

**Guideline 10B: Submitting Casino Disbursement Reports  
to FINTRAC by Paper**

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# 1 General

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

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

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

If you are a casino, this guideline has been prepared to help you submit casino disbursement reports by paper, effective **September 28, 2009**. It explains reporting timelines, how reports have to be sent to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), and what information has to be included in these reports.

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

- *Guideline 1: Background* explains money laundering and terrorist financing and their international nature. It also provides an outline of the legislative requirements as well as an overview of FINTRAC's mandate and responsibilities.
- *Guideline 2: Suspicious Transactions* explains how to report a suspicious transaction. It also provides guidance on how to identify a suspicious transaction, including general and industry-specific indicators that may help when conducting or evaluating transactions.
- *Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC* explains when and how to submit suspicious transaction reports. There are two different versions of Guideline 3, by reporting method.

- *Guideline 4: Implementation of a Compliance Regime* explains the requirement for reporting entities to implement a regime to ensure compliance with their obligations under the Act and associated Regulations.
- *Guideline 5: Submitting Terrorist Property Reports to FINTRAC* explains to reporting entities when and how to submit a terrorist property report.
- *Guideline 6: Record Keeping and Client Identification* explains the requirement for reporting entities to identify their clients and keep records. There are several different versions of Guideline 6, with each one applicable to a particular sector.
- *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC* explains when and how to submit large cash transaction reports. There are two different versions of Guideline 7, by reporting method.
- *Guideline 8: Submitting Electronic Funds Transfer Reports to FINTRAC* explains when and how to submit electronic funds transfer reports. There are three different versions of Guideline 8, by type of electronic funds transfer and reporting method.
- *Guideline 9: Submitting Alternative to Large Cash Transaction Reports to FINTRAC* explains when and how financial entities can choose the alternative to large cash transaction reports. This is only applicable to financial entities.
- *Guideline 10: Submitting Casino Disbursement Reports to FINTRAC* explains when and how to submit casino disbursement reports. There are two different versions of Guideline 10, by reporting method.

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

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

Throughout this guideline, any references to dollar amounts (such as \$10,000) refer to the amount in Canadian dollars or its equivalent in foreign currency.

## 2 Casino Disbursement Reporting Requirements

### 2.1 When does a casino disbursement report have to be made?

You have to send a casino disbursement report to FINTRAC in the following situations:

- If you make a disbursement, as described below, in an amount of \$10,000 or more, in the course of a single transaction. Each such transaction must be sent to FINTRAC separately, in its own report.
- If you make two or more disbursements, as described below, of less than \$10,000, that total \$10,000 or more under the 24-hour rule. In this case, you have to make a casino disbursement report if your employee or senior officer knows the disbursements were received within 24 consecutive hours of each other by or on behalf of the same individual or entity.

The period for the 24-hour rule is a rolling time frame. In other words, the 24-hour period begins with each new disbursement of less than \$10,000, if you know they were received by or on behalf of the same individual or entity. However, if your system permits you to know of multiple disbursements only within a static 24-hour period (such as the gaming day), you are required to report the multiple disbursements of less than \$10,000 each that you know of in that 24-hour period, if they add up to \$10,000 or more.

Include disbursements grouped under the 24-hour rule in the same casino disbursement report.

In the context of casino disbursement reports, only disbursements that you pay out in the following types of transactions must be reported:

- redemptions of slot tickets, chips, tokens or plaques;
- front cash withdrawals;
- safekeeping withdrawals;
- advances on any form of credit, including advances by markers or counter cheques;
- payments on bets, including slot jackpots;
- payments to clients of funds received for credit to that client or any other client;
- cashing of cheques or other negotiable instruments; and
- reimbursements to clients of travel and entertainment expenses.

This includes amounts paid out in cash, by cheque, by transfer or many other methods, but it only includes amounts paid out to a casino client or patron and only if

they were paid out for the types of transactions listed above. However, in this context, disbursements exclude any amounts that you pay out in casino chips.

A disbursement does not include the following:

- a payment for services or goods to the casino's staff, suppliers or entertainers
- an amount deposited to the casino's bank account
- an amount deposited to a front money account
- an amount applied to a casino credit account
- an advance on a client's credit card, unless the credit card was issued by the casino
- a "comp" (complimentary) payment or redemption of player points
- a cash bonus payment (rewards program)
- cash received by the casino (see *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC* for information about when receipts of cash are reportable)

If you pay out such an amount, it is not a reportable disbursement. However, if you conduct a single transaction in which you pay out an amount that covers both a reportable disbursement and a non-reportable payment, you will have to submit a casino disbursement report. For example, if you redeem \$18,000 in chips for a client by issuing a cheque to the client for \$10,000 and depositing the rest (\$8,000) to the client's front money account, you would be required to report this transaction in a casino disbursement report. In this case, the reason for disbursement in the report would reflect the total amount of chips presented for redemption, but the method of disbursement would not include the deposit to the front money account.

In this example, if the disbursement cheque issued were less than \$10,000, the transaction would not be reportable (unless you knew of other disbursements of less than \$10,000 for the 24-hour rule to apply).

A casino disbursement report is required when both the reason and the method of a disbursement equal \$10,000 or more. For examples to illustrate this, refer to Appendix 1.

You have to send a casino disbursement report to FINTRAC within 15 calendar days after the disbursement.

## 2.2 Disbursements in foreign currency

If a disbursement is in foreign currency, you will need to check whether it is the equivalent of 10,000 Canadian dollars or more to determine whether or not it is reportable. **For this purpose only**, use the last noon rate provided by the Bank of Canada available at the time of the transaction. This calculation is not based on the actual exchange rate used to process the transaction — this is only to check whether the \$10,000 threshold is met for the transaction to be reportable.

For example, for a disbursement in foreign currency that happened at 9:00 a.m. on Tuesday following a holiday Monday, you would use the Bank of Canada noon rate from the previous Friday to determine whether it is reportable. You can find the noon rate applicable at the time of a transaction on the Bank of Canada Web site at <http://www.bankofcanada.ca/en/exchange.htm>. If there is no Bank of Canada noon rate published for the currency of the transaction, use the actual exchange rate applied when you processed the disbursement to determine whether it is reportable.

Once you have determined that a disbursement in foreign currency is in fact reportable based on the Bank of Canada noon rate, you will have to send a casino disbursement report to FINTRAC. On this report, you will indicate any amounts involved in the transaction in foreign currency, and indicate the appropriate currency code. You are not required to provide information about any exchange rate applicable to the transaction in the casino disbursement report. The exchange rate is only relevant to determine whether or not the transaction is reportable.

