

2013

Joint Financial Intelligence Unit Annual Report



Joint Financial Intelligence Unit
聯合財富情報組



Vision and Mission

Vision

That the Joint Financial Intelligence Unit (JFIU) remains one of the leading FIUs in the Asia-Pacific Region

Mission

That JFIU will continue to assist the Government in her efforts to protect Hong Kong from the illicit activities of money laundering and terrorist financing by:

- **J**uxtaposing JFIU's professional standards with the relevant international standards
- **F**ostering and strengthening cooperation with local and international agencies in the exchange of financial intelligence
- **I**ntelligently analyzing suspicious transaction reports received by JFIU and making disseminations as appropriate
- **U**pggrading the relevant sectors' awareness and understanding on money laundering and terrorist financing issues



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1 Preface

The JFIU is jointly staffed by officers of the Hong Kong Police Force (HKPF) and the Hong Kong Customs and Excise Department (C&ED). It is the sole agency in Hong Kong to receive, analyze and disseminate Suspicious Transaction Reports (STRs), and facilitate financial intelligence exchange with Financial Intelligence Units (FIUs) worldwide.

This Annual Report highlights a wide spectrum of operations carried out by JFIU in combating money laundering and terrorist financing in Hong Kong:

- Cultivation, analysis, dissemination of financial intelligence, and research on money laundering and terrorist financing case typologies;
- Coordination with anti-money laundering/combating the financing of terrorism (AML/CFT) stakeholders including policy bureaux, financial regulators and professional bodies in respect of policies, legislation, operations and other topical issues;
- Enhancement of awareness and understanding on AML/CFT matters through financial investigation training and other outreach seminars to local and overseas law enforcement agencies (LEAs), FIUs, financial institutions (FIs) or designated non-financial businesses and professions (DNFBPs); and
- International cooperation with FIUs and LEAs.





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Message from the Head of JFIU

A robust and effective AML/CFT regime is crucial to Hong Kong to uphold the stability and integrity of its financial system as well as its status and reputation as one of the world's major financial centres. Over the past 25 years, the JFIU has been collaborating with government policy bureaux and private sectors to fight against money laundering and terrorist financing activities.

The JFIU manages the suspicious transaction reporting regime in Hong Kong, but the quantity and quality of STRs could not have been maintained and improved without the concerted efforts of the local regulators, professional bodies, FIs and DNFBPs. The annual figure of STRs received has been rising year by year, and it reached a record high of 32,907 in 2013, an increase of 41.3% from that of 2012. The JFIU appreciates the increased level of awareness from the reporting entities and welcomes continuous reporting through STRs, and at the same time places emphasis on the quality of STRs. The JFIU looks forward to more substantial details in each STR, which may lead to higher likelihood of intelligence cultivation and hence yield higher value to the investigation conducted by authorities or intelligence exchange with FIU counterparts.

I would also wish to take this opportunity to reiterate that it is a legal obligation in Hong Kong for any person, not limited to personnel from FIs and DNFBPs, to file STRs when he/she knows or suspects that any property is or represents proceeds of crime or terrorist property. However, filing an STR to the JFIU is never equivalent to making a formal report of crime to the HKPF or other enforcement agencies. If any person believes a crime has occurred, he/she should not hesitate to make a formal report to Police instead of filing an STR.

To better handle the anticipated volume of STRs in the months to come, the JFIU has been fine-tuning the overall STR analysis workflow. The incremental review and improvement of it were JFIU's top priority in 2013 and they will continue to be JFIU's direction in 2014.

The other challenge faced by JFIU is the coordination of the effort of HKPF in preparation for the 4th round of Mutual Evaluation of Hong Kong by the Financial Action Task Force (FATF). The JFIU will continue to make the best use of available resources to complete the induced workload and facilitate the AML/CFT efforts of HKPF and other stakeholders.



Cyril MAK
Superintendent of Police
Head of JFIU, Hong Kong



3 About JFIU

History and Establishment

In 1989, the JFIU was first set up under the Financial Investigation Division (FID) of Narcotics Bureau (NB) of the HKPF as the designated unit in Hong Kong to receive, analyze and disseminate STRs for the purpose of managing the suspicious transaction reporting regime as required by the Drug Trafficking (Recovery of Proceeds) Ordinance (DTROP) enacted in the same year and the Organized and Serious Crimes Ordinance (OSCO) since 1994. After the promulgation of United Nations (Anti-Terrorism Measures) Ordinance (UNATMO) in 2002, the JFIU has also been receiving STRs related to terrorist property.

In 2010, the JFIU expanded to the current structure and relocated its office within the Police Headquarters.

In 2012, the Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance (AMLO) was enacted to codify Hong Kong's money laundering preventive measures on customer due diligence (CDD) and record keeping requirements. This indirectly calls for more detailed and informative STRs to the JFIU and leads to a more crucial role of the JFIU in combating money laundering and terrorist financing.

The JFIU has been evolving not only to play its part in the local AML/CFT regime, but also to align with international standards. In 1996, the JFIU joined the Egmont Group of Financial Intelligence Units (Egmont Group) as a member. Officers of the JFIU also formed part of the Hong Kong Delegation and actively participated in the activities of FATF and the Asia/Pacific Group on Money Laundering (APG) since Hong Kong joined the two organizations in 1991 and 1997 respectively.

