清洗黑錢及恐怖分子資金籌集手法及舉報可疑交易

香港警務處 高級督察 岑凱怡

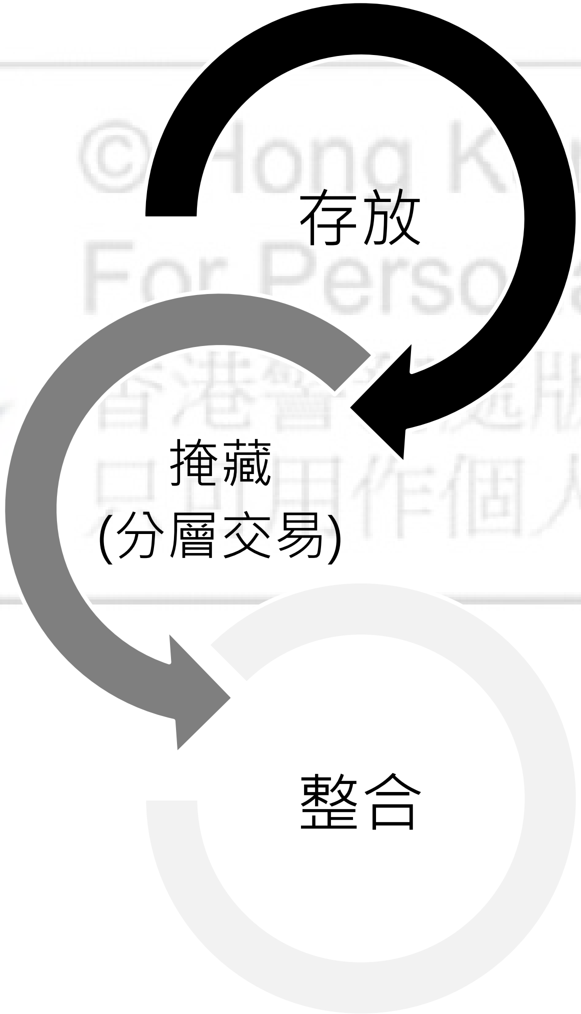
Joint Financial Intelligence Unit

- 關於聯合財富情報組
- 清洗黑錢及恐怖分子籌資活動一般方法
- 可疑交易報告 (STR)
- 可疑交易報告建議內容

關於聯合財富情報組

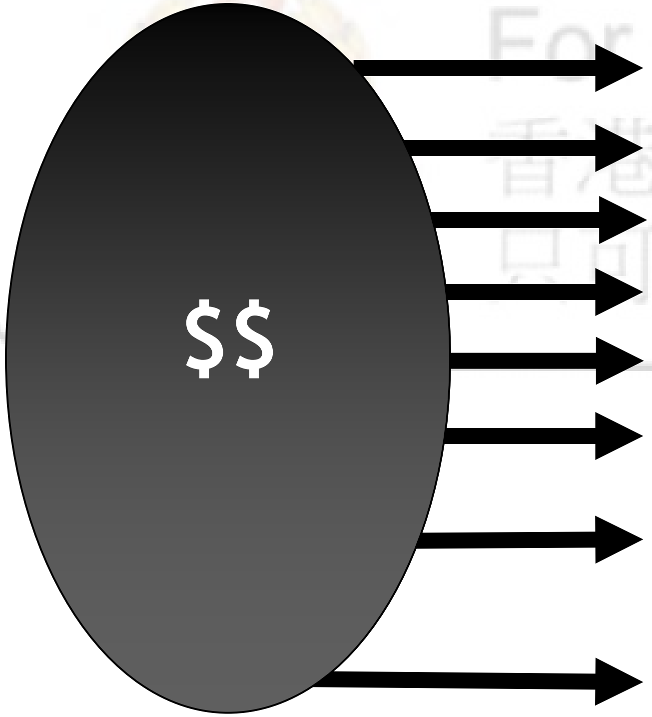
- 由香港警務處及香港海關人員組成
- 負責管理本港可疑交易舉報機制的唯一機構
- 與世界各地的財富情報單位及執法機關交換財富情報