### **2.3 Other requirements associated with casino disbursements**

In addition to the reporting requirements explained in this guideline, consider the following relating to a casino disbursement:

#### **Record keeping and client identification**

You have to keep a copy of each casino disbursement report you send to FINTRAC. In addition, casino disbursements have client identification and other associated record keeping requirements, such as third party determination. These are explained in *Guideline 6F: Record Keeping and Client Identification for Casinos*.

#### **Electronic funds transfer report**

If a casino disbursement involves an electronic funds transfer, you may have to make an electronic funds transfer report to FINTRAC about the same transaction in addition to the casino disbursement report.

For more information about making electronic funds transfer reports, consult *Guideline 8: Submitting Electronic Funds Transfer Reports to FINTRAC*.

#### **Suspicious transaction report**

If anything about a casino disbursement gives you reasonable grounds to suspect that it could be related to a money laundering or a terrorist activity financing offence, you have to make a suspicious transaction report to FINTRAC. This would be in addition to making the casino disbursement report about the same transaction as required.

Furthermore, if a disbursement is attempted but not completed, a casino disbursement report is not required. However, if the attempted disbursement gives you reasonable grounds to suspect that it could be related to a money laundering or

a terrorist activity financing offence, you have to make a suspicious transaction report to FINTRAC.

The suspicious transaction report has many similar fields to those of a casino disbursement report, although the order of some parts is different. There are other differences, such as a field in the suspicious transaction report for you to explain your suspicion about the transaction. There is also a field in that report for you to describe what action, if any, was taken by you as a result of the suspicious transaction. This would include stating that you have made a casino disbursement report for the same transaction (if that is the case).

For more information about suspicious transaction reports, consult the following:

- *Guideline 1: Backgrounder*
- *Guideline 2: Suspicious Transactions*
- *Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC*

### **Transactions related to terrorist property**

If you know that any proposed transaction is related to property owned or controlled by or on behalf of a terrorist or a terrorist group, you cannot complete the transaction. This is because terrorist property must be frozen under the *Regulations Implementing the United Nations Resolutions on the Suppression of Terrorism* as well as the *Criminal Code*.

For more information about this and to find out what your obligations are regarding any terrorist property in your control or possession, consult the following:

- *Guideline 1: Backgrounder*
- *Guideline 5: Submitting Terrorist Property Reports to FINTRAC*

## **2.4 Means of reporting to FINTRAC**

### **Electronic reporting**

You will have to submit all casino disbursement reports to FINTRAC **electronically** if you have the technical capabilities to do so. The minimum technical capabilities are as follows:

- A personal computer with the following characteristics:
  - 32 MB memory (64 MB or higher is preferable)
  - 640 x 480 VGA video display (800 x 600 or higher is preferable)
  - an operating system running a Web browser; and
- An Internet connection

See *Guideline 10A: Submitting Casino Disbursement Reports to FINTRAC Electronically* for more information.

## **Paper reporting**

If you do **not** have the technical capabilities to send reports electronically, you must submit reports on paper. See sections 3 and 4 for more information on submitting paper casino disbursement reports to FINTRAC.

### **2.5 Casino disbursement report records**

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

## **3 Paper Reporting**

### **3.1 How to complete paper reports**

If you do not have the technical capability (see subsection 2.4), you will have to submit paper casino disbursement reports to FINTRAC. In this case, forms will be available for paper filing as follows:

- A file is accessible from the reporting forms area of the publications section of FINTRAC's Web site (<http://www.fintrac-canafe.gc.ca>) to be printed at your local library or any other place with Internet access.
- Call 1-866-346-8722 for a copy to be faxed or mailed to you.

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

### **3.2 How to send paper reports to FINTRAC**

There are two ways to send a paper report to FINTRAC:

- Fax: 1-866-226-2346; or
- Mail to the following address:  
Financial Transactions and Reports Analysis Centre of Canada  
Section A  
234 Laurier Avenue West, 24th floor  
Ottawa, ON K1P 1H7  
Canada

### 3.3 Acknowledgement of receipt of a paper report

FINTRAC will not send you any acknowledgement when your paper casino disbursement report has been received.

### 3.4 Report corrections

If you need to change a paper casino disbursement report that you previously submitted to FINTRAC, use a new paper report. On page 1 of the form, answer “Yes” to the question “Is this report a correction to a report previously submitted?” and enter the original report’s date and time. Complete Part A, whether the information has changed or not and provide the new or changed information only for the affected fields in Part B through Part I. If you need to remove information from a field, strike a line through the field.

In addition, if you send a casino disbursement report that contains incomplete or inaccurate information, FINTRAC may notify you.

## 4 Instructions for Completing a Casino Disbursement Report

### 4.1 General instructions

The fields in this section correspond with the paper form called the *Casino Disbursement Report*. As explained in section 2.4, completing a paper report is only permitted if you do not have the capability to report electronically.

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

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

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

As explained in subsection 2.1, a casino disbursement report can be about multiple transactions of less than \$10,000 each conducted within 24 consecutive hours of each other that add up to \$10,000 or more. Because those individual transactions were under \$10,000, the information for some mandatory fields in the report may not be available in your records or from the time of the transaction. In this case, "reasonable efforts" applies to those otherwise mandatory fields.

There are ten parts to the casino disbursement report, but some are only to be completed if applicable. To report a casino disbursement, follow the following steps:

- **Step 1** – Complete Part A to provide information about the casino reporting the disbursement.
- **Step 2** – Complete Part B to provide details about the transaction. If you have to include more than one transaction in your report (for disbursement transactions of less than \$10,000 each made within 24 consecutive hours of each other that total \$10,000 or more), repeat steps 2, 3, 4 and 5 for each one.
- **Step 3** – Complete Part C to provide details about the individual who requested the disbursement. If the disbursement was received on behalf of an entity, also complete Part D. If the disbursement was received on behalf of another individual, complete Part E.
- **Step 4** – Complete Part F1 to provide details about the reason for disbursement. If there was more than one reason for disbursement, repeat this step for each disbursement. If the reason for disbursement involved a casino account, also complete Part G. If there was an individual associated to the reason for disbursement, also complete Part H. If there was an entity associated to the reason for disbursement, also complete Part I.
- **Step 5** – Complete Part F2 to provide details about the method of disbursement. If there was more than one method of disbursement, repeat this step for each disbursement. If the method of disbursement involved a casino account, also complete Part G. If there was an individual associated to the method of disbursement, also complete Part H. If there was an entity associated to the method of disbursement, also complete Part I.

The rest of this section will cover each part of the casino disbursement form.

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

### **Part A: Information about the casino reporting the disbursement**

This part is for information about the casino required to report the disbursement to FINTRAC.

Some reporting entities choose to have someone outside their entity send their reports to FINTRAC. In this situation, the sender is not the reporting entity, nor did they conduct the transaction. Therefore, information about the sender would not appear in Part A, unless the reporting entity chooses to have the sender be the contact person about the report (fields A4 to A8).