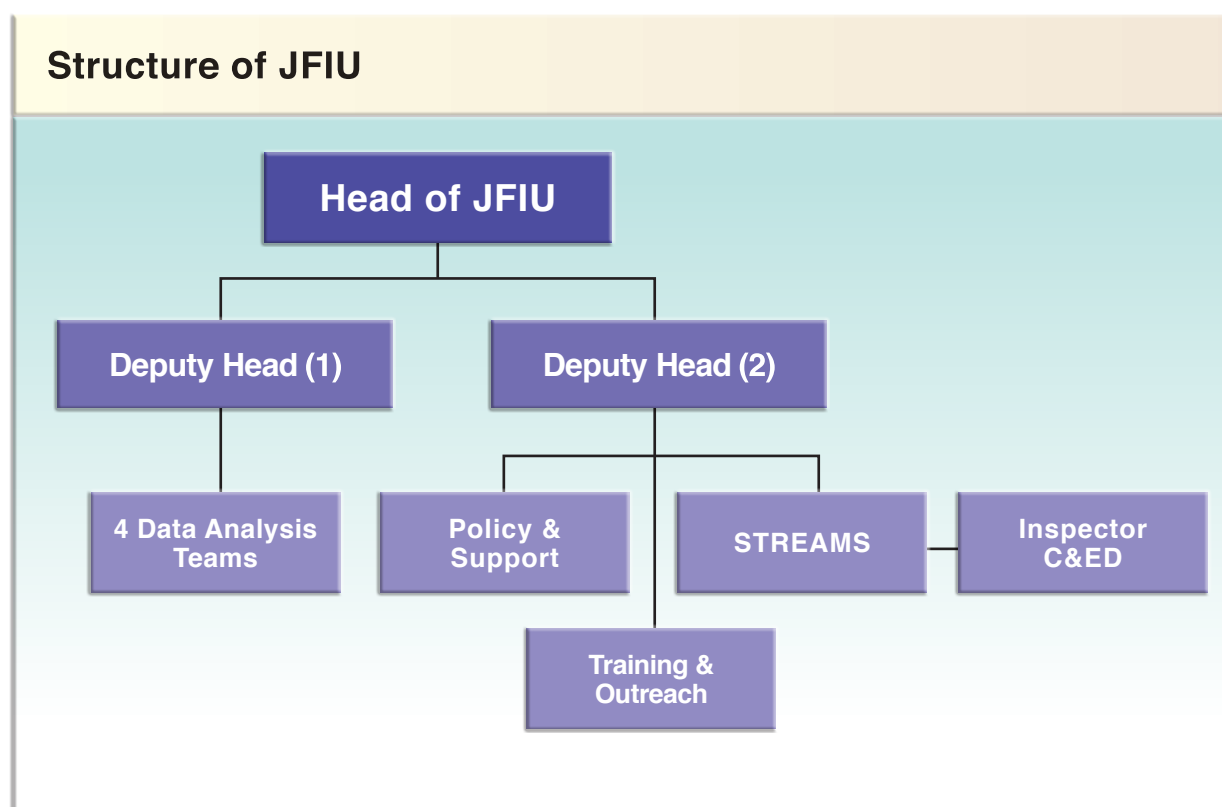
Organization and Work

At present, the Head of JFIU (Superintendent of Police) commands two Deputy Heads, each leading a functional section (JFIU 1 & JFIU 2):

The JFIU 1 (Intelligence Analysis and Development), comprising four analysis teams, conducts analysis and risk assessments, and cultivates intelligence on money laundering and terrorist financing from STRs for further dissemination.

The JFIU 2 (Policy & Support), comprising three teams, oversees the Suspicious Transaction Report and Management System (STREAMS, a web-based platform facilitating the e-reporting or dissemination of STRs); formulates policy and

maintains international cooperation and intelligence exchange with FIU counterparts; and coordinates financial investigation specialist training and publicity outreach programmes particularly to FIs and DNFBPs.



AML/CFT Stakeholders

The JFIU has been working closely with other stakeholders in Hong Kong's AML/CFT regime, including Hong Kong Special Administrative Region Government's policy bureaux, i.e. the Financial Services and the Treasury Bureau (FSTB) and the Narcotics Division of the Security Bureau (SB (Narcotics)), regulatory and professional bodies, private sectors like FIs and DNFBPs that are more prone to money laundering activities, FIUs and LEAs in the Greater China Region and worldwide. The long-term collaboration between JFIU and all these stakeholders contributes to the compliance with international AML/CFT standards and the improvement in the local AML/CFT regime.

4 Suspicious Transaction Reporting

Suspicious Transaction Reporting Regime

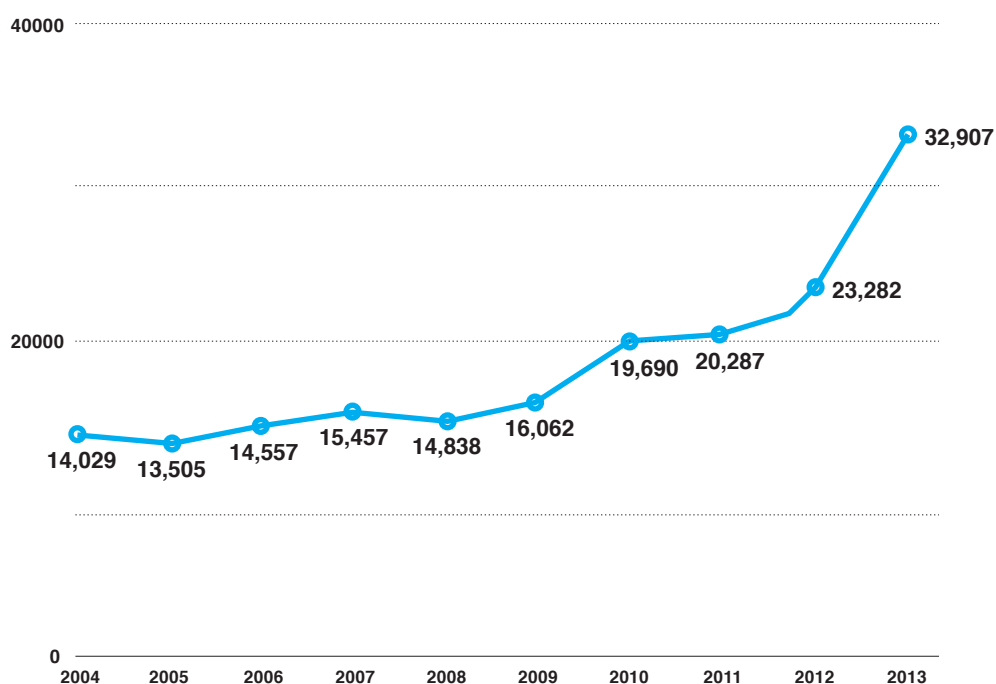
Under section 25A of DTROP, Cap. 405 and OSCO, Cap. 455 as well as section 12 of UNATMO, Cap. 575 of the Laws of Hong Kong, any person who knows or suspects any property is or represents proceeds of crime or terrorist property has to report his knowledge or suspicion to an authorized officer (i.e. JFIU officer) by way of an STR.

STR Submission Trends

STR Filings per Annum

During the last decade, the annual total number of STRs received by the JFIU has been rising steadily. In 2013, the number of STRs received marked a record high of 32,907, being double of that in 2009 (16,062) and an increase of 41.3% when compared to that in 2012 (23,282).

