CLIENT IDENTIFICATION, VERIFICATION, AND SOURCE OF MONEY CHECKLIST

The Law Society Rules in Part 3–Division 11–Client Identification and Verification (Rules 3-98 to 3-110) require lawyers to follow identification, verification, source of money, and monitoring procedures when retained to provide legal services. Lawyers are obligated to know their clients, understand their client's financial dealings in relation to the retainer, and manage any risks arising from the professional business relationship (Rule 3-99(1.1)). This checklist assists with compliance; however, refer to the rules to determine the requirements. Failure to comply with the rules, a key part of the Law Society's efforts to combat money laundering and terrorist financing, can have significant disciplinary, insurance, and financial consequences. Trust shortage liability coverage is contingent upon compliance with Division 11.

Identification and verification are separate but related concepts. Client *identification* requires you to obtain and record, with the applicable date, specific identity information. Additionally, client *verification* and source of money information are required when you receive, pay, or transfer money on behalf of a client, *or give instructions on behalf of a client* in respect of the receipt, payment, or transfer of money (a "financial transaction"). A "Source of Money Checklist" is part of this checklist (see p. A-1-15). Note that verification and source of money obligations may be triggered in situations that do not involve the use of a trust account.

If there is a "financial transaction", you must: (1) obtain and record, with the applicable date, information from the "client" about the source of "money" for the transaction, and (2) verify the client's identity to confirm that they are who they say they are. For individuals, including an individual instructing you on an organization's behalf, the four main verification methods are: (1) the government-issued photo ID method with a physical meeting; (2) the government-issued photo ID method with a virtual meeting (includes a reliable authentication technology requirement); (3) the credit file method (no physical meeting required); and (4) the dual process method (no physical meeting required). Your responsibilities may be fulfilled by your firm, including members or employees of the firm, wherever located. You may retain an agent to verify a client's identity provided you and the agent have an agreement or arrangement in writing (see Appendix 1 at p. A-1-17 for a sample agreement). Special rules apply for "organization" clients (e.g., trusts and corporations) that include obtaining beneficial ownership information.

While retained in respect of a "financial transaction", monitor the professional business relationship with the client on a periodic basis (Rule 3-110). Record the monitoring measures taken and the information obtained. Be alert to red flags or suspicious circumstances when onboarding the client or at any time while retained (note Rule 3-103(4), Rules 3-109 to 3-110, *Code of Professional Conduct for British Columbia* (the "*BC Code*") rules 3.2-7 to 3.2-8). If you know *or ought to know* that you would be assisting a client in fraud or other illegal conduct, or a client persists in instructing you to act contrary to professional ethics, you must withdraw (Rule 3-109, *BC Code* rule 3.7-7).

Terms defined in Rule 3-98 appear in boldface type in this checklist: "**client**", "**disbursements**", **"expenses"**, "**financial institution**", "**financial transaction**", "**interjurisdictional lawyer**", "**money**", "**organization**", **"professional fees"**, **"public body"**, "**reporting issuer**", and "**securities dealer**". Pay close attention to the definitions, as they may not be consistent with common use. Note that **"financial transaction"**, **"money",** and "**client"** are widely defined. A "**client**" includes another party that your client represents or on whose behalf the client otherwise acts (e.g., a beneficial owner) in relation to obtaining the legal services from you, and in Rules 3-102 to 3-105, an individual who instructs you on behalf of a client in relation to a financial transaction. Identification and verification requirements vary according to the type of transaction and entity.

More resources. See the Client ID & Verification and Anti-Money Laundering Risk Management webpage for more resources, including the Law Society of BC's free Anti-Money Laundering Measures webinar—2024 update (eligible for three hours of CPD ethics credits), Top 10 tips, FAQs, Red Flags Quick Reference Guide, Guidance on Politically Exposed Persons/Heads of International Organizations, Anti-money laundering and counter-terrorist financing updates (2025), Anti-money laundering: settlement agreements

(2025), Guidance for virtual verification of your client's identity using government-issued photo ID and technology, and other resources.

Currency of checklist and new developments. This checklist is current to **September 1**, **2026**. Keep abreast of Law Society notices for new developments.

Contact Barbara Buchanan, KC, Practice Advisor (604.697.5816 or bbuchanan@lsbc.org) or practiceadvice@lsbc.org for questions about this checklist, anti-money laundering, client identification and verification, source of money, fraud, and scams.

