

A vibrant nighttime cityscape featuring a multi-lane highway with long-exposure light trails from cars in various colors (red, white, yellow, blue). In the background, several skyscrapers are illuminated with bright lights. A prominent building on the left has a distinctive red and white striped tower. Another building in the center-right has a blue and white facade. The sky is dark blue.

# 2014

聯合財富情報組年報  
Joint Financial Intelligence Unit Annual Report



# 聯合財富情報組・香港

聯合財富情報組是執法型的財富情報單位，

組內人員來自香港警務處及香港海關。

聯合財富情報組專門接收、分析及發布可疑交易報告，  
並負責與各地的財富情報單位保持聯繫，促進情報交流，  
是本港唯一肩負此等職能的機構。

## 抱負及使命

### 抱負

使聯合財富情報組繼續作為亞太區內其中一個主要的財富情報組

### 使命

聯合財富情報組致力協助政府保護香港免受清洗黑錢  
及恐怖分子融資等非法活動的影響，方法是：

- ・ 使聯合財富情報組的專業標準與相關的國際標準接軌
- ・ 促進及加強本地與國際機構之間在財富情報交換方面的合作
- ・ 精細分析聯合財富情報組接收的可疑交易報告並且作出適時發布
- ・ 加強相關業界對清洗黑錢及恐怖分子融資問題的意識及了解



# JOINT FINANCIAL INTELLIGENCE UNIT, HONG KONG

As a law-enforcement-type Financial Intelligence Unit (FIU), the Joint Financial Intelligence Unit (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 FIUs worldwide.

## Vision and Mission

### Vision

That the JFIU remains one of the leading FIUs in the Asia-Pacific Region

### Mission

That the 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 STRs received by JFIU and making disseminations as appropriate

**U**pgrading the relevant sectors' awareness and understanding on money laundering and terrorist financing issues

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## 聯合財富情報組 主管序言

### Message from the Head of JFIU

香港作為法規完善、廉潔透明的國際金融中心，要守護這個美譽，決不可有絲毫鬆懈。數十年來，在打擊清洗黑錢／反恐籌資的領域上，香港公私營界別的持份者一直努力求進，確保香港在政策、法例、監管、執法、財富情報交流以至國際合作方面，均緊貼全球變化，與國際標準接軌。本着同一信念，聯合財富情報組致力與各持份者並肩合作，積極就打擊清洗黑錢／反恐籌資制度建立合規文化，使本港的金融體系倍添穩健。

「打擊清洗黑錢財務行動特別組織」（特別組織）預計於 2018 年對香港進行第四輪相互評核。為此，本組已在策略及運作層面展開前期工作，並相應參考新修訂的「特別組織」相互評核方法及其他國家的評核經驗。本人曾參與「亞洲／太平洋反清洗黑錢組織」（亞太反洗錢組織）的相互評核工作，更深明這輪相互評核的挑戰所在。這輪評核重點在於各地區是否能有效落實打擊清洗黑錢／反恐籌資措施。因此，本組將繼續與各工作伙伴合作，務求把香港的打擊清洗黑錢／反恐籌資措施的成效充分展現。

另外，本組十分感謝各持份者的鼎力支持，由監管機構、專業團體、執法機關、金融機構以至指定的非金融企業及行業，大家均積極配合，協力提升可疑交易報告的質量與數量。與此同時，本組亦珍視與海外機構的財富情報交流，使調查倍添順利，成功阻截非法資金的流竄。

回顧 2014 年，本組欣見人手略有增加。但須注意的是，年內接獲的可疑交易報告宗數以及國際財富情報交流的次數，均同創新高，分別達 37,188 宗及 1,605 次。縱使困難及挑戰仍在，本組定必繼續以專業及無畏精神，迎難而上。最後，我謹藉此機會向各位同事致謝；儘管清洗黑錢及恐怖分子籌資活動日趨複雜，同事們仍能克盡厥職。而作為財富情報單位，我們以捍衛香港免受這類罪行衝擊的使命為榮。

Protecting Hong Kong's reputation as a well-regulated and clean financial centre is not negotiable. Over the decades, stakeholders in the Anti-Money Laundering/ Combating the Financing of Terrorism (AML/CFT) regime from public and private sectors in Hong Kong have been striving for alignment with the evolving global standards in policies, legislation, regulatory controls, law enforcement, financial intelligence exchange and international cooperation. It is important that the JFIU works hand in hand with other stakeholders to build a strong AML/CFT compliance culture to safeguard the integrity of our financial system.



As the Financial Action Task Force (FATF) will probably commence the 4th round of Mutual Evaluation (ME) on Hong Kong in 2018, the JFIU has started preliminary work at strategic and operational levels to prepare for the ME by drawing reference to the revised FATF ME Methodology and the latest ME experiences of other jurisdictions. As one of the ME assessors for the Asia/Pacific Group on Money Laundering (APG), I have witnessed the challenges in this new round of ME with focus on how effectively jurisdictions have implemented the AML/CFT measures. The JFIU will continue to coordinate with our working partners with a view to demonstrating the effectiveness of Hong Kong's AML/CFT measures.

The JFIU highly appreciates the continuous support from local regulators, professional bodies, law enforcement agencies (LEAs), financial institutions (FIs) and designated non-financial businesses and professions (DNFBPs), contributing to the improvement in quality and quantity of STRs. The JFIU also treasures the exchanges of financial intelligence with our counterparts, which greatly facilitate investigations, resulting in the interception of the flow of suspected illicit funds.

In 2014, the JFIU was delighted to have its manpower slightly increased. On the other hand, the annual figure of STRs received and the number of international financial intelligence exchanges reached another record high of 37,188 and 1,605 respectively. In view of the difficulties and challenges ahead, the JFIU endeavours to cope with the situation professionally and fearlessly. Further, I would like to take this opportunity to thank JFIU colleagues for their perseverance in the face of increasingly complex money laundering and terrorist financing activities. As an FIU, we take pride in our mission to protect the territory from such crimes.



香港聯合財富情報組主管  
羅昭煥警司

**Bernard LAW**

Superintendent of Police  
Head of JFIU, Hong Kong



## 聯合財富情報組 About JFIU

### 歷史與發展 HISTORY AND DEVELOPMENT

過去 25 年，聯合財富情報組不斷蛻變求新，以緊貼本地法例及國際形勢的急速發展，務求令香港與時並進，在世界的打擊清洗黑錢／反恐籌資領域上保持卓越地位。回顧過去，本港曾經歷以下重要里程：

In the past two and a half decades, the JFIU has been evolving to keep pace with the local legislation and international developments to support Hong Kong's presentation in the world's AML/CFT stage. The major milestones are outlined below.

1989

為實施本港首條打擊清洗黑錢法例，即《販毒（追討得益）條例》（第 405 章），香港警務處毒品調查科特別成立財富調查組；此後在該組之下，又設立聯合財富情報組，並指定這個小組為本港接收、分析及發布可疑交易報告的專責機構。

To implement the first piece of AML legislation, namely the Drug Trafficking (Recovery of Proceeds) Ordinance (DTROP, Cap. 405), in Hong Kong, the Financial Investigation Division (FID) was set up within Narcotics Bureau (NB) of HKPF. The JFIU was then formed under FID NB as the designated unit of Hong Kong to receive, analyze and disseminate STRs.

1991

香港加入「特別組織」。透過參加「特別組織」的全體會議，聯合財富情報組成功掌握不時更新的國際標準及相關建議。

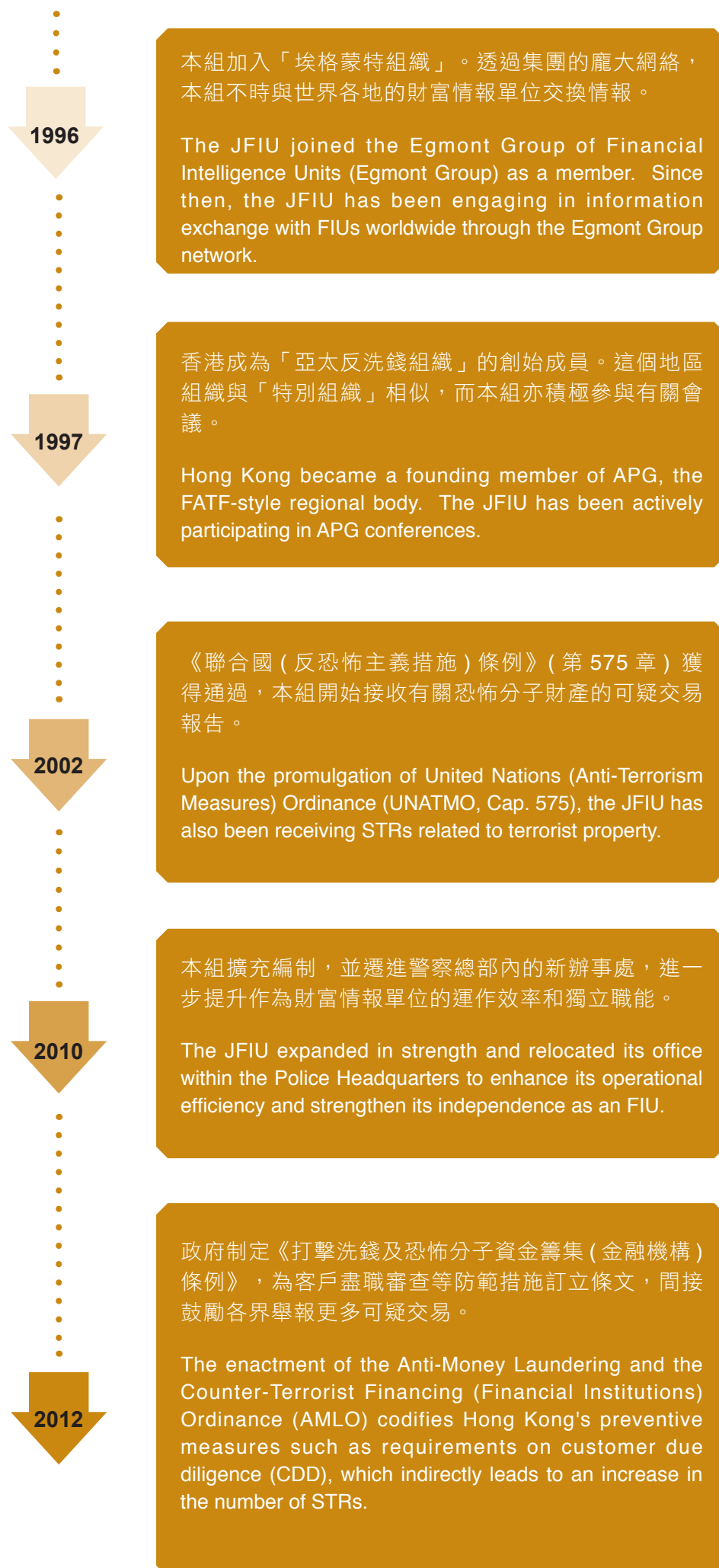
Hong Kong joined FATF as a member. The JFIU has also been kept up-to-date with ever-revising international standards and FATF Recommendations through participation in the plenary meetings.

1994

本港制定第二條打擊清洗黑錢法例，即《有組織及嚴重罪行條例》（第 455 章）。此法例賦予本組更多權力，使其更有效管理可疑交易報告的呈報機制。

The enactment of the second piece of AML legislation, namely the Organized and Serious Crimes Ordinance (OSCO, Cap. 455), in Hong Kong has further empowered the JFIU to continue its role of managing the STR regime.







## 架構與工作 ORGANIZATION AND WORK

目前，聯合財富情報組與財富調查組、洗錢及恐怖分子資金籌集風險評估小組同樣隸屬於香港警務處毒品調查科。惟不同的是，聯合財富情報組獨立運作，是本港執法型的財富情報單位。

本組由一位警司擔任主管，屬下有兩位副主管，職級為總督察。

聯合財富情報組 1 隊 ( 情報分析及發展 ) 設有四個資料分析小隊，專責從可疑交易報告中拓展、分析及發布財富情報，並就清洗黑錢／恐怖分子籌資的案件類型進行研究。

聯合財富情報組 2 隊 ( 政策及支援 ) 設有三個小隊，肩負多項職責，包括管理網絡平台「可疑交易報告管理系統」( 即 **STREAMS**，以便以電子方式舉報及發布可疑交易報告，並與其他情報資料庫建立聯繫)；制訂政策，與各地的財富情報單位合作及促進情報交流；籌辦財富調查訓練，以及向金融機構及指定的非金融企業及行業進行外展宣傳。

The JFIU, together with the FID and the Money Laundering and Terrorist Financing Risk Assessment Unit (RAU), is currently housed under the NB of HKPF. Different from FID or RAU, the JFIU operates independently as a law enforcement type of FIU in Hong Kong.