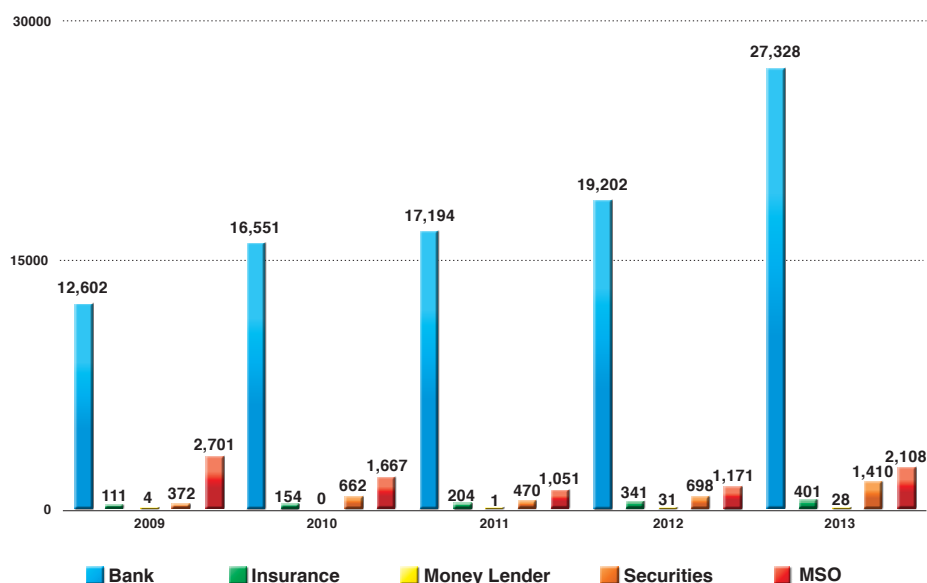
Number of STRs Received from 2004 to 2013



STR Filings by Sectors

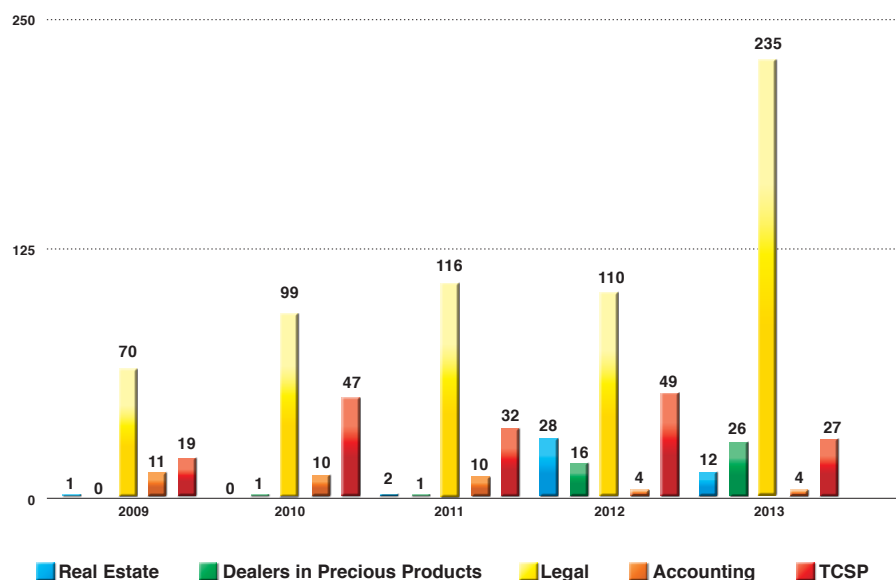
In the past five years, the FIs accounted for 95% of the annual total STR submissions, with banking sector as the major contributor.

Number of STRs Filed by Financial Sector from 2009 to 2013



The total number of STRs from the DNFBPs (304) was about 1% of the annual total number of STRs received by the JFIU in 2013. Through continuous engagement with the DNFBPs, it is noted that the filing trend is on the rise and the figure in 2013 represents a threefold increase when compared to the figure in 2009.

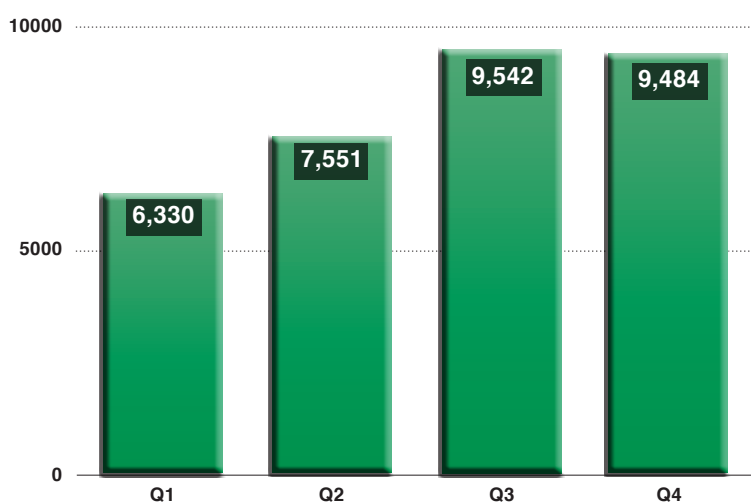
Number of STRs Filed by DNFBPs from 2009 to 2013



Suspicious Transaction Reporting in 2013

The quarterly breakdown of STRs received in 2013 is as follows.

Quarterly Breakdown of STRs Received in 2013



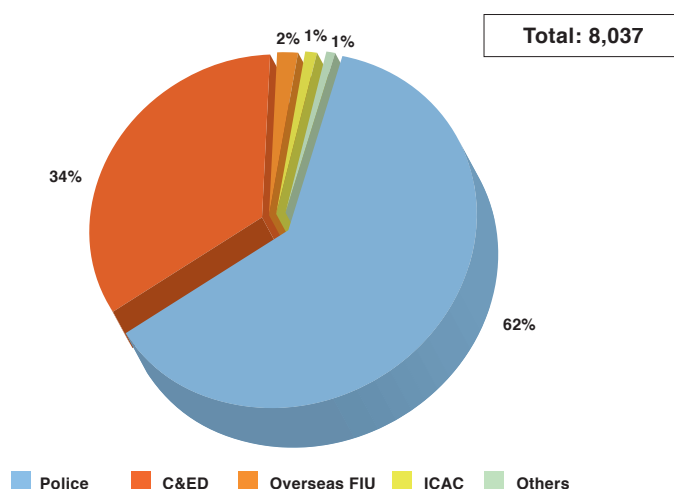
The yearly breakdown by category of reporting entities in 2013 shows that the banking sector and Money Service Operators (MSO) are the main STR contributors:

Sector	No. of STRs received in 2013	%
FIs		
Banks	27,328	83.05
Insurance Companies	401	1.22
Securities Firms	1,410	4.29
Money Service Operators (MSO)	2,108	6.41
Money Lenders	28	0.09
DNFBPs		
Real Estate Agents	12	0.04
Dealers in Precious Products	26	0.08
Legal Firms	235	0.72
Accounting Firms	4	0.01
Trust & Company Service Providers (TCSP)	27	0.08
Others	1,328	4.01
Total	32,907	100

