Financial Intelligence and Investigation Bureau
Hong Kong Police Force

AML Webinar for Money Lending Industry

Suspicious Transaction Reports, Introduction of STREAMS 2, Common Typologies and Case Sharing

Presented by:
Ms. Julia LEUNG
(Senior Inspector of Police)

www.jfiu.gov.hk

jfiu@police.gov.hk

Agenda of FIIB's Sharing

- Introduction of FIIB and JFIU
- Key Legislation
- STR Reporting Regime
- Introduction of STREAMS 2
- STR Reporting in STREAMS 2
- ML Landscape
- Common Typologies & Case Sharing

01. About FIIB & JFIU

NARCOTICS BUREAU HONG KONG
香港毒品調查科

1989

Expansion of FID and JFIU

財富情報及調查科
FINANCIAL INTELLIGENCE AND INVESTIGATION BUREAU
FIIB

2021

Features of JFIU

Co-staffed

Co-staffed by HKPF and C&ED and based in Police Headquarters

Sole Agency in HK

Managing Suspicious Transaction Reporting Regime

Partnership

Financial Intelligence Exchange with LEAs and FIUs worldwide

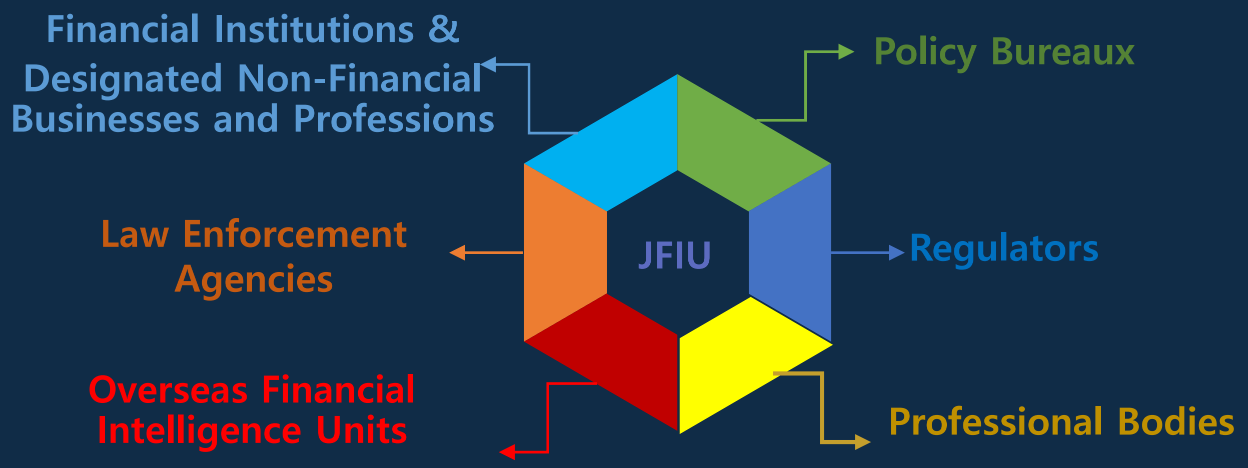
01. About FIIB & JFIU

Functions of the JFIU

STR Data
Collected via STREAMS system

Analysis → Intelligence Development → Intelligence Dissemination → Trend & Policy Study → International Cooperation

Public-Private Partnership



02. Key Legislation

Cap. 405
Drug Trafficking (Recovery of Proceeds) Ordinance
販毒(追討得益)條例

Cap. 455
Organized and Serious Crimes Ordinance
有組織及嚴重罪行條例

Cap. 575
United Nations (Anti-Terrorism Mesaures) Ordinance
聯合國(反恐怖主義措施)條例

Cap. 615
AML &CFT Ordinance and Amendment
打擊洗錢及恐怖分子資金籌集(金融機構)條例及其修訂

02. Key Legislation

Anti-Money Laundering (AML)

(s.25 of Cap. 405 - DTROP and s.25 of Cap. 455 - OSCO)

Any person

- **Knowing or having reasonable grounds to believe**
- **Any property**
- **In whole or in part directly or indirectly represents proceeds of drug trafficking / indicatable offence**
- **Deals with that property**

任何人

- 知道或有合理理由相信，
- 任何財產
- 全部或部分、直接或間接代表任何人的販毒/從可公訴罪行得益
- 而仍處理該財產
- 即屬犯罪

MAXIMUM PENALTY

FINE OF HKD 5 MILLIONS &

14 YEARS' IMPRISONMENT

02. Key Legislation

Counter Financing of Terrorism (CFT)

(s.7 of Cap. 575 - UNATMO)

Any person

- **Provide or collect by any means directly or indirectly**
- **Any property**
- **(1) With the intention that the property be used or (2) knowing that the property will be used**
- **In whole or in part to commit one or more terrorist acts**

任何人

- 不得在下述情況以任何方法直接或間接提供或籌集財產:
- (1) 懷有將該財產的全部或部分用於作出一項或多於一項恐怖主義行為的意圖(不論該財產實際上有否被如此使用)；或
- (2) 知道該財產的全部或部分將會用於作出一項/多於一項恐怖主義行為(不論該財產實際上有否被如此使用)

MAXIMUM PENALTY

FINE & 14 YEARS' IMPRISONMENT

02. Key Legislation

Suspicious Transactions Reporting

(s.25A(1) of Cap. 405 - DTROP; s.25A(1) of Cap. 455 - OSCO; and s12(1) of Cap. 575 - UNATMO)

Any person

- **Knows or suspects any property**
- **(1) represents / was used / is intended to be used in connection with the proceeds of drug trafficking / indictable offences or**
- **(2) is terrorist property**
- **Should disclose that knowledge or suspicion to an authorized officer (i.e. JFIU)**

任何人

- 知道或懷疑任何財產
- (1) 全部或部分、直接或間接代表任何人的販毒/從可公訴罪行得益曾在與販毒/可公訴罪行有關的情況下使用；或擬在與販毒/可公訴罪行有關的情況下使用;或
- (2) 是恐怖分子財產；
- 該人須在合理範圍內盡快把該知悉或懷疑，連同上述知悉或懷疑所根據的任何事宜，向獲授權人披露 (i.e. JFIU)

MAXIMUM PENALTY

FINE OF HKD 50,000 &

3 MONTHS' IMPRISONMENT

02. Key Legislation

TIPPING OFF

(s.25A(5) of Cap. 405 - DTROP; s.25A(5) of Cap. 455 - OSCO; and s12(5) of Cap. 575 - UNATMO)

Where a person

- **Knows or suspects a disclosure has been made**
- **The person shall not disclose to another person any matter**
- **Which is likely to prejudice any investigation which might be conducted following that first-mentioned disclosure**

任何人如知道或懷疑已有任何披露根據第(1)或(4)款作出，而仍向其他人披露任何相當可能損害或者會為跟進首述披露而進行的調查的事宜，

即屬犯罪。

MAXIMUM PENALTY

FINE OF HKD 500,000 &

3 YEARS' IMPRISONMENT

03. STR Reporting Regime

STR Mechanism - Public-Private Partnership

Financial Intelligence Units

Reporting Entities

Law Enforcement Agencies

Reporting Entities

e.g. Financial Institutions and Insurance Companies

- CDD, KYC
- Record Keeping
- STR Filing

Information

JFIU

- Maintaining STR Regime
- Intelligence Exchange
- International Cooperation
- Training and Outreach

Intelligence

LEA

e.g. HKPF, C&ED and ICAC

- Financial Investigation
- Asset Tracing
- Restraint
- Confiscation

Evidence

03. STR Reporting Regime

Why should you report STRs?