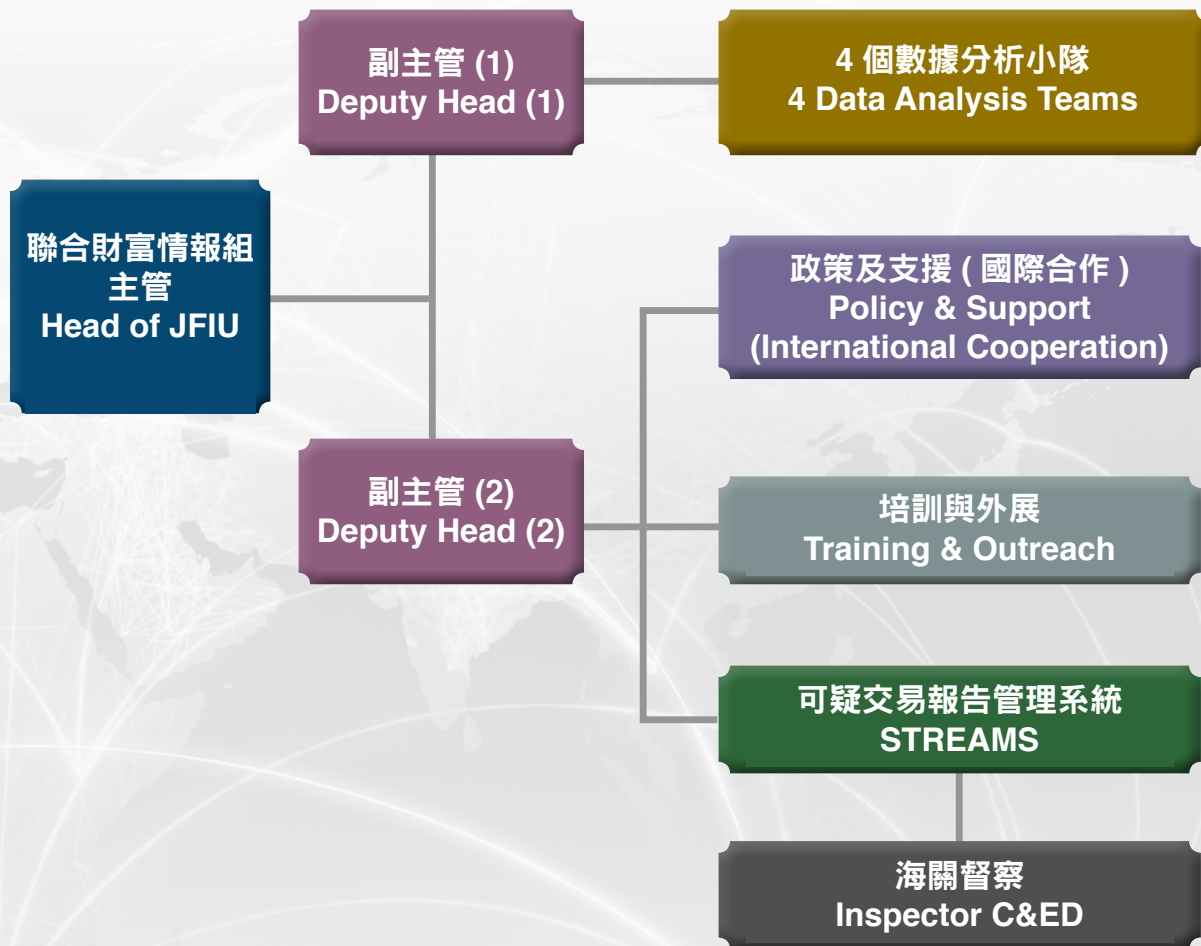
The JFIU is headed by a Superintendent of Police, with two Deputy Heads of the rank of Chief Inspector of Police.

The JFIU 1 (Intelligence Analysis and Development), comprising four data analysis teams, is responsible exclusively for cultivation, analysis and dissemination of financial intelligence and research on money laundering/ terrorist financing case typologies.

The JFIU 2 (Policy & Support), comprising three teams, is responsible for managing the Suspicious Transaction Report and Management System (STREAMS, a web-based platform facilitating the e-reporting/ dissemination of STRs and interfacing with other intelligence databases); formulating policy, establishing international cooperation and promoting intelligence exchange with FIU counterparts; as well as coordinating financial investigation training and publicity outreach to the FIs and DNFBPs.



## 聯合財富情報組架構 Structure of the JFIU



## 打擊清洗黑錢／反恐籌資的持份者 AML / CFT STAKEHOLDERS

聯合財富情報組一直與其他持份者保持密切聯繫，務求改善本港的打擊清洗黑錢／反恐籌資制度，確保香港符合相關的國際標準。

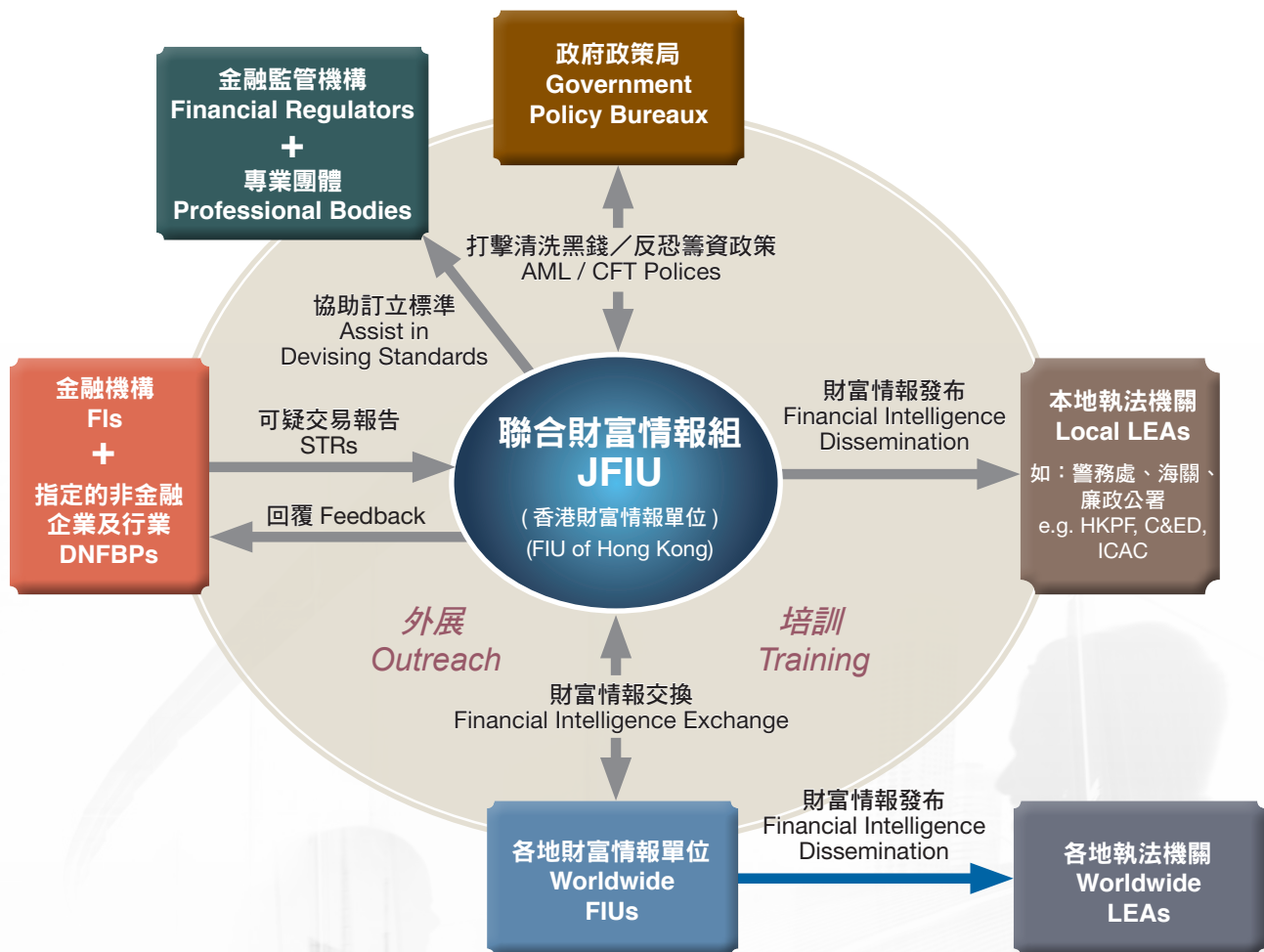
與本組建有聯繫的持份者涵蓋多個界別，包括香港特別行政區的政策局（即財經事務及庫務局以及保安局禁毒處）、多間監管機構及專業團體、私營機構（如金融機構以及指定的非金融企業及行業），以及亞洲區以至世界各地的財富情報單位及執法機關。

The JFIU has been maintaining closely knit ties with other stakeholders with a view to improving Hong Kong's AML/ CFT regime and meeting relevant international standards.

The interfacing stakeholders include Hong Kong Special Administrative Region'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, FIUs and LEAs in the Asia Region and worldwide.



## 聯合財富情報組的合作伙伴 Interface of the JFIU



## 可疑交易舉報 Suspicious Transaction Reporting

### 可疑交易舉報機制 SUSPICIOUS TRANSACTION REPORTING REGIME

根據《販毒(追討得益)條例》(第405章)及《有組織及嚴重罪行條例》(第455章)第25A條,以及《聯合國(反恐怖主義措施)條例》(第575章)第12條,凡任何人知道或懷疑任何財產是或代表犯罪得益或恐怖分子財產,必須提交可疑交易報告,把該知悉或懷疑向獲授權人(即聯合財富情報組人員)披露。

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.





## 可疑交易報告趨勢 STR SUBMISSION TRENDS

### 歷年可疑交易報告及發布宗數 STR Filings and Dissemination per Annum

過去五年，聯合財富情報組接獲及發布的可疑交易報告數目不斷遞增。

2014 年，本組接獲 37,188 宗報告，創出紀錄新高，與 2010 年的 19,690 宗相比，大升 88.9%。其中，升勢較急的年份為 2012 年 (23,282 宗) 至 2013 年 (32,907 宗)，升幅達 41.3%，這可能與 2012 年實施《打擊洗錢及恐怖分子資金籌集 (金融機構) 條例》有關。

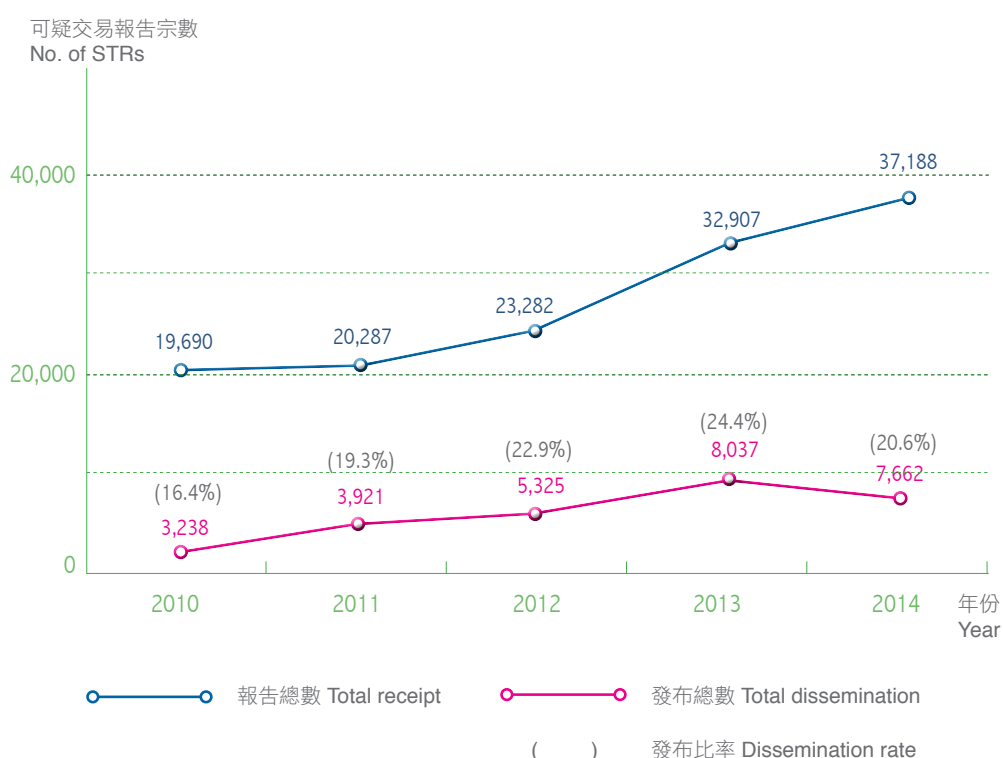
發布可疑交易報告數字方面，由 2010 年的 3,238 宗倍增至高峰期 2013 年的 8,037 宗。而報告的發布比率 (即發布報告宗數／接獲報告宗數) 則在 16.4% 至 24.4% 之間。

Over the past five years, there has been an upsurge in both the annual number of STRs received and disseminated by the JFIU.