清洗黑錢的一般方法



清洗黑錢的一般方法

- 階段一: 存放



現金偷運

各項商業活動、生意

匯款到外地

買賣貴重的物品

買賣外幣、虛擬貨幣

買賣證券、期貨

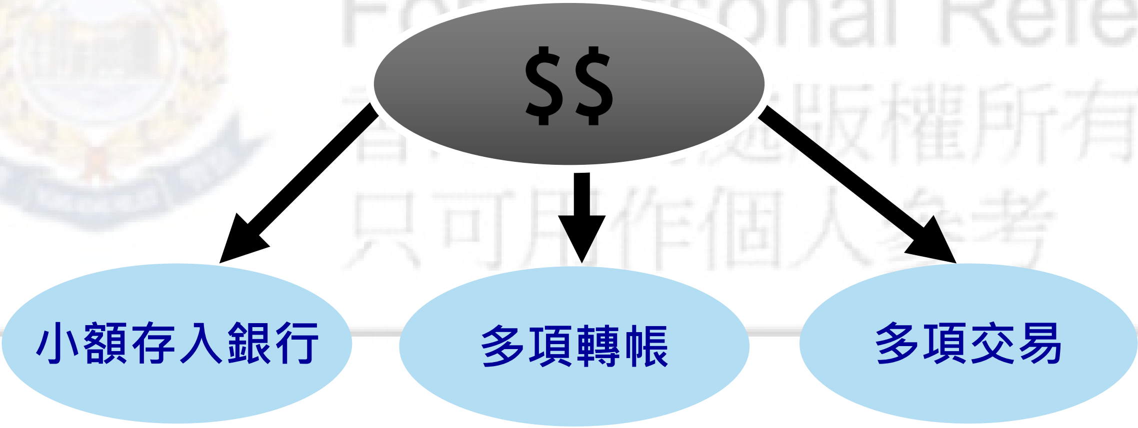
與合法得來的金錢混合，
然後存入銀行

買賣房地產

Joint Financial Intelligence Unit

清洗黑錢的一般方法

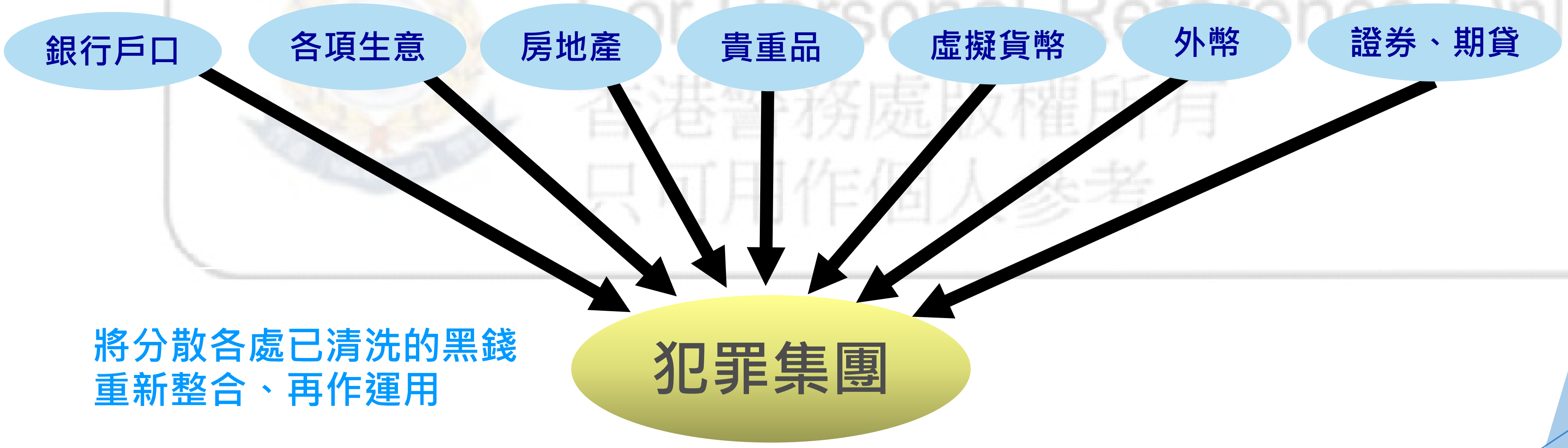
- 階段二: 分層交易



Joint Financial Intelligence Unit

清洗黑錢的一般方法

- 階段三: 整合



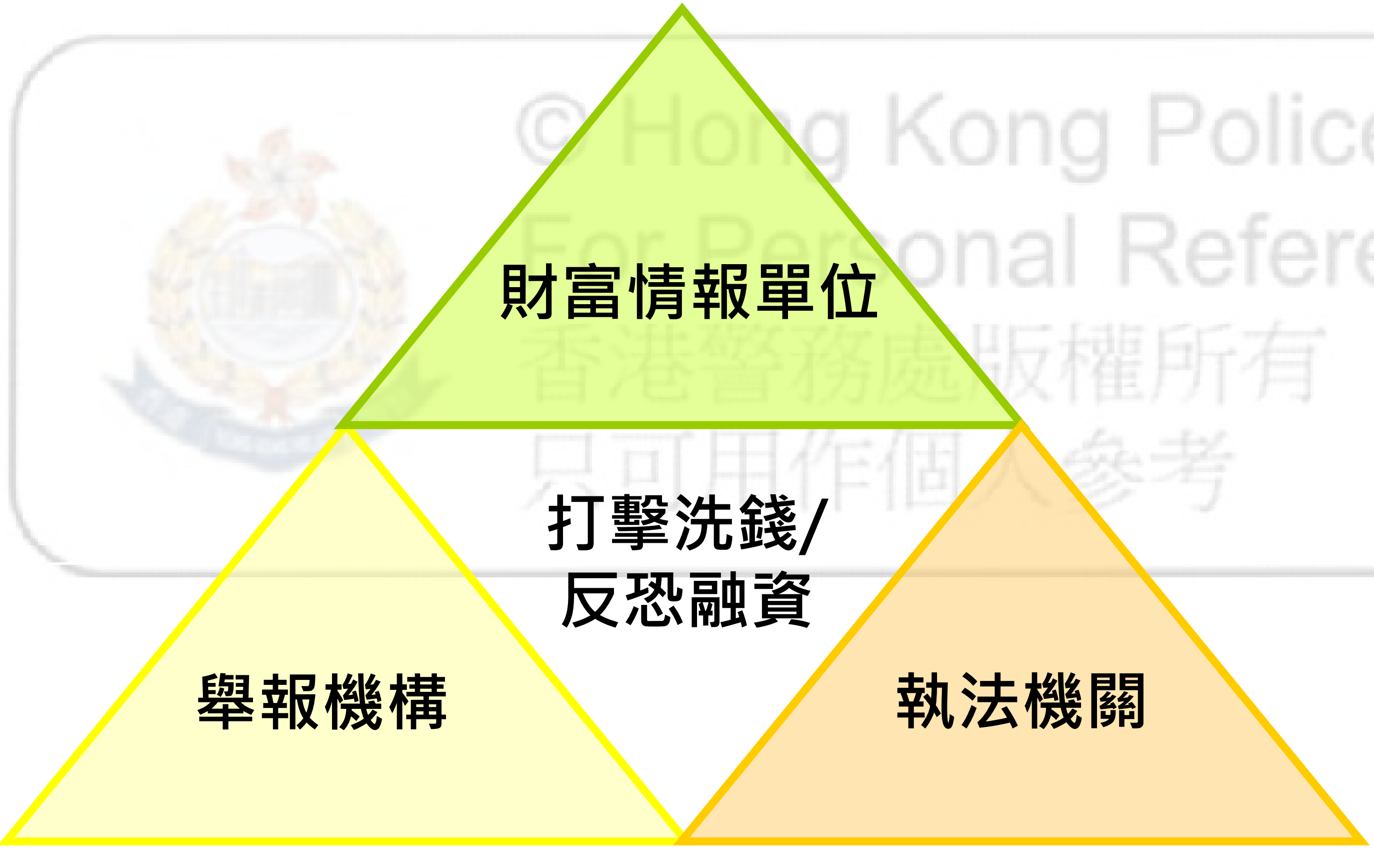
將分散各處已清洗的黑錢
重新整合、再作運用

恐怖分子籌資活動的一般方法

- 利用捐贈和非牟利機構
- 從犯罪或合法活動累積資金
- 運送實體現金
- 使用銀行帳戶和匯款服務

<u>* 本港受到恐怖襲擊的威脅程度 - “中度” 水平</u>