PART 3–DIVISION 11–GENERAL EXEMPTIONS FROM IDENTIFICATION AND VERIFICATION

You may use the checklist's general exemptions section to assist you with compliance and to record information; however, refer to the rules to determine the requirements. Terms defined in Rule 3-98 appear in boldface type in this checklist: "**client**", "**disbursements**", **"expenses"**, "**financial institution**", "**financial transaction**", "**interjurisdictional lawyer**", "**money**", "**organization**", **"professional fees"**, **"public body"**, "**reporting issuer**", and "**securities dealer**". Pay close attention to the definitions. *Note the wide definition of "**client**", and ensure that you have identified and verified all applicable individuals and organizations (e.g., including beneficial owners*). Note that if the instructing individual of an **organization** changes, you must identify the new individual, and if there is a "financial transaction", verify the new individual's identity as well.

This checklist assumes that there are no red flags or suspicious circumstances. For red flags and suspicious circumstances, make reasonable inquiries, make a record of the results, and determine if you can act or must withdraw. Consider Rules 3-103(4), 3-109 to 3-110 and *BC Code* rules 3.2-7 to 3.2-8 and 3.7-7. Also refer to the Red Flags Quick Reference Guide, the FAQs and other resources on the Client ID & Verification and Anti-Money Laundering Risk Management webpage.

You have a professional responsibility to safeguard the confidentiality of client information (*BC Code*, s. 3.3 and Law Society Rule 10-4). You must also comply with applicable privacy legislation affecting the collection, use and retention of personal information (*Personal Information Protection Act*, S.B.C. 2003, c. 63 and other relevant legislation).

Are you being retained by this **client** to provide legal services?		
☐	No – Division 11 does not apply (Rule 3-99(1))	
Were you retained in respect of this specific matter before December 31, 2008?		
☐	Yes – identification and verification not required for this specific matter (Rule 3-108) (Note: Rules 3-109 and 3-110 apply)	
Are you in-house counsel providing legal services on behalf of your employer?		
☐	Yes – identification and verification not required (Rule 3-99(2)(a)) (Note: Rule 3-109 applies)	
Will you provide legal services that do not involve a **financial transaction** as part of a duty counsel program sponsored by a non-profit organization?		

☐	Yes – identification and verification not required (Rule 3-99(2)(b)) (Note: Rule 3-109 applies)	
Will you provide legal services in the form of pro bono summary advice that does not involve a **financial transaction**?		
☐	Yes – identification and verification not required (Rule 3-99(2)(b)) (Note: Rule 3-109 applies)	
Has this **client** already been identified, and the identity verified and information and documentation retained, by another B.C. lawyer or **interjurisdictional lawyer** who has complied with Rules 3-100 to 3-106 or the equivalent provisions of another Canadian jurisdiction, and who has engaged you to act as an agent to provide legal services to the **client**?		
☐	Yes – repeat identification and verification not required unless you have reason to believe that the information, or its accuracy, has changed (Rules 3-99(2.1)(a), 3-100(2), 3-105(2), 3-106(2)) (Note: Rules 3-107, 3-109, and 3-110 apply)	
	Date confirmed:	
☐	Copy/copies obtained (Rule 3-107)	
	Date copy/copies obtained:	
Has this **client** already been identified, and the identity verified and information and documentation retained, by another B.C. lawyer or **interjurisdictional lawyer** who has complied with Rules 3-100 to 3-106 or the equivalent provisions of another Canadian jurisdiction, and who has referred the **client** to you for the provision of legal services?		
☐	Yes – repeat identification and verification not required unless you have reason to believe that the information, or its accuracy, has changed (Rules 3-99(2.1)(b), 3-100(2), 3-105(2), 3-106(2)) (Note: Rules 3-107, 3-109, and 3-110 apply)	
	Date confirmed:	
☐	Copy/copies obtained (Rule 3-107)	
	Date copy/copies obtained:	
Has this **client** already been identified, and the identity verified and information and documentation retained, by another member or employee of your firm, wherever located, that would fulfill your identification and verification responsibilities?		
☐	Yes – repeat identification and verification not required unless you have reason to believe that the information, or its accuracy, has changed (Rules 3-99(3), 3-100(2), 3-105(2), 3-106(2), 3-110) (Note: Rules 3-107, 3-109, and 3-110 apply)	
	Date confirmed:	
☐	Copy/copies obtained (Rule 3-107)	
	Date copy/copies obtained:	

IDENTIFICATION CHECKLIST

You may use the checklist's identification section to assist you with compliance and to record required information; however, refer to the rules to determine the requirements. Terms defined in Rule 3-98 appear in boldface type in this checklist: "**client**", "**disbursements**", **"expenses"**, "**financial institution**", "**financial transaction**", "**interjurisdictional lawyer**", "**money**", "**organization**", **"professional fees"**, **"public body"**, "**reporting issuer**", and "**securities dealer**". Pay close attention to the definitions. *Note the wide definition of "**client**", and ensure that you identify all applicable individuals and organizations.* Note that if the instructing individual of an **organization** changes, you must identify the new individual.

