C. Financial Institution with Only Low-Value Accounts

A Canadian Financial Institution satisfying the following requirements:

- 1. The Financial Institution is not an Investment Entity;
- 2. No Financial Account maintained by the Financial Institution or any Related Entity has a balance or value in excess of \$50,000, applying the rules set forth in Annex I for account aggregation and currency translation; and
- 3. The Financial Institution does not have more than \$50 million in assets on its balance sheet, and the Financial Institution and any Related Entities, taken together, do not have more than \$50 million in total assets on their consolidated or combined balance sheets.

D. Sponsored Investment Entity and Controlled Foreign Corporation

A Financial Institution described in subparagraph D(1) or D(2) of this section having a sponsoring entity that complies with the requirements of subparagraph D(3) of this section.

- 1. A Financial Institution is a sponsored investment entity if:
 - a) It is an Investment Entity established in Canada that is not a qualified intermediary, withholding foreign partnership, or withholding foreign trust pursuant to relevant U.S. Treasury Regulations; and
 - b) An Entity has agreed with the Financial Institution to act as a sponsoring entity for the Financial Institution.