#### **Field A1 24-hour-rule indicator**

If this report is about one transaction of \$10,000 or more, check the box for “no” in field A1. In this case, the report should only contain one transaction. This means that there should only be one Part B.

If this report is about a transaction that is part of a group of two or more transactions of less than \$10,000 each made within 24 consecutive hours of each other that total \$10,000 or more, check the box for “yes” in field A1. In this case, all of the transactions from that group should be included in the same casino disbursement report. This means that the report should contain a distinct Part B (Information about the transaction), with all the other applicable parts, for each transaction of the 24-hour rule group.

#### **Field A2\* Reporting entity’s identifier number**

This is the casino’s license number or other identifier number.

#### **Field A2A\* Reporting entity’s full name**

Enter the full legal name of the casino that is the reporting entity.

#### **Field A3 Reporting entity report reference number**

If you use a reference number for your own internal purposes, you can enter it in your report to FINTRAC.

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

#### **Fields A4\*, A5\*, A6, A7\* and A8 Contact name and telephone number**

Enter the name of the individual FINTRAC can contact for clarification about this report. Enter the telephone number, including the area code, of the individual FINTRAC can contact for clarification. Include the extension, if applicable, in field A8.

## **Part B: Information about the transaction**

This part is for information about where the transaction took place, as well as how and when it was conducted.

You must make separate casino disbursement reports for each distinct transaction of \$10,000 or more. In this case, you will only have **one** Part B to complete.

If you are reporting two or more transactions that were disbursements of less than \$10,000 each received by or on behalf of the same individual or entity within 24 consecutive hours of each other that total \$10,000 or more, you should group those in the same report. Remember to answer “yes” in field A1 (the 24-hour-rule indicator) in Part A for this type of report.

When you need to report more than one transaction, complete a separate Part B for each transaction. To do this, you can copy Part B. Fill in the “Transaction \_\_\_ of \_\_\_” area at the top of Part B to distinguish between each transaction. When you provide information in other parts of the report, indicate to which transaction that information applies.

### **Field B1\* Address where the transaction took place**

Enter the street address. This should be the physical address where the transaction took place, not a post office box or general delivery address. Enter the town or city, province or state, country and postal or zip code. If you have more than one location, this information should refer to where the transaction took place.

### **Fields B2\* and B3 How was the transaction conducted?**

Check the appropriate box to indicate how the transaction was conducted. For example, if the transaction was done in person, check that box. If the selections provided do not cover this particular transaction, indicate "Other" and provide details in field B3. In this case, field B3 is mandatory.

### **Fields B4\* and B5 When the transaction took place**

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

The time of transaction (field B5) can be left blank if it is not available from the moment of the transaction or in your records.

The date of transaction (field B4) is mandatory and cannot be earlier than September 28, 2009.

### **Part C: Information about the individual who requested the disbursement**

This part is for information about the individual who requested the disbursement.

If you include more than one transaction in this report under the 24-hour rule, you have to complete Part C for each one. In this case, provide information about the individual who requested the transaction in Part C for each transaction included in the report. Fill in the "Transaction \_\_\_ of \_\_\_" area at the top of Part C to distinguish between each transaction, based on the number you assigned the transaction in Part B.

#### **Fields C1 and C2 Is there a client number assigned by the reporting casino for this individual?**

Check the appropriate box. If the answer to field C1 is "no", field C2 does not apply.

If the answer to field C1 is "yes", enter the client number you issued to the individual who requested the disbursement in field C2. In this case, field C2 is mandatory.

#### **Fields C3\*, C4\* and C5 Individual's full name**

Enter the last name, first name and middle initial (if applicable) of the individual who requested the disbursement.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for fields C3 and C4 was not obtained at the time of the transaction (and is not available from your records) you can leave these fields blank.

#### **Fields C6\* to C10\* Individual's full address**

Enter the street address. This should be the individual's physical address, not a post office box or general delivery address. Enter the town or city, province or state, country and postal or zip code of the individual who requested the disbursement.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for fields C6 to C10 was not obtained at the time of the transaction and is not available from your records, you can leave these fields blank.

#### **Field C11 Home telephone number**

Enter the home telephone number, including the area code, of the individual who requested the disbursement.

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

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

**Fields C12 and C13 Business telephone number**

Enter the business telephone number, including the area code, of the individual who requested the disbursement. Include the extension, if applicable, in field C13.

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

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

**Field C14\* Individual’s date of birth**

Enter the date (yyyy-mm-dd) of birth of the individual who requested the disbursement.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for field C14 was not obtained at the time of the transaction and is not available from your records, you can leave this field blank.

**Field C15 Country of residence**

Enter the country of permanent residence of the individual who requested the disbursement.

**Fields C16\* and C17 Individual’s identifier**

Check the appropriate box to show the document used to identify the individual who requested the disbursement. If the selections provided do not cover the identifier used, indicate “Other” and provide details in field C17. In this case, field C17 is mandatory.

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

Although a Social Insurance Number (SIN) card can be used for identification purposes, the SIN (that is, the number) is not to be provided in any report to FINTRAC. If your client used a SIN card and no other identifying document

for ID purposes, indicate “Social insurance number (SIN) card”. In this case, field C18 does not apply.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for field C16 was not obtained at the time of the transaction and is not available from your records, you can leave this field blank.

#### **Field C18\* ID Number**

Check the number of the document described in field C16 that was used to identify the individual who requested the disbursement.

As explained above, if your client used a SIN card and no other identifying document for ID purposes, field C18 does not apply.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for field C18 was not obtained at the time of the transaction and is not available from your records, you can leave this field blank.

#### **Fields C19\* and C20\* Place of issue of individual’s identifier**

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

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for fields C19 and C20 was not obtained at the time of the transaction and is not available from your records, you can leave these fields blank.

#### **Field C21\* Individual’s occupation**

Enter the occupation of the individual who requested the disbursement.

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

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

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for field C21 was not obtained at the time of the transaction and is not available from your records, you can leave this field blank.

#### **Field C22 “On behalf of” indicator**

You have to indicate whether the individual who received the disbursement did so on anyone else’s behalf. You have to select one of the following for this entry:

- **Not applicable**  
This means that **neither** Part D (Information about the entity on whose behalf the disbursement was received) **nor** Part E (information about the individual on whose behalf the disbursement was received) applies to this report. “Not applicable” indicates that the disbursement was not on anyone else’s behalf (that is, it was received on behalf of the individual that requested it).
- **On behalf of an entity**  
This indicates that the disbursement was received on behalf of an entity, such as a business, a partnership, a corporation, a trust or other entity. For a disbursement that was received on behalf of an entity, complete Part D (Information about the entity on whose behalf the disbursement was received) to provide the information about that entity.
- **On behalf of another individual**  
This indicates that the disbursement was received on behalf of another individual. For a disbursement that was received on behalf of another individual, complete Part E (information about the individual on whose behalf the disbursement was received) to provide the information about that other individual.