The number of STRs received in 2014 marked a record high of 37,188, being an increase of 88.9% when compared to that in 2010 (19,690). The heightened awareness among the FIs and DNFBPs pursuant to the enactment of AMLO in 2012 might have contributed to a significant increase of STRs by 41.3% from 2012 (23,282) to 2013 (32,907).

The number of STRs disseminated was more than double from 3,238 in 2010 to a record high of 8,037 in 2013. The STR dissemination rate (i.e. no. of STRs disseminated / no. of STRs received) was within the range of 16.4% to 24.4%.

2010 至 2014 年本組接獲及發布的可疑交易報告宗數  
Number of STRs Received and Disseminated from 2010 to 2014

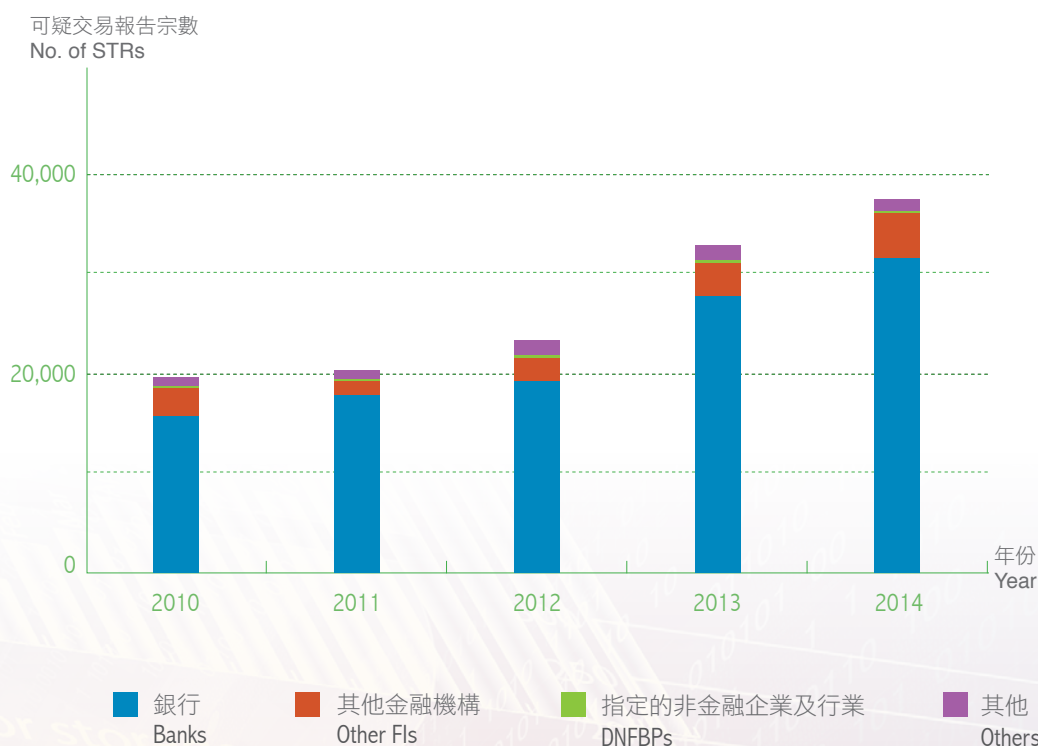


## 各個界別的可疑報告宗數 STR Filings by Sectors

在 2010 至 2014 年間，金融機構的可疑交易報告宗數佔每年報告總數逾 90%，其中以銀行業為最主要的舉報者。相反，指定的非金融企業及行業的比重少於 1%，其他界別則佔 2% 至 8%。

Between 2010 and 2014, the FIs accounted for over 90% of the annual total STR submissions, with the banking sector as the major contributor. The DNFBPs accounted for less than 1% and other sectors for 2-8%.

2010 至 2014 年本組接獲的可疑交易報告宗數 (按各個界別劃分)  
Number of STRs Received (By Sector) from 2010 to 2014





如按舉報機構行業劃分，過去五年接獲的年度可疑交易報告數字及所佔比率詳見下表。回顧2014年，銀行、金錢服務經營者以及證券公司，是首三個最常舉報的界別。

The yearly breakdown of STRs received by category of reporting entities (and respective %) in the past five years is tabulated below. In 2014, banks, Money Service Operators (MSOs) and securities companies were the top three STR contributors.

行業 Sector	2010	2011	2012	2013	2014
<b>金融機構 FIs</b>					
銀行 Banks	16,551 (84.06%)	17,194 (84.75%)	19,202 (82.48%)	27,328 (83.05%)	31,095 (83.61%)
金錢服務經營者 MSOs	1,667 (8.47%)	1,051 (5.18%)	1,171 (5.03%)	2,108 (6.41%)	2,772 (7.45%)
證券公司 Securities Firms	662 (3.36%)	470 (2.32%)	698 (3.00%)	1,410 (4.29%)	1,574 (4.23%)
保險公司 Insurance Companies	154 (0.78%)	204 (1.00%)	341 (1.46%)	401 (1.22%)	446 (1.20%)
放債人 Money Lenders	0	1 ( $<0.01\%$ )	31 (0.13%)	28 (0.09%)	32 (0.09%)
<b>指定的非金融企業及行業 DNFBPs</b>					
律師行 Legal Firms	99 (0.50%)	116 (0.57%)	110 (0.47%)	235 (0.72%)	222 (0.60%)
信託及公司服務供應商 Trust & Company Service Providers (TCSPs)	47 (0.24%)	32 (0.16%)	49 (0.21%)	27 (0.08%)	46 (0.12%)
地產代理 Real Estate Agents	0	2 (0.01%)	28 (0.12%)	12 (0.04%)	29 (0.08%)
貴重貨品交易商 Dealers in Precious Products	1 (0.01%)	1 ( $<0.01\%$ )	16 (0.07%)	26 (0.08%)	18 (0.05%)
會計師行 Accounting Firms	10 (0.05%)	10 (0.05%)	4 (0.02%)	4 (0.01%)	3 (0.01%)
其他 Others	499 (2.53%)	1,206 (5.94%)	1,632 (7.01%)	1,328 (4.01%)	951 (2.56%)
<b>總計 Total</b>	<b>19,690</b>	<b>20,287 (+ 3%)</b>	<b>23,282 (+14.8%)</b>	<b>32,907 (+41.3%)</b>	<b>37,188 (+13%)</b>

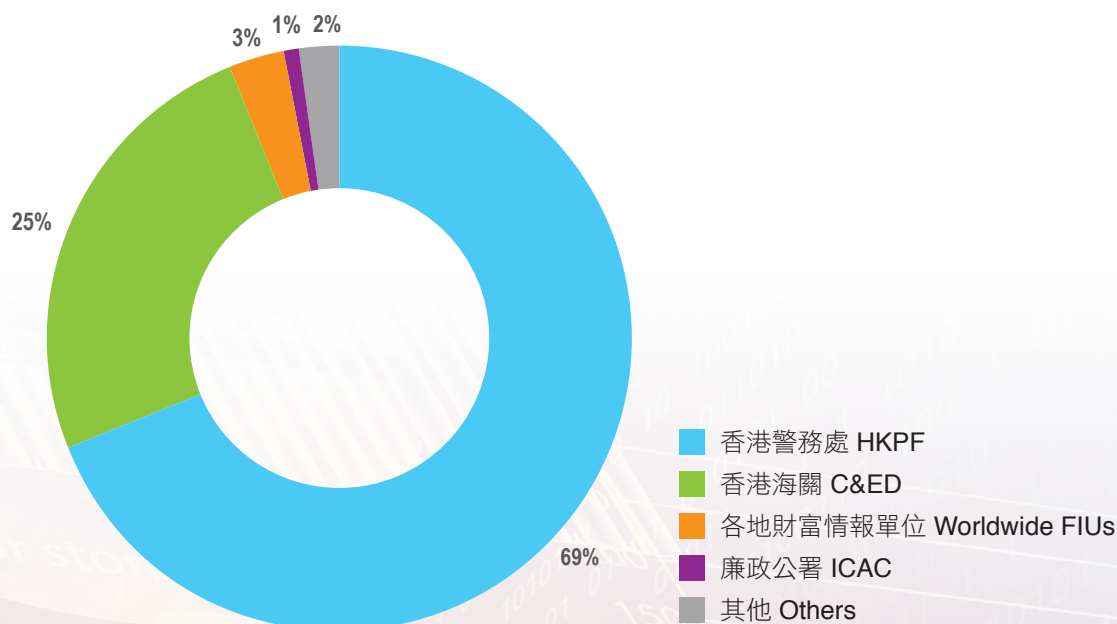
## 2014 年可疑交易報告發布情況 STR DISSEMINATION IN 2014

聯合財富情報組一直致力從可疑交易報告及其他情報來源擷取財富情報，然後發布予本地執法機關及海外財富情報單位，藉此協助調查工作。在 2014 年，本組向執法機關及財富情報單位發布共 7,662 宗可疑交易報告，當中以香港警務處 (69%) 及香港海關 (25%) 為主要的接收者。

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 7,662 STRs disseminated by the JFIU to LEAs and FIUs in 2014, the HKPF (69%) and the C&ED (25%) were the major recipients.

發布報告總數

Total no. of STRs Disseminated: 7,662



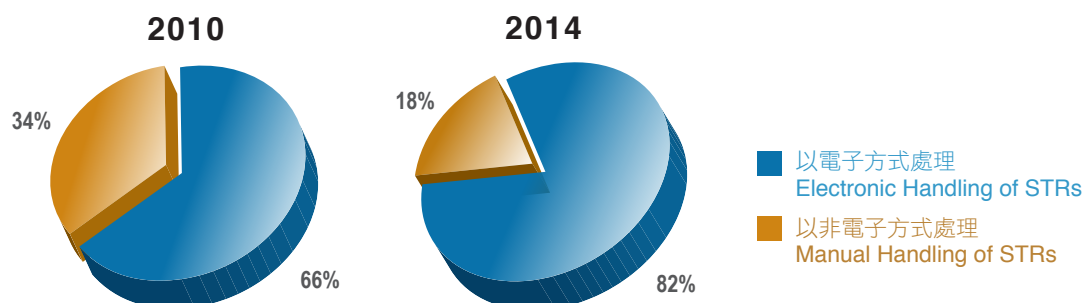


## 可疑交易報告管理系統 STREAMS

### 電子報告 e-STR Submissions

自 2006 年起，本組採用安全保密的網絡平台 STREAMS (可疑交易報告管理系統)，以便接收、分析、儲存及發布可疑交易報告。舉報機構只需安裝軟件程式 S-Box II，便可以電子方式提交報告及接收本組的回覆。隨着 STREAMS 的使用不斷普及，可疑交易報告的處理效率亦相應提升，舉報機構與本組之間的溝通聯繫也變得緊密快捷。

Since 2006, a secure web-based platform known as STREAMS has been rolled out for receiving, analyzing, storing and disseminating STRs. Reporting entities only need to install a software application "S-Box II", which allows e-submission of STR and e-receipt of JFIU feedback. The increasing use of STREAMS has improved the efficiency of STR workflow and speeded up communication between the reporting entities and the JFIU.