Unless an exemption applies, you must obtain and record the identification information with the applicable date (Rules 3-100 and 3-107). You are not required to obtain and copy documents for compliance with Rule 3-100; however, it may be prudent to do so depending on the circumstances (Rules 3-99(1.1) and 3-109 and *BC Code* rules 3.2-7 and 3.2-8). You must retain copies of any documents obtained or produced (Rule 3-107).

Your firm, including members or employees, may fulfill your Division 11 responsibilities (Rule 3-99(3)).

This checklist assumes that there are no red flags or suspicious circumstances. For red flags and suspicious circumstances, make reasonable inquiries and make a record of the results and determine if you can act or must withdraw. Consider Rules 3-109 to 3-110 and *BC Code* rules 3.2-7 to 3.2-8 and 3.7-7. Also refer to the Red Flags Quick Reference Guide, FAQs and other publications on the Client ID & Verification and Anti-Money Laundering Risk Management webpage.

You have a professional responsibility to safeguard the confidentiality of client information (*BC Code*, s. 3.3 and Law Society Rule 10-4). You must also comply with applicable privacy legislation affecting the collection, use and retention of personal information (*Personal Information Protection Act*, S.B.C. 2003, c. 63 and other relevant legislation).

	IDENTIFICATION EXEMPTION		
Have you previously identified this **client** and retained a record with the applicable date, without having reason to believe the information, or the accuracy of it, has changed?			
☐	Yes – repeat identification not required (Rules 3-100(2) and 3-107)		
	Date confirmed:		

	IDENTIFICATION INFORMATION		
☐	**Client** is an individual:		
	Full name:		
	Business address:		
	Business telephone:		

	Home address:		
	Home telephone:		
	Occupation(s):		
	"Unemployed", "retired", or vague descriptions (e.g., self-employed, consultant) are not sufficient. Obtain information that identifies the nature of the individual's work or former work and the industry involved. Clients (or their family members or close associates) who are identified as politically exposed persons or heads of international organizations may involve unique risks for lawyers (see Guidance on Politically Exposed Persons/Heads of International Organizations on the Client ID & Verification and Anti-Money Laundering Risk Management webpage).		
		Date identified:	
☐	**Client** is a **financial institution**, **public body**, or **reporting issuer**:		
	Full name:		
	Business address:		
	Business telephone:		
	Name, position, and business contact information for individuals who give instructions with respect to the matter for which the lawyer is retained		
		Date identified:	
☐	**Client** is another type of **organization** (e.g., trust, partnership, association, company, society, cooperative):		
	Full name:		
	Business address:		
	Business telephone:		
	Incorporation number or business identification number and place of issue of number:		
	General nature of business or activity:		
	Name, position, and business contact information for individuals who give instructions with respect to the matter for which you are retained:		

	Date identified:	

VERIFICATION CHECKLIST

You may use the checklist's verification section to assist you with compliance and to record information, however, refer to the rules to determine the information and documents necessary to verify client identity. Terms defined in Rule 3-98 appear in boldface type in this checklist: "**client**", "**disbursements**", **"expenses"**, "**financial institution**", "**financial transaction**", "**interjurisdictional lawyer**", "**money**", "**organization**", **"professional fees"**, **"public body"**, "**reporting issuer**", and "**securities dealer**". Pay close attention to the definitions. *Note the wide definition of "**client**" and the Rule 3-103 requirements to ensure that you consider all applicable individuals and organizations (e.g., including beneficial owners, the actual individuals who are the trustees and known beneficiaries and settlors of a trust, or those who directly or indirectly own or control 25% or more of a corporation or society or other organization such as a partnership)*. Note that if the instructing individual of an **organization** changes, you must verify the new individual's identity.

Your firm, including members or employees, may fulfill your responsibilities (Rule 3-99(3)).

This checklist assumes that there are no red flags or suspicious circumstances. For red flags and suspicious circumstances, make reasonable inquiries, make a record of the results, and determine if you can act or must withdraw. Consider Rules 3-103(4), 3-109 to 3-110 and *BC Code* rules 3.2-7 to 3.2-8 and 3.7-7. Also refer to the Red Flags Quick Reference Guide, FAQs and other publications on the Client ID & Verification and Anti-Money Laundering Risk Management webpage.

