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FINTRAC Examination Info Requests – Real Estate Document List

- 1) Copy of your organization's most recent version of compliance policies and procedures, including those that pertain to special measures for identifying clients, keeping records, and monitoring financial transactions in respect of the activities that pose a high risk, as required under the PCMLTFA.
- 2) Copy of your documented assessment of risks related to money laundering and terrorist financing offences, as required under the PCMLTFA.
- 3) Copy of the ongoing training program that has been provided to your staff and/or agents in relation to your obligations under the PCMLTFA.
- 4) An organizational chart of your organization.
- 5) The most recent financial information (approximate) for your organization: Value of Assets, Gross Revenue and Net Revenue.
- 6) The number of full and part-time employees and/or sales representatives.
- 7) All suspicious or attempted suspicious transaction records that your organization has filed with FINTRAC, along with any unusual transaction records flagged for suspicion but not filed, for the examination period indicated by FINTRAC.
- 8) A list (in Microsoft Excel format) of all closed deals related to the sale/purchase of real estate that took place during the examination period indicated by FINTRAC. From those closed deals, FINTRAC will make a selection of deals to review which they will provide to your organization prior to the exam. Please include the following information in the spreadsheet:
 - a. The trade number of each closed deal;
 - b. The names, address and telephone numbers of the parties involved in the transaction;
 - c. The address of the property;
 - d. The date of closing;
 - e. The type of property (residential or commercial);
 - f. The type of sale (purchase/sale/double ender/assignment);
 - g. The value (i.e., sales price) of the real estate transaction; and
 - h. The names of real estate agents on both sides (buyer/seller).

When your organization sends FINTRAC's selection of deal files back to them for review, each record should clearly indicate which party the brokerage is representing, and contain the following records:

- The first page of all Brokerage Contracts (purchase/sale) containing the name(s) of the clients;
 - Individual Identification Information Records, including all third party information if applicable;
 - Corporation Identification Information Records, including copies of the records confirming the corporation's existence if applicable;
 - Receipt of Funds Records (including any copies of cheques):
 - i. The amount and currency of the funds received;
 - ii. The name, date of birth and address of the individual from whom you received the funds and that individual's principal business or occupation;
 - iii. The date of the transaction;
 - iv. The purpose, details, and type of transaction, including whether any other individuals or entities were involved in the transaction;
 - v. If the funds received were cash, how the cash was received (for example, in person, by mail, by armoured car, or any other way); and
 - If an account was affected by the transaction.
- 9) Copy of in-trust bank account records (account statements, deposit slips) for the examination period indicated by FINTRAC.

Where warranted, FINTRAC reserves the right to request additional information and documentation that is outside of the indicated sample period. Under certain circumstances, FINTRAC may also expand the examination to include additional compliance elements.



Good compliance is good business.