Dissemination of STRs in 2013

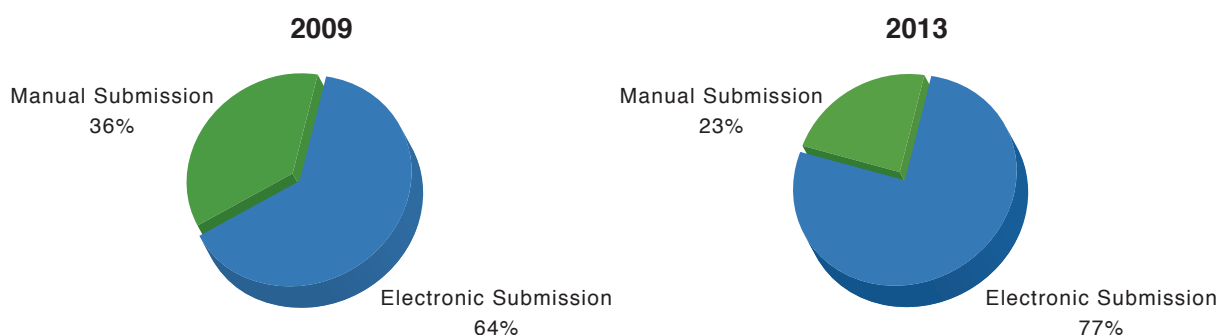
The JFIU contributes to the investigations undertaken by local LEAs and overseas FIUs through dissemination of financial intelligence obtained from STRs and other intelligence sources. Among the 8,037 cases disseminated by the JFIU to LEAs and FIUs in 2013, the HKPF (62%) and the C&ED (34%) were the major recipients.

Dissemination of Financial Intelligence in 2013



STREAMS

Since 2006, a secure web-based platform known as STREAMS has been rolled out for receiving, analyzing, storing and disseminating STRs. By installing a software application known as "S-Box II" in their computers, reporting entities can file STRs electronically to the JFIU. Electronic submission of STRs has been increasing in recent years, as shown in the below charts.



To cope with the increasing demand of STR reporting and evolving need for intelligence analysis by stakeholders in the AML/CFT regime, STREAMS is undergoing a major system enhancement to further improve its capacity and functionality. The upgrade is scheduled for completion by the end of 2015.

5 Case Examples and Typologies

The JFIU has been working closely with the HKPF and the C&ED in combating money laundering activities and confiscating proceeds of crime. Five recent significant investigations are selected to showcase the efforts of the HKPF and the C&ED, and to outline some prevailing money laundering patterns and trends.

Case Example 1 Money Laundering Related to Unlicensed Money Service Operator (UMSO)

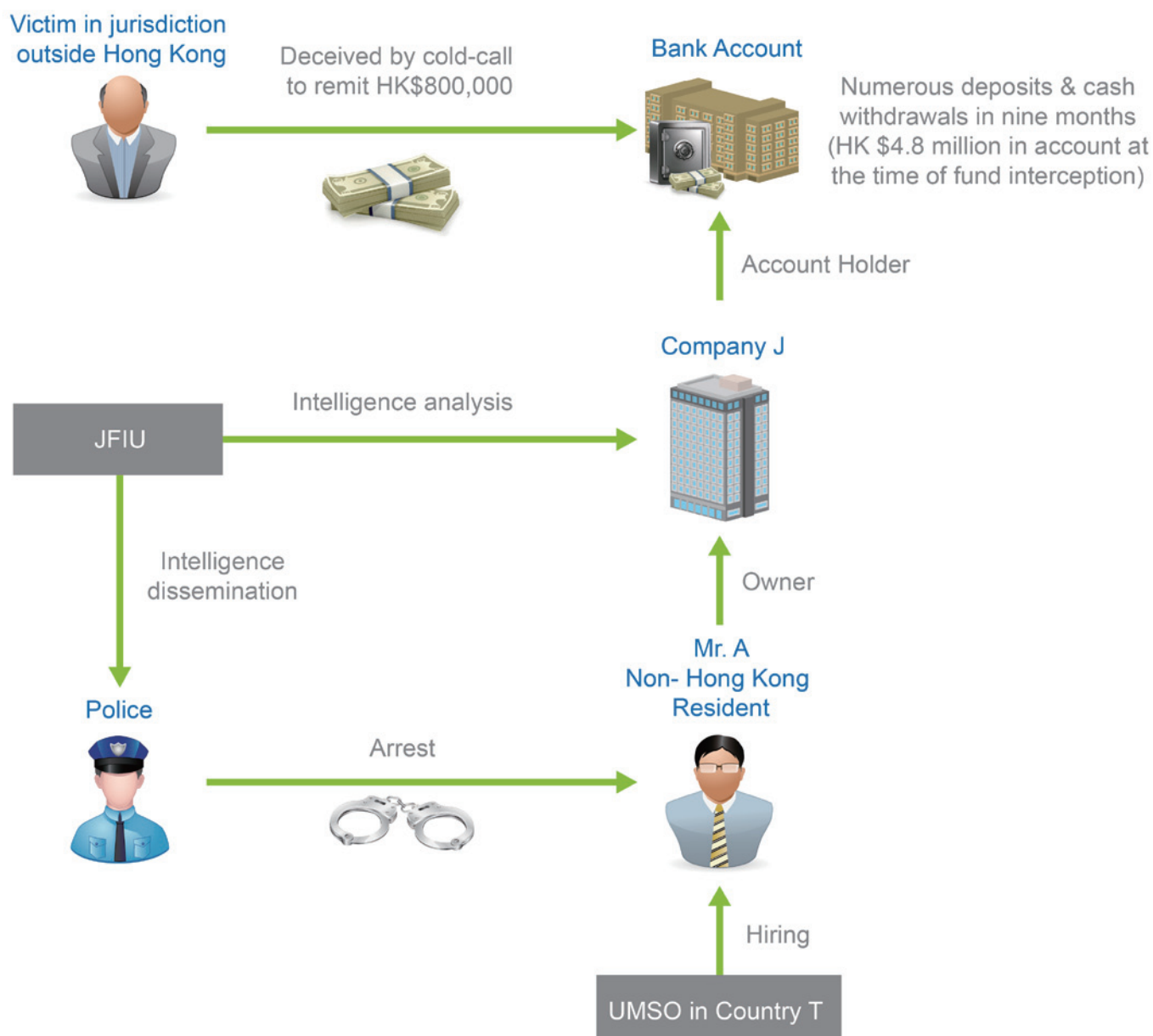
In April 2010, intelligence indicated that the bank account held by Company J in Hong Kong had recorded voluminous transactions. Mr. A, a non-resident of Hong Kong, was the beneficial owner and sole signatory of the company account. The bank account had received about HK\$800,000 from a victim of a telephone deception case in another jurisdiction. Initial analysis by JFIU revealed that the account activities were highly suspicious with exceptionally high turnover and were not commensurate with the business nature of Company J. The case was disseminated to the FID NB for investigation.