You have a professional responsibility to safeguard the confidentiality of client information (*BC Code*, s. 3.3 and Law Society Rule 10-4). You should also be aware of your legal responsibilities under the *Personal Information Protection Act*, S.B.C. 2003, c. 63 and other relevant legislation.

	VERIFICATION EXEMPTIONS	
Will you provide legal services in respect of a **financial transaction**?		
☐	No – verification not required (Rules 3-99(2) and 3-102)	
Have you previously verified this **client's** identity, and the identity of instructing individuals if the **client** is an **organization**? Have you retained a record of the information, and the copies of the documents obtained or produced with the applicable date? In the case of an individual, do you recognize the individual whose identity you previously verified? (Note that if the instructing individual of an **organization** changes, you must verify the identity of the new individual.)		
☐	Yes – repeat verification not required assuming you have no reason to believe the information, or the accuracy of it has changed (Rules 3-105(2) and 3-106(2)) (Note: Monitoring is not exempted (Rule 3-110))	
	Date confirmed:	
If you provide legal services with respect to a **financial transaction**:		

Is the **client**:			
☐	A **financial institution**, **public body**, or **reporting issuer**?		
☐	An individual instructing you on behalf of a **financial institution**, **public body**, or **reporting issuer**?		
	☐	If yes to any of the above, verification not required (Rule 3-101(a)) (Note: Monitoring is not exempted (Rule 3-110))	
	Date confirmed:		
Will you:			
☐	Pay **money** to or receive **money** from a **financial institution**, **public body**, or **reporting issuer** acting as a principal? (Note: a principal is a party acting on its own behalf)		
☐	Receive **money** paid from the trust account of another B.C. lawyer or **interjurisdictional lawyer**?		
☐	Receive **money** from a peace officer, law enforcement agency, or other public official acting in an official capacity?		
☐	Pay or receive **money** to pay a fine, penalty, or bail?		
☐	Pay or receive **money** for **professional fees, disbursements,** or **expenses**?		
	☐	If yes to any of the above, verification is not required for the applicable **financial transaction** (Rule 3-101(b)). *Note that if there is another **financial transaction**, verification is required unless an exemption applies*. (Note: Monitoring is not exempted (Rule 3-110)).	
	Date confirmed:		
If *all* funds involved are being transferred by electronic transmission, and *neither the sending nor the receiving account holders handle or transfer the funds:*			
☐	Is the transfer occurring between **financial institutions** or financial entities headquartered and operating in countries that are members of the Financial Action Task Force?		
☐	Does the transmission record contain a reference number, date, transfer amount, type of currency, the names of the sending and receiving account holders, and the names of the sending and receiving entities?		
	☐	If yes to all of the above, verification may not be required (Rule 3-101(c)). However, Part 3–Division 7 trust rule compliance is also required, and thus the exemption may be incompatible with the trust rules. See Rules 3-64(4), 3-64.1, and 3-64.2). Note that monitoring is not exempted (Rule 3-110)).	
	Date confirmed:		

VERIFICATION INFORMATION AND DOCUMENTS

If the verification exemptions above do not apply, you must obtain from the **client** and record, with the applicable date, information about the source of **money** (see "Source of Money**"** in this checklist) and verify the **client's** identity by means of the documents and information set out in Rule 3-102. Retain a record of the information obtained, with the applicable dates, and the documents obtained or produced (Rule 3-107)). Special rules apply for individuals under 12 years of age (Rule 3-102(5)) and for individuals 12 years or over but less than 15 years (Rule 3-102(6)). *Documents used to verify identity must be valid, authentic, and current, and information must be valid and current.* A member or employee of your firm may fulfill your responsibilities, or you may retain an agent to verify the client's identity on your behalf.

Verify all applicable individuals and organizations, noting the definition of **client**. If the instructing individual of an **organization** changes, you must identify and verify the new individual's identity. Note the requirements regarding *identification* of directors, shareholders, ownership, control, and structure of an **organization** and the trustees and beneficiaries and settlors of a trust (Rule 3-103). Note that the ultimate owner is not another **organization**; it must be the actual individuals who own or control the **organization**.

If a director is the instructing individual, verify the director's identity (Rules 3-98 and 3-102) and, in addition, comply with Rule 3-103 with respect to that director. If you are not able to obtain the information referred to in Rule 3-103 or to confirm its accuracy, see Rule 3-103(4). Also consider Rules 3-109 to 3-110 and *BC Code* rules 3.2-7 to 3.2-8.

For individuals, including an individual instructing you on an **organization's** behalf, the verification methods are: (1) the government-issued photo ID method (physical meeting or virtual meeting using reliable authentication technology); (2) the credit file method (no physical meeting required); and (3) the dual process method (no physical meeting required).