#### **Part D: Information about the entity on whose behalf the disbursement was received (if applicable)**

This part only applies if the disbursement was received on behalf of a third party that is an entity. If you indicated at field C22 that the disbursement was received on behalf of an entity, you have to complete Part D.

If you include more than one transaction in this report under the 24-hour rule, you have to complete Part D for each one that was received on behalf of an entity. To do this, you can copy Part D. Fill in the "Transaction \_\_\_\_ of \_\_\_\_ " area at the top of Part D to distinguish between each transaction, based on the number you assigned the transaction in Part B.

**Field D1\* Full name of entity**

Enter the full name of the business, corporation, trust or other entity on whose behalf the disbursement was received.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for field D1 was not obtained at the time of the transaction and is not available from your records, you can leave this field blank.

**Field D2\* Type of business**

Describe the type of business of the entity on whose behalf the disbursement was received.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for field D2 was not obtained at the time of the transaction and is not available from your records, you can leave this field blank.

**Fields D3\* to D7\* Entity's full address**

Enter the street address. This should be the entity's physical address, not a post office box or general delivery address. Enter the town or city, province or state, country and postal or zip code of the business, corporation or other entity on whose behalf the disbursement was received.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for fields D3 to D7 was not obtained at the time of the transaction and is not available from your records, you can leave these fields blank.

**Fields D8 and D9 Business telephone number**

Enter the telephone number, including the area code, of the business, corporation, trust or other entity on whose behalf the disbursement was received. Include the extension, if applicable, in field D9.

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

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

**Field D10 Is the entity a corporation?**

Check the appropriate box. If the answer to field D10 is "no", fields D11 to D13 do not apply.

If the answer to field D10 is “yes”, provide incorporation information in fields D11 to D13.

**Fields D11\* to D13\* Incorporation information (if applicable)**

If the answer to field D10 is “yes” (in other words, the disbursement was received on behalf of an entity that is a corporation), provide the incorporation number. Also provide the province or state and the country of the incorporation number’s place of issue. If an incorporation number does not exist for the corporation, leave fields D11 to D13 blank. If the incorporation number was issued nationally and there was no province or state included in the place of issue, leave the province or state field blank.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for fields D11, D12 and D13 was not obtained at the time of the transaction and is not available from your records, you can leave these fields blank.

**Fields D14 to D16 Individual(s) authorized to bind the entity or act with respect to the casino account (up to three)**

Provide the names of up to three individuals who have authority to bind the entity or conduct transactions through the casino account. For each such individual, enter the last name, first name and middle initial (if applicable).

**Part E: Information about the individual on whose behalf the disbursement was received (if applicable)**

This part only applies if the disbursement was received on behalf of a third party that is an individual. If you indicated at field C22 that the disbursement was received on behalf of another individual, you have to complete Part E.

If the individual received the disbursement on his or her own behalf, this part does not apply.

If you include more than one transaction in this report under the 24-hour rule, you have to complete Part E for each one that was received on behalf of another individual. To do this, you can copy Part E. Fill in the "Transaction \_\_\_\_ of \_\_\_\_" area at the top of Part E to distinguish between each transaction, based on the number you assigned the transaction in Part B.

**Fields E1\*, E2\* and E3 Individual’s full name**

Enter the last name, first name and middle initial (if applicable) of the individual on whose behalf the disbursement was received.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for

fields E1 and E2 was not obtained at the time of the transaction and is not available from your records, you can leave these fields blank.

**Fields E4\* to E8\* Individual's full address**

Enter the street address. This should be the individual's physical address, not a post office box or general delivery address. Enter the town or city, province or state, country and postal or zip code of the individual on whose behalf the disbursement was received.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for fields E4 to E8 was not obtained at the time of the transaction and is not available from your records, you can leave these fields blank.

**Field E9 Home telephone number**

Enter the home telephone number, including the area code, of the individual on whose behalf the disbursement was received.

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

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

**Fields E10 and E11 Individual's business telephone number**

Enter the business telephone number, including the area code, of the individual on whose behalf the disbursement was received. Include the extension, if applicable, in field E11.

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

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

**Field E12 Individual's date of birth**

Enter the date of birth (yyyy-mm-dd) of the individual on whose behalf the disbursement was received.

**Field E13 Country of residence**

Enter the country of permanent residence of the individual on whose behalf the disbursement was received.

**Fields E14 and E15 Individual's identifier**

Check the appropriate box to show the document used to identify the individual on whose behalf the disbursement was received. If the selections provided do not cover the identifier used, indicate "Other" and provide details in field E15. In this case, field E15 is required.

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

Although a Social insurance number (SIN) card can be used for identification purposes, the SIN (that is, the number) is not to be provided in any report to FINTRAC. If your client used a SIN card and no other identifying document for ID purposes, indicate "Social insurance number (SIN) card". In this case, field E16 does not apply.

**Field E16 ID number**

Enter the number of the document described in field E14 that was used to identify the individual on behalf of whom the disbursement was received.

As explained above, if you used a SIN card and no other identifying document for the individual, field E16 does not apply.

**Fields E17 and E18 Place of issue of individual's identifier**

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

**Field E19 Individual's occupation**

Enter the occupation of the individual on whose behalf the disbursement was received.

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

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

**Fields E20 and E21 Relationship of the individual named in Part C to the individual named above**

Check the appropriate box to indicate the relationship of the individual requesting the disbursement to the individual on whose behalf the disbursement was received. If the selections provided do not cover the relationship, indicate "Other" and provide details in field E21. In this case, field E21 is required.

**Part F1: Reason for disbursement**

This part is for information about why the disbursement was requested.

If you are reporting a transaction for which there is more than one reason for disbursement, complete a separate Part F1 for each reason for disbursement. To do this, you can copy Part F1. Fill in the "Reason for disbursement \_\_\_\_ of \_\_\_\_" area at the top of Part F1 to distinguish between each reason.

If you are including more than one transaction in this report under the 24-hour rule, in addition to including Part F1 for each transaction, you will also have to indicate to which transaction each Part F1 applies. Fill in the "...for transaction \_\_\_\_ of \_\_\_\_" area at the top of Part F1 to distinguish between each transaction, based on the number you assigned the transaction in Part B.

**Fields F1-1\* and F1-2 Reason for disbursement**

Check the appropriate box to indicate the reason for disbursement. Some reasons require the completion of other parts of the report to provide additional information. Common occurrences of these are explained below.

The selections for this field are grouped as follows:

- Redemption of slot tickets, chips or tokens, or plaques
- Front cash withdrawal  
If this is the reason for disbursement, you will have to indicate at field F1-5 that the disbursement involved a casino account. You will also have to complete Part G (Account information) to provide information about that account.
- Safekeeping withdrawal
- Advance on credit  
This is for an advance that constitutes a loan from the casino, including a counter cheque, a casino credit account or a marker issued.

