

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

2017



Joint Financial Intelligence Unit  
聯合財富情報組



# VISION

AND

# MISSION

抱負及使命

## 抱負

保持聯合財富情報組在亞太區內其中一個主要的財富情報單位的領先地位

## Vision

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

## 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資金籌集等非法活動的影響，方法包括：

致使聯合財富情報組的專業標準與相關的國際標準接軌

在交換財富情報方面與本地及國際機構加強合作

對接收的可疑交易報告進行精細分析並且適時發布

加強相關業界對清洗黑錢及為恐怖分子資金籌集問題的意識及了解

## Mission

That the JFIU continues to assist the Government in its efforts to protect Hong Kong from illicit activities of money laundering (ML) and terrorist financing (TF) by :

**J**uxtaposing the JFIU's professional standards with 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 (STRs) received by the JFIU and making disseminations as appropriate

**U**pgrading relevant sectors' awareness and understanding of ML and TF issues





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# MESSAGE FROM THE HEAD OF JFIU

聯合財富情報組  
主管序言

# 序言

跨國罪行層出不窮，創科發展瞬息萬變，為聯合財富情報組及全球打擊洗錢及反恐籌資的伙伴，帶來無盡的挑戰。對於全世界急速的轉變，本組並不能獨善其身。

香港是世界主要金融中心之一，經濟極具競爭力，資本流通自由，商業服務多元化；惟擔心此方便之門會惹不法之徒覬覦，肆機處理犯罪得益或懷疑屬於恐怖分子的財產。本港對此類威脅時刻保持警剔，持續檢討打擊洗錢及恐怖分子資金籌集機制，以保穩健，又致力與時並進，與財務行動特別組織(特別組織)最新訂立的國際標準看齊。

作為香港唯一的財富情報單位，2017年可謂對本組的能力和表現的一大考驗。年內，本組接獲舉報之可疑交易以及與各地財富情報單位交換情報的數量同創新高，分別有92,115宗報告和2,493次書信往來。有見及此，本組積極精簡日常工作流程，以保持分析和發布情報的效率。去年，本組就可疑交易報告管理系統(STREAMS)網上平台展開另一輪優化工程，提升其功能，以及新設一支策略分析及研究小隊，強化現有拓展財富情報的工作，冀為有關當局提供類型學分析和情報成果，並且就所面對的威脅和弱點作出探察，在政策和行動層面上提出可取的行動建議。

本組努力迎合本港對財富情報分析及成果日益提高的需求，就多項法例與監管措施的修訂、持續在全港進行的

What happens there, matters here. The ever-evolving landscape of transnational crime and the fast-changing environment of technology and innovation have been posing dynamic challenges to the JFIU as well as the Anti-Money Laundering/ Counter-Financing of Terrorism (AML/CFT) community worldwide.

As one of the international financial centres and most competitive economies, Hong Kong allows free flow of capital and provides a wide range of professional services, but it may at the same time offer conduits and convenience to lawbreakers for dealing with proceeds of crime or suspected terrorist property. Staying vigilant against such prevailing threats, Hong Kong has been constantly reviewing and further improving its robust AML/CFT regime, and striving to align with the latest international standards set by the Financial Action Task Force (FATF).

The JFIU sees the year of 2017 another test of capacity and performance to its unique role as the FIU of Hong Kong. When both the annual total of STRs from local reporting entities and international financial intelligence exchanges with FIUs reached new highs of 92,115 reports and 2,493 correspondence respectively, the JFIU has been streamlining its daily workflow and putting extra effort to sustain its efficacy in analyzing and disseminating intelligence. Last year, the JFIU launched another round of project on enhancing the functionality of the web-based Suspicious Transaction Report and Management System (STREAMS) and set up a dedicated Strategic Analysis and Research Team to intensify its ongoing efforts in the deep dive into financial intelligence development, with a view to providing relevant authorities with typologies and intelligence products, observations on threats and vulnerabilities as well as actionable recommendations at policy and operational levels.

