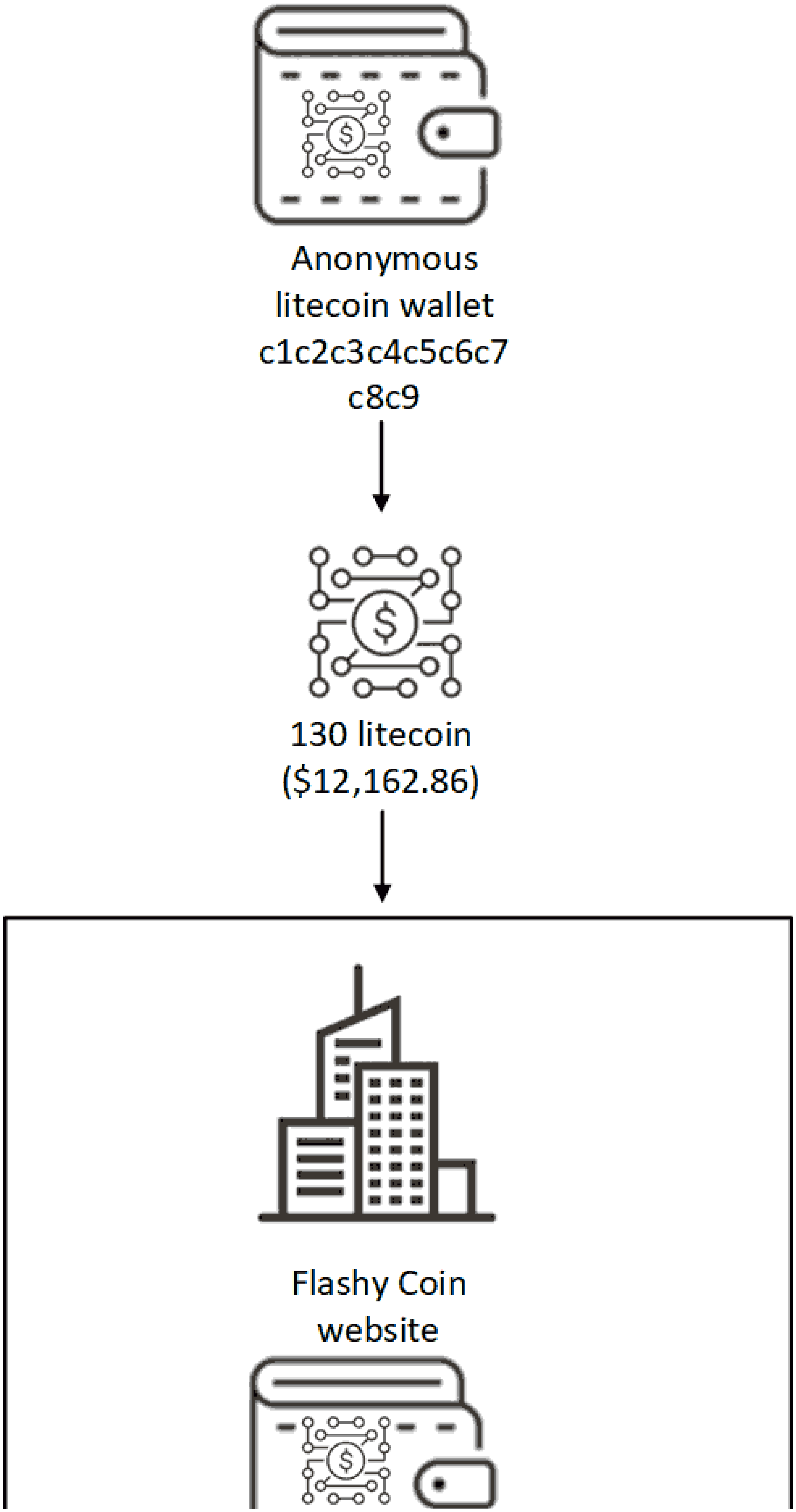
Scenario

- On June 29, 2021, Flashy Coin (Hawk Junction location) received 130 Litecoin ($12,162.86) from wallet address c1c2c3c4c5c6c7c8c9 to be added to wallet address b1b2b3b4b5b6b7b8b9, belonging to Sam Pepper.
- Sam Pepper’s wallet is hosted by Flashy Coin.
- Flashy Coin follows its policies and procedures on reasonable measures and asks Sam where the virtual currency came from.
- Sam Pepper is unable to provide a source of the virtual currency.
- After taking reasonable measures as part of their travel rule obligations, Flashy Coin is unable to identify a conductor of the transaction.
- The beneficiary of the transaction is Sam Pepper.
- Since Sam Pepper is a client, Flashy Coin can complete the beneficiary information in the report with fulsome information.

Large Virtual Currency Transaction Report requirement

- Flashy Coin must report this transaction because it was above threshold.
- FINTRAC can contact Jamie Salt who is associated with the contact number provided in the report.

Infographic summarizing scenario B.2


Anonymous
litecoin wallet
c1c2c3c4c5c6c7
c8c9
130 litecoin
($12,162.86)
Flashy Coin
website

Infographic summarizing scenario B.2: Receipt of virtual currency

Expected field information in the report

General information – Scenario B.2

General information about Flashy Coin

Fields	Information provided by Flashy Coin
*** Reporting entity number**	###### (Flashy Coin) The 7-digit identifier assigned to Flashy Coin when it enrolled with FINTRAC Web Reporting System (FWR).
‡ Reporting entity report reference number	LVCTR-FC-001 The unique number for this report assigned by Flashy Coin or its service provider.
*** Activity sector**	Money services business
*** Contact number**	###### (Jamie Salt) The unique number for the person that FINTRAC can liaise with.

Report information – Scenario B.2

“Report information” provided by Flashy Coin

Fields	Information provided by Flashy Coin
‡ Aggregation type	Not applicable
‡ 24-hour period start date/time	2021-06-29T00:00:00-04:00 Flashy Coin’s start date and time for the 24-hour period.