	INDIVIDUALS		
☐	**Client** is an individual (includes the instructing individual of an **organization**). Clients (or their family members or close associates) who are identified as politically exposed persons or heads of international organizations may involve unique risks for lawyers (see Guidance on Politically Exposed Persons/Heads of International Organizations and the Red Flags Quick Reference Guide and other resources on the Client ID & Verification and Anti-Money Laundering Risk Management webpage).		
	A. Government-issued photo ID method		
	This method requires that you either physically meet the client or that you have a virtual meeting. If you have a virtual meeting, you must use reliable authentication technology. Verifying identity only by viewing the individual and their ID in a video conference and obtaining a scan of their ID is not sufficient. See the information in "Methods to verify an individual's identity" in the FAQs and Guidance for virtual verification of your client's identity using government-issued photo ID and technology.		
	Use valid, authentic, and current photo ID such as:		
	☐	Driver's licence	

	☐	BC Services Card		
	☐	Canadian Permanent Resident Card		
	☐	Passport		
	☐	Secure Certificate of Indian Status		
	☐	NEXUS Card		
	☐	Other, similar record (other than an ID issued by a municipal government)		
		Lawyer/law firm employee who verified ID:		
		Date verified:		
		(Must verify an individual at the time legal services are provided in respect of the **financial transaction**: Rule 3-105)		
☐	Obtain and retain a copy (front and back) that includes the name, photo, type of document, ID number, jurisdiction and place of issuance (e.g., province, country) and, if available, the expiry date.			
	B. Credit file method (physical meeting not required)			
	The identity verification information (not a credit rating) must be obtained directly from a Canadian credit bureau (Equifax or TransUnion) or a third-party vendor authorized by the credit bureau to obtain the information from the credit bureau. You cannot rely on a copy of credit file information provided by the individual whose identity you need to verify. Information from a foreign credit bureau is not acceptable. See the FAQs for more information.			
	☐	**Client** has a credit file located in Canada that has been in existence for at least three years with tradelines that are independent of the client		
	☐	**Client** has consented to a search of the client's Canadian credit file for identity verification		
	☐	The name, address and date of birth in the client's credit file match the information the **client** provided		
		Credit bureau's name:		
		Reference number:		
		Lawyer/law firm employee who conducted search:		

	Date verified:		
	(The credit file search must be conducted at the time legal services are provided in respect of the **financial transaction**: Rule 3-105)		
☐	Copy of credit file verification document attached		
	C. Dual process method (physical meeting not required)		
Obtain information from a reliable source from *any two of the three categories below. The information must be from two different sources.* The individual, you or an agent is not a source (Rule 3-102(4)). A reliable source would be a source that is well known and considered reputable (e.g., federal, territorial, and municipal levels of government, Crown corporations, financial institutions, and utility providers). Example documents: bank statement, letter from bank, credit card statement, utility bill, insurance document (home, car, life), mortgage statement, municipal property tax assessment, provincial or territorial vehicle registration, investment account statement (RRSP, TFSA, RRIF), Canada Pension Plan or other benefits statement, Canada Revenue Agency document (requirement to pay, installment reminder, GST refund letter, notice of assessment), or birth certificate. With the client's consent, you may be able to view password protected information online from the reliable source without the client disclosing their password to you. Documents must be valid, authentic, current, and information must be valid and current. See the FAQs for more information.			
☐	Individual's name and address		
	Name of source:		
	Type of information:		
	Account or reference number:		
☐	Individual's name and date of birth		
	Name of source:		
	Type of information:		
	Account or reference number:		
☐	Individual's name and confirmation of deposit account or credit card or other loan amount with a **financial institution**		
	Name of source:		
	Type of information:		
	Account or reference number:		
	Name of lawyer/law firm employee who verified ID:		
	Date verified:		