Locally, in addition to responding to the growing appetite and expectation on financial intelligence analysis and outcomes, the JFIU has been keeping in view the development of and contributing its

# MESSAGE

風險評估，以及公私營機構就交換資訊合作等事宜，一直密切留意最新發展和適時提供意見。本組亦透過與有關當局和私營界別緊密聯繫及通力合作，把現行舉報可疑交易的架構發揮極致。

放眼國際，我有幸在2017年起擔任埃格蒙特金融情報組織(埃格蒙特組織)亞太區代表和埃格蒙特委員會委員。希望本組能藉著參與埃格蒙特組織亞太區工作小組會議和委員會會議展示本組對打擊洗錢及反恐籌資的議題之決心，特別是情報交流，並透過財富情報單位之間的龐大網絡加強國際合作的信念。

特別組織對香港的第四輪相互評核定於2018/19年度進行，本組竭力在策略及行動層面，支援決策局，又協助其他主要機構進行籌備和協調工作。本組致力與其他持份者合作，在快將來臨的實地視察，展現本港機制如何有效地打擊洗錢及反恐籌資。

一如以往，本組看重與各工作伙伴的合作關係，珍視意見回饋，並與全球打擊洗錢及恐怖分子資金籌集的伙伴一樣，懷有持續發展的抱負。洗錢、恐怖分子資金籌集以至大規模毀滅武器擴散資金籌集，皆越見複雜；儘管未來挑戰重重，本組會致力參與相關國際事務，繼續提升本組的效能。

香港聯合財富情報組主管  
周志鈞警司

relevant input to various legislative and regulatory changes, the ongoing territory-wide risk assessment exercise, as well as public-private partnership on information sharing. The JFIU has been working and liaising more closely with competent authorities and private sectors to capitalize on the existing suspicious transaction reporting framework.

Globally, I am pleased to have taken up the new role of regional representative of the Asia and Pacific region of the Egmont Group of Financial Intelligence Units (Egmont Group) and a member of the Egmont Committee since 2017. It is hoped that the JFIU's greater involvement in both the Asia and Pacific region working group and committee meetings can exhibit Hong Kong's unremitting commitment to addressing common AML/CFT concerns particularly in intelligence exchange and promoting international cooperation via extensive FIU-FIU networks.

As the process of the 4th round of FATF Mutual Evaluation (ME) on Hong Kong is scheduled for 2018/19, the JFIU has been supporting the steer by the policy bureaux and cooperating with other key local agencies in the preparatory and coordination work at both strategic and operational levels. It can be rest assured that the JFIU, together with other stakeholders, will work at full stretch and stand ready to demonstrate the effectiveness of Hong Kong's AML/CFT regime in the upcoming on-site visit.

The JFIU values its collaboration with and feedback from working partners as always, and shares with all the vision to sustainability in the global AML/CFT arena. The JFIU will continue in its endeavours to increase international representation and strengthen capacity building, in face of the multi-faceted challenges along the uphill battle against increasingly complex ML, TF or even proliferation financing.

Edwin CHOW  
Superintendent of Police  
Head of JFIU, Hong Kong

# ABOUT THE JFIU 聯合財富情報組

## 本組角色

聯合財富情報組作為香港的財富情報單位，專門負責管理本港的可疑交易舉報機制，並與世界各地的財富情報單位及執法機關交換財富情報，是肩負此等職能的唯一機構。

本組雖為執法型財富情報單位，卻非調查單位。本組與不同機構通力合作，憑藉其情報分析能力和觀點，為本港的打擊洗錢及反恐籌資制度作出貢獻。本組的合作伙伴，包括決策局及政府部門、金融監管機構及其他專業團體、執法機關及財富情報單位、洗錢及恐怖分子資金籌集風險評估小組，以及金融機構和指定非金融企業及行業。

## Our Role

As the FIU of Hong Kong, the JFIU is the sole agency to manage the local suspicious transaction reporting regime, and to engage in international financial intelligence exchange with FIUs and law enforcement agencies (LEAs).

The JFIU, though adopting the law-enforcement model, is not an investigative unit. Distinctive in intelligence analysis capabilities and perspectives, it contributes to the AML/CFT regime through close inter-agency collaboration with policy bureaux and government departments, financial regulators and other professional bodies, LEAs and FIUs, ML and TF Risk Assessment Unit (RAU), financial institutions (FIs) and designated non-financial businesses and professions (DNFBPs).