‡ 24-hour period end date/time	2021-06-29T23:59:59-04:00 Flashy Coin’s end date and time for the 24-hour period.

Transaction information – Scenario B.2

“Transaction information” provided by Flashy Coin

Fields	Information provided for transaction 1 of 1
*** Date/time virtual currency was received**	2021-06-29T11:23:55-04:00 The date and time Flashy Coin received the virtual currency.
*** Method of transaction**	Online The method that describes how Flashy Coin received the virtual currency.
‡ Threshold indicator	Above threshold

*** Transaction identifier**	a1881rr24a2d9856bcf5f19512261ll9033eafaefb9eb0 The unique identifier, or a hash, with mixed numerical and alphabetical characters.
‡ Reporting entity transaction reference number	20210629-112355-0015 The unique reference number assigned to the transaction by Flashy Coin. The number is unique to the report level.
*** Reporting entity location number**	01 (Hawk Junction Location) This is where the transaction was received.

Starting action 1 of transaction 1 – Scenario B.2

“Starting action” information provided by Flashy Coin

Fields	**Information provided for starting action 1 of transaction 1**
*** Amount**	130
*** Virtual currency type**	Litecoin The virtual currency type used in the transaction.
*** Exchange rate**	93.90 The rate of exchange to Canadian dollars that Flashy Coin used for the transaction.

*** Sending virtual currency address**	c1c2c3c4c5c6c7c8c9 The alpha-numeric address associated with the sender (typically the conductor) of the virtual currency.
‡ Was information about the source of virtual currency obtained?	No
‡ Have you obtained any conductor information related to the transaction?	No

Completing action 1 of transaction 1 – Scenario B.2

"Completing action" information provided by Flashy Coin

Fields	Information provided for completing action 1 of transaction 1
*** Details of disposition**	Added to virtual currency wallet This describes what happened to the virtual currency in the transaction.
† Amount	130
† Virtual currency type	Litecoin
† Receiving virtual currency address	b1b2b3b4b5b6b7b8b9 The address of the person or entity receiving the virtual currency.