### 系統升級計劃 Enhancement Project

由於打擊清洗黑錢／反恐籌資的持份者對提交可疑交易報告和財富情報分析的需求與日俱增，所以本組現正為 STREAMS 進行系統升級工程，藉此提升效能及功能，預計於 2015 年年底完成。

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

下文將臚列五個近期由香港警務處及香港海關偵辦的清洗黑錢案件。這些案件不但突顯一些獨特的犯案趨勢，而且清楚說明財富情報、法證會計分析及／或國際合作如何發揮作用，協助財富調查人員偵破複雜的案件。

The following five recent money laundering cases from the HKPF or the C&ED do not only highlight distinct crime trends, but also show how financial intelligence, forensic accounting analysis and/or international cooperation could effectively facilitate complex financial investigations.

### 案例 Case 1

#### 涉及虧空公款的清洗黑錢案

#### Money Laundering related to Embezzlement of Funds

香港警務處毒品調查科財富調查組接獲舉報，指國家 M 某銀行的三名前分行經理涉嫌盜用款項。在財富情報的支援下，調查人員展開漫長的偵查，結果發現該等經理曾把大筆款項匯款至他們的海外私人公司，藉此掩飾他們的個人消費，包括在多個國家的賭博消費。最引起警方注意的是，該等經理的助理 A 先生，曾替他們接收及分發犯罪得益，即利用其在香港的銀行戶口，把盜取自銀行的款項由國家 M 轉移至地區 N 的賭場。法證會計分析亦顯示，在 58 個月期間，高達 6.3 億港元流經 A 先生的銀行戶口。

2011 年 10 月，A 先生被控八項清洗黑錢罪，涉款 6.3 億港元。2014 年 8 月，他被香港法院定罪，被判入獄 4 年。另外，涉案的分行經理亦於香港境外被捕及判處監禁服刑。

從這宗複雜案件可見，實用的金融情報能夠促進財富調查，有助掌握罪案的嚴重性；另外，法證會計師的賬戶分析，也可作為專家證據呈堂，為清洗黑錢控罪提供有力佐證。

The FID NB of HKPF conducted prolonged financial investigation into a report of embezzlement of funds from a bank in Country M by its three former branch managers. The investigation, supported by financial intelligence, later revealed that the branch managers had large sums of money remitted to their private companies overseas for covering their personal expenses including that on gambling in different countries. What is noteworthy to the HKPF is that Mr. A, the key assistant of those branch managers, had received and dissipated the crime proceeds (stolen funds from the bank) for the branch managers from Country M to casinos in Jurisdiction N via his bank accounts in Hong Kong. Forensic accounting analysis concluded that a total of HK\$630 million had flown through Mr. A's bank accounts within 58 months.

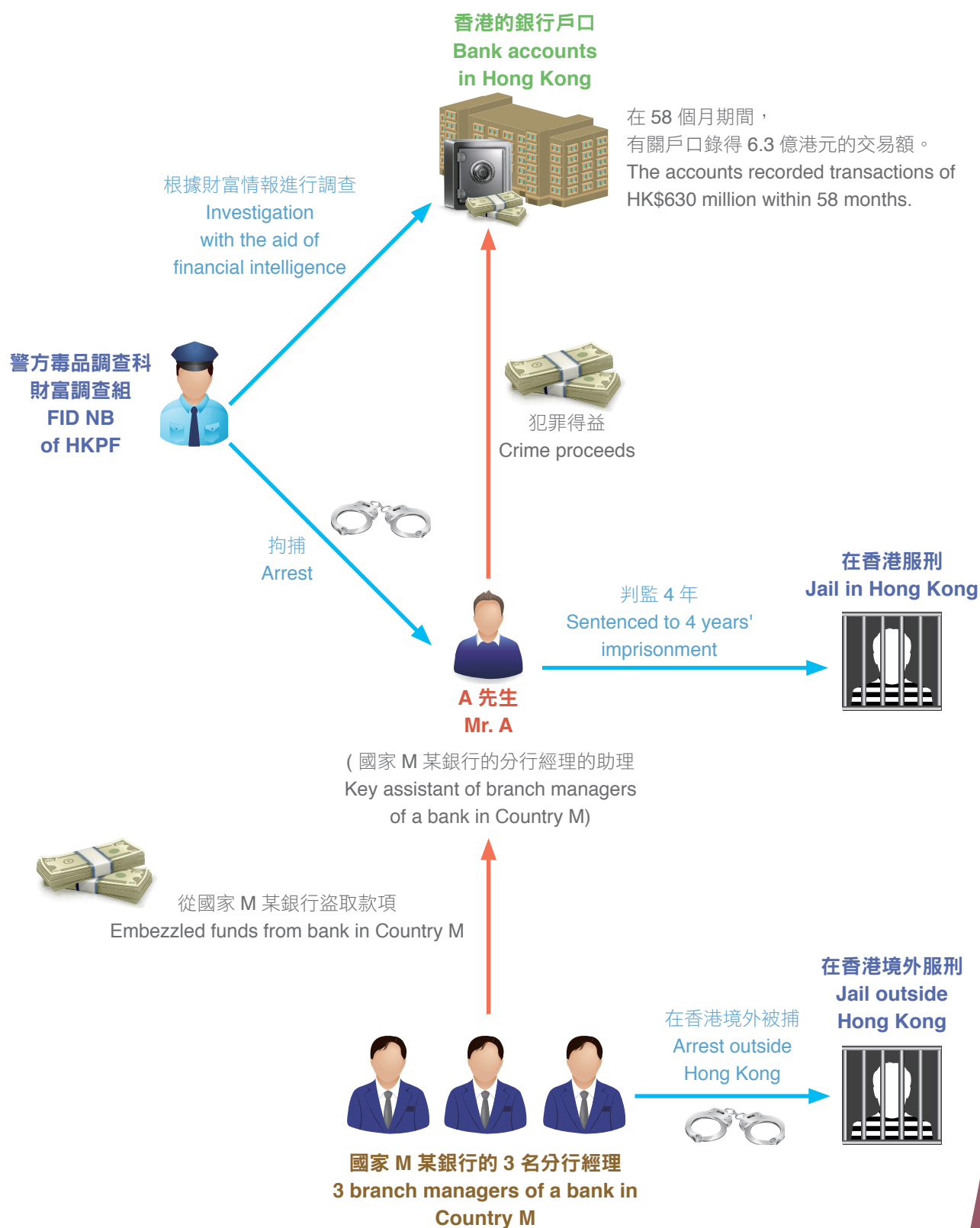
In October 2011, Mr. A was charged with eight counts of money laundering involving HK\$630 million. Eventually in August 2014, he was convicted at the court of Hong Kong and sentenced to 4 years' imprisonment. Meanwhile, the branch managers were also arrested and sentenced to jail outside Hong Kong.

This complex case shows that financial investigation underpinned by financial intelligence could help identify the scale of criminality, while the account analysis conducted by forensic accountant could serve as expert evidence in court proceedings to help secure money laundering conviction.



## 案例 Case 1

### 涉及虧空公款的清洗黑錢案 Money Laundering related to Embezzlement of Funds



犯罪得益的流向  
Flow of crime proceeds

## 案例 Case 2

### 透過購買物業及貴重貨品清洗黑錢

### Money Laundering through Purchase of Real Properties and Precious Products

2012 年 4 月，香港警方某刑事部門根據國家 O 的執法機關的情報，成功瓦解一個國際販毒集團，並拘捕四名來自國家 P 的男子，即 B、C、D 及 E 先生。警方毒品調查科財富調查組接手展開偵查，發現該集團曾成立 24 間空殼公司，並利用香港 53 個銀行戶口購買村屋、金條及鑽石，藉此清洗犯罪得益。在 2010 年 1 月至 2012 年 4 月期間，該等戶口合共接收存款 17 億港元。

在 2013 年 5 月至 2014 年 6 月期間，這四名外籍男子被裁定清洗黑錢罪成立，被判入獄 52 至 66 個月。法庭亦頒發 4 項沒收令，命令充公 161 公斤金條、4 枚鑽石、5 公斤銀粒、3 幢物業及 26 個銀行戶口的現金結餘。被充公的資產總值 1.69 億港元。

本案件彰顯出國際合作及本地聯合調查的重要性，不只偵破了複雜的犯案手法，還瓦解一個犯罪集團及其清洗黑錢網絡。

In April 2012, acting upon the intelligence from a law enforcement agency of Country O, a crime bureau of the HKPF neutralized an international drug trafficking syndicate, resulting in the arrest of four males namely Messrs B, C, D, & E from Country P. Subsequent financial investigation by the FID NB of HKPF revealed that the syndicate set up 24 shell companies and used 53 bank accounts in Hong Kong to launder the crime proceeds through purchase of village houses, gold bars and diamonds. The bank accounts received deposits of HK\$1.7 billion in total between January 2010 and April 2012.

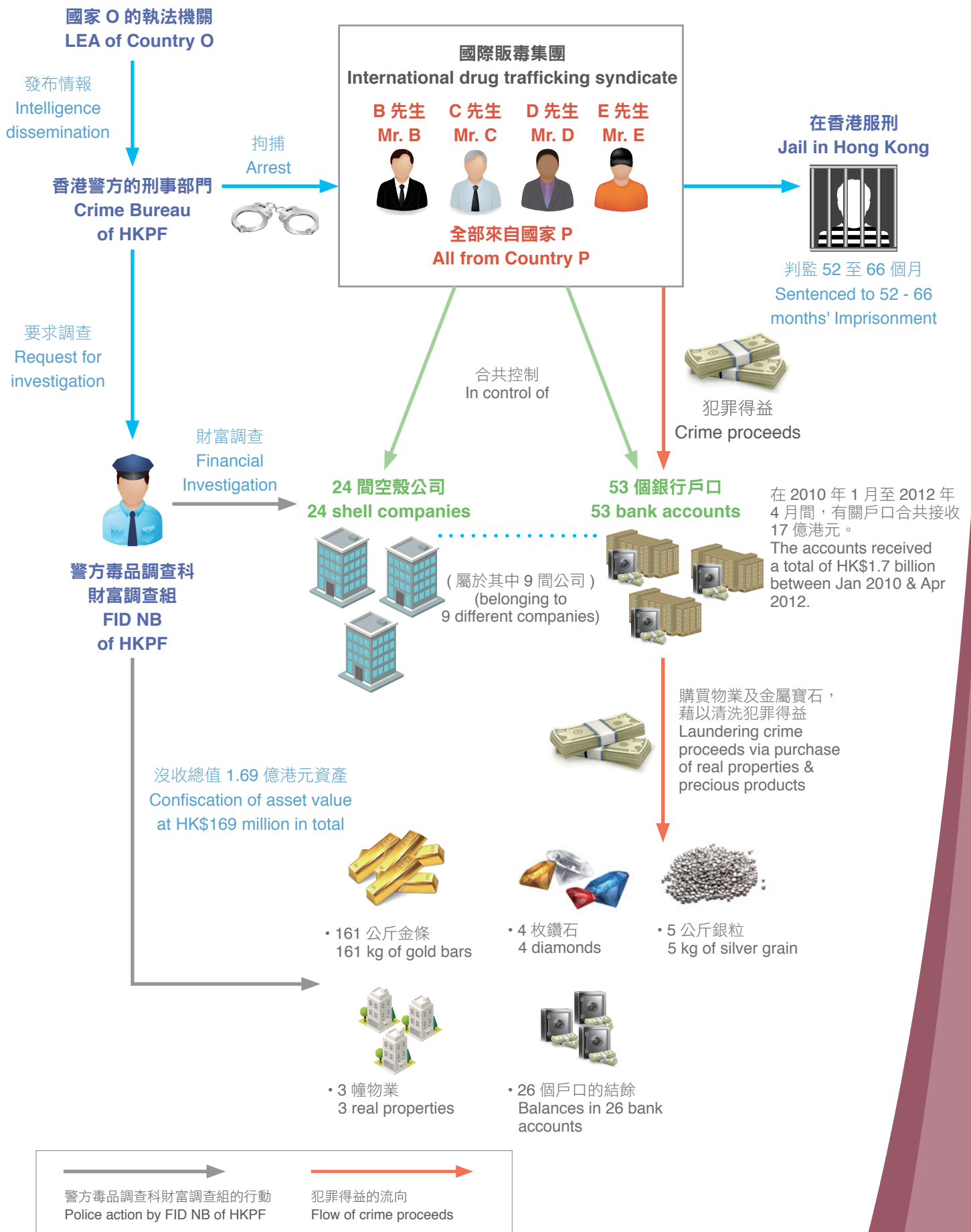
Between May 2013 and June 2014, the four foreign males were convicted of money laundering offences and sentenced to 52 - 66 months' imprisonment. Four confiscation orders were issued to confiscate 161 kg of gold bars, 4 diamonds, 5 kg of silver grain, 3 real properties and the cash balances of 26 bank accounts. The total value of assets confiscated amounted to HK\$169 million.