## 本組職責

本組因應對內和對外持續進行的風險評估，履行廣泛職務，銳意打擊和防範洗錢、相關的上游罪行及恐怖分子資金籌集。有關職務列舉如下：

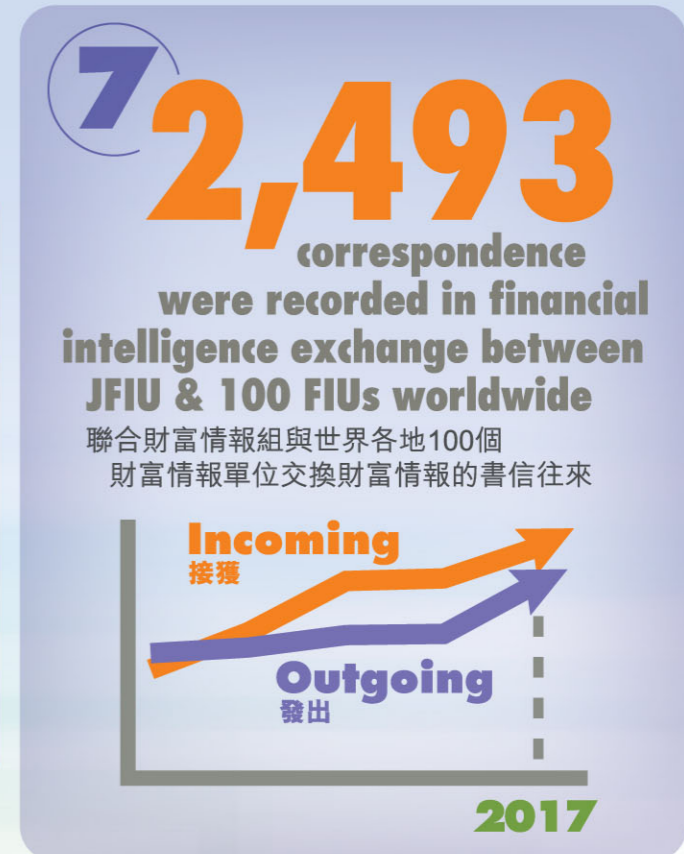
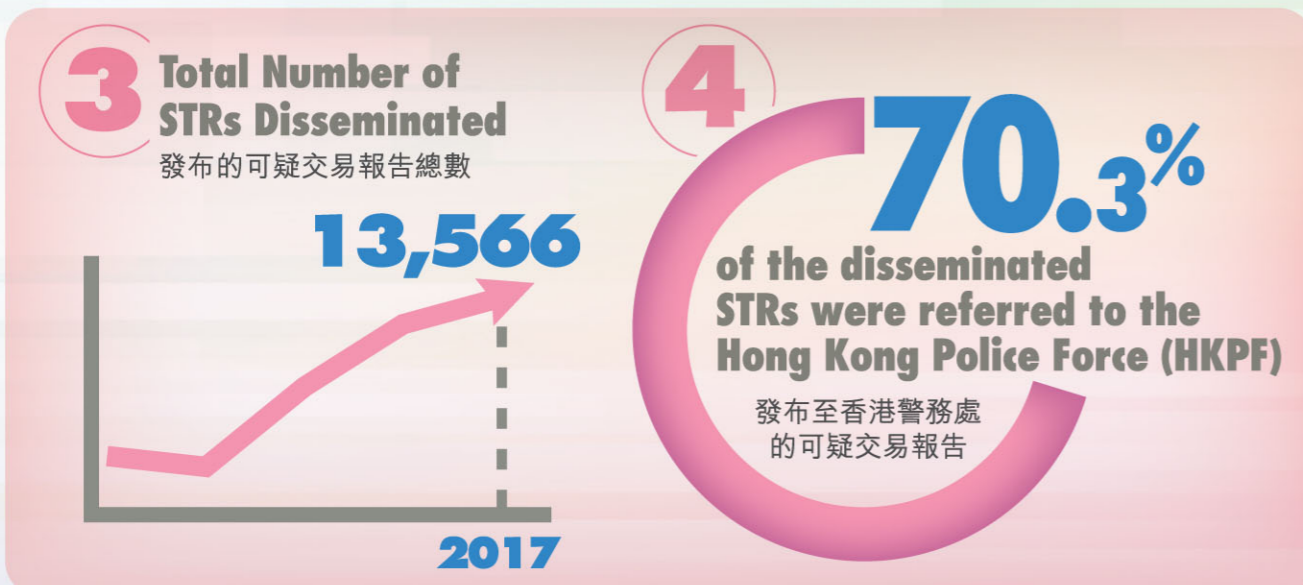
- 就可疑交易報告進行行動分析
- 與世界各地交換財富情報及資訊
- 就財富情報及其他資訊進行策略分析
- 就洗錢及恐怖分子資金籌集活動趨勢和類型學進行研究
- 運作可疑交易報告管理系統 (STREAMS)
- 為防止繼續處理可疑財產的臨時措施提供支援
- 參謀本地及國際打擊洗錢及反恐籌資的政策事宜
- 籌辦打擊洗錢及反恐籌資培訓及外展活動
- operational analysis of STRs
- global exchange of financial intelligence and information
- strategic analysis of financial intelligence and other information
- research on ML/ TF trends and typologies
- operation of the STREAMS
- support on provisional measures to prevent further dealing of suspicious property
- staffing of local and international AML/CFT policy matters
- coordination of AML/CFT training and outreach