In this context, an advance on credit does not include advances on credit cards that are issued by any institution other than the casino. For example, an advance on a bank credit card is not a disbursement in this context.

If none of the selections describes the advance, indicate “Other” and provide details in field F1-2. In this case, field F1-2 is mandatory.

If the advance on credit was a counter cheque written by or payable to the individual requesting the disbursement, you will have to indicate at field F1-7 that an entity was involved. You will also have to provide the name of the financial institution on which the cheque was drawn in Part I (Information about an associated entity). However, if the counter cheque involved an individual other than the one requesting the disbursement, you will have to indicate at field F1-6 that another individual was involved. In this case, you will also have to complete Part H (Information about an associated individual) to provide information about the individual and the account involved.

If the advance on credit was a casino credit account, you will have to indicate at field F1-5 that the disbursement involved a casino account. You will also have to complete Part G (Account information) to provide information about that account.

- Payment to a client or a patron of any of the following:
  - on bets (including payments on lottery-type games, sports betting, etc., but excluding payments made by casino chips, slot tickets, tokens or vouchers);
  - from a casino stored value card;
  - of slot jackpots (other than payments made by slot tickets)
  - of a table jackpot, tournament payout or of a draw or prize payout; or
  - of credit for a recipient or of credit for other than the recipient (that is, a payment to a client of funds received for credit to that client or any other client, such as a wire transfer you received for a client or an employer providing funds for their employees to pick up and use at the casino). If the credit was for other than the recipient, you will have to indicate at field F1-6 that another individual was involved. In this case, you will also have to complete Part H (Information about an associated individual) to provide information about the individual and any account associated.

- Cashing of negotiable instruments (bank draft, casino cheque, cheque from other than a casino, money order or traveller's cheque)  
If the negotiable instrument was a casino cheque from your casino, payable to the individual requesting the disbursement, indicate at field F1-7 that no other entity was involved. If it was any other type of negotiable instrument written by or payable to the individual requesting the disbursement, you will have to indicate at field F1-7 that an entity was involved. You will also have to provide the name of the institution on which the negotiable instrument was drawn in Part I (Information about an associated entity). However, if the negotiable instrument involved an individual other than the one requesting the disbursement, you will have to indicate at field F1-6 that another individual was involved. In this case, you will also have to complete Part H (Information about an associated individual) to provide information about the individual involved and the account involved, if applicable.
- Reimbursement of entertainment or travel expenses

The values presented for this field are the only ones that can be included in this report. In other words, there is no other category of reportable disbursement.

There could be more than one reason for a particular disbursement transaction. In that case, make sure you include the information for each reason in Part F1. For example, your client could, in the same transaction, request the redemption of slot tickets (reason 1), the reimbursement of travel expenses (reason 2) and the cashing of a traveller's cheque (reason 3). In this case you would include fields F1-1 to F1-7 for each of those three reasons for disbursement. As another example, your client could request that you cash two cheques. In this case you would include fields F1-1 to F1-7 for each cheque as a distinct reason for disbursement.

### **Field F1-3\* Amount**

To the right of the box you checked for field F1-1, enter the amount requested for each reason for disbursement. What was actually disbursed will be explained in Part F2 (Method of disbursement), according to the method (or methods) of disbursement.

The amount can be entered with spaces or commas for thousand separators. For example, \$9,000 could be entered as "9 000" or "9,000". It can also be entered without any thousand separators (e.g., 9000). If you need to, you can indicate a decimal in any of these formats, by including two numeric characters following a period. For example, \$9,999.99 could be entered as "9,999.99" or "9999.99". It could also be entered using a comma to denote the decimal (e.g., "9999,99").

If this was not in Canadian funds, do not convert it, but provide the currency information in field F1-4. If the disbursement requested was in more than one currency, include fields F1-1 to F1-7 for each currency.

**Field F1-4\* Currency**

To the right of the amount, enter the type of currency for each amount associated to a reason for disbursement. Enter CAD if Canadian dollars, or USD for United States dollars. If the transaction was in another type of currency, see the list of currency codes in Appendix 1 in *Guideline 3B: Submitting Suspicious Transaction Reports to FINTRAC by Paper*.

**Field F1-5 Did the reason for disbursement involve a casino account?**

Check the appropriate box to answer the question. If the answer in field F1-5 is “yes”, provide information about the casino account involved in the disbursement in Part G (Account information). This is only for a casino account held at your casino. If the disbursement involved an account at another casino, this information is required in Part H (Additional information about another individual associated to the disbursement) or Part I (Additional information about an entity associated to the disbursement), as applicable.

If the client named in Part C, the entity named in Part D or the individual named in Part E does have a casino account, but the disbursement did not involve it in any way, answer “no” in field F1-5.

If the answer to this question is “no” for all reasons for disbursement in Part F1 and all methods of disbursement in Part F2, Part G does not apply for this disbursement.

**Field F1-6 Was there any individual (other than those named in Part C or E of this transaction) associated to the reason for disbursement?**

This is to determine, for each reason for disbursement, if any additional information is required other than that already provided in the rest of the report. For example, if you cash a cheque for your client that was payable to another individual who had signed it over to your client, information about that other individual, including information about the account and the financial institution on which the cheque was drawn, would be required in Part H.

If the answer in field F1-6 is “yes”, provide information about the other individual involved in the reason for disbursement in Part H.

If the answer to this question is “no” for all reasons for disbursement in Part F1 and all methods of disbursement in Part F2, Part H does not apply for this transaction.

**Field F1-7 Was there any entity (other than the reporting casino or any entity named in Part D of this transaction) associated to the reason for disbursement?**

This is to determine, for each reason for disbursement, if any additional information is required other than that already provided in the rest of the report. For example, if you cash a bank draft for your client that was payable to your client, information about the financial institution where the bank draft was issued would be required in Part I.

If the answer in field F1-7 is “yes”, provide information about the entity involved in the reason for disbursement in Part I.

If the answer to this question is “no” for all reasons for disbursement in Part F1 and all methods of disbursement in Part F2, Part I does not apply for this transaction.

**Part F2: Method of disbursement**

This part is for information about how the disbursement was actually paid out.

If you are reporting a transaction for which there is more than one method of disbursement, complete a separate Part F2 for each method of disbursement. To do this, you can copy Part F2. Fill in the “Method of disbursement \_\_\_\_ of \_\_\_\_” area at the top of Part F2 to distinguish between each method.

If you are including more than one transaction in this report under the 24-hour rule, in addition to including Part F2 for each transaction, you will also have to indicate to which transaction each Part F2 applies. Fill in the “...for transaction \_\_\_\_ of \_\_\_\_” area to distinguish between each transaction, based on the number you assigned the transaction in Part B.