This case reflects the importance of international cooperation and local joint investigation in unveiling sophisticated modus operandi, and in busting a criminal syndicate and its money laundering network.



## 案例 Case 2

### 透過購買物業及貴重貨品清洗黑錢 Money Laundering through Purchase of Properties & Precious Products



## 案例 Case 3

### 利用替身戶口清洗黑錢

### Money Laundering using Stooge Account Holders

2013 年 5 月，一名外籍男子充當臥底，刻意獲國家 Q 的 F 先生聘用，代其在香港開立兩間掛名公司及一個銀行戶口，藉此清洗犯罪得益。一個月後，該男子按指示開立公司 U 及公司 V，而兩者名字與香港現有的兩間公司（公司 X 及公司 Y）十分相似，相信是為了掩飾清洗黑錢的渠道。該男子迅即向警方報案，結果 F 先生在香港被捕，並被控告煽惑清洗黑錢罪。在 2014 年 9 月，F 先生罪名成立，被判監禁 4 年。

在此案中，毒品調查科財富調查組曾對 F 先生進行偵查，並掌握情報指 F 先生是另一外籍男子 G 先生的同謀。此外，公司 X 及公司 Y 由 G 先生獨資擁有，而這兩家公司的戶口均曾錄得可疑交易。結果，G 先生於香港因清洗黑錢罪被捕，獲准警方保釋，但後來他棄保潛逃，並被發現使用偽造護照。稅務紀錄亦顯示，G 先生及其兩間公司均未曾申報在香港有任何收入。2014 年 8 月，法庭根據潛逃者法律程序對 G 先生頒布沒收令，命令充公其公司戶口結餘約 1,350 萬港元。

本案突顯兩個重點，就是必須提高市民對可疑清洗黑錢活動的警覺性，以及必須善用財富情報，如此方能促進財富調查及追討不法財產。

In May 2013, a foreign male (who acted as an undercover agent) was recruited by Mr. F in Country Q to set up two front companies and open a bank account in Hong Kong with a view to laundering crime proceeds. One month later, the male, as instructed, set up Company U and Company V with names resembling that of two existing companies, Company X and Company Y, in Hong Kong. It was suspected that the resemblance between the companies' names would help obscure the conduits of money laundering activities. The case was soon reported to the HKPF. Mr. F was arrested in Hong Kong and was subsequently charged with the offence of incitement to money laundering. In September 2014, Mr. F was sentenced to 4 years' imprisonment.

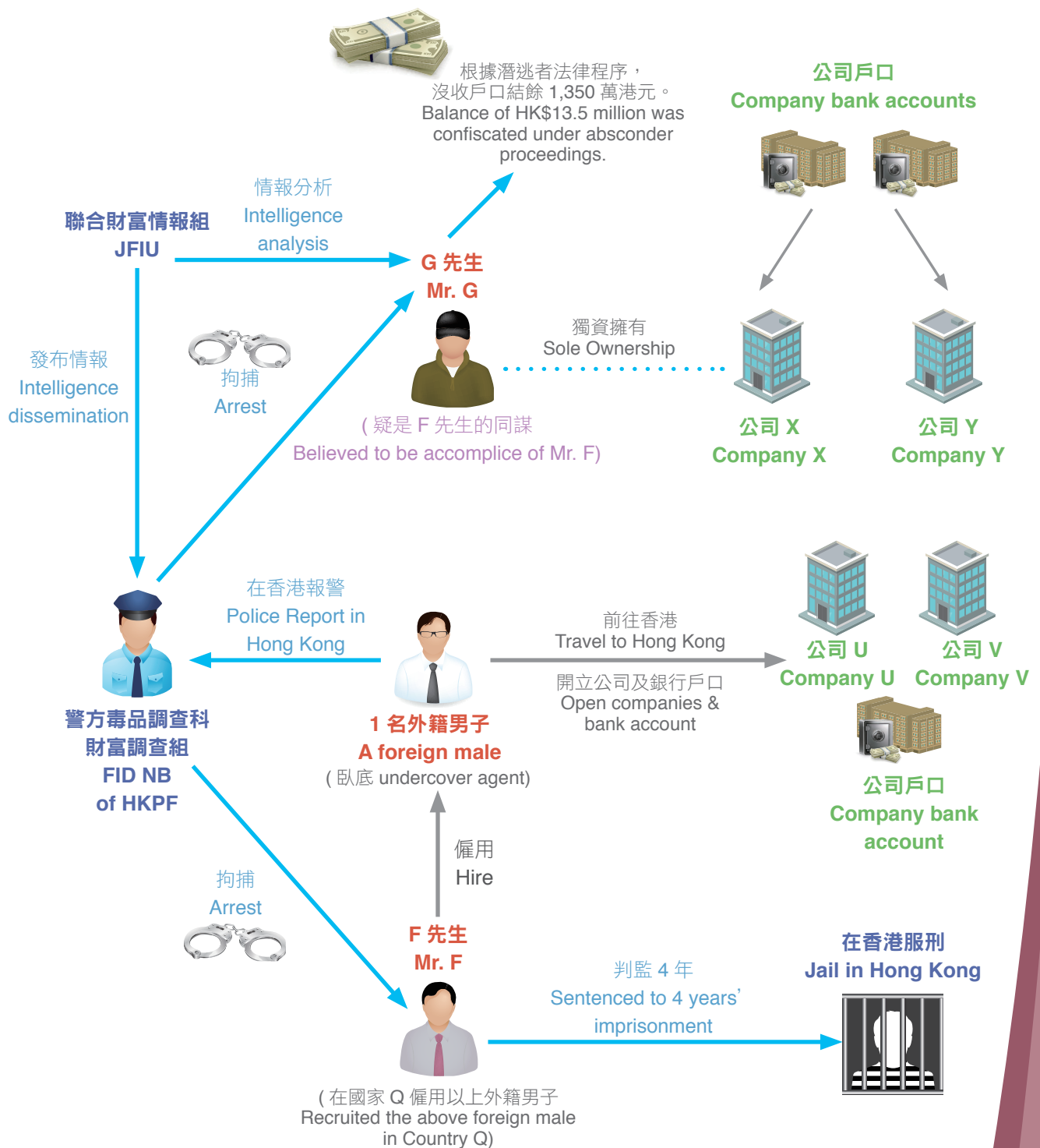
In the course of financial investigation by FID NB against Mr. F, intelligence also suggested that he was believed to be an accomplice of another foreigner Mr. G. The bank accounts of Company X and Company Y, solely owned by Mr. G, had recorded suspicious transactions. Mr. G was arrested for money laundering in Hong Kong. However, he later jumped police bail and was found using a forged passport. The tax records showed that both Mr. G and his two companies had no declared income in Hong Kong. In August 2014, confiscation order under absconder proceedings against Mr. G was granted to confiscate the balance of about HK\$13.5 million in his company bank accounts.

This case illustrates the importance of both public awareness of suspicious money laundering activities and appropriate use of financial intelligence, which facilitate financial investigation and recovery of illicit assets.



### 案例 Case 3

#### 利用替身戶口清洗黑錢 Money Laundering using Stooage Account Holders



## 案例 Case 4

### 涉及販毒得益的清洗黑錢活動

### Money Laundering related to Drug Proceeds

2009 年 8 月，有情報分析指本地某販毒集團的兩名聯繫人 H 先生及 I 先生，涉嫌利用其銀行戶口清洗犯罪得益。案件交由警方毒品調查科財富調查組偵辦。

根據 H 先生及 I 先生的交易紀錄，兩人似乎與販毒集團主腦沒有直接聯繫；然而，財富調查發現，在 2008 至 2010 年間，兩人的個人戶口曾錄得合共 1,500 萬港元的交易額。警方相信有關戶口被用作暫時保管資金，原因是有人經常透過櫃員機存入款項，然後於同日或稍後日子把金額相若的款項提走或轉賬至其他戶口。這些戶口的交易活動十分頻繁，明顯與 H 先生及 I 先生的財務背景不符，特別是兩人聲稱任職保安員及車房工人，每月收入微薄。

2012 年，兩人被警方拘捕，各被控告一項清洗黑錢罪。2014 年，兩人被法庭定罪，分別判處入獄 24 個月及 26 個月。

短暫地保管資金，是清洗黑錢活動的常見特徵之一。金融機構以及指定的非金融企業及行業應當提高警覺，把可疑交易活動向聯合財富情報組舉報。只要舉報機構能夠提供優質的報告，執法人員便可據此拓展情報，促進財富調查，從而協助檢控清洗黑錢罪行，打擊犯罪活動。

In August 2009, intelligence analysis revealed that the bank accounts of two associates of a local drug syndicate, Mr. H and Mr. I, were used for laundering crime proceeds. The case was disseminated to the FID NB of HKPF for investigation.

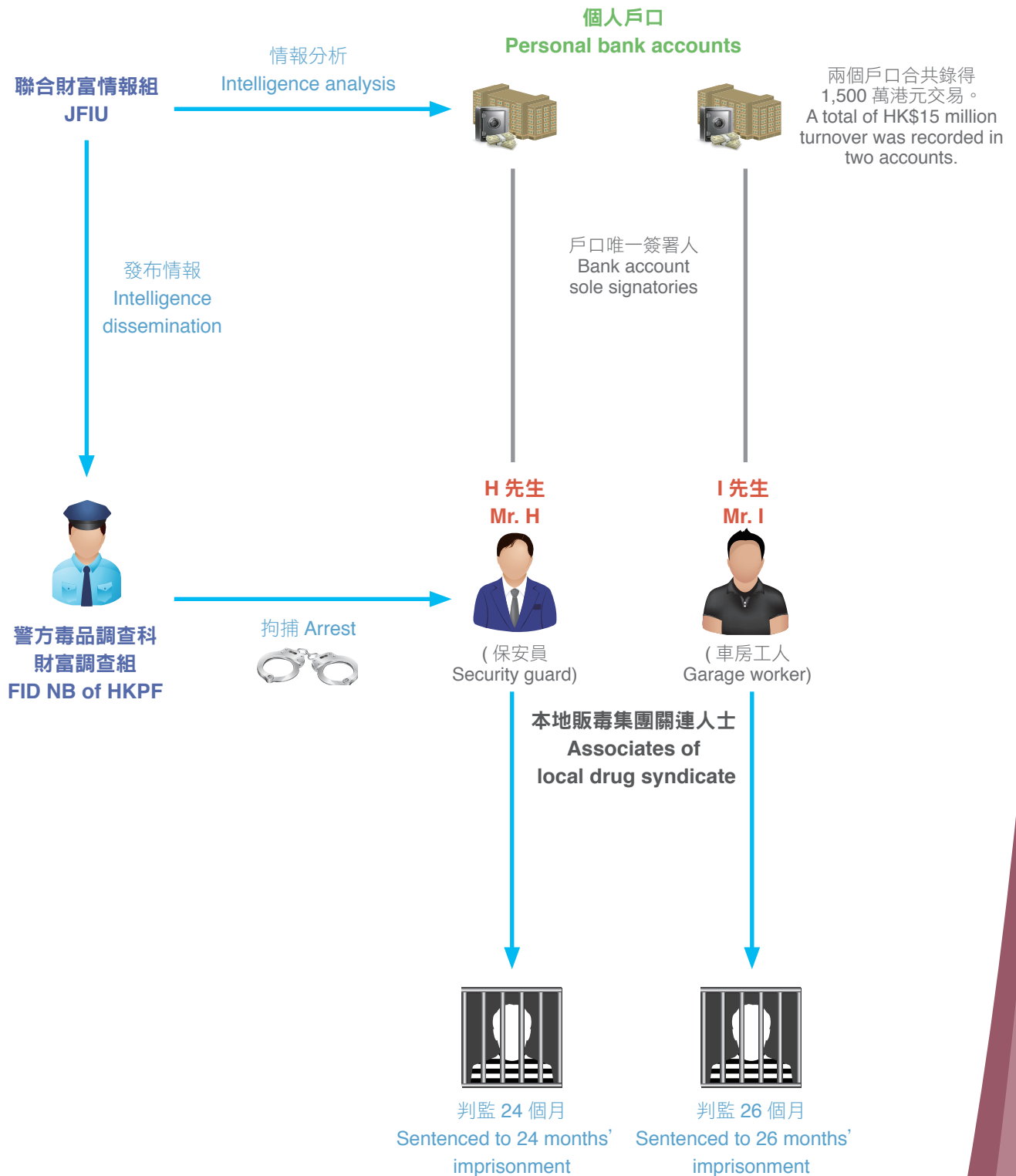
Although the transaction records of Mr. H and Mr. I did not show any direct link with the drug syndicate head, financial investigation revealed that their personal bank accounts had recorded a total turnover of HK\$15 million between 2008 and 2010. Their accounts were used as a temporary repository of funds as funds of similar amount were deposited and withdrawn or transferred to different accounts via ATM on the same day or shortly afterwards. The volume of account activities were incommensurate with the financial background of Mr. H and Mr. I who claimed to be security guard and garage worker respectively with low monthly income.