可疑交易報告(STR)作用



可疑交易報告(STR)作用

← 公私營機構合作→

舉報機構

金融機構及
指定非金融企業及行業

- 客戶盡職審查(CDD) + 認識你的客戶(KYC)
- 備存記錄
- 內部監控
- 提交可疑交易報告

財富情報單位

聯合財富情報組

- 可疑交易報告機制
- 情報交換
- 國際合作
- 培訓與外展

執法機關

警方、海關、廉政公署等

- 財富調查
- 資產追查
- 限制及沒收
- 相互法律協助

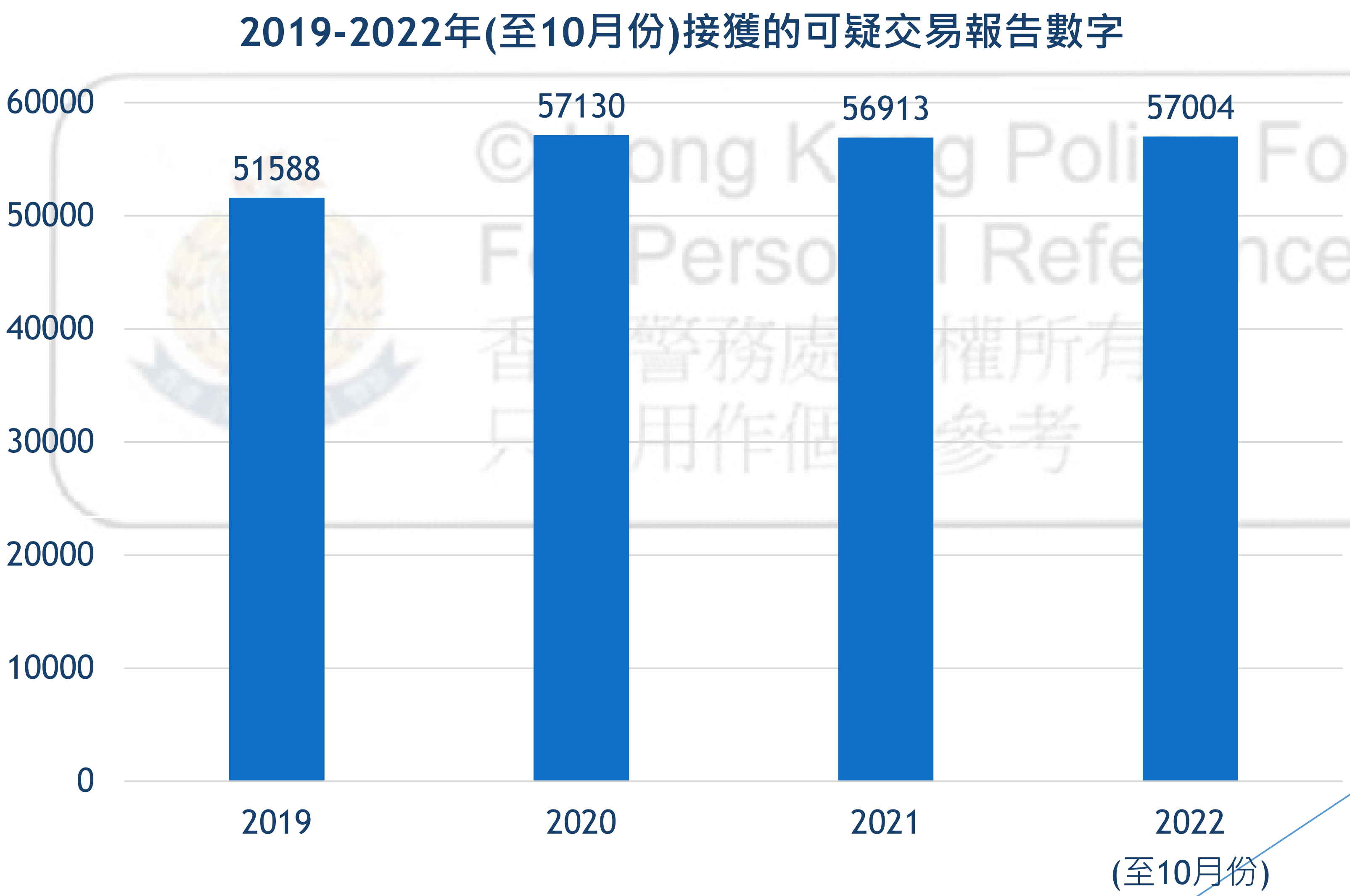
Joint Financial Intelligence Unit

可疑交易報告(STR)訊息流向

舉報機構	財富情報單位	執法機關
		
可疑交易報告	分析	財富調查
實用資訊	*情報*	*證據*

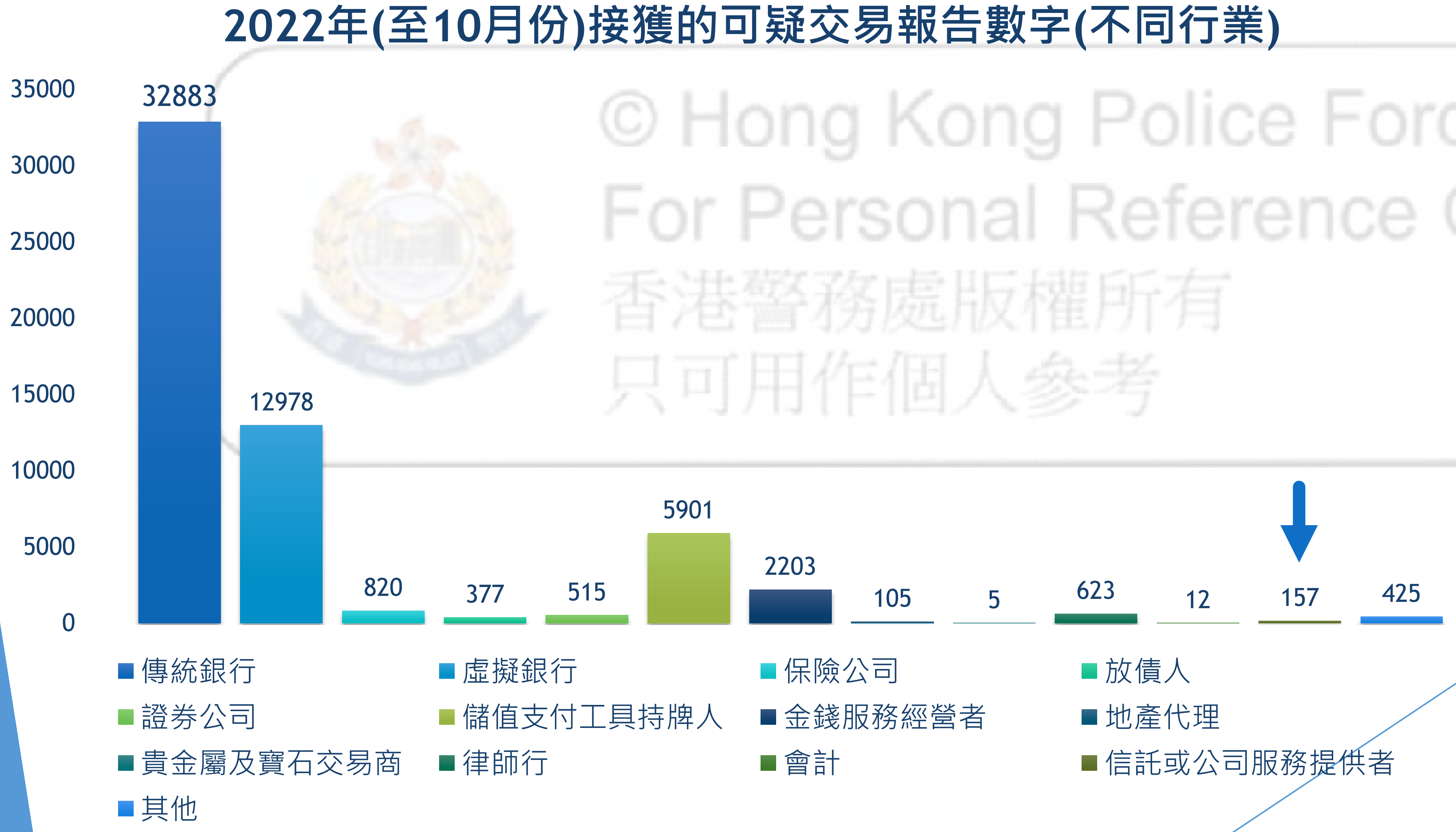
Joint Financial Intelligence Unit

可疑交易報告的統計資料



Joint Financial Intelligence Unit

可疑交易報告的統計資料



Joint Financial Intelligence Unit

可疑交易報告的統計資料

Joint Financial Intelligence Unit

可疑交易指標(信託或公司服務提供者)

- 多重司法管轄及 / 或公司實體的複雜結構及 / 或信託的設立毫無合理理由。
- 所作出或接收的本地或外地付款與公司實體的實際活動沒有清楚的連繫。
- 沒有合理經濟需要而使用離岸銀行戶口。
- 客戶不願意或拒絕提供有關他 / 她或信託 / 公司受益人的資料 / 文件證明。
- 款項的來源及 / 或目的地不明。
- 交易主要是現金為本的，而這些交易通常應透過其他付款設施進行。

可疑交易指標(信託或公司服務提供者)

- 客戶的背景與客戶所進行交易的價值或所代表的公司不相稱。
- 某公司成立的目的主要是收集不同來源的款項，其後這些款項轉帳至與該公司沒有明顯的聯繫的本地 / 外地銀行戶口。
- 由非居住於香港的人組成公司，但該人在所設立公司的司法管轄區內沒有連繫或活動。
- 某公司的資金流動與其基本業務活動並不相符。

