Financial Transactions and Reports Analysis Centre of Canada

Ottawa, Canada K1P 1H7

Centre d'analyse des opérations et déclarations financières du Canada

Ottawa, Canada K1P 1H7

PROTECTED A

Our File : A-2014-00047

November 21, 2014

Ms. Amber D. Scott Founder Outlier Solutions Inc. 163 Viewmount Avenue North York, ON M6B 1T5

Dear Ms. Scott:

This is further to your request for access to information which we received in our office on September 22, 2014 submitted under the *Access to Information Act* (the *Act*) for:

"TOPIC: FINTRAC Policy Positions Issued: ...request FINTRAC's policy positions, including any clarifications related to the PCMLTFA, its enacted regulations and FINTRAC's related guidance documents from 2008 to present [September 22, 2014]. We wish to receive this data in electronic format, sorted by reporting entity type (the reporting entity types to which the policy position has relevance): - Accountants & Accounting Firms,- BC Notaries,-Casinos,- Dealers in Precious Metals & Stones,- Financial Services,- Life Insurance Companies, Brokers and Independent Agents,- Money Services Businesses,- Real Estate, and - Security Dealers

In addition, we would like to request any policy positions issued related to the following non-reporting entities:- Dealers in digital currency / crypto currency; and - Consulting firms. We understand that any identifying information about the entities requesting policy clarification must be omitted from these documents. We wish to exclude any responses from FINTRAC that simply direct the person or institution requesting the policy position to refer to legislation and/or FINTRAC's published guidance. We are requesting all related records from 2008 to the most recent available data." [following conversation with applicant, they are interested in all (as per the above request) of what we have even those which may be obsolete or inactive – and to please identify which ones are now obsolete /no longer being referred to anymore]

Based on a search of our information holdings, the enclosed record was found to be responsive to your request; no exemptions apply under the Act.

Please note that the remaining information identified as being responsive to your request is being exempted under section 26 of the Act as its contents will be published by FINTRAC within ninety days following the date of receipt of your request or within such further period of time as may be necessary for translating the material for the purpose of publishing it on our web site. Our office will provide you with the web link once published.



Canada

Please be advised that you are entitled to complain to the Information Commissioner concerning the processing of your request within sixty days of the receipt of this notice. In the event you decide to avail yourself of this right, your notice of complaint should be addressed to:

Office of the Information Commissioner of Canada 30 Victoria Street Gatineau, Québec K1A 1H3

Should you have any questions, please do not hesitate to contact Mijanoux Beauchamp by telephone at (613) 943-1073, email atip-aiprp@fintrac-canafe.gc.ca, or at the address noted above. When communicating with us, we would appreciate it if you would quote the file number we have assigned to your request.

Yours sincerely,

John Widdls Access to Information and Privacy Coordinator Enclosules

Access to Information Act

26 REFUSAL OF ACCESS WHERE INFORMATION TO BE PUBLISHED

26. The head of a government institution may refuse to disclose any record requested under this Act or any part thereof if the head of the institution believes on reasonable grounds that the material in the record or part thereof will be published by a government institution, agent of the Government of Canada or minister of the Crown within ninety days after the request is made or within such further period of time as may be necessary for printing or translating the material for the purpose of printing it. 1980-81-82-83, c. 111, Sch. I "26".