## Our Charter

The JFIU performs diverse responsibilities to combat and deter ML, associated predicate offences and TF in view of the ongoing internal and external risk assessment. Its duties include:

# JFIU ACHIEVEMENT HIGHLIGHTS

## IN 2017 聯合財富情報組 於2017年度之工作成果概覽



# LOCAL SUSPICIOUS TRANSACTION REPORTING REGIME

本地可疑交易舉報機制

## 舉報可疑交易的 法律基礎

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(1)條，以及《聯合國(反恐怖主義措施)條例》(第575章)第12(1)條，凡任何人知道或懷疑任何財產是(a)全部或部分、直接或間接代表任何人從販毒或可公訴罪行的得益；(b)曾在與販毒或可公訴罪行有關的情況下使用；或(c)擬在與販毒或可公訴罪行有關的情況下使用；或凡任何人知悉或懷疑任何財產是恐怖分子財產，該人須在合理/切實可行範圍內盡快將該知悉或懷疑(以提交可疑交易報告的方式)向獲授權人(即聯合財富情報組人員)披露。

## Legal Basis for Suspicious Transaction Reporting

Pursuant to sections 25A(1) of the Drug Trafficking (Recovery of Proceeds) Ordinance (DTRP, Cap. 405) and the Organized and Serious Crimes Ordinance (OSCO, Cap. 455), as well as section 12(1) of the United Nations (Anti-Terrorism Measures) Ordinance (UNATMO, Cap. 575), where a person knows or suspects that any property (a) in whole or in part directly or indirectly represents any person's proceeds of; or (b) was used in connection with; or (c) is intended to be used in connection with drug trafficking or an indictable offence; or where a person knows or suspects that any property is terrorist property, the person shall as soon as it is reasonable/ practicable for him/ her to do so disclose that knowledge or suspicion (i.e. by way of STR) to an authorized officer (i.e. JFIU officer).

## 有關舉報可疑交易的 其他法例

近年，由於針對金融機構和指定非金融企業及行業的打擊洗錢及反恐籌資法律架構越趨嚴謹，也成為聯合財富情報組接獲可疑交易報告宗數持續上升的一大原因。

自2012年4月1日起，金融機構受《打擊洗錢及恐怖分子資金籌集條例》(《打擊洗錢條例》，第615章)規管，須履行就客戶盡職審查及備存紀錄的規定。

根據《支付系統及儲值支付工具條例》(第584章)，有關儲值支付工具的監管制度於2015年11月首度推行，並於2016年11月全面實施。自此，儲值支付工具持牌人必須設有健全和適當的管制系統，以確保符合《打擊洗錢條例》的條文規定。

隨著《2018年打擊洗錢及恐怖分子資金籌集(金融機構)(修訂)條例》(《打擊洗錢(修訂)條例》)之實施，上述客戶盡職審查及備存紀錄的規定延伸至指定非金融企業及行業，即法律專業人士、會計專業人士、地產代理和信託或公司服務提供者；信託或公司服務提供者亦須獲信納屬適當人選，並取得公司註冊處所發出的牌照，方可在香港經營業務。