‘SAFE’ 法則

Screen	審查涉事者的背景及交易
Ask	詢問適當問題，釐清情況
Find	翻查相關記錄，仔細覆核
Evaluate	評估有否理據，作出可疑報告

報告方式

怎樣向聯合財富情報組舉報？

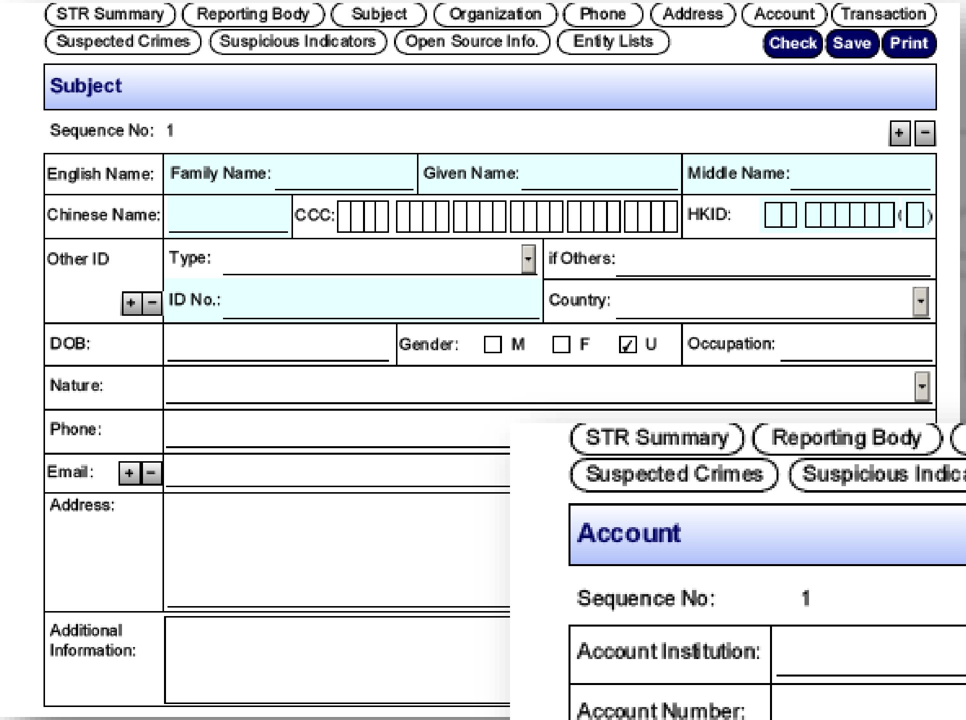
請以下列其中一種方式，遞交可疑交易報告：

- 網上舉報 – 可疑交易報告管理系統網上舉報表格
- 電郵 – 電郵地址jfiu@police.gov.hk
- 傳真 – 傳真號碼：(852) 2529 4013
- 郵遞 – 請寄往香港郵政總局信箱6555號聯合財富情報組收
- 電話 – (852) 2866 3366（只限於辦公時間內提供緊急報告之用）

如要經可疑交易報告管理系統舉報，請填寫 申請表 及交回聯合財富情報組(傳真 – 傳真號碼：(852) 2529 4013或 電郵 – 電郵地址jfiu@police.gov.hk). 如需進一步的資料，請聯絡聯合財富情報組人員。

STREAMS

標準設計的表格

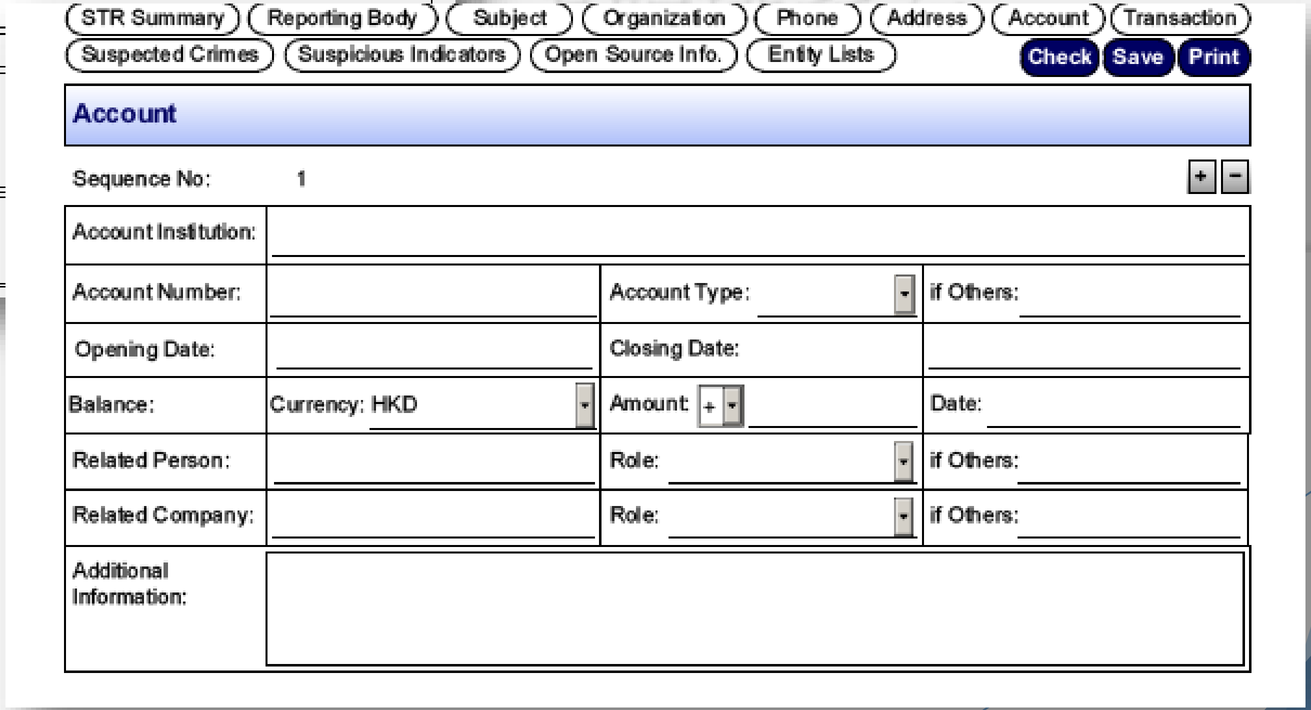


STR Summary | Reporting Body | Subject | Organization | Phone | Address | Account | Transaction
Suspected Crimes | Suspicious Indicators | Open Source Info. | Entity Lists | Check | Save | Print

Subject

Sequence No: 1

English Name: Family Name: Given Name: Middle Name:
Chinese Name: CCC: HKID:
Other ID Type: if Others:
ID No.: Country:
DOB: Gender: M F U Occupation:
Nature:
Phone:
Email:
Address:
Additional Information:



STR Summary | Reporting Body | Subject | Organization | Phone | Address | Account | Transaction
Suspected Crimes | Suspicious Indicators | Open Source Info. | Entity Lists | Check | Save | Print

Account

Sequence No: 1

Account Institution:					
Account Number:		Account Type:		if Others:	
Opening Date:		Closing Date:			
Balance:	Currency: HKD	Amount: +		Date:	
Related Person:		Role:		if Others:	
Related Company:		Role:		if Others:	
Additional Information:					

可疑交易報告填寫

STR Summary | Reporting Body | Subject | Organization | Phone | Address | Account | Transaction
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
1		KB
	Total	KB

可疑交易報告填寫

STR Summary | Reporting Body | Subject | Organization | Phone | Address | Account | Transaction
Suspected Crimes | Suspicious Indicators | Open Source Info. | Entity Lists | Check | Save | Print

Reporting Body

Organization ID:	
Organization Name:	
Reporting Officer ID:	
Reporting Officer:	
Organization Reference:	
Phone:	
Fax:	
Email:	