**Fields F2-1\* and F2-2 Method of disbursement**

Check the appropriate box to indicate the method of disbursement. Some methods require the completion of other parts of the report to provide additional information. Common occurrences of these are explained below.

If the method of disbursement was a deposit to an account at a financial institution, an international or domestic funds transfer, or a transfer to another casino, you would need to provide information in Part H (Information about an associated individual) or Part I (Information about an associated entity), as appropriate.

For example, if an amount were disbursed by a deposit to an account at a financial institution in the name of the individual requesting the disbursement or in the name of an entity, you would have to indicate at field F2-7 that an entity was involved. In the case of an account in the name of the individual

requesting the disbursement, you would also have to provide the name of the financial institution where the account is held in Part I (Information about an associated entity). In the case of an account in the name of an entity, you would have to provide information about the account in addition to the name of the financial institution.

As another example, if the method of disbursement was a deposit to an account in the name of an individual other than the one requesting the disbursement, you would have to indicate at field F2-6 that another individual was involved. In this case, you would also have to complete Part H (Information about an associated individual) to provide information about the individual and the account involved.

If the selections provided do not cover the method of disbursement (for example, in the case of a car or a trip as a prize payout), indicate “Other” and provide details in field F2-2. In this case, field F2-2 is mandatory.

There could be more than one method for the same disbursement transaction. For example, your client could, in the same transaction, request that part be paid out by cheque (method 1) and the rest paid out in cash (method 2). In this case, you would include fields F2-1 to F2-7 for each of those two methods.

### **Field F2-3\* Amount**

To the right of the box you checked for field F2-1, enter the amount paid out for each method of disbursement.

It can be entered with spaces or commas for thousand separators. For example, \$9,000 could be entered as “9 000” or “9,000”. It can also be entered without any thousand separators (e.g., 9000). If you need to, you can indicate a decimal in any of these formats, by including two numeric characters following a period. For example, \$9,999.99 could be entered as “9,999.99” or “9999.99”. It could also be entered using a comma to denote the decimal (e.g., “9999,99”).

If this was not in Canadian funds, do not convert it, but provide the currency information in field F2-4. If the disbursement was paid out in more than one currency, include fields F2-1 to F2-7 for each currency.

If the method of disbursement was other than money, such as a car, a trip, or other similar prize, use the cash equivalent value of that prize as the amount in field F2-3. If there was no cash equivalent, use the total amount that the casino actually paid for the prize disbursed.

**Field F2-4\* Currency**

To the right of the amount, enter the type of currency for each amount associated to a method of disbursement. Enter CAD if Canadian dollars, or USD for United States dollars. If the transaction was in another type of currency, see the list of currency codes in Appendix 1 in *Guideline 3B: Submitting Suspicious Transaction Reports to FINTRAC by Paper*.

**Field F2-5 Did the method of disbursement involve a casino account?**

Check the appropriate box to answer the question. If the answer in field F2-5 is “yes”, provide information about the casino account involved in the disbursement in Part G (Account information). This is only for a casino account held at your casino. If the disbursement involved an account at another casino, this information is required in Part H (Additional information about another individual associated to the disbursement) or Part I (Additional information about an entity associated to the disbursement), as applicable.

If the client named in Part C, the entity named in Part D or the individual named in Part E does have a casino account, but the disbursement did not involve it in any way, answer “no” in field F2-5.

If the answer to this question is “no” for all reasons for disbursement in Part F1 and all methods of disbursement in Part F2, Part G does not apply for this disbursement.

**Field F2-6 Was there any individual (other than those named in Part C or E of this transaction) associated to the method of disbursement?**

This is to determine, for each method of disbursement, if any additional information is required other than that already provided in the rest of the report. For example, if you send a funds transfer for the disbursement to any individual other than the one for whom the disbursement was received, information about that other individual would be required in Part H.

If the answer in field F2-6 is “yes”, provide information about the other individual involved in the method of disbursement in Part H.

If the answer to this question is “no” for all reasons for disbursement in Part F1 and all methods of disbursement in Part F2, Part H does not apply for this transaction.

**Field F2-7 Was there any entity (other than the reporting casino or any entity named in Part D of this transaction) associated to the method of disbursement?**

This is to determine, for each method of disbursement, if any additional information is required other than that already provided in the rest of the report. For example, if you are a casino and you transfer the amount to another casino, information about that other casino would be required in Part I.

If the answer in field F2-7 is “yes”, provide information about the entity involved in the method of disbursement in Part I.

If the answer to this question is “no” for all reasons for disbursement in Part F1 and all methods of disbursement in Part F2, Part I does not apply for this transaction.

**Part G: Account information (if the disbursement involved a casino account)**

This part is for information about the casino account involved in the disbursement, if it in fact involved a casino account. This only applies to a casino account held at your casino. If the disbursement involved an account at another casino, the information is required in Part H (Additional information about another individual associated to the disbursement) or I (Additional information about an entity associated to the disbursement), as applicable.

You have to complete Part G if you indicated in Part F1 that the reason for disbursement (field F1-5) or in Part F2 that the method of disbursement (field F2-5) involved a casino account.

If the disbursement did not involve a casino account, Part G is not required. Even if the client has a casino account, if the disbursement did not involve it in any way, do not include the account information in the report about that disbursement.

If there were two or more reasons for disbursement that involved a casino account, provide the casino account information for each one. The same is true if there were two or more methods of disbursement that involved a casino account.

If you are reporting a transaction for which more than one reason or method of disbursement involved a casino account, complete a separate Part G for each account. To do this, you can copy Part G. Fill in the area at the top of Part G to distinguish between each account, as follows:

- If the account is related to a reason for disbursement, fill in the “Account \_\_\_\_ of \_\_\_\_ for reason for disbursement \_\_\_\_ of \_\_\_\_”.
- If the account is related to a method of disbursement, fill in the “Account \_\_\_\_ of \_\_\_\_ for method of disbursement \_\_\_\_ of \_\_\_\_”.

If you are including more than one transaction in this report under the 24-hour rule, you will also have to indicate to which transaction each Part G applies. In addition to the area explained above, fill in the “...for transaction \_\_\_\_ of \_\_\_\_” area to distinguish between each transaction, based on the number you assigned the transaction in Part B.

**Fields G1 and G2 Is there an identifier number for the casino where the account is held?**

Check the appropriate box to answer the question. If the answer in field G1 is “no”, field G2 does not apply.

If the answer in field G1 is “yes”, enter the casino identifier number where the account is held in field G2. In this case, field G2 is mandatory.

**Field G3\* Account number**

Enter the number of the relevant casino account.

**Fields G4\* and G5 Type of account**

Indicate the type of the relevant casino account. If the selections “credit” or “front money” do not cover this particular casino account, indicate “Other” and provide details in field G5. In this case, field G5 is mandatory.