		(Verify at the time legal services are provided in respect of the **financial transaction** (Rule 3-105))	
	☐	Copies of source information and documents attached	
	D. Using an agent		
You may retain an agent to verify a client's identity provided you and the agent have an agreement or arrangement in writing for this purpose. See the FAQs on using an agent.			
See Appendix 1 of this checklist at p. A-1-17 for a sample agreement with an agent.			
	☐	Lawyer and agent have agreement or arrangement in writing to verify client's identity	
	☐	Copy of agreement or arrangement attached	
	☐	Copy of agent's attestation attached	
	Date of verification:		
	(Verify at the time legal services are provided in respect of the **financial transaction** (Rule 3-105))		
Organizations			
Verify the identity of the individual(s) instructing you on the organization's behalf (see above) as well as the **organization**. See the Red Flags Quick Reference Guide and other resources on the Client ID & Verification and Anti-Money Laundering Risk Management webpage.			
☐	**Client** is an **organization**		
	☐	**Client** is created or registered pursuant to legislative authority (e.g., company, society, cooperative, limited partnership, LLP). Obtain written confirmation from a government registry as to **client's** existence, its name and address, including the names of directors, where applicable, such as: a certificate of corporate status issued by a **public body**, a copy of annual filings required under applicable legislation, or a similar record (Rule 3-102(2)(b))	
	Lawyer/law firm employee:		
	Date verified:		
	(Verify the **organization** within 30 days of engaging in a **financial transaction** (Rule 3-106). The timing for verifying the instructing individual is the same as for any individual **client** (Rule 3-105)).		
	☐	Copy/copies attached	
OR			

	☐	**Client** is not registered in a government registry (e.g., trust, partnership): copy of constating documents such as a trust or partnership agreement, articles of association, or similar record confirming its existence as an **organization** (Rule 3-102(2)(c)).		
		Lawyer/law firm employee:		
		Date verified:		
		(Verify the **organization** within 30 days of engaging in a **financial transaction** (Rule 3-106). The timing for verifying the instructing individual is the same as for any individual **client** (Rule 3-105)).		
	☐	Copy/copies attached		
	Requirement to identify directors, shareholders, and owners of organization			
	☐	Obtain and record the names of all directors if the **organization** is not a **securities dealer** (Rule 3-103(1)). Record all efforts made to obtain the information, and record all reasonable measures taken to confirm the accuracy of the information, with the applicable dates (e.g., government registry search). One document may satisfy two steps; i.e., to obtain information and to confirm its accuracy. If efforts were unsuccessful, explain why and refer to Rule 3-103(4), treating the **client** as high risk. Also consider Rule 3-109 and *BC Code* rules 3.2-7 to 3.2-8 and 3.7-7.		
		Lawyer/law firm employee:		
		Date obtained:		
	☐	Copy/copies attached (if applicable)		
AND				
	☐	Make reasonable efforts to obtain and, if obtained, record the names and addresses of all persons who own, directly or indirectly, 25% or more of the **organization** or its shares. Identify the actual individuals. Do not stop at the corporation level. Record all efforts made to obtain the information (e.g., official documentation supplied by client, verbal information from client that you record in writing, client fills out a form and provides it to you). Also record all reasonable measures taken to confirm the accuracy of the information (e.g., client signs a document confirming the information, shareholder agreement, partnership agreement, directors' meeting records of decisions, shareholders register), with the applicable dates. One document may satisfy two steps; i.e., to obtain information and confirm its accuracy. If efforts were unsuccessful, explain why and refer to Rule 3-103(4), treating the client as high risk. Also consider Rule 3-109 and *BC Code* rules 3.2-7 to 3.2-8 and 3.7-7.		

		Lawyer/law firm employee:		
		Date obtained:		
	☐	Copy/copies attached (if applicable)		
AND				
	☐	Make reasonable efforts to obtain and, if obtained, record the names and addresses of all known beneficiaries and settlors of a **client** that is a trust. Identify actual individuals. Record all efforts made to obtain the information (e.g., official documentation supplied by client, verbal information from client that you record in writing, client fills out a form and provides it to you), and record all reasonable measures taken to confirm the accuracy of the information (e.g., review the trust deed; ask the client to provide supporting official documentation), with the applicable dates. One document may satisfy two steps; i.e., to obtain information and confirm its accuracy. If efforts were unsuccessful, explain why and refer to Rule 3-103(4), treating the **client** as high risk. Also consider Rule 3-109 and *BC Code* rules 3.2-7 to 3.2-8 and 3.7-7.		
		Lawyer/law firm employee:		
		Date obtained:		
	☐	Copy/copies attached (if applicable)		
AND				
	☐	Make reasonable efforts to obtain and, if obtained, record, information identifying the ownership, control, and structure of the **organization**. Identify actual individuals. Do not stop at the corporation level. Record all efforts made to obtain the information (e.g., official documentation supplied by client, verbal information from client that you record in writing, client fills out a form and provides it to you). Record all efforts made to obtain the information and all reasonable measures taken to confirm the accuracy of the information (e.g., shareholder agreements, partnership agreements, directors' meeting minutes), with the applicable dates. One document may satisfy two steps; i.e., to obtain information and confirm its accuracy. If efforts were unsuccessful, explain why and refer to Rule 3-103(4), treating the **client** as high risk. Also consider Rule 3-109 and *BC Code* rules 3.2-7 to 3.2-8 and 3.7-7.		