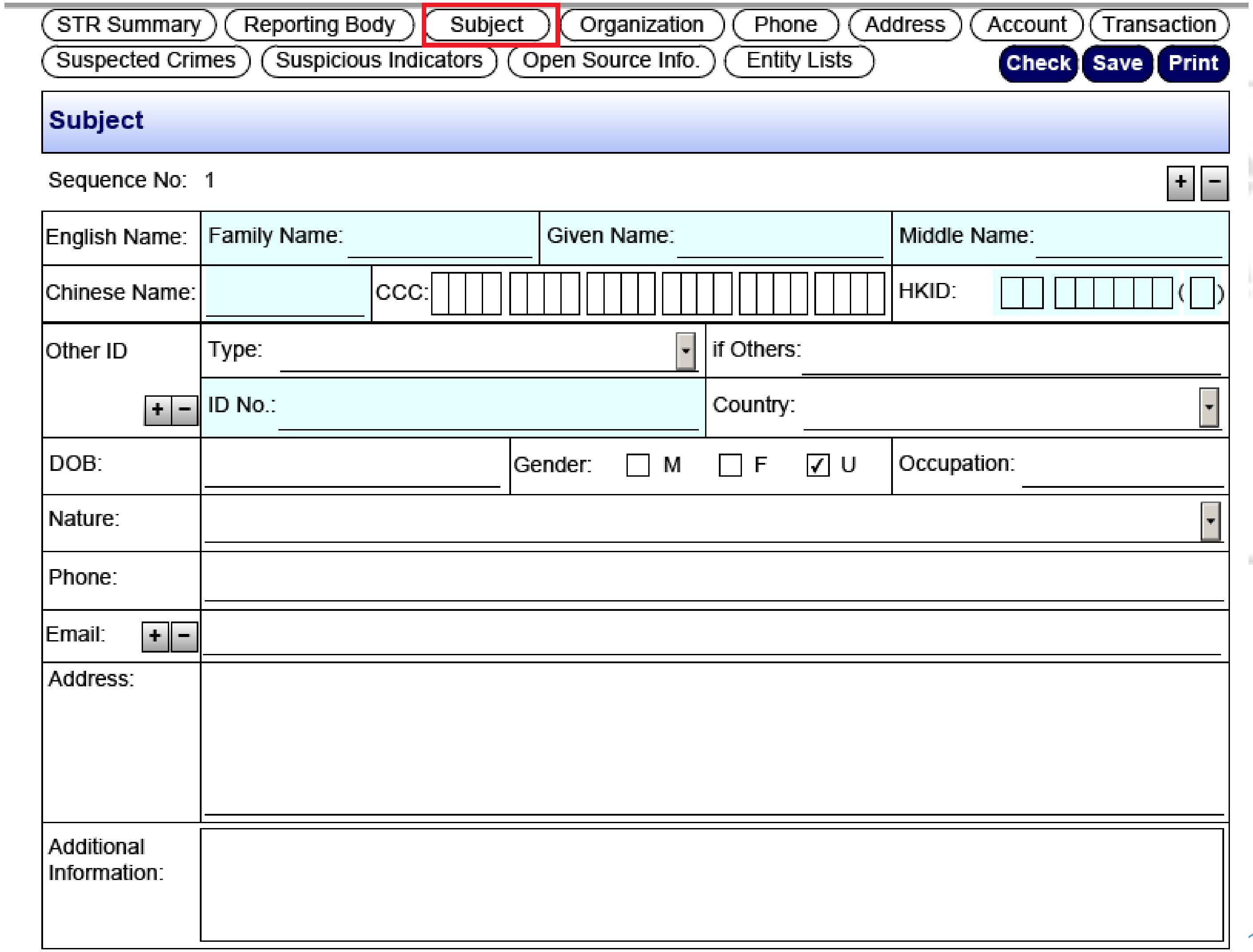
***Reason for Disclosure:**

Drug Trafficking (ROP) Ordinance [Cap.405]:	☐
Organized and Serious Crimes Ordinance [Cap. 455]:	☑
United Nations (Anti-Terrorism Measures) Ordinance [Cap. 575]:	☐
National Security Law:	☐

Other Information:

This Disclosure Related to a Previous Disclosure:		☑ Yes ☐ No	
JFIU Reference:		Your Reference:	

可疑交易報告填寫


STR Summary | Reporting Body | Subject | Organization | Phone | Address | Account | Transaction
Suspected Crimes | Suspicious Indicators | Open Source Info. | Entity Lists | Check | Save | Print

Subject

Sequence No: 1

English Name: Family Name: Given Name: Middle Name:
Chinese Name: CCC: HKID:
Other ID Type: if Others:
ID No.: Country:
DOB: Gender: M F U Occupation:
Nature:
Phone:
Email:
Address:
Additional Information:

可疑交易報告填寫

STR Summary | Reporting Body | Subject | Organization | Phone | Address | Account | Transaction
Suspected Crimes | Suspicious Indicators | Open Source Info. | Entity Lists

Check | Save | Print

Organization

Sequence No: 1

English Name:					
Chinese Name:		Date of Incorporation:			
Local Company: ☐	BR No.:	CR No.:	Public Listed Company No.:		
Oversea Company: ☐	Country:		Reg. No.:		
Non-Government Organization:	☐Yes ☐No	Charitable Organization:	☐Yes ☐No		
Nature:		Business Nature:			
Phone:					
Email:					
Address:					
Related Person:		Role:		if Others:	
Related Company:		Role:		if Others:	
Additional Information:					

可疑交易報告填寫

STR Summary | Reporting Body | Subject | Organization | Phone | Address | Account | Transaction