**Field G6\* Account currency code**

Enter the type of currency for the relevant casino account. Enter CAD if Canadian dollars, or USD for United States dollars. If the transaction was in another type of currency, see the list of currency codes in Appendix 1 in *Guideline 3B: Submitting Suspicious Transaction Reports to FINTRAC by Paper*.

**Field G7 Is this account held by one or more individuals or by an entity?**

Check the appropriate box to answer the question. If the answer in field G7 is that one or more individuals hold the account, complete fields G8 to G10 for each individual account holder (up to three). In this case, field G11 does not apply.

If the answer in field G7 is that an entity holds the account, complete field G11. In this case, fields G8 to G10 do not apply.

**Fields G8, G9 and G10 Full name of individual account holder(s)**

If the answer in field G7 is an entity holds the account, fields G8 to G10 do not apply.

If the answer in field G7 is that one or more individuals hold the account, enter the last name in field G8, first name in field G9 and middle initial (if applicable) in field G10 for each individual account holder (up to three). In this case, fields G8 and G9 are mandatory.

**Field G11 Full name of entity account holder**

If the answer in field G7 is that one or more individuals hold the account, field G11 does not apply.

If the answer in field G7 is that an entity holds the account, enter the full name of the entity in field G11. In this case, field G11 is mandatory.

The account holder might be different from the individual(s) authorized to give instructions for the account. For example, an account for a corporation will have one or more individuals authorized to give instructions for that account. In this case, it is the name of the corporation that holds the account that is required in field G11. Information about individuals authorized to bind the entity or to act with respect to the account belongs in Part D, if applicable, in fields D14 to D16.

### **Part H: Additional information about another individual associated to the disbursement**

This part is for information about another individual associated to the reason or method of disbursement, other than an individual named in Part C or E for the disbursement. Part H will only appear if you answered “yes” in field F1-6 in Part F1 or field F2-6 in Part F2.

For example, this part would apply if you cashed a cheque for your client that was payable to another individual who had signed it over to your client. You would have to provide information about that other individual in Part H, including information about the account and the financial institution on which the cheque was drawn.

Complete Part H for each reason for disbursement and each method of disbursement to which another individual (other than an individual named in Part C or E) was associated. If the disbursement did not have another individual associated to it, Part H is not required.

If you are reporting a transaction for which more than one reason or method of disbursement is associated with another individual, complete a separate Part H for each individual associated. To do this, you can copy Part H. Fill in the area at the top of Part H to distinguish between each individual, as follows:

- If the other individual is associated to a reason for disbursement, fill in the “Individual \_\_\_ of \_\_\_\_\_ associated with reason for disbursement \_\_\_ of \_\_\_”.
- If the other individual is associated with a method of disbursement, fill in the “Individual \_\_\_ of \_\_\_\_\_ associated with method of disbursement \_\_\_ of \_\_\_”.

If you are including more than one transaction in this report under the 24-hour rule, you will also have to indicate to which transaction each Part H applies. In addition to the area explained above, fill in the “... for transaction \_\_\_ of \_\_\_\_\_” area to distinguish between each transaction, based on the number you assigned the transaction in Part B.

**Fields H1\*, H2\* and H3 Individual’s full name**

Enter the last name, first name and middle initial (if applicable) of the other individual associated.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for fields H1 and H2 was not obtained at the time of the transaction and is not available from your records, you can leave these fields blank.

**Field H4 Was there an account for this individual (other than the account provided in Part G) associated to the disbursement?**

Check the appropriate box to answer the question. If the answer in field H4 is “no”, fields H5 to H7 do not apply.

If the answer in field H4 is “yes”, provide information about the account in fields H5 to H7.

**Fields H5\*, H6\* and H7\* (if applicable) Account information for the individual associated to the disbursement**

If the answer in field H4 is “yes” (in other words, there was an account for the individual associated to the disbursement), enter the financial institution’s name in field H5, the transit number in field H6 and the account number in field H7. This would apply for example, if the disbursement involved a cheque from an individual that is neither the individual who requested the disbursement nor the individual on whose behalf the disbursement was received.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for fields H5, H6 and H7 was not obtained at the time of the transaction and is not available from your records, you can leave these fields blank.

**Part I: Additional information about an entity associated to the disbursement**

This part is for information about an entity associated to the reason or method of disbursement, other than the reporting casino or any entity named in Part D. Part I will only appear if you answered “yes” in field F1-7 in Part F1 or field F2-7 in Part F2.

For example, if you cash a bank draft for your client that was payable to your client, provide information about the financial institution where the bank draft was issued in Part I.

Complete Part I for each reason for disbursement and each method of disbursement to which an entity (other than the reporting casino or any entity named in Part D) was associated. If the disbursement did not have an entity associated to it, Part I is not required.

If you are reporting a transaction for which more than one reason for disbursement is associated with another entity, complete a separate Part I for each entity associated. To do this, you can copy Part I. Fill in the area at the top of Part I to distinguish between each entity, as follows:

- If the entity is associated to a reason for disbursement, fill in the “Entity \_\_\_ of \_\_\_ associated with reason for disbursement \_\_\_ of \_\_\_”.
- If the entity is associated to a method of disbursement, fill in the “Entity \_\_\_ of \_\_\_ associated with method of disbursement \_\_\_ of \_\_\_” area at the top of Part I to distinguish between each entity.

If you are including more than one transaction in this report under the 24-hour rule, you will also have to indicate to which transaction each Part H applies. In addition to the area explained above, fill in the “...for transaction \_\_\_ of \_\_\_” area to distinguish between each transaction, based on the number you assigned the transaction in Part B.

**Field I1\* Full name of entity**

Enter the full name of the business, corporation, trust or other entity associated to the disbursement.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for field I1 was not obtained at the time of the transaction and is not available from your records, you can leave this field blank.

**Field I2 Was there an account for this entity (other than the account provided in Part G) associated to the disbursement?**

Check the appropriate box to answer the question. If the answer in field I2 is “no”, fields I3 to I5 do not apply.

If the answer in field I2 is “yes”, provide information about the account in fields I3 to I5.

**Fields I3\*, I4\* and I5\* (if applicable) Account information for the entity associated to the disbursement**

If the answer in field I2 was “yes” (in other words there was an account for the entity associated to the disbursement), enter the name of the financial institution where the account is held in field I3, the transit number in field I4 and the account number in field I5. For example, this would apply if the disbursement involved a cheque from a financial institution, payable to the client requesting the disbursement.

If the disbursement is reportable under the 24-hour rule as one of multiple transactions of less than \$10,000 each and, because of this, information for

fields I3, I4 and I5 was not obtained at the time of the transaction and is not available from your records, you can leave these fields blank.