		Lawyer/law firm employee:		
		Date obtained:		
	☐	Copy/copies attached (if applicable)		
AND				
	☐	Make reasonable efforts to obtain and, if obtained, record the names and addresses of all known beneficiaries and settlors of a **client** that is a trust. Identify actual individuals. Record all efforts made to obtain the information (e.g., official documentation supplied by client, verbal information from client that you record in writing, client fills out a form and provides it to you), and record all reasonable measures taken to confirm the accuracy of the information (e.g., review the trust deed; ask the client to provide supporting official documentation), with the applicable dates. One document may satisfy two steps; i.e., to obtain information and confirm its accuracy. If efforts were unsuccessful, explain why and refer to Rule 3-103(4), treating the **client** as high risk. Also consider Rule 3-109 and *BC Code* rules 3.2-7 to 3.2-8 and 3.7-7.		
		Lawyer/law firm employee:		
		Date obtained:		
	☐	Copy/copies attached (if applicable)		
AND				
	☐	Make reasonable efforts to obtain and, if obtained, record, information identifying the ownership, control, and structure of the **organization**. Identify actual individuals. Do not stop at the corporation level. Record all efforts made to obtain the information (e.g., official documentation supplied by client, verbal information from client that you record in writing, client fills out a form and provides it to you). Record all efforts made to obtain the information and all reasonable measures taken to confirm the accuracy of the information (e.g., shareholder agreements, partnership agreements, directors' meeting minutes), with the applicable dates. One document may satisfy two steps; i.e., to obtain information and confirm its accuracy. If efforts were unsuccessful, explain why and refer to Rule 3-103(4), treating the **client** as high risk. Also consider Rule 3-109 and *BC Code* rules 3.2-7 to 3.2-8 and 3.7-7.		
		Lawyer/law firm employee:		
	☐	Date obtained:		

SOURCE OF MONEY CHECKLIST

When you provide legal services in respect of a **financial transaction**, you must obtain from the **client** and record, with the applicable date, information about the source of **money** (Rule 3-102(1)(a)). Your responsibilities may be fulfilled by your firm, including members or employees of the firm, wherever located. See the guidance in FAQs on source of **money** questions. Also consider the accounting requirements in Part 3–Division 7–Trust Accounts and Other Client Property.

Be cautious about a client who is evasive about the source of **money** for a **financial transaction**. For red flags and suspicious circumstances, consider Rules 3-109 to 3-110, *BC Code* rules 3.2-7 to 3.2-8 and 3.7-7. Make reasonable inquiries, make a record of the results, and determine if you can act or must withdraw. Resources include the Anti-money laundering and counter-terrorist financings updates (July 2025), Red Flags Quick Reference Guide, FAQs, Discipline Advisory: Country/Geographic risk, Discipline Advisory: Private lending, Guidance on Politically Exposed Persons/Heads of International Organizations and other publications on the Client ID & Verification and Anti-Money Laundering Risk Management webpage.

Purpose of **financial transaction** (e.g., deposit for commercial lease)			
Amount of **money**			
Obtain the following information from the **client** with respect to the **financial transaction**:			
	☐	Payer's full name, occupation, and contact information	
	☐	Relationship of the payer to the **client** (the payer may be the **client**)	
	☐	Date on which the **money** was received by the lawyer from the payer	

	☐	Economic activity or action that generated the **money** (e.g., bank loan, savings from salary, settlement funds) (Note: If the opposing party, represented by counsel, is paying, you may not be privy to the details)	
	☐	Form in which the **money** was received by the lawyer (e.g., cheque, bank draft)	
	☐	Full name and address of all financial institutions or other entities through which the payer processed or transmitted the **money** to the lawyer	
	☐	Any other information relevant to determining the source of **money** (e.g., source of wealth)	
		Lawyer/law firm employee:	
		Date(s):	
	☐	Copy/copies attached (if applicable)	

MONITORING CHECKLIST

While retained by a client in respect of a **financial transaction**, you must monitor on a periodic basis the professional business relationship with the **client**. The monitoring section of this checklist may be used to record information required by Rule 3-110.

For red flags and suspicious circumstances, consider Rules 3-109 to 3-110, *BC Code* rules 3.2-7 to 3.2-8 and 3.7-7, Risk Advisories, Red Flags Quick Reference Guide, Anti-money laundering and counter-terrorist financing updates (July 2025), and other publications on the Client ID & Verification and Anti-Money Laundering Risk Management webpage.