Suspected Crimes | Suspicious Indicators | Open Source Info. | Entity Lists

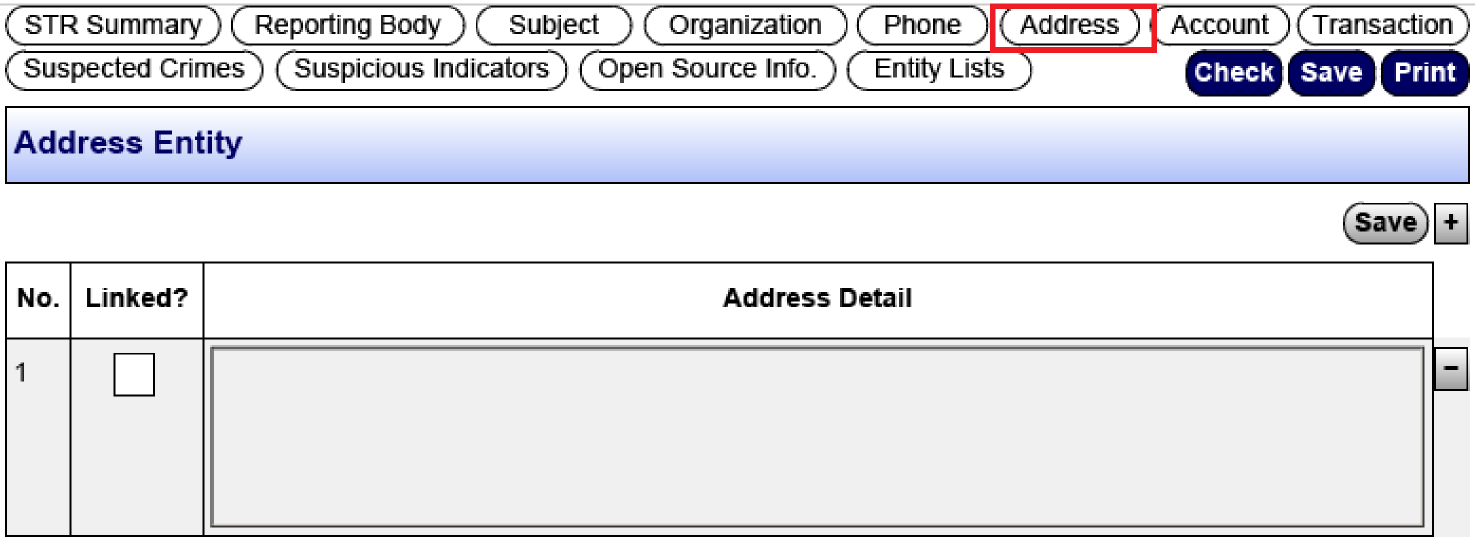
Check **Save** **Print**

Phone Entity

Save **+**

No.	Linked?	Country Code	Area Code	* Subscriber Number	Extension
1	☐				

可疑交易報告填寫


STR Summary
Reporting Body
Subject
Organization
Phone
Address
Account
Transaction
Suspected Crimes
Suspicious Indicators
Open Source Info.
Entity Lists
Check
Save
Print
Address Entity
Save
+
No.
Linked?
Address Detail
1
−

可疑交易報告填寫

STR Summary | Reporting Body | Subject | Organization | Phone | Address | Account | Transaction

Suspected Crimes | Suspicious Indicators | Open Source Info. | Entity Lists

Check **Save** **Print**

Account

Sequence No: 1 + −

Account Institution:			
Account Number:		Account Type:	if Others:
Opening Date:		Closing Date:	
Balance:	Currency: HKD	Amount: +	Date:
Related Person:		Role:	if Others:
Related Company:		Role:	if Others:
Additional Information:			

可疑交易報告填寫

STR Summary | Reporting Body | Subject | Organization | Phone | Address | Account | Transaction

Suspected Crimes | Suspicious Indicators | Open Source Info. | Entity Lists

Check | Save | Print

Summary of Suspicious Transaction in the Reviewed Period

+ − ...

No.	From (Date)	To (Date)	Subject	Type	Currency	Amount
1					HKD	+
	Transaction Branch:					
	Transaction Counterpart:			A/C:		Others:
Remark:						

* Total Amount of Suspicious Transactions Reported (in HKD)

* Total Period covering the Suspicious Transactions (in days)

* Daily Average of the Suspicious Transactions Reported

可疑交易報告填寫

STR Summary | Reporting Body | Subject | Organization | Phone | Address | Account | Transaction

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

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

Designated Categories of Offences by FATF

Clear Checkbox

- ☐ Participation in an Organized Criminal Group and Racketeering
- ☐ Terrorism including Terrorist Financing
- ☐ Trafficking in Human Beings and Migrant Smuggling
- ☐ Sexual Exploitation including Sexual Exploitation of Children
- ☐ Illicit Trafficking in Narcotic Drugs and Psychotropic Substances
- ☐ Illicit Arms Trafficking
- ☐ Illicit Trafficking in Stolen and Other Goods
- ☐ Corruption and Bribery
- ☐ Fraud
  - ☐ Email Scam
  - ☐ Investment Scam
  - ☐ Romance Scam
  - ☐ Telephone Deception
  - ☐ Others (Please specify)
- ☐ Counterfeiting Currency
- ☐ Counterfeiting and Piracy of Products
- ☐ Environmental Crime
- ☐ Murder, Grievous Bodily Injury
- ☐ Kidnapping, Illegal Restraint and Hostage-Taking
- ☐ Robbery or Theft
- ☐ Smuggling (including in relation to customs and excise duties and taxes)
- ☐ Tax Crimes (related to direct taxes and indirect taxes)
- ☐ Extortion
- ☐ Forgery
- ☐ Piracy
- ☐ Insider Trading and Market Manipulation

- ☐ Money Laundering
  - ☐ Self Laundering
  - ☐ Third-Party Laundering
- ☐ No Crime Related
- ☐ Other (Please specify in 'Additional Information')

Additional Information:

可疑交易報告填寫

STR Summary | Reporting Body | Subject | Organization | Phone | Address | Account | Transaction
Suspected Crimes | Suspicious Indicators | Open Source Info. | Entity Lists | Check | Save | Print

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

Fund Movement Pattern

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

Accounts

- ☐ Shell Company
- ☐ Account Operated/Controlled by Third-Party other than Signatory/Account Holder
- ☐ Non-Resident Personal Account
- ☐ Offshore Company
- ☐ N/A