‡ Was there any other person or entity involved in the completing action?	No

Beneficiary indicator – Scenario B.2

“Beneficiary indicator” information provided by Flashy Coin

Fields	Information provided by Flashy Coin
‡ Was there a beneficiary for this completing action?	Yes

Information about the beneficiary – Scenario B.2

“Information about the beneficiary” provided by Flashy Coin

Fields	Information provided by Flashy Coin
† Surname	Pepper
† Given name	Sam
House/Building number	123
† Street address	Giggles Way
† City	Orton
† Country	CA
† Province or state (code)	ON
Postal or zip code	K2K 3P3

Telephone number	613-555-2368
Email address	Sam.pepper@myemail.ca
Date of birth	1977-03-07

Identification 1 of 1 – Scenario B.2

‘Identification 1 of 1” information provided by Flashy Coin

Fields	Information provided by Flashy Coin
† Identifier type	Passport
† Number associated with identifier type	H1234556798
† Jurisdiction of issue (country)	CA
† Jurisdiction of issue (province or state) (code)	ON

Scenario B.3: Receipt of virtual currency (24-hour rule)

Scenario

Sam Pepper has 3 wallets hosted by Flashy Coin:

- d1d2d3d4d5d6d7d8d9
- e1e2e3e4e5e6e7e8e9, and
- f1f2f3f4f5f6f7f8f9

On June 29, 2021, Sam Pepper received virtual currency (Litecoin) to his virtual currency addresses/wallets that are hosted by Flashy Coin. The details of the transactions are described in the following table:

Details of virtual currency transactions received by Sam Pepper 2021

Transaction	Date and time of transaction	Beneficiary	Amount of virtual currency received	Virtual address/wallet
Transaction 1	June 29, 2021 at 10:15 am	Sam Pepper	60 Litecoin ($5,590.04 CAD (Canadian dollar))	d1d2d3d4d5d6d7d8c
Transaction 2	June 29, 2021 at 2:08 pm	Sam Pepper	60 Litecoin ($5,769.89 CAD (Canadian dollar))	e1e2e3e4e5e6e7e8e
Transaction 3	June 29, 2021 at 7:39 pm	Sam Pepper	60 Litecoin ($5,643.60 CAD (Canadian dollar))	f1f2f3f4f5f6f7f8f9

Flashy Coin follows its policies and procedures for receiving virtual currency transfers and asks Sam where the virtual currency came from.