1. Legal obligations for all citizens in Hong Kong
2. No reporting threshold
3. Source of report and reported details will be kept confidential
4. Legal protection to civil and criminal liability

What's more?

https://www.cr.gov.hk/en/Guidelines.htm

公 司 註 冊 處
COMPANIES REGISTRY

Guideline on Anti-Money Laundering and Counter-Financing of Terrorism

(For Licensed Money Lenders)

March 2025

公 司 註 冊 處
COMPANIES REGISTRY

打擊洗錢
及
恐怖分子資金籌集指引

(持牌放債人適用)

2025 年 3 月

CONTENTS

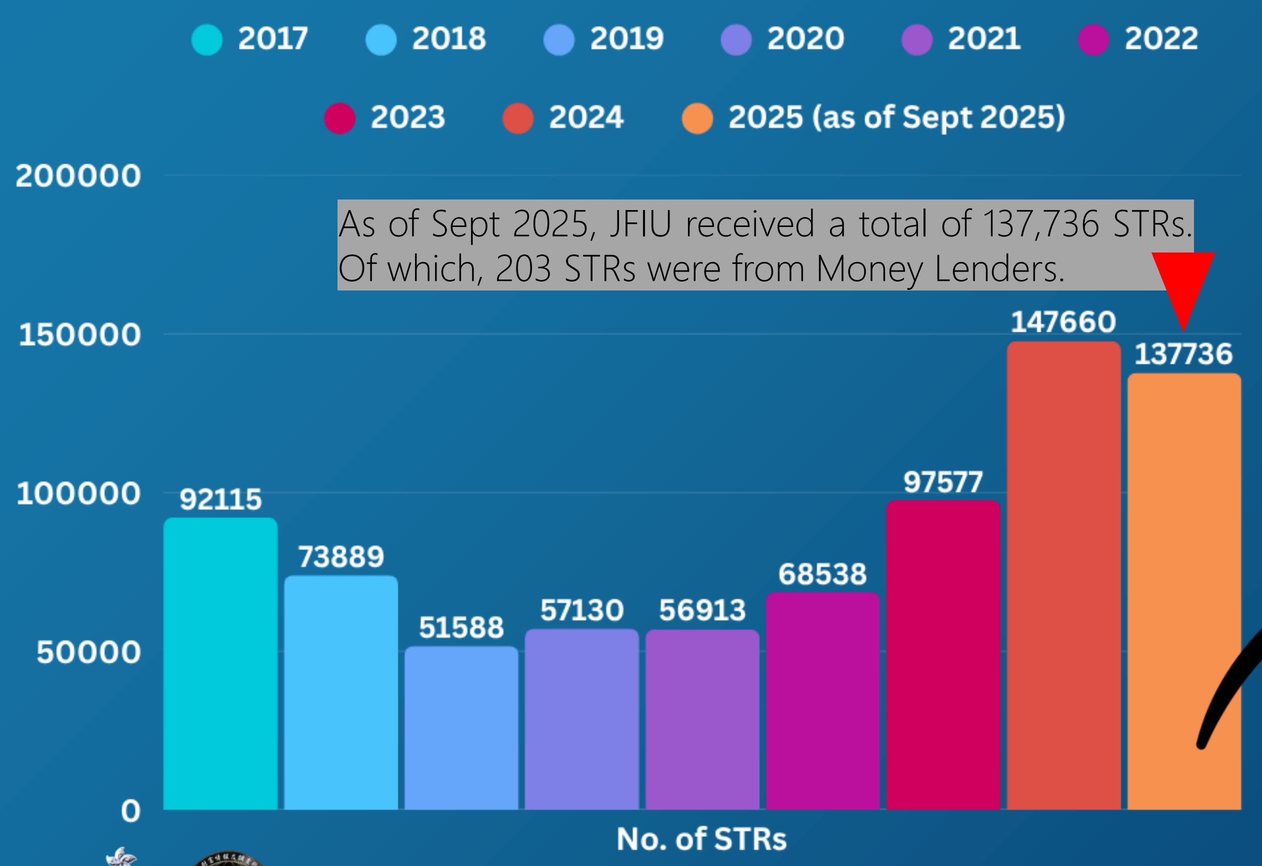
What's more?

MLRO		
	7.9	A licensee should appoint an MLRO as a central reference point for reporting suspicious transactions and also as the main point of contact with the JFIU and law enforcement agencies. The MLRO should play an active role in the identification and reporting of suspicious transactions. Principal functions of the MLRO should include having oversight of: (a) review of internal disclosures and exception reports and, in light of all available relevant information, determination of

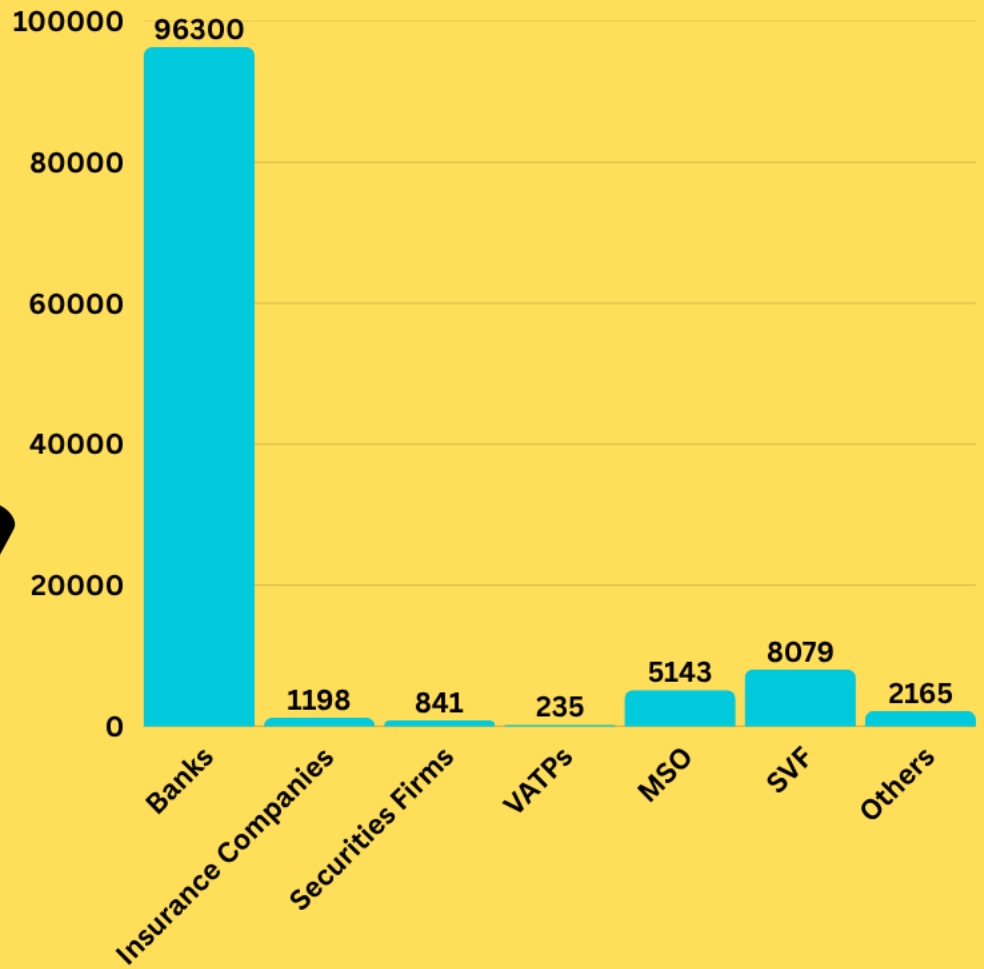
	7.12	A licensee should establish and maintain clear policies and procedures to ensure that: (a) all staff are made aware of the identity of the MLRO and of the procedures to follow when making an internal report; and (b) all internal reports should reach the MLRO without undue delay.

Reporting to the JFIU		
	7.19	If after completing the review of the internal report, an MLRO decides that there are grounds for knowledge or suspicion, he should disclose the information to the JFIU as soon as it is reasonable to do so after his evaluation is complete together with the information on which that knowledge or suspicion is based. Dependent on when knowledge or suspicion arises, an STR may be made either before a suspicious transaction or activity occurs (whether the intended transaction ultimately takes place or not), or after a transaction or activity has been completed.