☐	**Client's** information in respect of their activities, source of **money** used in the **financial transaction**, and instructions in respect of the transactions are consistent with the retainer's purpose and the information obtained about the **client**	
	Measures taken and information obtained:	

	Lawyer/law firm employee:		
	Date:		
☐	Assess whether there is a risk that you may be assisting in or encouraging dishonesty, fraud, crime, or other illegal conduct		
	Measures taken and information obtained:		
	Lawyer/law firm employee:		
	Date:		

APPENDIX I - SAMPLE AGREEMENT WITH AGENT FOR VERIFICATION OF CLIENT IDENTITY

Government-issued photo ID verification method (individual inside or outside of Canada)

You may use an agent to verify a **client**'s identity. **Client** is widely defined in Rule 3-98 and includes an individual instructing a lawyer on behalf of an **organization**. Rule 3-104 requires that you and the agent have an agreement or arrangement in writing for this purpose. The Law Society recommends that you use this sample agreement when retaining an agent to verify the identity of an individual **client** where the agent will physically meet with the **client** and review their original government-issued identification document. The agreement will need to be amended if the agent will use other permitted methods of verifying identity. Lawyers who have relied on an agent to verify a client's identity but failed to have an agency agreement or arrangement in place have been disciplined.

Rule 3-104 does not require that the agent be a lawyer or notary. Use your judgment to choose a reputable person who understands what is expected and who will carry out the required work. Keep in mind that the agent is your agent, not the client's agent. Accordingly, select your agent and follow up to ensure that the agent actually carried out the work. In some cases, potential new clients have chosen the agent to the lawyer's detriment. The agent was not who they purported to be and was simply part of an arrangement to set up a scam on the lawyer. See the FAQs on the Client ID & Verification and Anti-Money Laundering Risk Management webpage for more information about using an agent.

BETWEEN:

[*Name of the lawyer and business address*]

the "Lawyer"

AND:

[*Agent's full name, occupation and business address*]

the "Agent"

RE:

[*Client's full name, occupation and address*]

the "Client"

AS A RESULT OF THE FOLLOWING:

The Client has retained the Lawyer to provide legal services in Canada;

The Lawyer is required by the Law Society of British Columbia to verify the Client's identity; and

The Agent has agreed to meet with the Client and examine, in the Client's presence, the Client's identification document or documents for the purpose of verifying the Client's identity on the Lawyer's behalf;

THE PARTIES AGREE THAT, in exchange for [*sum of money*], sufficiency of which is acknowledged:

1. The Agent will physically meet with the Client and examine, in the Client's presence, a valid, authentic, and current identification document issued by the government of Canada, a province or territory, or a foreign government, other than a municipal government, that contains the client's name and photograph, to verify that the name and photograph are those of the Client (the "Document").
2. The Agent will make a legible photocopy of the Document that the Agent examined.
3. The Agent will attest, on a photocopy of the Document and in a form similar to that attached as an Appendix to this agreement, that the Agent has examined the Document in the Client's presence to verify that the name and photograph are those of the Client.
4. The Agent will provide the original signed attestation, on which the Agent has placed the information required under paragraph 3 above, to the Lawyer no later than [*date*];
5. This agreement may be signed in counterparts, and will be read with any changes of gender and number as may be required by context; and
6. This agreement will be governed and interpreted according to the laws of the Province of British Columbia and the laws of Canada, as applicable.

Dated this [*specify*] day of [*month*], [*20__*] at [*place and country*].

[*name of law firm*]

[*name of the Lawyer*]

_____

Lawyer's signature

[*name of the Agent's firm or business, if applicable*]

[*name of the Agent and occupation*]

_____

Agent's signature

Appendix to Agent Agreement: Sample Attestation Form

[THE FOLLOWING MUST BE PLACED ON THE PHOTOCOPY
OF THE IDENTIFICATION DOCUMENT]

I attest that:

1. I am a [*agent status or occupation*] in [*location*] with a place of business at [*business address and telephone number*].

2. I met with [*name of lawyer's client*] on the [*specify*] day of [*month*], [*20__*] and examined, in the Client's physical presence, the Client's original [*type of government-issued identification document*], issued by [*name of government authority*] on [*date of issue*] and bearing document number [*number*] (the "Document").

3. The photograph in the Document was a true likeness of [*name of lawyer's Client*].

4. To the best of my knowledge and belief, the Document was valid, authentic, current and the information in it was valid and current.

5. This copy is a true copy of the Document, the original of which I examined.

Signed by me on the [*specify*] day of [*month*], [*20__ *] at [*place*].

_____

Agent's signature