In-depth investigation found that the account had a total turnover of HK\$13 billion between August 2009 and April 2010. The average monthly turnover amounted to HK\$107 million. The account activities showed that it was used for temporary repository of funds with numerous transactions that complicated the fund flow and audit trail.

In January 2012, Mr. A under arrest claimed that he was employed by a UMSO in Country T to open the bank account in Hong Kong. The account was used as a conduit to facilitate fund transfers as instructed by their clients. Such UMSOs turn a blind eye to the nature of transactions and identities of their clients, so they are prone to be abused by criminals and their associates to launder crime proceeds at a cross-jurisdiction scale. These omissions have indirectly facilitated criminals to commit crimes such as corruption, deception, drug trafficking and tax evasion, etc.

In 2013, Mr. A was convicted of money laundering and sentenced to 10 years and 6 months' imprisonment. A Confiscation Order was later granted against Mr. A's bank accounts to confiscate HK\$5.3 million.

This money laundering case was tried in the Court of First Instance with the defendant convicted by jury. The amount of crime proceeds involved and the sentence awarded were the highest of its kind in Hong Kong.



Case Example 2

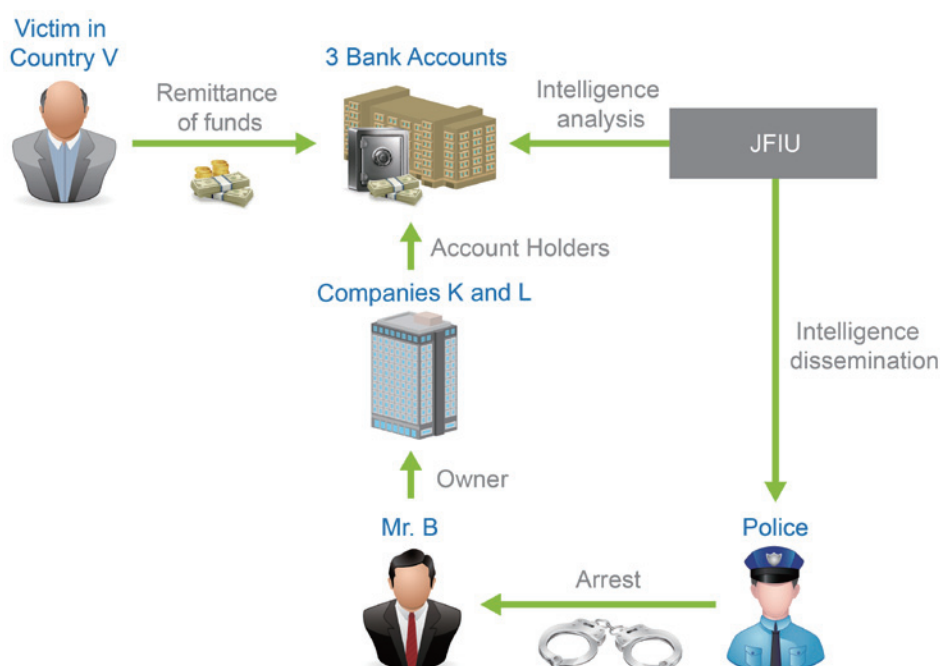
Money Laundering related to Boiler Room Fraud

In 2011, intelligence suggested that an elderly victim in Country V had been deceived to remit about HK\$13 million to three bank accounts held by Companies K and L in Hong Kong for investment. Initial analysis by JFIU revealed that Companies K and L were incorporated in Hong Kong and Mr. B was the sole authorized signatory of all the accounts. The case was disseminated to the FID NB for investigation.

Financial investigation revealed that the two companies were shell companies without any genuine business operation. The companies did not file any tax return in Hong Kong. Between March 2011 and January 2012, the three accounts received about HK\$33 million of deposits. Besides the elderly victim, some other remittances of HK\$7 million in total were made by different individuals from four jurisdictions in Asia Pacific and Europe. The majority of funds were remitted to other corporate bank accounts in Country V. About HK\$150,000 remained in one of the accounts and the fund was successfully restrained.

In December 2012, Mr. B was charged with four counts of money laundering. He was convicted in June 2013 and was sentenced to 3 years and 4 months' imprisonment. Application was made to the Court of Hong Kong to return part of the funds remained in the accounts to the victim and HK\$33,000 was confiscated.

Money laundering cases in Hong Kong often involve transnational criminal syndicates. Despite the prevalence of such cases, the HKPF strives to strengthen international cooperation and take resolute action to combat transnational money laundering activities.



Case Example 3

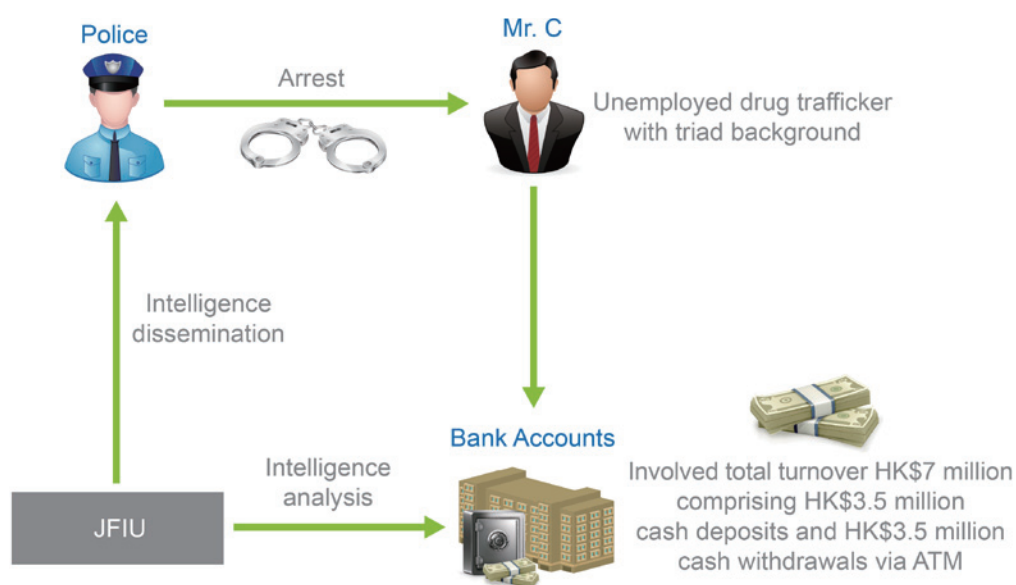
Money Laundering Related to Drug Proceeds

In November 2010, intelligence indicated that the bank account of Mr. C had recorded cash transactions of over HK\$1 million within four months' time. After analysis by JFIU, Mr. C was found to be unemployed with triad background and association with drug traffickers. An intelligence report was disseminated to an investigation unit of the HKPF.