STR Statistics
- from 2017 to September 2025

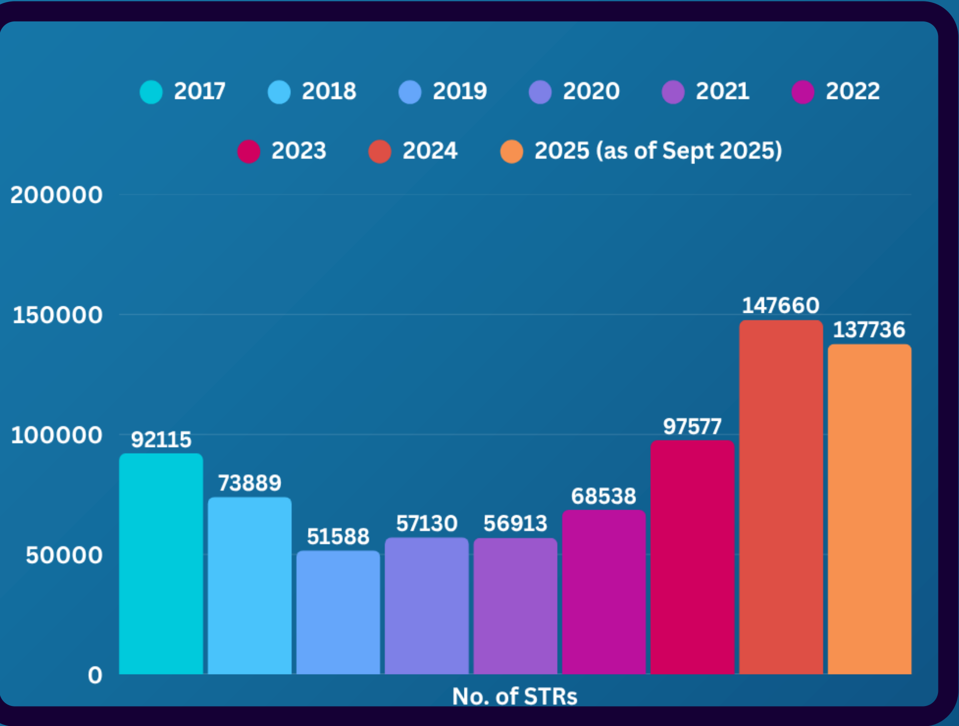


Breakdown of STR filed by different sectors as of Sept 2025



STR Statistics
- from 2017 to Sept 2025

STRs filed by money lenders had a significant increase since 2022 with an average number of 421 STRs (0.13%) per year.



Current STR Reporting Methods
- by email and e-submission (STREAMS)

How to submit an STR?

Suspicious transaction reports can be made in one of the following ways:

- by e-reporting system, STREAMS
- by email to jfiu@police.gov.hk

- by fax to : (852) 2529 4013

- by mail, addressed to Joint Financial Intelligence Unit, GPO Box 6555 Hong Kong

- by telephone (852) 2866 3366 (for urgent reports during office hours)

If you want to file an STR via STRE
to the JFIU either by fax (2529 4
information, please feel free to cont

Suspected Crimes | Suspicious Indicators | Open Source Info. | Entity Lists | **Check** | **Save** | **Print**

REPORT MADE UNDER SECTION 25A OF THE
DRUG TRAFFICKING (RECOVERY OF PROCEEDS) ORDINANCE OR
ORGANIZED AND SERIOUS CRIMES ORDINANCE/
SECTION 12 OF THE UNITED NATIONS (ANTI-TERRORISM MEASURES) ORDINANCE
TO THE JOINT FINANCIAL INTELLIGENCE UNIT ("JFIU")

STR Summary	
STR Number:	
Submission Number:	
Date of Submission:	
Acknowledgement Issue Date:	
Consent Letter Issue Date:	
Consent:	☑ None ○ Yes ○ No ○ Not Applicable
Consent Remark:	

Special Cases with Time Critical Nature:

* Report Related to Existing Investigation:	○ Yes ◉ No

Attachment: + **Refresh**

No.	File Name	File Size
		KB
	Total	KB

04. INTRODUCTION OF STREAMS 2

Enhanced Data Collection in STREAMS 2

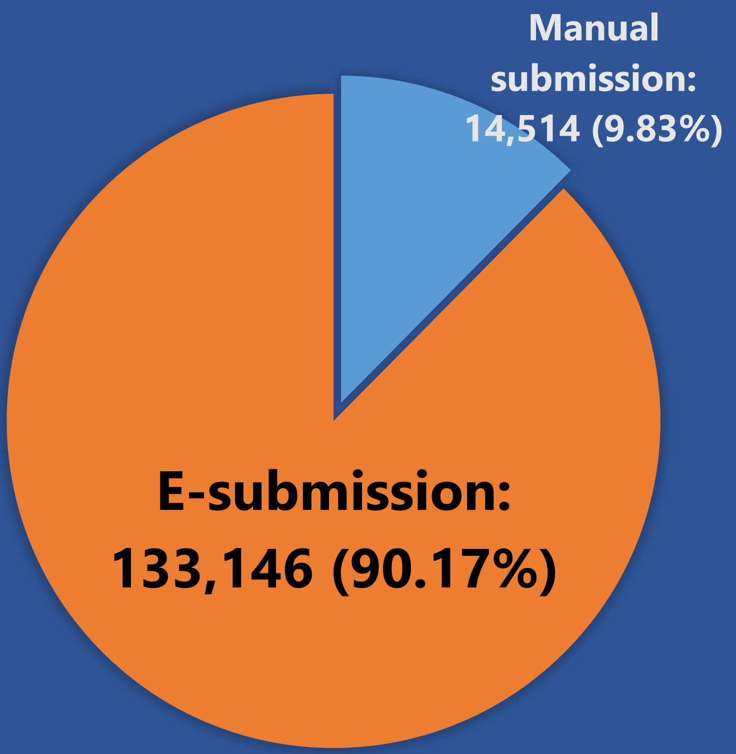
- Comprehensive scope of information collected
- Facilitate big data analytics to identify network / trends effectively

Social Media	Digital Footprints	Address Format	Crypto-transactions
Capture relevant social media identifiers and activity	Collect IP, SSID, BSSID, Geohash Data, etc.	Standardised address input	Dedicated fields for crypto-transactions

Benefits of E-submission

- Negate the need of paper-based reporting
- Free and secure system
- Receive consent decision via STREAMS
- Instant Acknowledgement

Total submission of STRs in 2024:
147,660



Mode of STR Submission in STREAMS 2

All regulated entities will be required to submit STRs by **electronic means!**

PDF Form	Structured PDF for offline completion and secure upload
Web Form	User-friendly online forms with built-in validation
XML	Direct system-to-system reporting

STR Form Enhancement in STREAMS 2

Comprehensive Data Fields

Mandatory Fields

- Core information required for all sector
- e.g. Phone number (8 digits for Hong Kong numbers) and BR / CR No. for organisation

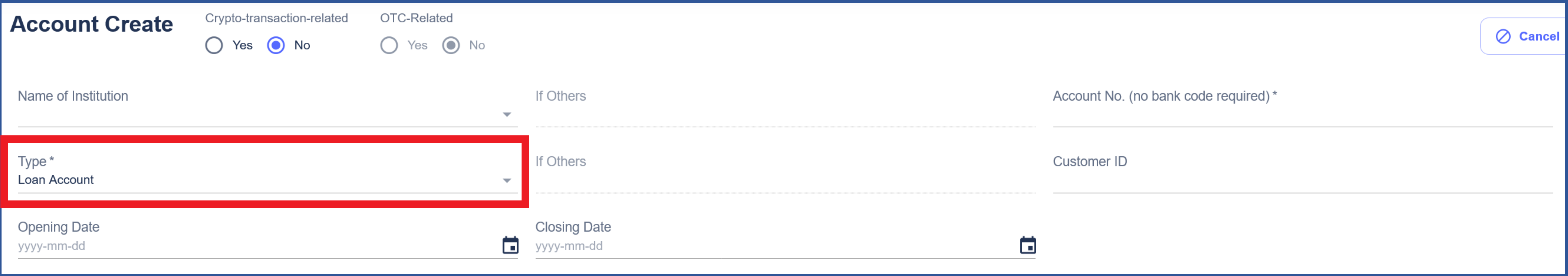
Optional Fields (Sector Specific)

- Additional data points tailored to specific industry needs and transaction types

STR Form Enhancement in STREAMS 2

Comprehensive Data Fields

Example:



Optional Fields (Sector Specific)

- Additional data points tailored to specific industry needs and transaction types

05.
STR Reporting In STREAMS 2

How to identify suspicion?