Customer Background/Behavior Clear Checkbox

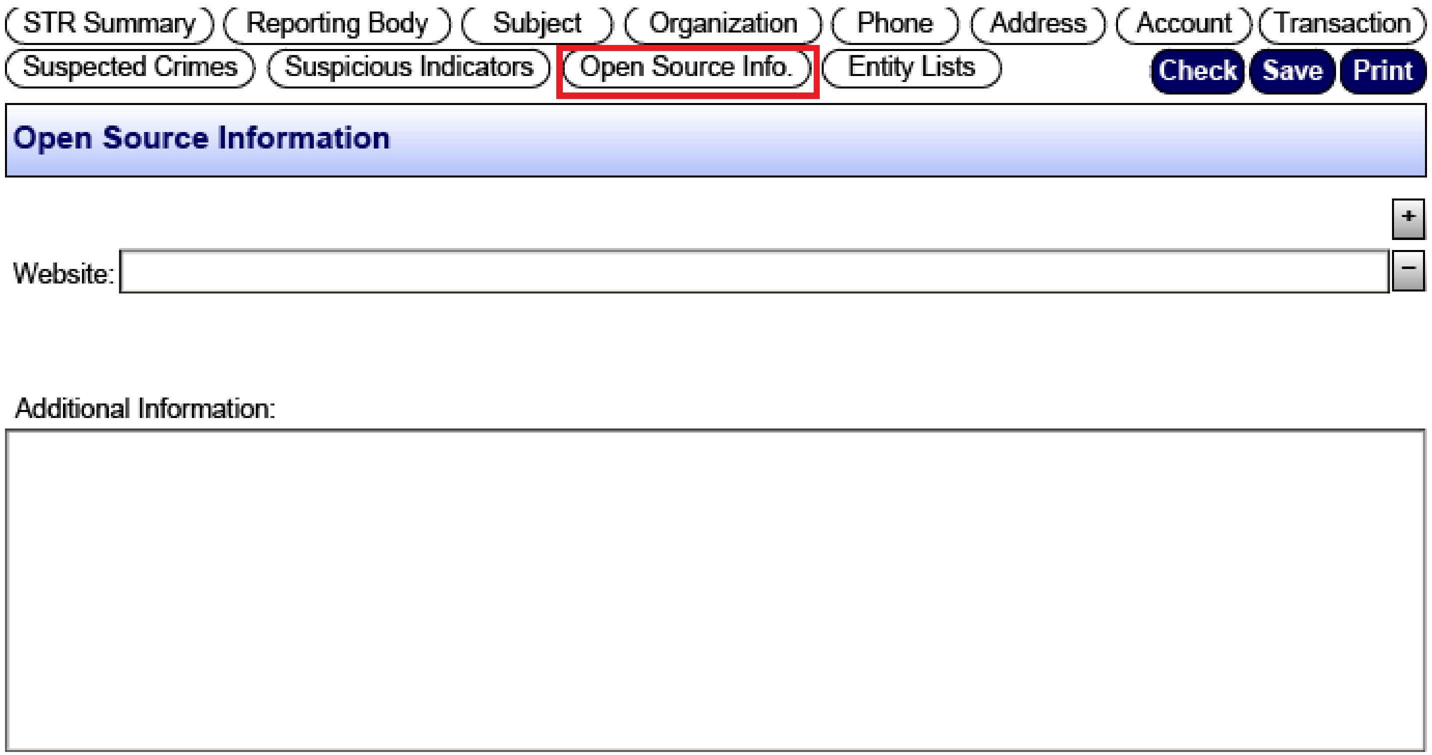
- ☐ Transactions/ Amount Incommensurate with the Background of the Person / Business
- ☐ Suspected Money Courier/Unlicensed Money Service Operator
- ☐ Politically Exposed Persons (PEP)
- ☐ Customer Insisted to Use Less Secured Transactions
- ☐ Customer Evasive/Reluctant to Provide Information
- ☐ Suspected Counterfeit Document Presented by the Customers
- ☐ N/A

Others Clear Checkbox

- ☐ Casino related Suspicious Transaction
- ☐ Charitable Organization/NPO related Suspicious Transaction
- ☐ Others (Please Specify)
- ☐ N/A

Narrative comment about the questioned transactions:

可疑交易報告填寫


STR Summary
Reporting Body
Subject
Organization
Phone
Address
Account
Transaction
Suspected Crimes
Suspicious Indicators
Open Source Info.
Entity Lists
Check
Save
Print
Open Source Information
Website:
Additional Information:

可疑交易報告填寫

STR Summary | Reporting Body | Subject | Organization | Phone | Address | Account | Transaction
Suspected Crimes | Suspicious Indicators | Open Source Info. | Entity Lists | Check | Save | Print

Entity Lists

Subject List

No.	Linked	English Name	Chinese Name	HKID	Other ID No.	Country	Occupation
1							

Organization List

No.	Linked	Company Name	Registration Type	Person Name	Person Role	Company Name	Company Role
1							

Phone List

No.	Country Code	Area Code	* Subscriber Number	Extension
1				

Account List

No.	Account Number	Account Type	Person Name	Person Role	Company Name	Company Role
1						

Address List

No.	Address Detail
1	

可疑交易報告建議內容

1) 觸發報告原因

2) 報告對象背景

3) 交易

4) 查詢及公開資料

5) 總結及跟進

可疑交易報告建議內容

1) 觸發報告原因

- 有關罪案 (詐騙，貪污，國際制裁，恐怖主義行為等)
- 收到搜查令 / 其他法庭命令，案件編號 、調查隊伍 (如有)
- 公開資料 (新聞消息，監管機構名單等)
- 可疑交易模式 (大額現金，資金短暫停留等)

2) 報告對象背景

- 個人: 年齡，職業，收入，過往交易紀錄等
- 公司: 成立日期，業務性質，預期交易額等

可疑交易報告建議內容

3) 交易

- 審查時段
- 過往交易模式 (突然改變？)
- 總存款 / 提款額
- 可疑交易 (不只限於大量 / 大額交易)
- 可疑交易模式

可疑交易報告建議內容

4) 查詢及公開資料

- 帶出可疑指標的查詢 (KYC查詢，world check結果等)
- 公開資料的連結

5) 總結及跟進

- 報告總結
- 跟進行動 (進一步審查，終止客戶關係等)

可疑交易報告意見回饋

- 接到報告的收條
- 同意/ 不同意處理書、不適用
- 可疑交易報告季度分析報告

謝謝！

網頁 ： www.jfiu.gov.hk

電郵 ： jfiu@police.gov.hk

Joint Financial Intelligence Unit