Financial investigation revealed that Mr. C had used his personal savings account to launder about HK\$7 million of drug proceeds between August and December 2010. Further fund flow analysis showed that the account recorded multiple cash deposits of different denominations made through ATM at different locations every day. After the deposits, the funds would be withdrawn in cash through ATM when the balance reached a certain threshold.

In March 2012, Mr. C was arrested and charged with one count of money laundering. In January 2014, he was convicted at the court of Hong Kong and sentenced to 2 years' imprisonment.

Frequent cash deposits and withdrawals pattern incommensurate with bank account holder's profile is one of the red-flag indicators of money laundering activities. FIs and DNFBPs come across different suspicious patterns of transactions in their daily operations. The concerted efforts of CDD by STR reporting entities could provide more valuable input to JFIU for intelligence analysis, and result in in-depth financial investigation and successful prosecution.



Case Example 4

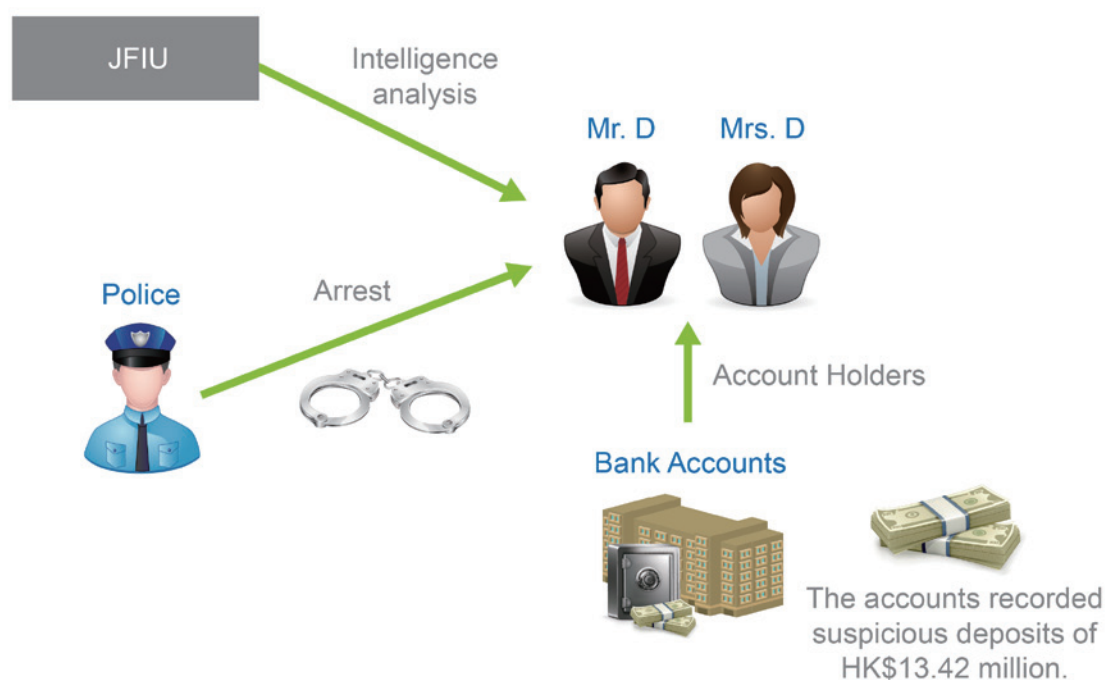
Proactive Investigation against Triad Personality

Intelligence suggested that Mr. D was a notorious member of a triad society in Hong Kong and was the mastermind of various illegal activities including drug trafficking and extortion.

The FID NB initiated proactive financial investigation against Mr. D and his family members. Intelligence analysis by the JFIU revealed that Mr. D and his wife (Mrs. D) maintained a number of bank accounts, which recorded large sum deposits of HK\$13.42 million between April 2006 and March 2010. The turnover of the accounts was not commensurate with the reported income of the couple during the said period. In October 2011, Mr. D and Mrs. D were arrested and they were unable to provide any legitimate details to explain the account activities.

In December 2013, Mr. D and Mrs. D were convicted of money laundering and were sentenced to 5 years' and 20 months' imprisonment respectively. Assets of about HK\$9.3 million under their control were ordered for confiscation.

Parallel investigation of predicate and money laundering offences disrupts the flow of crime proceeds and illegal activities. The success in confiscating ill-gotten gains is indeed the most effective means to combat money laundering and underlying profit-generating criminal activities.



Case Example 5 Smuggling of Illicit Cigarettes

Since 2004, the C&ED had mounted an operation against a local syndicate suspected of importing and distributing duty-not-paid and counterfeit cigarettes from Country W to Hong Kong and laundering crime proceeds from the illicit cigarette business for years.

After in-depth investigation, the C&ED identified a Hong Kong male (the mastermind), his wife and his elder sister as the core members of the syndicate. The trio was believed to have received large sums of money from cigarette peddlers who bought illicit cigarettes from the mastermind for sale in different districts in Hong Kong.