SAFE approach

SCREEN

- Screen the account for suspicious indicators
- Adverse news, sensitive connections, method of payment etc

ASK

- Check and enquiry
- Clarify any suspicion, such as financial background, source of fund, purpose of transactions etc

FIND

- Find and review clients' previous records
- Analysis on clients' backgrounds

EVALUATE

- Evaluate the available information to determine if the transaction is suspicious
- If affirmative, file STRs

05. STR Reporting In STREAMS 2

- Red Flag Indicators

Clients

- Politically Exposed Person (PEP)?
- Person / Corporate from high-risk country?
- No known nexus in HK?
- Suspected forged supporting document during applications?
- Virtual on-boarding

Transactions

- Payment from 3rd party / cash / cashier order?
- Transactions incommensurate with client's background?
- Repay the loan prematurely without reasonable explanation?
- Received LEA enquiries

05. STR Reporting In STREAMS 2

- Red Flag Indicators

Further Enquiry

- Background check / open source research unveil **adverse news** / records
- Unwilling to respond to questions or answers are not convincing
- Unwilling to provide supporting documents

Evaluation

- Information from client is incommensurate with the record in hand
- Information from client could not be verified

05. STR Reporting in STREAMS 2
- STR Filing Format

Reporting Party | Subject | Organisation | Account | Transaction | Suspected Crimes | Suspicious Indicator

Organisation Name	Reporting Officer Name	Your Reference	Phone	Fax	Email *
Org Name	Testing Company				test@gmail.com

Industry Category *
Financial - Licensed Money Lender

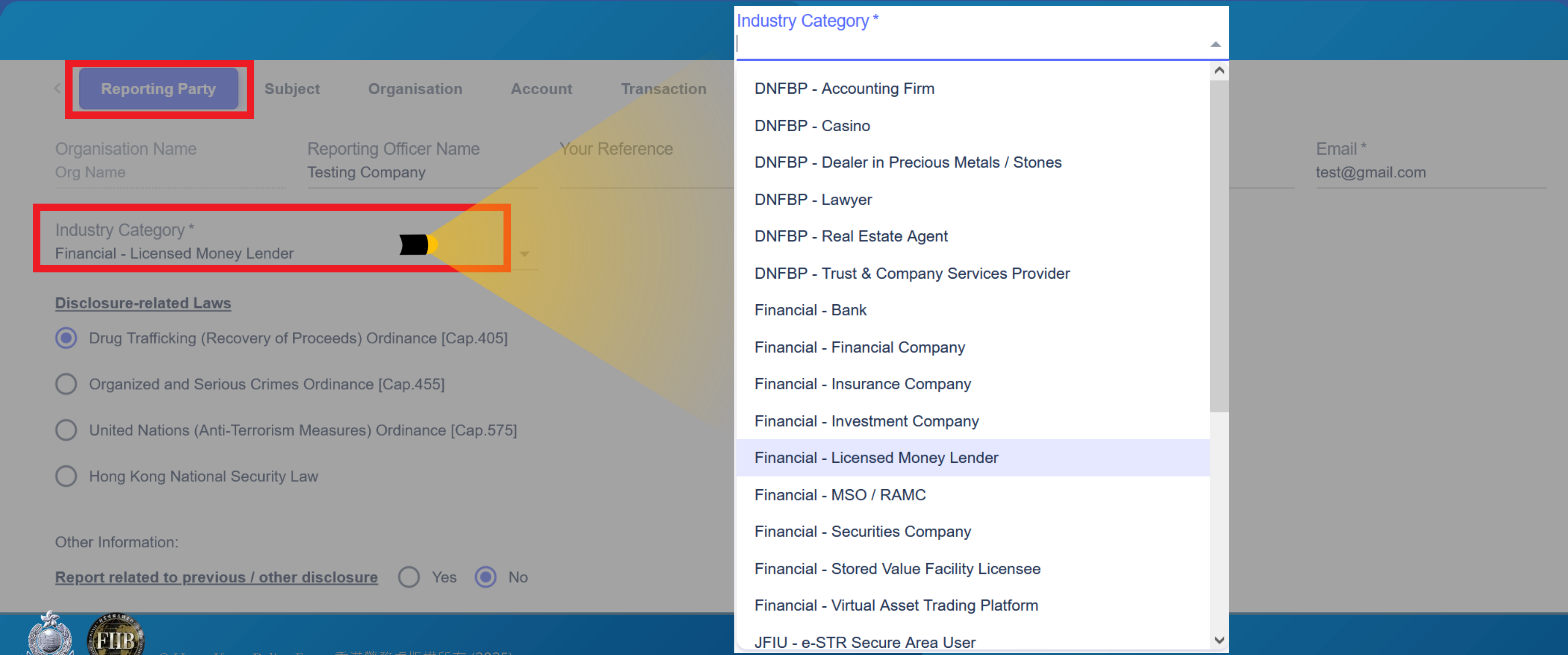
Disclosure-related Laws

- (●) Drug Trafficking (Recovery of Proceeds) Ordinance [Cap.405]
- ( ) Organized and Serious Crimes Ordinance [Cap.455]
- ( ) United Nations (Anti-Terrorism Measures) Ordinance [Cap.575]
- ( ) Hong Kong National Security Law

Other Information:

Report related to previous / other disclosure ( ) Yes (●) No

05. STR Reporting in STREAMS 2
- STR Filing Format



05. STR Reporting in STREAMS 2 - STR Filing Format

Reporting Party | Subject | Organisation | Account | Transaction | Suspected Crimes | Suspicious Indicator

Organisation Name	Reporting Officer Name	Your Reference	Phone	Fax	Email *
Org Name	Testing Company				test@gmail.com

Industry Category *
Financial - Licensed Money Lender

Disclosure-related Laws

- (selected) Drug Trafficking (Recovery of Proceeds) Ordinance [Cap.405]
- Organized and Serious Crimes Ordinance [Cap.455]
- United Nations (Anti-Terrorism Measures) Ordinance [Cap.575]
- Hong Kong National Security Law

Other Information:

Report related to previous / other disclosure Yes / No (selected)

05. STR Reporting in STREAMS 2
- STR Filing Format

STR triggered by LEA enquiry / intelligence

STR triggered by internal monitoring system

Disclosure-related Laws

- (●) Drug Trafficking (Recovery of Proceeds) Ordinance [Cap.405]
- ( ) Organized and Serious Crimes Ordinance [Cap.455]
- ( ) United Nations (Anti-Terrorism Measures) Ordinance [Cap.575]
- ( ) Hong Kong National Security Law

Other Information:

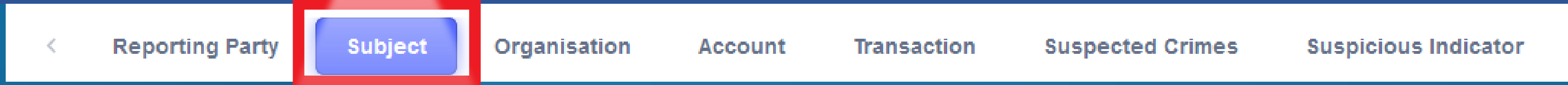
Report related to previous / other disclosure ( ) Yes (●) No

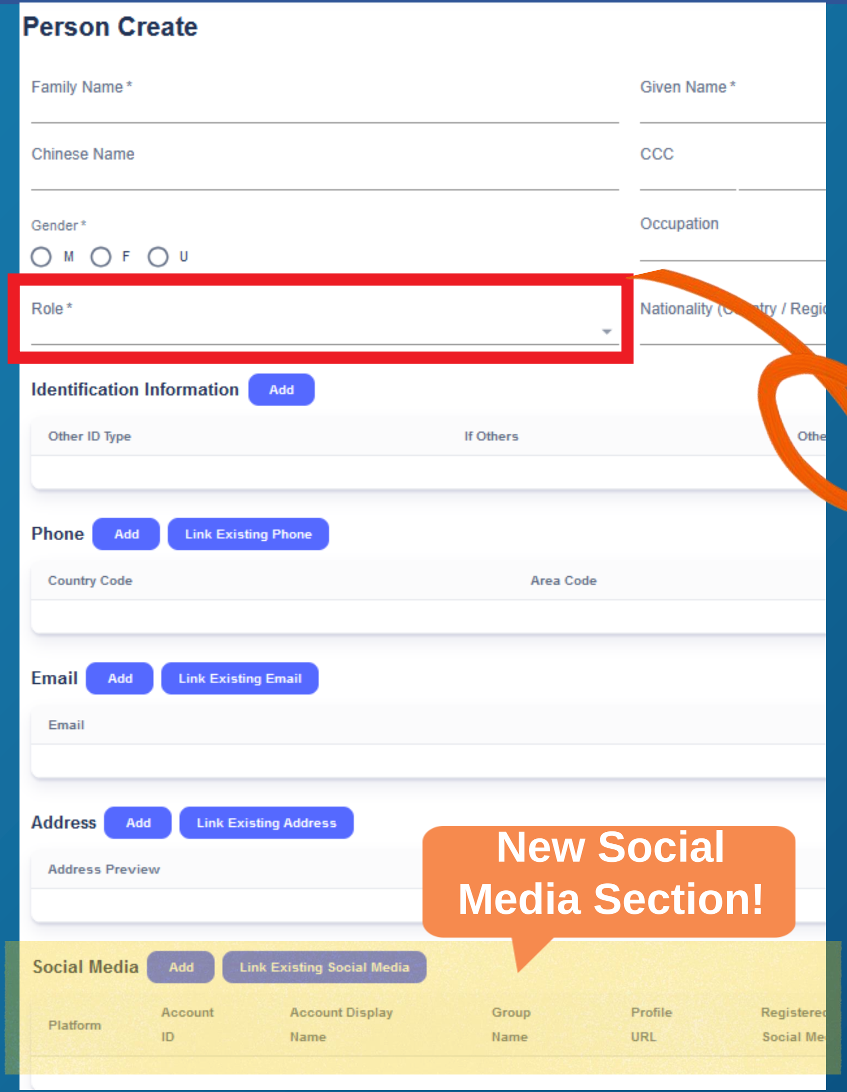
Other Information:

Report related to previous / other disclosure (●) Yes ( ) No

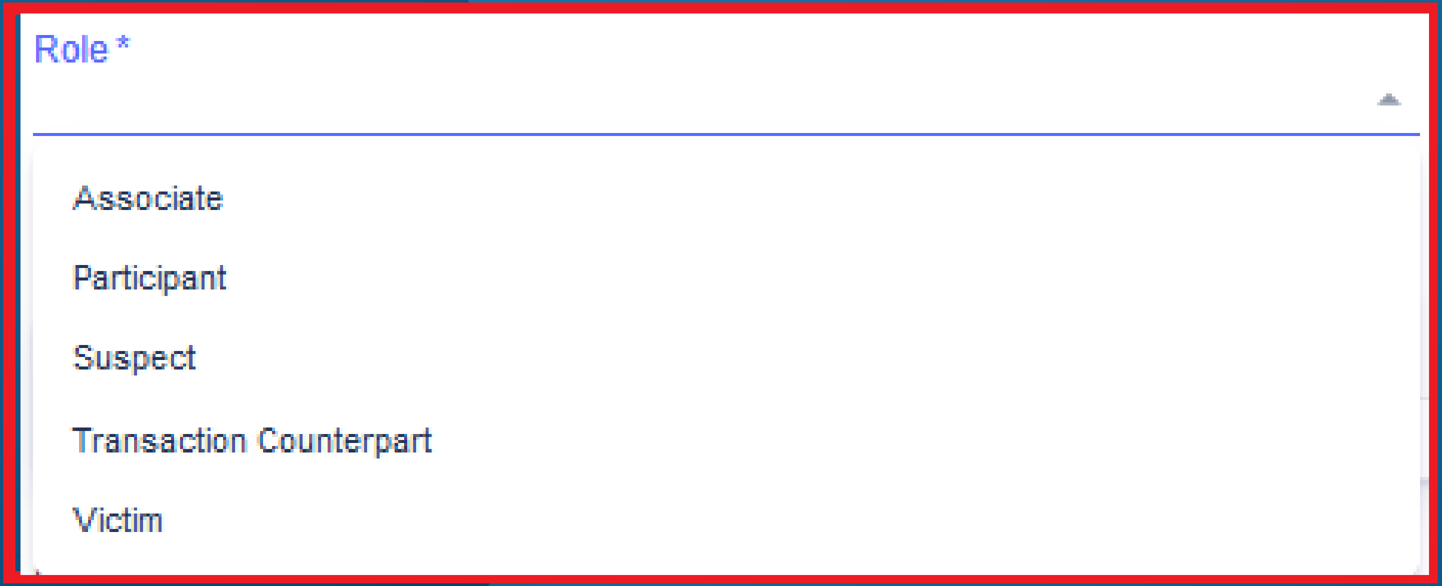
Your Previous Reference		+ −
Previous STR No.	[E.g. STR 20250001]	+ −
ADCC Ref. No.	[E.g. ESPS 24/2025]	+ −
Police Report No.	[E.g. MK RN 25000001]	+ −
Investigation Unit	[E.g. DIT 1 MKDIST]	+ −
Search Warrant (Writ No.)		+ −
FINEST ISR No.		+ −
Other LEA Reference No.		+ −
( ) C&ED		
( ) ImmD		
( ) Others		
IRD Reference No.		+ −
SFC Reference No.		+ −

05. STR Reporting in STREAMS 2 - STR Filing Format

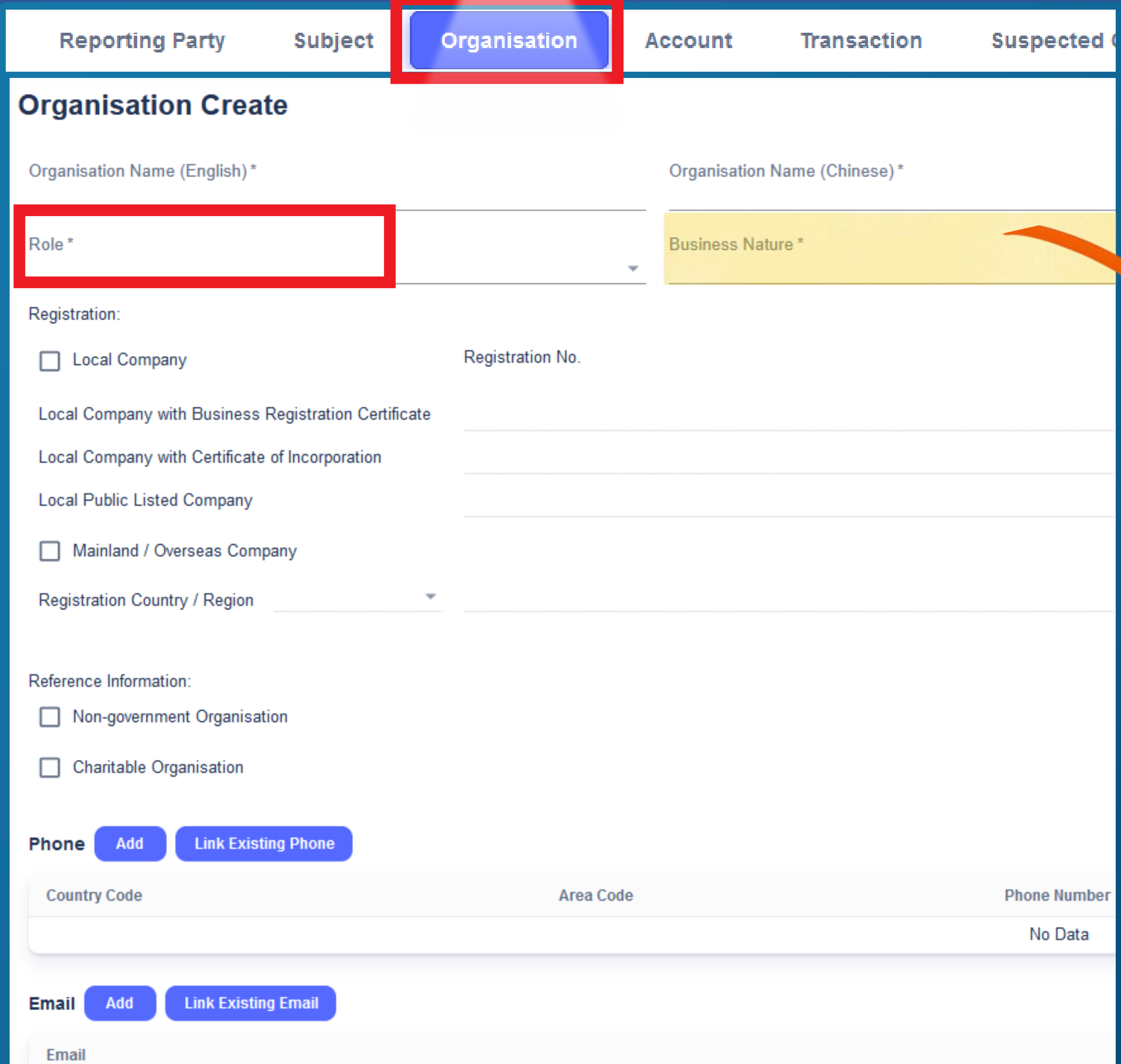




- Identification no., age, nationality, residential address, occupation, reported salary, source of wealth, etc.
- Specify the roles of the reported entities (suspect, victim, transaction counterparty, etc.)