In 2012, the duo were arrested and each charged with one count of money laundering. In 2014, they were convicted and sentenced to 24 months' and 26 months' imprisonment respectively.

Temporary repository is one of the common red flags of money laundering activities. FIs and DNFBPs are encouraged to report suspicious transaction activities to the JFIU. Quality disclosures from reporting entities can be developed into useful financial intelligence for financial investigation and hence facilitate prosecution of money laundering offence to deter criminal activities.

## 案例 Case 4

### 涉及販毒得益的清洗黑錢活動 Money Laundering related to Drug Proceeds





## 案例 Case 5

### 涉及挪用公款的清洗黑錢活動

### Money Laundering Related to Misappropriation of Funds

自 2013 年起，香港海關就一名因干犯挪用公款罪行而被 R 國政府通緝的 J 先生，於香港及海外的跨境洗黑錢活動展開調查。

香港海關調查發現，J 先生曾於 R 國取得虛假身份，在 2008 至 2012 年間，以該身份開設多間離岸公司。此外，J 先生又以其虛假身分及該等離岸公司名義，在香港開立多個銀行賬戶，借此接收大量資金。這些資金包括不明來歷現金存款，以及來自本地居民的轉帳。在累積相當金額後，J 先生將大筆款項轉移至他控制的其他本地及海外戶口。為掩飾犯罪得益的來源，J 先生利用一名本地居民以相同手法協助他收取及轉移資金。與此同時，J 先生的海外銀行賬戶亦錄得大量來自香港的匯款。調查結果顯示這些資金源自 R 國的地下錢莊，期間 J 先生清洗超過 3.3 億港元的犯罪得益。

2014 年 8 月，香港海關與四個國家的有關機構聯合行動，追查 J 先生的犯罪資產。憑藉各方通力合作，香港海關成功凍結 J 先生於香港及另一國家持有的資產，總值 1.12 億港元。於 2014 年 12 月，有關資產在香港被法庭頒令充公。此外，香港海關在是次行動拘捕四名本港居民，各人涉嫌協助 J 先生清洗黑錢。

從這宗案件可見，香港海關一直銳意打擊跨國清洗黑錢罪行，並透過與海外機關緊密合作，彰顯共同打擊罪犯的卓著成效。

Since 2013, the C&ED has been investigating a transnational money laundering scheme in Hong Kong and other countries involving Mr. J who was wanted by Country R for misappropriation of public funds.

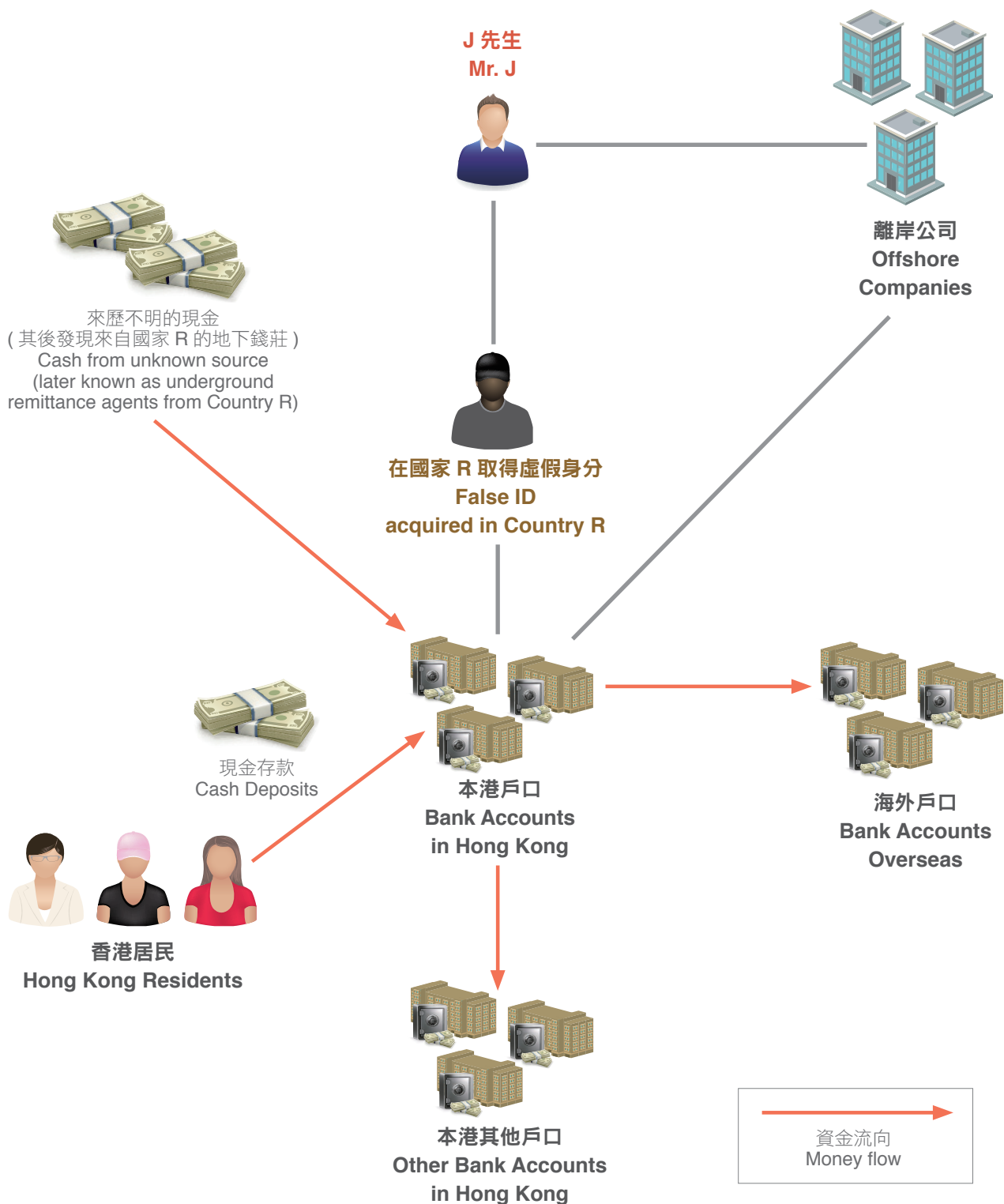
The C&ED's investigation unveiled that Mr. J had acquired a false identity in Country R. Between 2008 and 2012, he used his false identity to set up several offshore companies and opened a number of personal and company bank accounts in Hong Kong to receive large amount of funds via cash deposits from unidentified sources and bulk deposits from local residents. After accumulation to a certain threshold, he transferred the funds in large amount to other local and overseas accounts under his control. To conceal the origin of the crime proceeds, Mr. J engaged a local resident to help him receive and divert the money using the same structuring modus operandi. On the other hand, Mr. J's overseas bank accounts recorded a large amount of remittances from Hong Kong. Investigations confirmed that the money originated from underground remittance agents in Country R. Over HK\$330 million was laundered during the period.

In August 2014, the C&ED mounted a joint operation in collaboration with the relevant authorities in four other countries to track down the assets held by Mr. J. Through seamless cooperation with the counterparts, the C&ED successfully restrained HK\$112 million worth of assets held by Mr. J in Hong Kong and in another country. In December 2014, the assets were ordered for confiscation in Hong Kong. In the same operation, the C&ED also arrested four Hong Kong residents for assisting Mr. J in laundering crime proceeds.

This case demonstrates the C&ED's firm commitment to cracking down on transnational money laundering syndicate and showcases the effectiveness of Customs cooperation with overseas authorities in the fight against illicit activities.

## 案例 Case 5

### 涉及挪用公款的清洗黑錢活動 Money Laundering related to Misappropriation of Funds



#### 香港海關財富調查成果 C&ED's Financial Investigation Result

J 先生於香港及另一國家總值 1.12 億港元的資產被充公；  
4 名涉嫌協助 J 先生清洗黑錢的香港居民被拘捕。

HK\$112 million worth of Mr. J's assets in Hong Kong & another country was confiscated;  
4 Hong Kong residents were arrested for assisting Mr. J in money laundering.

## 國際合作及參與 International Cooperation and Representation

香港一直與國際社會合作，致力打擊清洗黑錢及恐怖分子籌資活動。香港分別於 1991 及 1997 年加入「特別組織」及「亞太反洗錢組織」。另外，聯合財富情報組於 1996 年加入了「埃格蒙特組織」。

為促進國際交流，聯合財富情報組、毒品調查科財富調查組、洗錢及恐怖分子資金籌集風險評估小組的人員，均積極參加上述團體的會議及工作坊，與打擊清洗黑錢／反恐籌資的伙伴保持聯繫，彼此交換財富情報或就各個範疇分享經驗，包括並不限於即將進行的「特別組織」／「亞太反洗錢組織」相互評核分享籌備心得。

Hong Kong is committed to the global fight against money laundering and terrorist financing activities. Hong Kong has been a member of FATF and the APG since 1991 and 1997 respectively. JFIU has also joined the Egmont Group as a member since 1996.

On the international front, officers of the JFIU, FID NB and RAU actively participate in the meetings and workshops of FATF, APG and Egmont Group to engage with AML/CFT partners with a view to exchanging financial intelligence and sharing experiences in areas including but not limited to the preparation for the upcoming FATF/APG Mutual Evaluation.



2014 年 6 月，聯合財富情報組人員在秘魯利馬出席第 22 屆「埃格蒙特組織」全體會議。

The JFIU participated in the 22nd Egmont Group Plenary Meeting in Lima, Peru in June 2014.

2014 年 7 月，聯合財富情報組、毒品調查科財富調查組、洗錢及恐怖分子資金籌集風險評估小組人員，在澳門出席第 17 屆「亞太反洗錢組織」周年會議。

Officers of the JFIU, FID NB and RAU participated in the 17th Annual Meeting of the APG in Macao in July 2014.





2014 年 7 月，香港警務處人員隨香港代表團在澳門出席第一屆內地暨香港澳門反洗錢業務交流會。

HKPF joined the Hong Kong delegation to attend the 1st Tripartite Meeting on AML Works among China, Hong Kong and Macao in Macao in July 2014.