## **5 Comments?**

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

## **6 How to Contact FINTRAC**

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

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

Toll-free: 1-866-346-8722

## **Appendix 1: Examples of Reasons and Methods for Casino Disbursement Reports**

The following examples are to help explain when and why a casino disbursement report (CDR) is required for common casino transactions effective September 28, 2009.

Examples 1 to 3 are commonly occurring transactions at a casino for which a CDR will be required. Examples 4 and 5 are likely to occur less frequently, but are provided to highlight other reportable disbursement transactions. In each case for examples 1 to 5, the disbursement is requested by one casino patron during a single transaction (for example, one visit to a cashier's station).

Examples 6 to 8 are about situations where a casino disbursement report will **not** be required. Example 9 is about multiple transactions involving the 24-hour rule.

For all examples, funds are in Canadian dollars unless otherwise specified. In addition, where a CDR is required, only the information required in fields F1-1 to F1-4 of Part F1 (Reason for disbursement) and fields F2-1 to F2-4 of Part F2 (Method of disbursement) is explained. Although all other applicable parts and fields of the CDR would also be required, these examples illustrate only basic reason and method information.

### **Example 1**

A patron redeems \$11,000 in slot tickets for \$11,000 in cash.

A CDR is required, with one transaction including the following information about the reason and the method of disbursement.

- Reason: Redemption of slot tickets, 11,000 CAD
- Method: Paid out in cash, 11,000 CAD

### **Example 2**

A patron redeems \$25,000 in casino chips for a \$25,000 casino cheque.

A CDR is required, with one transaction including the following information about the reason and the method of disbursement.

- Reason: Redemption of chips or tokens, 25,000 CAD
- Method: Issued a cheque, 25,000 CAD

### **Example 3**

A patron redeems slot tickets for \$ 12,000 and casino chips for \$5,000. In exchange, he receives a cheque for \$7,000 and \$10,000 in cash.

A CDR is required, with one transaction including the following information about the two reasons and the two methods of disbursement.

- Reason 1: Redemption of slot tickets, 12,000 CAD
- Reason 2: Redemption of chips or tokens, 5,000 CAD
- Method 1:: Issued a cheque, 7,000 CAD
- Method 2: Paid out in cash, 10,000 CAD

### **Example 4**

A patron withdraws \$24,000 from her front money account in exchange for a casino cheque for \$24,000.

A CDR is required, with one transaction including the following information about the reason and the method of disbursement.

- Reason: Front cash withdrawal, 24,000 CAD
- Method: Issued a cheque, 24,000 CAD

### **Example 5**

A patron withdraws \$44,000 from his front money account and requests the casino to wire the funds to his bank in the United States.

A CDR is required, with one transaction including the following information about the reason and the method of disbursement.

- Reason : Front cash withdrawal, 44,000 CAD
- Method : Sent international funds transfer, 44,000 CAD

In this example, a casino disbursement report is required even though the funds were sent by wire transfer. This applies to any disbursement involving a wire transfer, whether domestic or international. As explained in subsection 2.4 of this guideline, if a casino disbursement involves an international wire transfer, you may have to make an electronic funds transfer report to FINTRAC about the same transaction in addition to the CDR.

### **Example 6**

A patron cashes a \$10,000 personal cheque (that is made payable to the patron) in exchange for \$10,000 in chips.

A **CDR** is **not** required. Although the cashing of a \$10,000 cheque could be a reportable disbursement, it is not in this example because of how it was paid out. Pay outs in casino chips are not considered to be a disbursement in this context.

### **Example 7**

A patron cashes a casino cheque for \$11,000. In exchange, she receives \$6,000 in cash and \$5,000 in chips.

A **CDR** is **not** required. Although the reason for disbursement (cashing of a cheque) is over \$10,000, the method of disbursement is less than \$10,000 because the amount paid out in casino chips is excluded. A **CDR** is only required when **both** the reason and the method of a disbursement (as explained in subsection 2.2 of this guideline) equal \$10,000 or more.

If the payout in this example had been \$10,000 in cash and \$1,000 in chips, a **CDR** would have been required.

### **Example 8**

A patron withdraws \$5,000 from his casino front money account and requests a cash advance on his bank-issued credit card for \$5,000. In exchange, he receives a cheque for \$10,000.

A **CDR** is **not** required. Although the amount paid out is \$10,000, the reason for disbursement is less than \$10,000 because an advance on a bank-issued credit card is not considered a disbursement. A **CDR** is only required when **both** the reason and the method of a disbursement (as explained in subsection 2.2 of this guideline) equal \$10,000 or more.

## Example 9

This example has two scenarios.

### Scenario 1

The following transactions occur at the following times, on the same day:

- At 2:00 p.m., a patron exchanges \$5,000 cash (United States dollars) for \$5,500 cash (Canadian dollars).
- At 4:00 p.m., the same patron redeems a \$7,000 slot ticket for \$7,000 cash.
- At 8:00 p.m., the same patron exchanges \$5,000 cash (United States dollars) and redeems \$3,000 in casino chips for \$8,500 cash (Canadian dollars).

A CDR is required under the 24-hour rule for the 4:00 p.m. transaction and the 8:00 p.m. transaction, as follows.

- Transaction 1 (from 4:00 p.m.):
  - Reason: Redemption of slot tickets, 7,000 CAD
  - Method: Paid out in cash, 7,000 CAD
- Transaction 2 (from 8:00 p.m.):
  - Reason: Redemption of chips or tokens, 3,000 CAD
  - Method: Paid out in cash, 3,000 CAD

### Scenario 2

The same transactions as scenario 1, with the following change to how the payout is made at 8:00 p.m.:

- At 8:00 p.m., the same patron exchanges \$5,000 cash (United States dollars) and redeems \$3,000 in casino chips for a cheque in the amount of \$8,500 (Canadian dollars).

A CDR is required under the 24-hour rule for the 4:00 p.m. transaction and the 8:00 p.m. transaction as follows.

- Transaction 1:
  - Reason: Redemption of slot tickets, 7,000 CAD
  - Method: Paid out in cash, 7,000 CAD
- Transaction 2:
  - Reason: Redemption of chips or tokens, 3,000 CAD
  - Method: Issued a cheque 8,500 CAD

In this scenario, the method reported for transaction 2 is the full amount of the casino cheque, even if it includes an amount that is not reportable as a disbursement. The cash being exchanged is not included in the CDR as a

reason for disbursement. However, the portion of that transaction that is the redemption of casino chips is included because, when added to the reason of disbursement in transaction 1, the threshold of \$10,000 or more has been met.

In both scenarios of this example, in addition to a CDR, a large cash transaction report (LCTR) would also be required. The LCTR 24-hour rule applies to the 2:00 p.m. and 8:00 p.m. foreign currency exchange transactions. For more information about when LCTRs are required, see *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC*.