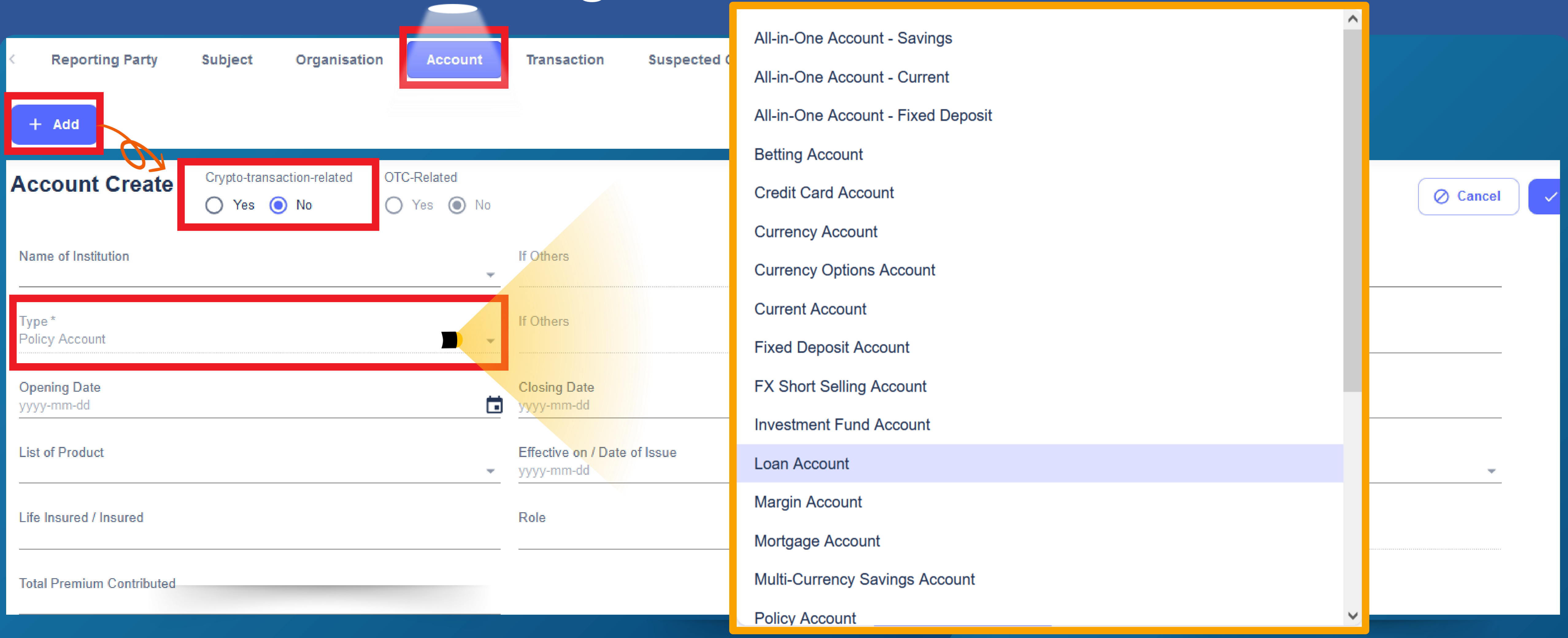


05. STR Reporting in STREAMS 2
- STR Filing Format

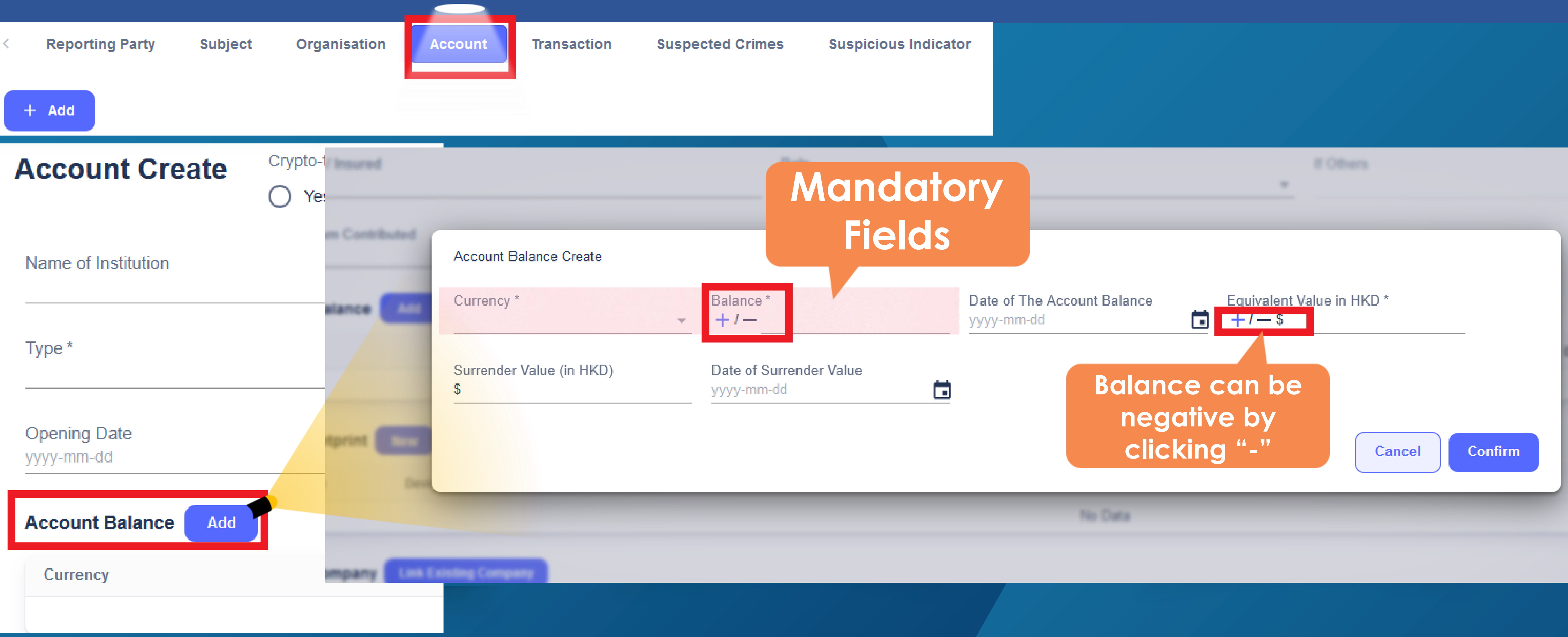


- **unique identification no., place of incorporation, business nature**
- **details of connected parties (e.g. directors, shareholders and beneficial owners)**

05. STR Reporting in STREAMS 2 - STR Filing Format



05. STR Reporting in STREAMS 2 - STR Filing Format



05. STR Reporting in STREAMS 2 - STR Filing Format

Reporting Party | Subject | Organisation | **Account** | Transaction | Suspected Crimes | Suspicious Indicator