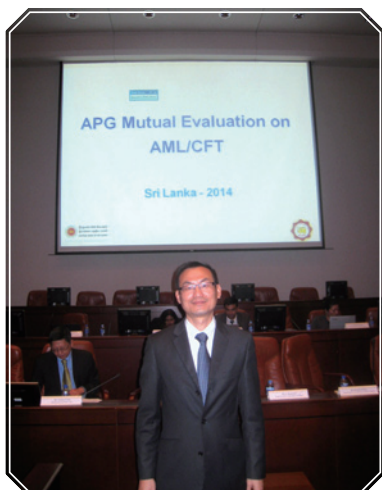


2014 年 11 月，聯合財富情報組副主管陳麗華在泰國曼谷出席「特別組織」／「亞太反洗錢組織」類型學聯合專家會議及「亞太反洗錢組織」技術研討會，分享有關打擊清洗黑錢的專業知識。

Ms. UPATHAMCHART S. Apple, Deputy Head of JFIU, shared her expertise on money laundering at the FATF / APG Joint Experts' Meeting on Typologies and APG Technical Seminars in Bangkok, Thailand in November 2014.

此外，聯合財富情報組主管羅昭煥獲邀出任為財富情報單位／執法機關專家，於 2014 年 12 月在斯里蘭卡為其第三輪「亞太反洗錢組織」相互評核進行實地評估。

Besides, Mr. Bernard LAW, Head of JFIU, was invited to be the FIU/LEA expert to conduct on-site assessment for the 3rd round of APG ME on Sri Lanka in December 2014.



聯合財富情報組主管羅昭煥與各領域及各國的專家一同擔任相互評核的評估人員，為斯里蘭卡的打擊清洗黑錢／反恐籌資制度作實地考核，以檢視其合規水平及成效。

Mr. Bernard LAW, Head of JFIU, joined other ME assessors from different fields and countries to conduct a comprehensive ME on-site assessment to evaluate the level of technical compliance and effectiveness of Sri Lanka's AML/CFT regime.

## 情報交流 INFORMATION EXCHANGE

清洗黑錢及恐怖分子籌資活動屬跨國罪行，往往不受地域界限或司法管轄區的法規所約束。因此，世界各國必須緊密合作，方能追蹤這些不法財產，查明罪犯的身分背景。近年，情報交換日趨頻繁，反映財富情報單位之間的國際合作愈來愈重要。

Money laundering and terrorist financing are often transnational crimes that are not bound by geographical boundaries or sovereign jurisdictions. A close and effective international cooperation is of paramount importance to the success in tracing ill-gotten gains, and unveiling the identity and background of criminals. The escalating number of information exchange reflects the growing value of international engagement among FIUs.

過去三年，聯合財富情報組常與外地機關交換情報，次數按年上升，詳見下表。

The number of JFIU's financial intelligence exchange with our counterparts has been on the rise in the past three years, as shown in the figures below.

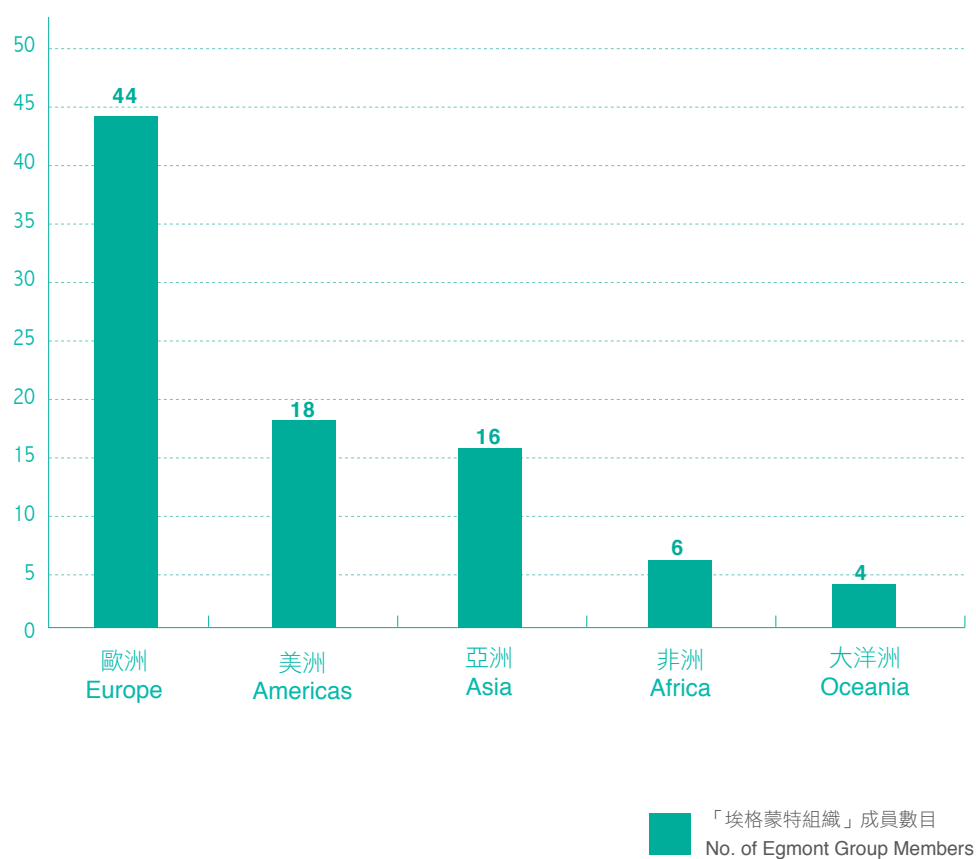
		2012	2013	2014
<b>接獲外地的</b> 全新／跟進請求 及自發交換情報宗數 Total No. of <b>Incoming</b> Fresh / Further Requests & Spontaneous Exchanges	埃格蒙特組織 (Egmont Group)	656	705	744
	非埃格蒙特組織 (Non-Egmont Group)	18	20	14
<b>本組接獲的總數</b> <b>Incoming total</b>		674	725	758

		2012	2013	2014
<b>對外發出的</b> 全新／跟進回覆、請求 及自發交換情報宗數 Total No. of <b>Outgoing</b> Fresh / Further Replies, Requests & Spontaneous Exchanges	埃格蒙特組織 (Egmont Group)	575	613	824
	非埃格蒙特組織 (Non-Egmont Group)	21	18	23
<b>本組發出的總數</b> <b>Outgoing total</b>		596	631	847

本組與各地財富情報單位的情報交流  
 Financial Intelligence Exchange between the JFIU and FIUs Worldwide

回顧 2014 年，聯合財富情報組曾與五大洲共 88 個「埃格蒙特組織」成員交換情報。如按這五大洲劃分，與本組曾有交往的「埃格蒙特組織」成員數目如下：

In 2014, the JFIU exchanged financial information with 88 Egmont Group members from different continents. The number of Egmont Group members from each continent being engaged is illustrated as follows:



2014 年與本組交換情報的「埃格蒙特組織」成員數目 (按五大洲劃分)  
Number of Egmont Group FIUs Exchanged Information with the JFIU (By Continents) in 2014



## 國際訪客 INTERNATIONAL VISITORS

一如以往，聯合財富情報組致力與各國機構建立聯繫網絡，彼此深化合作關係。透過實地探訪，各地人員能有效交換重要情報，有助偵破及防止罪案，並確保本組的情報收集工作能夠與時並進。

回顧 2014 年，聯合財富情報組先後接待法國、日本、荷蘭、新西蘭、新加坡、泰國、英國及美國的代表團。透過直接會面與交流，本組能與來訪的財富情報單位深入交談，促進了解，從而掌握最新趨勢及良好實務，並認識不同打擊清洗黑錢／反恐籌資部門所面對的獨特挑戰。

The JFIU has continued to establish network and enhance relationships with international counterparts. Visits and interactive dialogues are effective ways of exchanging useful pointers to detect and prevent crime, as well as keeping our intelligence gathering processes up-to-date.

In 2014, the JFIU received delegations from France, Japan, the Netherlands, New Zealand, Singapore, Thailand, the United Kingdom and the United States. Such face-to-face meetings and exchanges enhance mutual understanding between the visiting delegations and the JFIU on the latest trend, good practices and challenges that different AML/CFT units are encountering.



2014 年 2 月，泰國反洗錢辦公室訪問本組。  
The Anti-Money Laundering Office, Thailand visited the JFIU in February 2014.



2014 年 5 月，日本財富情報單位訪問本組。  
The Japan Financial Intelligence Center visited the JFIU in May 2014.



2014 年 12 月，美國財富情報單位訪問本組。  
The Financial Crimes Enforcement Network, U.S. visited the JFIU in December 2014.

## 2014 年聯合財富情報組交流活動一覽 EVENT CALENDAR OF THE JFIU IN 2014

### 第一季 1st Quarter

在法國巴黎出席「特別組織」全體會議及工作小組會議  
The FATF Plenary and Working Group Meetings in Paris, France

英國國家打擊犯罪調查局訪問本組  
Visit to the JFIU by the National Crime Agency, U.K.

在匈牙利布達佩斯出席「埃格蒙特組織」委員會及工作小組會議  
The Egmont Group Committee and Working Group Meetings in Budapest, Hungary

泰國反洗錢辦公室訪問本組  
Visit to the JFIU by the Anti-Money Laundering Office, Thailand

美國財政部國稅局刑事調查組訪問本組  
Visit to the JFIU by the Criminal Investigation Division, Internal Revenue Service, Department of the Treasury, U.S.

### 第二季 2nd Quarter

日本防止犯罪收益移轉管理中心訪問本組  
Visit to the JFIU by the Japan Financial Intelligence Center

美國聯邦調查局駐港法務聯絡處訪問本組  
Visit to the JFIU by the Legal Liaison Office, Federal Bureau of Investigation, U.S.

與新加坡警隊商業事務局交流  
Exchange with the Commercial Affairs Department of Singapore Police Force

與日本駐港總領事館的聯絡官交流  
Exchange with Liaison Officers of the Consulate-General of Japan in Hong Kong

在秘魯利馬出席第 22 屆「埃格蒙特組織」全體會議  
The 22nd Egmont Group Plenary Meeting in Lima, Peru

法國國家警察防範金融罪行總部反洗錢小組訪問本組  
Visit to the JFIU by the Anti-Laundering Section, Central Office for Suppression of Great Financial Crime, French National Police

在法國巴黎出席「特別組織」全體會議及工作小組會議  
The FATF Plenary and Working Group Meeting in Paris, France



## 2014 年聯合財富情報組交流活動一覽

### EVENT CALENDAR OF THE JFIU IN 2014

#### 第三季 3rd Quarter

與荷蘭國家警察局警政專員交流  
Exchange with Police Attachés from the National Police of the Netherlands

為聯合國毒品和犯罪問題辦事處人員舉辦毒品調查科財富調查課程  
The NB's Financial Investigation Course for officers of the United Nations Office on Drugs and Crime

在澳門出席第 17 屆「亞太反洗錢組織」周年會議  
The 17th Annual Meeting of the APG in Macao

在澳門出席第一屆內地暨香港澳門反洗錢業務交流會  
The 1st Tripartite Meeting on Anti-Money Laundering Works among China, Hong Kong and Macao in Macao

法國駐港總領事館訪問本組  
Visit to the JFIU by the Consulate General of France (Hong Kong)

#### 第四季 4th Quarter

在法國巴黎出席「特別組織」全體會議及工作小組會議  
The FATF Plenary and Working Group Meetings in Paris, France

在泰國曼谷出席「特別組織」／「亞太反洗錢組織」類型學聯合專家會議及「亞太反洗錢組織」技術研討會  
The FATF / APG Joint Experts' Meeting on Typologies and APG Technical Seminars in Bangkok, Thailand

與美國財政部反恐金融情報辦公室交流  
Exchange with the Office of Terrorism and Financial Intelligence, U.S. Department of the Treasury

美國金融罪行執法網絡訪問本組  
Visit to the JFIU by the Financial Crimes Enforcement Network, U.S.

在澳洲悉尼出席「澳洲交易報告及分析中心」所主辦的「國際資金轉移指示會議」  
The Australian Transaction Reports and Analysis Centre's Conference on International Funds Transfer Instructions in Sydney, Australia

與紐西蘭警察交流  
Exchange with the New Zealand Police

## 培訓和外展 Training and Outreach

聯合財富情報組不時舉辦財富調查訓練，講授如何調查清洗黑錢及恐怖分子籌資等罪行，旨在增進執法機關及其他機構人員的調查技巧。此外，本組亦協助統籌為金融機構及指定的非金融企業及行業的外展宣傳，藉此提高私營界別對其角色及責任的認知，鼓勵它們緊守崗位，協力鞏固香港的打擊清洗黑錢／反恐籌資制度。

The JFIU provides financial investigation training for LEAs and other counterparts, and coordinates publicity outreach to the FIs and DNFBPs. These courses strengthen trainees with skills on money laundering and terrorist financing investigation, and increase the private sectors' awareness of their role and responsibility in Hong Kong's AML/CFT regime.