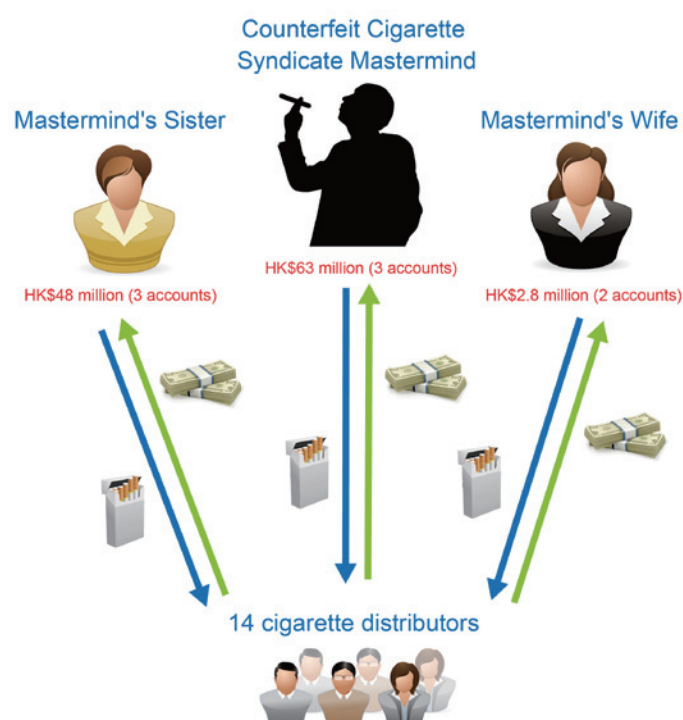
Financial investigation revealed that the mastermind had made use of his own bank accounts and those of his wife and sister to launder crime proceeds derived from the illicit cigarette business. The total amount laundered was over HK\$110 million between January 2006 and November 2008.

In 2008, the operation turned overt and the C&ED arrested 17 persons in total, including the trio and 14 cigarette peddlers. Subsequently, the C&ED prosecuted them with money laundering, conspiracy to deal with illicit cigarettes and/ or selling cigarettes with false trademark under OSCO, Dutiable Commodities Ordinance and Trade Descriptions Ordinance respectively. It was the first time the C&ED had invoked OSCO to restrain crime proceeds derived from illicit cigarette smuggling activities. The restrained proceeds amounted to about HK\$10 million.

The case was first tried at the court of Hong Kong in 2010. Except for two peddlers playing a minor role in the operation, all defendants were convicted of money laundering charges. The mastermind, his wife and his sister were sentenced to 66, 40 and 20 months' imprisonment respectively while other defendants were sentenced to 15 to 36 months' imprisonment.

In 2013, a Confiscation Order was granted against the trio and a total of HK\$18.5 million worth of realizable properties were confiscated.

This case highlights the determination of C&ED in combating cigarette smuggling activities. The successful application of the Confiscation Order to confiscate crime proceeds has also demonstrated the effectiveness of enforcement actions.



6 International Cooperation and Representation

Hong Kong has been a member of FATF and the APG since 1991 and 1997 respectively. The JFIU has also joined the Egmont Group as a member since 1996.

The JFIU is committed to fostering cooperation with our counterparts for the exchange of financial intelligence and sharing of experience. Officers of the JFIU actively participate in the meetings and workshops of FATF, APG and Egmont Group.



Mr. Bernard Law, Deputy Head of JFIU gave a presentation at the 31st Asian Regional Law Enforcement Management Programme on Money Laundering in Hanoi, Vietnam in June 2013.



Mr. Alfred Chow, Senior Inspector of Police from JFIU, shared his expertise on money laundering typologies at the FATF/Middle East and North Africa Financial Action Task Force Joint Experts' Meeting on Money laundering and Terrorist Financing Typologies in Doha, Qatar in December 2013.

Information Exchange

Money laundering and terrorist financing activities are transnational in nature. Close and effective international cooperation is vital to the success in combating these activities. In recent years, more exchanges of financial intelligence were noted. The information exchanged assists in money laundering investigations and highlights the significance of international cooperation.

	2011	2012	2013
No. of Incoming Correspondences	408	387	529
No. of Outgoing Correspondences	281	325	236

Financial Intelligence Exchange between JFIU and other Egmont Group Members

International Visitors

The JFIU treasures strategic international affiliations, which are crucial to the long-term organizational development. The JFIU is committed to establishing and strengthening the relations with our international partners for better cooperation.



Thailand senators visited JFIU in July 2013.

In 2013, the JFIU received delegations from Australia, Bangladesh, China, Germany, Macao, Malaysia, Nepal and Thailand. Through face-to-face meetings with the representatives from different jurisdictions, officers shared the best practices, latest trend and typologies in an effort to enhance mutual understanding and strengthen the cooperation.



AUSTRAC (Australian Transaction Reports and Analysis Centre) visited JFIU in August 2013.



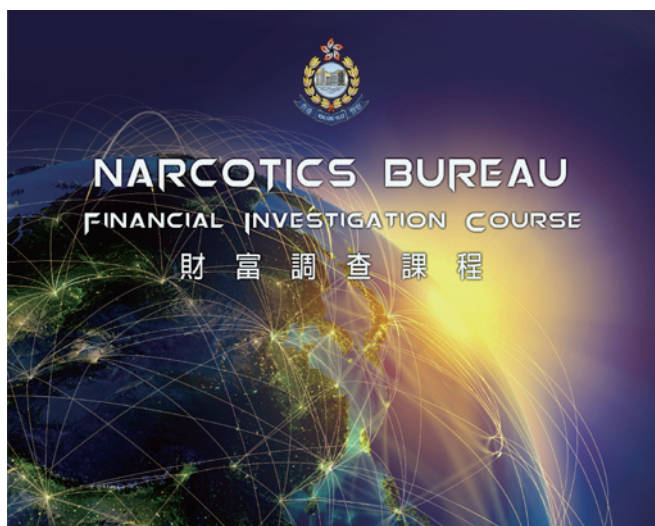
Malaysian Central Bank visited JFIU in November 2013.



7 Training and Outreach

The JFIU, on behalf of the HKPF, runs in-house and international financial investigation courses and participates in AML/CFT seminars for FIs and DNFBPs. All these capacity-building initiatives are to meet the escalating operational need for financial investigation and intelligence analysis, and to increase the private sectors' awareness of their roles in Hong Kong's AML/CFT regime.

Specialist Financial Investigation Training



Between 1989 and 2013, 1,634 HKPF members, 155 non-HKPF local participants and 519 overseas participants from 29 jurisdictions attended the Financial Investigation training run by the JFIU.

The international financial investigation course has been arranged annually since 1989. It offers an opportunity for both local and overseas officers to enhance their AML/CFT knowledge and skills, and provides an experience exchange forum amongst jurisdictions on transnational financial investigation and financial intelligence management. In 2013, a total of 68 participants of FIUs, LEAs and regulators from 13 jurisdictions and Hong Kong attended the English and Chinese classes. In particular, the Chinese class attended by the AML/CFT strategic partners in the Mainland China, Macao and Hong Kong was first conducted in Putonghua.



The International Financial Investigation Course (English and Chinese Classes) was held in October and November 2013.



Participants of International Financial Investigation Course had fruitful discussions with fellows during a practical exercise on money laundering investigation.