+ Add

Digital Footprint New | Link Existing Digital Footprint

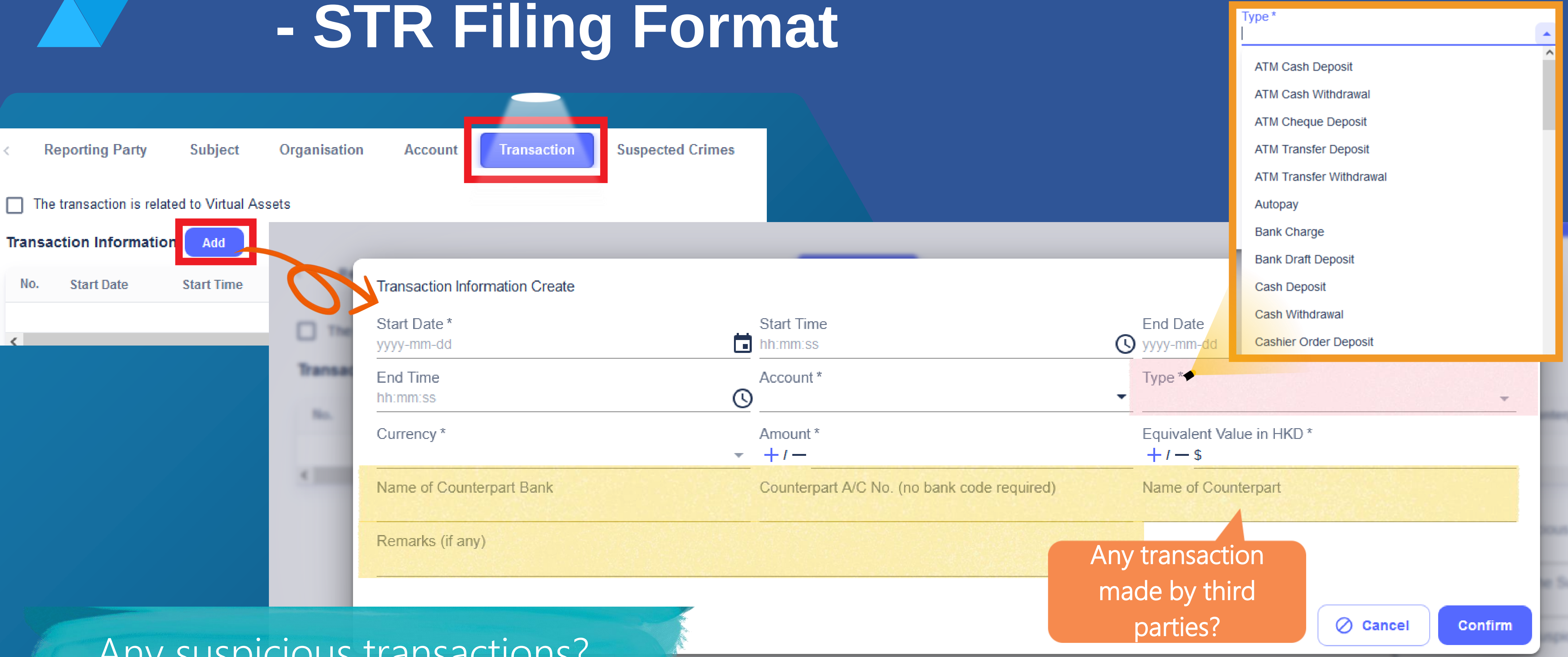
Event Type	Device Name	Device Model

Digital Footprint

Digital Footprint Create

Event Type	Device Name	Device Model	Device OS
Device ID	IP Address	Period From yyyy-mm-dd	Period To yyyy-mm-dd
SSID	BSSID	Geohash	Latitude
Longitude			

05. STR Reporting in STREAMS 2 - STR Filing Format



Any suspicious transactions?

05. STR Reporting in STREAMS 2
- STR Filing Format

Reporting Party | Subject | Organisation | Account | Transaction | **Suspected Crimes** | Suspicious Indicator

Suspected Crimes Please put a " ✓ " in the appropriate box(es)

National Security

- [ ] Offence(s) Endangering National Security

Fraud

- [ ] Email Scam
- [ ] Investment Scam
- [ ] Romance Scam
- [ ] Telephone Deception
- [ ] Others (Please Specify) ....

Other Crimes

- [ ] Bookmaking
- [ ] Crime under Gambling Ordinance
- [ ] Corruption and Bribery
- [ ] Counterfeiting Currency

Illicit Trade Activities

- [ ] Counterfeiting and Piracy of Products
- [ ] Dealing in Precious Metals and Stones without a license
- [ ] Endangered Species Smuggling
- [ ] Illicit Cigarettes
- [ ] Smuggling (including those related to customs and excise duties and taxes)
- [ ] Trade Based Money Laundering
- [ ] Unlicensed Money Service Operator (UMSO)

- [ ] Kidnapping, Illegal Restraint and Hostage-Taking
- [ ] Money Laundering
- [ ] Murder, Grievous Bodily Injury
- [ ] Participation in an Organized Criminal Group and Racketeering

05. STR Reporting in STREAMS 2
- STR Filing Format

Reporting Party | Subject | Organisation | Account | Transaction | Suspected Crime | **Suspicious Indicator**

Please put a " ✓ " in the selected box(es).

Fund Movement Pattern

- [ ] Indirect Transaction / Transaction Intended to Break Audit Trail
- [ ] Large Cash Transaction
- [ ] Numerous Transaction Counterparties without Apparent Reasonable Cause
- [ ] Temporary Repository of Fund
- [ ] Transactions Involving High-Risk Jurisdiction / Region
- [ ] Uneconomical Transaction / Transaction with No Business Purpose
- [ ] N/A

Customer Background / Behaviour

- [ ] Civil Servant-related
- [ ] Common IP Address

NEW

- [ ] Customer Evasive / Reluctant to Provide Information
- [ ] Customer Insisted to Use Less Secured Transaction Methods
- [ ] Politically Exposed Persons (PEP)
- [ ] Sanctions-related
- [ ] Shared Device

NEW

- [ ] Suspected Counterfeit Document Presented by the Customers
- [ ] Suspected Money Courier / Unlicensed Money Service Operator

Accounts

- [ ] Account Operated / Controlled by Third-Party Other Than Signatory / Account Holder
- [ ] Non Resident Personal Account
- [ ] Offshore Account (e.g. BVI Bank Account)
- [ ] Shell Company Account
- [ ] N/A

National Security Related

- [ ] A person is suspected of committing an offence endangering national security
- [ ] Transactions with specified absconders under Safeguarding National Security Ordinance
- [ ] Transactions with prohibited organisations under Safeguarding National Security Ordinance
- [ ] Transactions with high NS risk counterparties
- [ ] Others (Please Specify) ____________
- [ ] N/A

Other Suspicious Indicator

- [ ] Casino-related Suspicious Transaction
- [ ] Charitable Organisation / NPO-related Suspicious Transaction
- [ ] Others (Please Specify) ____________
- [ ] N/A

05. STR Reporting in STREAMS 2
- STR Filing Format

Narrative Comment about the Suspicious Transactions

1. Triggering Factors

- ☐ Commission / Types / Association of Offence
- ☐ Evidence of Suspicious Transaction Patterns
- ☐ Intelligence Received from LEAs
- ☐ Material from Publicly Available Information (e.g. adverse news, SFC alerts)
- ☐ Receipt of Search Warrant / Court Order
- ☐ Upstream Scam Intervention

2. Background of Person / Organisation

3. Details of Investigation / Transaction Analysis

4. Conclusions / Action Taken / Way Forward

Reporting Party | Subject | Organisation | Account | Transaction | Suspected Crimes | **Suspicious Indicator**

- Offence (Fraud, Corruption, Sanction, Terrorist Financing, National Security, etc.)
- Suspicious Transaction Patterns (Substantial Cash Deposits, Temporary Repository of Funds, etc.)
- Intelligence / Enquiry from LEAs (e.g. JFIU, CSTCB, ADCC)
- Publicly available information (Adverse News, LEA Press Release, Sanction, etc.)
- Receipt of Search Warrant / Court Order
- Upstream Scam Intervention (Client is a victim)

05. STR Reporting in STREAMS 2
- STR Filing Format

Narrative Comment about the Suspicious Transactions

1. Triggering Factors

- ☐ Commission / Types / Association of Offence
- ☐ Evidence of Suspicious Transaction Patterns
- ☐ Intelligence Received from LEAs
- ☐ Material from Publicly Available Information (e.g. adverse news, SFC alerts)
- ☐ Receipt of Search Warrant / Court Order
- ☐ Upstream Scam Intervention

2. Background of Person / Organisation

3. Details of Investigation / Transaction Analysis

4. Conclusions / Action Taken / Way Forward

Reporting Party | Subject | Organisation | Account | Transaction | Suspected Crimes | **Suspicious Indicator**

- Nationality
- Type of ID document - HKID Holder, China Passport Holder, etc.
- Occupation / business nature, source of wealth, source of income
- Family / business background, if known - *e.g. co-borrower (Ms. CHAN Xxx, HKID No.) or related entity also maintained business relationship with the money lender and displayed similar suspicion*
- Date of commencing business relationship with the borrower