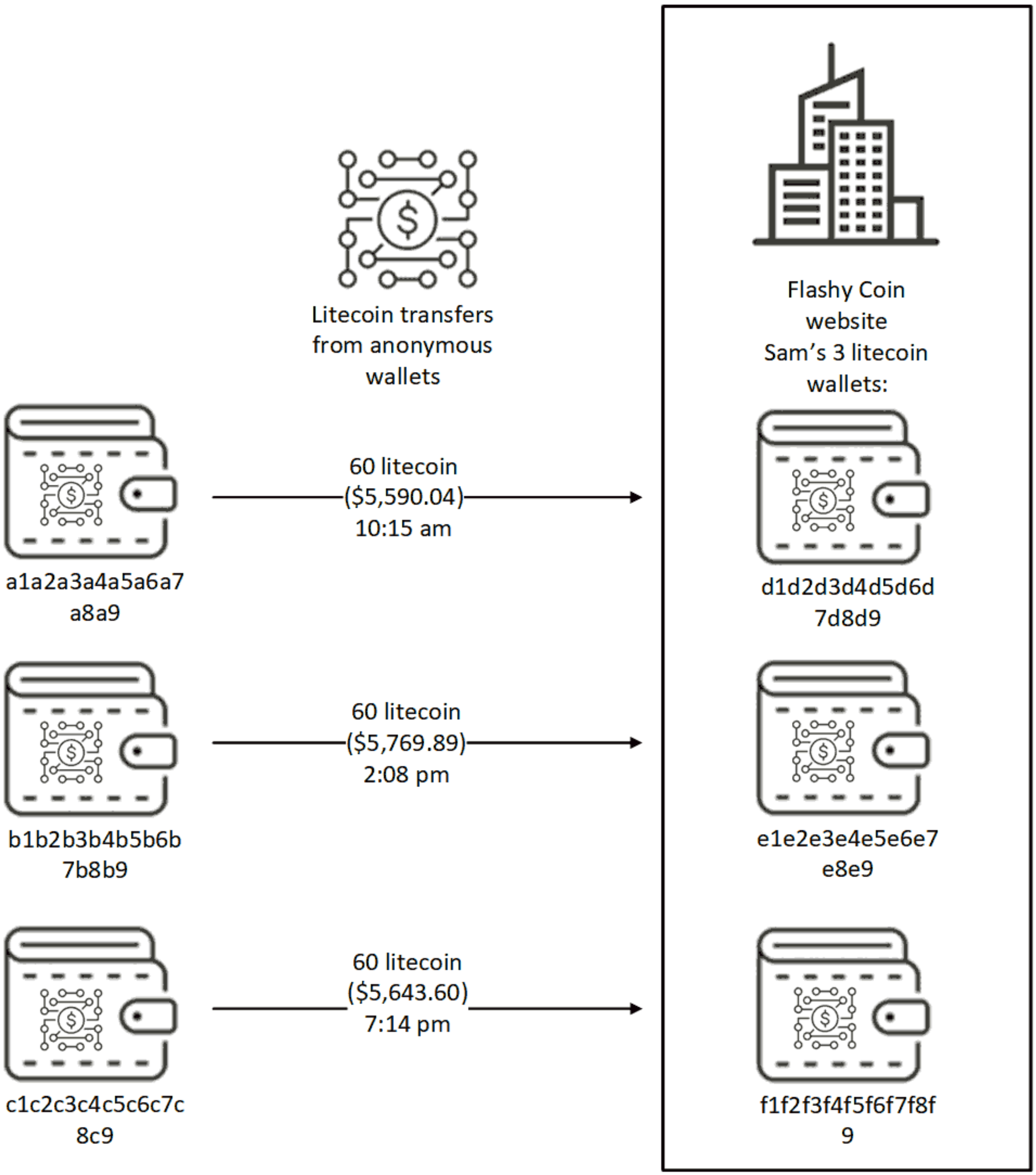
Sam is unable to provide a source of the virtual currency or identify the sender, which means Flashy Coin cannot report conductor information.

Flashy Coin will need to follow their risk-based policies and procedures for determining whether any follow-up measures must be taken. However, Flashy Coin will need to submit the Large Virtual Currency Transaction Report.

Large Virtual Currency Transaction Report requirement

Flashy Coin must submit a report because Sam Pepper is the beneficiary of the 3 transactions and they aggregate above threshold.

Infographic summarizing scenario B.3



Infographic summarizing scenario 3: Receipt of virtual currency (24-hour rule)

Expected field information in the report

General information – Scenario B.3

General information about Flashy Coin

Fields	Information provided by Flashy Coin
*** Reporting entity number**	###### (Flashy Coin) The 7-digit identifier assigned to Flashy Coin when it enrolled with FINTRAC Web Reporting System (FWR).
‡ Reporting entity report reference number	LVCTR-FC-002 The unique number for this report assigned by Flashy Coin or its service provider.
*** Activity sector**	Money services business
*** Contact number**	###### (Jamie Salt) The unique number for the person that FINTRAC can liaise with.

Report information – Scenario B.3

"Report information" provided by Flashy Coin

Fields	Information provided by Flashy Coin
‡ Aggregation type	Beneficiary The type of aggregation when multiple transactions occur in Flashy Coin's 24-hour reporting period.

‡ 24-hour period start date/time	2021-06-29T00:00:00-04:00 Flashy Coin's start date and time for the 24-hour period.
‡ 24-hour period end date/time	2021-06-29T23:59:59-04:00 Flashy Coin's end date and time for the 24-hour period.