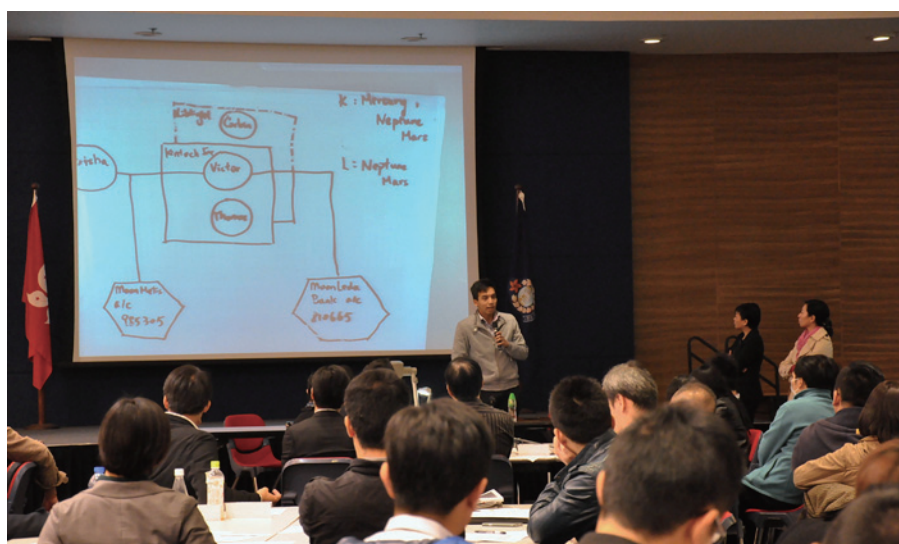


Visits to the Hong Kong Exchange and the Hong Kong Monetary Authority allowed the participants to better understand the financial activities in Hong Kong.



Upon the completion of the International Financial Investigation Course, participants were awarded a certificate.

As an integral part of the HKPF's strategy to enhance AML/CFT capacity, the JFIU runs four financial investigation classes every year, which are tailor-made for police investigators working in Police Headquarters Units and Regional / District Crime Units. Since August 2013, the class size has been expanded from 50 to 100. 291 HKPF officers were trained during the year.



The HKPF members actively took part in the in-house financial investigation course.

AML/CFT Publicity Outreach

Working in partnership with the FSTB and the SB (Narcotics) of the Hong Kong Special Administrative Region Government, the JFIU regularly provides seminars together with other stakeholders such as the Hong Kong Monetary Authority, the Hong Kong Institute of Certified Public Accountants, the CPA Australia and the Estate Agents Authority.

The JFIU officers co-hosted or joined as guest speakers in 32 seminars throughout the year in an effort to continue raising awareness, enhancing knowledge and skills, discussing matters of common interest in respect of combating money laundering and terrorist financing.



Mr Cyril MAK, Head of JFIU, shared his AML expertise with the audience of HKICPA's Symposium.



JFIU participated in different outreach seminars.



8 Conclusion and Outlook

The achievements of JFIU are built on the professionalism of our officers, sound legal framework, strong partnership with all stakeholders and effective international cooperation. The JFIU will maintain the momentum of development and dedicate itself to strengthening the domestic and international cooperation in enhancing the effectiveness of the Hong Kong AML/CFT regime.

It is anticipated that the number of STRs will remain on steady rise in 2014. Besides improvement in internal workflow, the JFIU will continue to support FIs and DNFBPs in improving the quality of STRs and in reporting STRs by electronic submission through STREAMS.

To prepare HKPF for the FATF 4th round of Mutual Evaluation of Hong Kong, the JFIU has commenced preliminary work to assist the senior management to steer the exercise and coordinate data collection with reference to the revised FATF Recommendations and Methodology. Moreover, the JFIU will continue to facilitate the AML/CFT efforts of HKPF as well as other stakeholders so that, together, we can better demonstrate the effectiveness of Hong Kong's AML/CFT regime.

Financial investigation training and AML/CFT outreach programmes are of great importance in strengthening specialized knowledge of law enforcement officers and AML/CFT practitioners in public and private sectors. This is one of the key activities of JFIU. The JFIU will continue to contribute to the capacity building with all AML/CFT stakeholders in Hong Kong as well as with overseas partners.



Abbreviations 簡稱	English Full Name	中文名稱
AML	Anti-Money Laundering	打擊清洗黑錢
AMLO #	Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance	《打擊洗錢及恐怖分子資金籌集 (金融機構) 條例》
APG* 「亞太反洗錢組織」	Asia/Pacific Group on Money Laundering	亞洲／太平洋反清洗黑錢組織
AUSTRAC ^	Australian Transaction Reports and Analysis Centre	澳洲交易報告及分析中心
CDD	Customer Due Diligence	客戶盡職審查
CFT	Combating the Financing of Terrorism	反恐融資
C&ED ~	Customs and Excise Department	香港海關
DNFBPs	Designated Non-Financial Businesses and Professions	指定的非金融企業及行業
DTROP #	Drug Trafficking (Recovery of Proceeds) Ordinance	《販毒 (追討得益) 條例》
Egmont Group*	The Egmont Group of Financial Intelligence Units	埃格蒙特組織
FATF* 「特別組織」	Financial Action Task Force	打擊清洗黑錢財務行動特別組織
FIs	Financial Institutions	金融機構
FID NB ~	Financial Investigation Division, Narcotics Bureau	毒品調查科財富調查組
FIU	Financial Intelligence Unit	財富情報單位
FSTB ~	Financial Services and the Treasury Bureau	財經事務及庫務局
HKPF ~	Hong Kong Police Force	香港警務處
ICAC ~	Independent Commission Against Corruption	廉政公署
JFIU ~	Joint Financial Intelligence Unit	聯合財富情報組
LEA	Law Enforcement Agency	執法機關
MSO/ UMSO	Money Service Operators / Unlicensed Money Service Operators	金錢服務經營者 / 無牌金錢服務經營者
SB (Narcotics) ~	Narcotics Division, Security Bureau	保安局禁毒處
OSCO #	Organized and Serious Crimes Ordinance	《有組織及嚴重罪行條例》
STR	Suspicious Transaction Report	可疑交易報告
STREAMS	Suspicious Transaction Report and Management System	可疑交易報告管理系統
TCSP	Trust and Company Service Providers	信託及公司服務供應商
UNATMO #	United Nations (Anti-Terrorism Measures) Ordinance	《聯合國 (反恐怖主義措施) 條例》

Remarks :

* - International organizations

^ - Overseas counterparts/partners

~ - Local units

- Local legislation

備註：

* - 海外組織

^ - 海外對口單位／伙伴

~ - 本地機關

- 本地法例