05. STR Reporting in STREAMS 2
- STR Filing Format

Narrative Comment about the Suspicious Transactions

1. Triggering Factors

- [ ] Commission / Types / Association of Offence
- [ ] Evidence of Suspicious Transaction Patterns
- [ ] Intelligence Received from LEAs
- [ ] Material from Publicly Available Information (e.g. adverse news, SFC alerts)
- [ ] Receipt of Search Warrant / Court Order
- [ ] Upstream Scam Intervention

2. Background of Person / Organisation

3. Details of Investigation / Transaction Analysis

4. Conclusions / Action Taken / Way Forward

Reporting Party | Subject | Organisation | Account | Transaction | Suspected Crimes | **Suspicious Indicator**

- Review Period
- Transactions and linkage with suspicious counterparts / third party, if any
- KYC / RFI result
- Open source information / details of the adverse news / sanction list with website links
- Findings on the digital footprints, if any

- Further review
- Exit relationship

05. STR Reporting in STREAMS 2
- Appropriate File Attachments

Transaction Records in Excel Format

Loan Application Forms

Relevant Documents obtained during CDD Process

Records of Digital Footprints, if any

Reporting Party | Subject | Organisation | Account | Transaction | Suspected Crimes | Suspicious Indicator

Attachment

Account Opening Mandate / Document(s)

No.	Person / Account Holder *

Detailed Transaction Record(s)

No.	Person / Account Holder *

Other Bank / Institution Document(s)

No.	Person / Account Holder *

Other Document(s)

No.

Our Observations

On STRs received from reporting entities

Common pitfalls	Suggestions
STR contains a group of **unrelated** subjects / did not specify their commonality in the narrative part	• If there is no correlation among the subjects, report STR separately for each subject; • If syndication is observed, specify the commonality in the narrative part
Only mention "**refer to Attachment**" in the narrative part of the STR	• Narrative comment should be included in STR Form. • Only transactions or supporting documents be provided in form of attachment
Report STR **solely** because other companies of the same group report STRs of the subject	• Compliance officers should critically review if the accounts of the same subject were used to channel illicit funds / related to terrorist financing

Feedback from JFIU

Acknowledgement of Receipt

Consent / No Consent / Not Applicable

Quarterly STR Analysis published by JFIU

Meetings with stakeholders

Upcoming Arrangement for STREAMS 2

Final UAT

- STR Submission
- Check STR status including consent decision
- Receive LNC and Notification Letters from Police

Seminar to different sectors

- Starting from October / November 2025

Enquiry Hotline (General)

- Senior Inspector Owen TSE
- Tel: 3660 0533 / Email: owencytse@police.gov.hk

Enquiry Hotline (Technical)

- System Analyst Mr. Christopher CHAN
- Tel: 3660 9682 / Email: christopherchan@police.gov.hk

TIMELINE OF LAUNCHING
STREAMS 2

01

Sept 2025

Deadline of submitting email address for STREAMS 2 login during UAT

02

Oct 2025

Final UAT for reporting entity

03

Oct - Nov 2025

Seminars for industries practitioners

04

Dec 2025 – Jan 2026

Arrange account opening of STREAMS 2

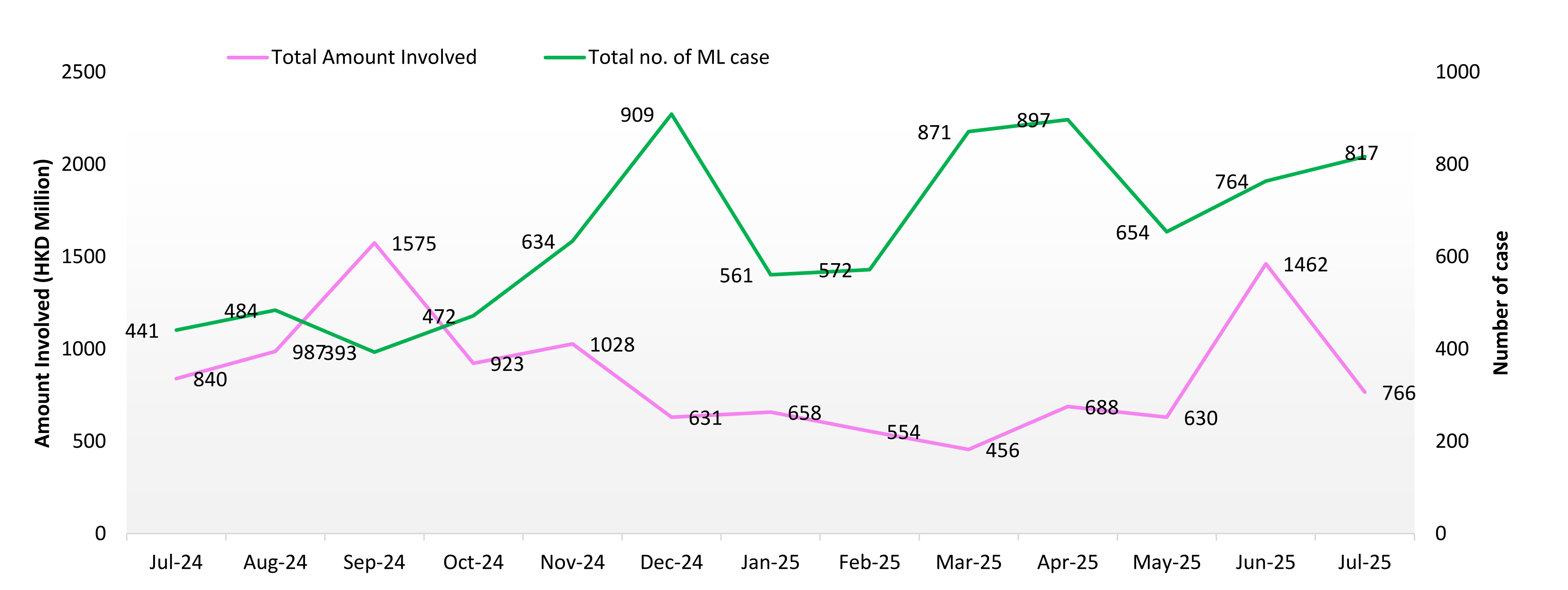
05

Jan 2026 (Tentatively)

Launch of STREAMS 2

06.
ML Landscape

Hong Kong ML Landscape



	Jan-Jul 2024	Jan-Jul 2025	Change
Total no. of ML case	3,808	5,136	⬆ 1,328 or 34.9%
Total Amount Involved (HKD)	8,651.4M	5,214.8M	⬇ 3,436.6 or 39.7%

Fraud/Deception remains at top threat

Domestic vs Other Jurisdictions

Hong Kong ML Landscape

Predicate Offence
• Fraud/Deception Related • Standalone ML • Theft/Robbery/Burglary/Blackmail • Organised Crime • Gambling • Loansharking • Drug Related • Vice • Tax Related • Corruption

Sector	
Financial Institutions: • Banking • SVF • Virtual Asset Service Provider • Money Lenders • Insurance • Securities • Money Service Operators	DNFBP: • Dealers in Precious Metals and Stones • Estate Agents • Trust and Company Service Providers • Lawyers • Accountants

07.
Common Typologies & Case Sharing

Common Typologies & Case Sharing

#1 Multiple suspicious applications were handled by the same agent

Agent assists in loan application

Use of forged documents

Bypass the CDD/KYC system

Common Typologies & Case Sharing

#2 Third Party Payment / Unknown Source of Fund

Paid by unrelated third party

Paid by cashier order / cash

Obscuring the true source of funds
and
Placing "dirty money" into financial system

Common Typologies & Case Sharing

#3 Early one-off repayment

Applied loans from various lenders

Paying off a debt faster then income would support

Used in the layering and the integration stage of the ML process


投入選舉 共創未來
Join the Election Together We Create the Future
2025立法會換屆選舉
Legislative Council General Election
12月7日
7 DEC
齊投票!
elections.gov.hk
2891 1001
投票箱
Ballot Box

Financial Intelligence and Investigation Bureau
Hong Kong Police Force

THANK YOU
FOR YOUR ATTENTION

More Information:
www.jfiu.gov.hk