Transaction information – Scenario B.3

"Transaction

Fields	Information provided for transaction 1 of 3	Infor
*** Date/time virtual currency was received**	2021-06-29T10:15:55-04:00 The date and time Flashy Coin received the virtual currency.	2021-
*** Method of transaction**	Other The method that describes how Flashy Coin received the virtual currency.	Othe
‡ Threshold indicator	Below threshold	Belov
*** Transaction identifier**	110eea569810268e90e901e9de0c83c1cedd02d1d854d The unique identifier, or a hash, with mixed numerical and alphabetical characters.	277a

‡ Reporting entity transaction reference number	20210629-101555-0087 The unique reference number assigned to the transaction by Flashy Coin. The number is unique to the report level.	2021(
*** Reporting entity location number**	01 (Hawk Junction Location) This is where the transaction was received.	01 (H This i:

Starting action – Scenario B.3

“Starting action” information provided by Flashy Coin

Fields	Information provided for starting action of transaction 1 of 3	Information provided for starting action of transaction 2 of 3	Informatior provided fo starting act transaction
*** Amount**	60	60	60
*** Virtual currency type**	Litecoin The virtual currency type used in the transaction.	Litecoin	Litecoin
*** Exchange rate**	93.90 The rate of exchange to Canadian dollars that Flashy Coined used for the transaction.	96.16	94.06

*** Sending virtual currency address**	a1a2a3a4a5a6a7a8a9 The alpha-numeric address associated with the sender (typically the conductor) of the virtual currency.	b1b2b3b4b5b6b7b8b9	c1c2c3c4c5c(
‡ Was information about the source of virtual currency obtained?	No	No	No
‡ Have you obtained any conductor information related to the transaction?	No	No	No

Completing action – Scenario B.3

“Completing action” information provided by Flashy Coin

Fields	Information provided for completing action of transaction 1 of 3	Information provided for completing action of transaction 2 of 3	Information provided for completing action of transaction 3 3
* Details of disposition	Added to virtual currency wallet This describes what happened to the virtual currency in the transaction.	Added to virtual currency wallet	Added to virtu currency walle
† Amount	60	60	60
† Virtual currency type	Litecoin	Litecoin	Litecoin
† Receiving virtual currency address	d1d2d3d4d5d6d7d8d9 The address of the person or entity receiving the virtual currency.	e1e2e3e4e5e6e7e8e9	f1f2f3f4f5f6f7

‡ Was there any other person or entity involved in the completing action?	No	No	No

Beneficiary indicator – Scenario B.3

“Beneficiary indicator” information provided by Flashy Coin

Field	Information provided for transaction 1 of 3	Information provided for transaction 2 of 3	Information provided for transaction 3 of 3
‡ Was there a beneficiary for this completing action?	Yes	Yes	Yes

Information about the beneficiary – Scenario B.3

“Information about the beneficiary” provided by Fla

Fields	Information provided for transaction 1 of 3	Information provided for transaction 2 of 3	In fo
† Surname	Pepper	Pepper	Pe

† Given name	Sam	Sam	Sa
Alias	Professor Pepper	Professor Pepper	Pr
Username	Sam.pepper@myemail.ca	Sam.pepper@myemail.ca	Sa
Client number	1001	1001	10
House/Building number	123	123	12
† Street address	Giggles Way	Giggles Way	Gi
† City	Orton	Orton	Or
† Country	CA	CA	C
† Province or state (code)	ON	ON	O
Postal or zip code	K2K 3P3	K2K 3P3	K2
Telephone number	613-555-2368	613-555-2368	61
Email address	Sam.pepper@myemail.ca	Sam.pepper@myemail.ca	Sa
Date of birth	1977-03-07	1977-03-07	19
Country of residence	CA	CA	C
Occupation	Musician	Musician	M

Identification – Scenario B.3

“Identification” information provided by Flashy Coin

Fields	Information provided for transaction 1 of 3	Information provided for transaction 2 of 3	Information provided for transaction 3 of 3
† Identifier type	Passport	Passport	Passport
† Number associated with identifier type	H1234556798	H1234556798	H1234556798
† Jurisdiction of issue (country)	CA	CA	CA
† Jurisdiction of issue (province or state) (code)	ON	ON	ON

For assistance

If you have questions about this guidance, please contact FINTRAC by email at guidelines-lignesdirectrices@fintrac-canafe.gc.ca.

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2024-04-08