毒品調查科財富調查課程及聯合財富情報組反清洗黑錢／反恐籌資講座的部份講題  
Some Topics of NB's Financial Investigation Courses and JFIU's AML/CFT Seminars

## 專門訓練 SPECIALIST TRAINING

聯合財富情報組每季均會舉辦內部的財富調查課程，以供香港警務處的刑偵人員修讀。在 1989 至 2014 年間，共有 1,928 名警務處人員修讀課程。自 2014 年 2 月起，課程更增設「打擊清洗黑錢國際標準」環節。多年來，課程除了提升人員的調查水平外，還增進人員對反清洗黑錢知識的認知。

The JFIU runs quarterly in-house financial investigation courses for HKPF crime investigators. Between 1989 and 2014, 1,928 HKPF members attended the training. Since February 2014, the new session of AML International Standards has been added to the courses. Over the years, other than raising the trainees' level of investigation, the courses have helped enhance their AML knowledge.



學員參與實習訓練，熱烈討論如何分析財富情報及調查清洗黑錢活動。

Trainees actively participated in the discussion on financial intelligence analysis and money laundering investigation during practical exercise session.



此外，聯合財富情報組也舉辦兩項國際財富調查課程，為亞洲及各地的策略伙伴提供專門訓練；其中一項課程以英語授課，另一項以中文授課。由 1989 年至今，共有 689 名來自 30 個司法管轄區的財富情報單位、執法機關及監管機構人員報讀國際財富調查課程。

The JFIU also runs specialist training for strategic partner agencies both in the Asia Region and globally, through two international financial investigation courses. One is conducted in English while the other in Chinese. Since 1989, a total of 689 participants of FIUs, LEAs and regulators from 30 jurisdictions have attended the international financial investigation courses.



回顧 2014 年，聯合財富情報組曾為聯合國毒品和犯罪問題辦事處人員舉辦財富調查課程，學員來自大湄公河次區域的五個國家，即柬埔寨、中國大陸、緬甸、越南及泰國。至於原定在 2014 年第四季舉行的國際財富調查課程，因警務處的行動需要而停辦，有關年度國際課程將於 2015 年復辦。

上述課程為學員交流經驗與知識提供理想平台，深受本地及海外學員歡迎。

In 2014, the JFIU hosted a Financial Investigation Course for officers of the United Nations Office on Drugs and Crime (UNODC) from five countries of the Greater Mekong Subregion, namely Cambodia, Mainland China, Myanmar, Vietnam and Thailand. However, the international financial investigation courses originally scheduled for the 4th quarter of 2014 were suspended due to the HKPF's operational exigencies. Such annual international classes will resume in 2015.

All these courses were well received by local and overseas officers and provided a forum for experience and information exchange.







2014 年 7 月，本組假香港警官俱樂部為聯合國毒品和犯罪問題辦事處人員舉辦財富調查課程。

The Financial Investigation Course for UNODC officers was held in Hong Kong Police Officers' Club in July 2014.





## 反清洗黑錢／反恐籌資的外展宣傳 AML/CFT PUBLICITY OUTREACH

要有效落實反清洗黑錢及反恐籌資的措施，指定界別及專業人士必須妥善履行有關責任義務。為此，本組致力與社會大眾及策略伙伴溝通聯繫，提高相關界別／專業的意識，同心協力鞏固香港的反清洗黑錢／反恐籌資制度。因此，本組常與財經事務及庫務局以及保安局禁毒處合作，定期為持份者舉辦各式研討會，當中包括證券及期貨事務監察委員會、香港會計師公會以及地產代理監管局等。

年內，聯合財富情報組以合辦或派員演講方式參加了 28 場研討會，致力提高與會者的反清洗黑錢／反恐籌資意識，講授相關知識與技巧，解答各種有關預防、偵測及舉報清洗黑錢及恐怖分子資金籌集的可疑活動等問題疑難。

To effectively implement measures against money laundering and terrorist financing, designated sectors/professionals should fulfil the obligation imposed on them. As such, it is vital to engage the general public and strategic partners through publicity outreach with a view to raising their awareness and enlisting their concerted support to build a robust AML/CFT regime in Hong Kong. Working in partnership with the FSTB and the SB(Narcotics) of the HKSAR Government, the JFIU regularly provides seminars together with other stakeholders such as the Securities and Futures Commission, the Hong Kong Institute of Certified Public Accountants and the Estate Agents Authority.

The JFIU co-hosted or sent officers as guest speakers in 28 seminars over the year to continue raising awareness, enhancing knowledge and skills, and addressing relevant concerns or queries about the prevention, detection and reporting of money laundering/terrorist financing activities.



本組參與在香港中央圖書館舉行的保險業講座，活動反應踴躍。

The JFIU participated in outreach seminars for the insurance sector at Hong Kong Central Library.





2014 年 5 月，聯合財富情報組前主管麥永業出席香港特許秘書公會講座，分享反清洗黑錢的專業知識。

Mr. Cyril Mak, Former Head of JFIU, shared his AML expertise at the seminar run by the Hong Kong Institute of Chartered Secretaries in May 2014.



## 紀念特輯 Anniversary Feature

2014 年不只是聯合財富情報組的銀禧之喜，更標誌着毒品調查科邁進鑽禧新里程。事實上，本組自成立以來一直隸屬於毒品調查科，彼此關係密切。

在本港的緝毒機關中，毒品調查科一直擔當先鋒角色，儘管本地及國際形勢幾經轉變、挑戰重重，該科仍能堅守重任，穩步發展。過去 25 年，本港的打擊清洗黑錢／反恐籌資法例日益完善，毒品調查科的工作亦擴展至財富調查，積極追查及沒收罪犯的不法財產，使罪犯不得從販毒、有組織及嚴重罪行以至恐怖分子籌資活動中獲益。這些年間，毒品調查科的編制亦不斷壯大，由 1954 年最初警務處反貪污部屬下的三人小組，發展至今日 400 多人的刑事部門，為警務處執行各類禁毒及打擊清洗黑錢／反恐籌資工作。

The year of 2014 did not only mark the silver anniversary of JFIU, but also the diamond anniversary of NB, under which JFIU has been housed since its establishment.

The NB has been at the forefront of drug enforcement agencies in Hong Kong and remained steadfast in various local and international challenges. Along with the development of AML/CFT legislation in Hong Kong over the last 25 years, the NB has been expanding its focus on financial investigation to enhance the enforcement against criminals by tracking down and confiscating their illicit proceeds in drug offences, other organized and serious crimes as well as terrorist financing activities. The NB has also gone from strength to strength as manifested by its growing workforce, which has increased from three persons back in 1954 under the Anti-Corruption Branch within HKPF to 400 plus officers in 2014 running a crime bureau responsible for anti-narcotics and AML/CFT functions of the HKPF.

憑藉各人員群策群力，毒品調查科多年來屢創佳績：

The synergy brought together by the NB officers has led to a number of significant achievements in history:

1972

在大埔某海灣的海床起出 357 包生鴉片及 22 塊「999 牌」嗎啡磚。

Recovery of 357 packets of raw opium and 22 blocks of "999" brand morphine from the seabed in a bay in Tai Po.



1989

在西貢破獲 420 公斤四號海洛英，檢獲量屬當時世界第二大。

The world's second largest seizure of No. 4 heroin (420 kg) from Sai Kung at that time.



1992

經過五年的財富調查，毒品調查科掌握某國際販毒集團在香港的清洗黑錢罪證，最終沒收犯罪得益 1.2 億港元。有關金額創下當時紀錄，是自《販毒（追討得益）條例》於 1989 年實施以來，警方在單一販毒案中所沒收的最大筆財產。

Five years of financial investigation by NB on an international drug syndicate laundering its proceeds in Hong Kong led to recovery of HK\$120 million, which was the biggest single seizure of drug-related assets at that time since the enactment of the DTROP in 1989.





2006

成功瓦解一個高層次的氯胺酮販運集團，拘捕六名骨幹成員（各人被判入獄 8 年至 30 年不等），並破紀錄檢獲 906 公斤氯胺酮。

Neutralization of a high-level ketamine trafficking syndicate with the arrest of six core members (sentenced to imprisonment ranging from 8 to 30 years) and a record seizure of 906 kg of ketamine at that time.



2011

成功瓦解一個南美販毒集團，並破紀錄檢獲 567 公斤可卡因。有關毒品收藏於屯門某回收倉庫的壓縮塑料堆之中。六名被捕者各被判監 17 年至 27 年不等。

Neutralization of a South American drug trafficking syndicate with a record seizure of 567 kg of cocaine concealed in heaps of compressed plastics stored in a recycling warehouse in Tuen Mun, and arrest of six persons who were later sentenced to imprisonment ranging from 17 to 27 years.





2013

印度禁毒局、中國公安部禁毒局以及本港毒品調查科聯合行動，成功打擊某跨國販毒集團。最後三名罪犯被裁定清洗黑錢罪成立，超過 4,200 萬港元資產遭到沒收。

A successful joint operation between Narcotics Control Bureau of India, Narcotics Control Bureau of the Ministry of Public Security of Mainland China and NB against a transnational drug trafficking syndicate, with three criminals convicted of money laundering and assets over HK\$ 42 million confiscated.

2014

偵破香港史上大型的清洗黑錢案 -- 一名輟學男子在九個月內利用銀行戶口處理 130 億港元，被裁定清洗黑錢罪成，判監 10 年 6 個月。控罪所涉的洗黑錢金額屬歷來最高，而原訟法庭所判處的監禁刑罰也屬同類案件中最重。

An unprecedented money laundering case in the history of Hong Kong - a male school dropout was convicted of money laundering and sentenced to 10.5 years imprisonment in relation to a total turnover of HK\$13 billion in a bank account within nine months. It marked the highest amount of crime proceeds particularized in a money laundering charge and the heaviest custodial sentence awarded by the Court of First Instance in connection with money laundering conviction.

積極部署策劃，銳意調查及沒收販毒及各類罪行的得益，一直是香港警方及毒品調查科的首要工作之一。展望未來，毒品調查科定當精益求精，打擊遺禍深遠的毒品貿易及清洗黑錢罪行，協力共建美好香港。

Taking proactive measures to investigate and confiscate proceeds of drug trafficking and other crimes is one of the operational priorities of HKPF and NB. The NB will continue to strive for excellence in all that we do in pursuit of effectively combating the nefarious drug trade and money laundering to contribute to a better Hong Kong.



# 常用詞彙 Glossary

8

(A-S)

Abbreviations 簡稱	English	中文
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
CDD	Customer Due Diligence	客戶盡職審查
CFT	Combating the Financing of Terrorism	反恐籌資
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
HKSAR	Hong Kong Special Administrative Region	香港特別行政區
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
ME	Mutual Evaluation	相互評核
MSO	Money Service Operator	金錢服務經營者
SB (Narcotics)	Narcotics Division, Security Bureau	保安局禁毒處

## (O-Z)

Abbreviations 簡稱	English	中文
<b>OSCO</b>	Organized and Serious Crimes Ordinance	《有組織及嚴重罪行條例》
<b>RAU</b>	Money Laundering and Terrorist Financing Risk Assessment Unit	洗錢及恐怖分子資金籌集風險評估小組
<b>STR</b>	Suspicious Transaction Report	可疑交易報告
<b>STREAMS</b>	Suspicious Transaction Report and Management System	可疑交易報告管理系統
<b>TCSP</b>	Trust and Company Service Provider	信託及公司服務供應商
<b>UNATMO</b>	United Nations (Anti-Terrorism Measures) Ordinance	《聯合國 ( 反恐怖主義措施 ) 條例》
<b>UNODC</b>	United Nations Office on Drugs and Crime	聯合國毒品和犯罪問題辦事處



[www.jfiu.gov.hk](http://www.jfiu.gov.hk)



Joint Financial Intelligence Unit  
聯合財富情報組