《2018年公司(修訂)條例》(第622章)規定，在香港成立為法團的公司(上市公司另須遵守《證券及期貨條例》(第571章)更嚴格的披露規定)，須藉備存重要控制人登記冊，備存實益擁有者的資料。

上述有關香港法例修訂，不但有助提高私營機構對打擊洗錢及反恐籌資的意識，促使其加強規管措施，也可能促使可疑交易報告宗數持續增長。

## Other Legislation Relevant to Suspicious Transaction Reporting

The total number of STRs received by the JFIU has been on the rise over the years, mainly as a result of a strengthened AML/CFT legal framework for FIs and DNFBPs.

Since 1 April 2012, FIs have been subject to the customer due diligence (CDD) and record-keeping requirements under the Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance (AMLO, Cap. 615).

Under the Payment Systems and Stored Value Facilities Ordinance (Cap. 584), a regulatory regime for the stored value facility (SVF) licensees was first introduced in November 2015 and came into full operation in November 2016. Since then, the SVF licensees must have in place adequate and appropriate systems of control to ensure compliance with the provisions of AMLO.

Upon the operation of the Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) (Amendment) Ordinance 2018 (AML(A)O), such CDD and record keeping requirements are extended to DNFBPs, namely legal professionals, accounting professionals, estate agents, and trust or company service providers (TCSPs); TCSPs are also required to obtain a licence from the Companies Registry, subject to the fulfillment of a fit-and-proper test, before they can run the business in Hong Kong.

The Companies (Amendment) Ordinance 2018 (Cap. 622) requires companies incorporated in Hong Kong (other than listed companies subject to more stringent disclosure requirements under the Securities and Futures Ordinance, Cap. 571) to maintain beneficial ownership information by way of keeping a significant controllers register.

The above legislative changes in Hong Kong would lead to wider awareness and tighter controls on AML/CFT in the private sector, and would likely fuel the continuous growth of STRs.

## 接收可疑交易報告

可疑交易報告是聯合財富情報組之主要財富情報來源。近年，聯合財富情報組處理的可疑交易報告宗數大幅增加。每年接獲可疑交易報告宗數在2013至2015年持續上升，由32,907宗上升近30%至42,555宗，並於2016年飆升80%至76,590宗，更在2017年再創新高，達92,115宗。過去五年，提交最多可疑交易報告的界別是金融機構，佔總數逾94%，當中以銀行居多；指定非金融企業及行業約佔3%，其他界別分別約佔1%至4%不等。

2017年，提交可疑交易報告最多的頭三位，分別屬銀行業、證券業和保險業。自2016年11月起，儲值支付工具持牌人所舉報的可疑交易，亦越趨頻繁。

### Receipt of STRs

The JFIU has been processing an influx of STRs, the major source of financial intelligence. The annual total of STRs steadily climbed by nearly 30% from 32,907 in 2013 to 42,555 in 2015, and surged as much as 80% to 76,590 in 2016 and hit another record high of 92,115 in 2017. Over the past five years, FIs, in particular banks, remained the major contributor, accounting for over 94% of STR submissions; DNFBPs accounted for less than 3% and other sectors ranged from below 1% to 4%.

In 2017, the banking, securities and insurance sectors were the top three STR contributors. Since November 2016, SVF licensees have been filing more STRs.

下表載列本組在2013至2017年接獲的可疑交易報告宗數，並按呈報行業劃分。

The yearly breakdown of STRs received by category of reporting sectors between 2013 and 2017 is tabulated below:

Sectors 行業	2013	2014	2015	2016	2017
<b>FIs 金融機構</b>					
Banks 銀行	27,328 (83.05%)	31,095 (83.61%)	34,959 (82.15%)	68,745 (89.76%)	86,029 (93.39%)
Securities Firms 證券公司	1,410 (4.29%)	1,574 (4.23%)	1,095 (2.57%)	1,423 (1.86%)	2,090 (2.27%)
Insurance Companies 保險公司	401 (1.22%)	446 (1.20%)	495 (1.16%)	928 (1.21%)	1,094 (1.19%)
Money Service Operators 金錢服務經營者	2,108 (6.41%)	2,772 (7.45%)	3,566 (8.38%)	2,554 (3.33%)	908 (0.99%)
Money Lenders 放債人	28 (0.09%)	32 (0.09%)	33 (0.08%)	24 (0.03%)	28 (0.03%)
SVF Licensees* 儲值支付工具持牌人*	/	/	/	67 (0.09%)	590 (0.64%)
(*New category since November 2016) (*2016年11月起新設的界別)					
Total Number of STRs Filed by All FIs 金融機構提交的報告總數	31,275 (95.06%)	35,919 (96.58%)	40,148 (94.34%)	73,741 (96.28%)	90,739 (98.51%)
(% of all STRs Received) (佔可疑交易報告總數比率)					
<b>DNFBPs 指定非金融企業及行業</b>					
Legal Professionals 法律專業人士	235 (0.72%)	222 (0.60%)	894 (2.10%)	969 (1.26%)	555 (0.60%)
Estate Agencies 地產代理	12 (0.04%)	29 (0.08%)	31 (0.07%)	58 (0.08%)	71 (0.08%)
Dealers in Precious Metals & Stones 貴重金屬及寶石交易商	26 (0.08%)	18 (0.05%)	6 (0.02%)	59 (0.08%)	60 (0.07%)
TCSPs 信託或公司服務提供者	27 (0.08%)	46 (0.12%)	22 (0.05%)	27 (0.03%)	31 (0.03%)
Accounting Professionals 會計專業人士	4 (0.02%)	3 (0.01%)	6 (0.02%)	3 (<0.01%)	19 (0.02%)
Number of STRs Filed by All DNFBPs 指定非金融企業及行業提交的可疑交易報告總數	304 (0.94%)	318 (0.86%)	959 (2.26%)	1,116 (1.46%)	736 (0.80%)
(% of all STRs Received) (佔可疑交易報告總數比率)					
Number of STRs Filed by Others 其他行業提交的可疑交易報告宗數	1,328 (4.00%)	951 (2.56%)	1,448 (3.40%)	1,733 (2.26%)	640 (0.69%)
Total Number of STRs Received 接獲可疑交易報告總數	32,907	37,188	42,555	76,590	92,115



## 分析可疑交易報告

可疑交易報告中的資料乃本組日常行動分析和策略分析的主要及獨有的資料來源。

本組接獲可疑交易報告後，會採取風險為本的方法，並參考最新之洗錢及恐怖分子資金籌集的發展和趨勢，以審視和評估每個可疑交易報告。本組亦會根據可疑交易報告所涉及的潛在清洗黑錢及恐怖分子資金籌集風險、情報價值，以及促成往後調查或採取其他跟進行動的可能性，作出篩選，並會集中撥予資源對篩選後之可疑交易報告作全面而深入的分析，冀能拓展優質的財富情報成果。

## Analysis of STRs

The JFIU relies on STRs as the major and unique source of information for daily operational and strategic analyses.

Upon the receipt of STRs, the JFIU adopts a risk-based approach to examining and assessing each of them, with regular reference to the latest ML/TF landscape and trends. Reviewing the level of inherent ML/TF risks, the value of intelligence, and the prospect for further investigation or other follow-up actions, the JFIU may allocate more resources to conduct more holistic and in-depth analysis of selected STRs with the potential to develop quality financial intelligence products.

## 發布可疑交易報告

儘管可疑交易報告宗數大增，本組訂立可疑交易報告質素標準，並進行篩選和分析，從而甄別當中具充足資料而需發布的報告。本組亦會從中抽取有用及/或可付諸行動的情報，向執法機關/財富情報單位發布，作情報用途或其他合適行動之用。

過去五年，每年發布的可疑交易報告宗數普遍上升，於2017年更達至頂峰之13,566宗。

(除了2014年獲發布的報告，由2013年的8,037宗微跌至7,662宗。)

## Dissemination of STRs

Despite the rapid growth of STRs received, the JFIU sets quality standards, screens and analyses STRs with a view to ascertaining if there is sufficient information that warrants dissemination, and to extracting useful and/ or actionable intelligence for dissemination to LEAs/ FIUs for intelligence purposes or any actions deemed appropriate.

The annual total of STRs disseminated showed a general increase in the past five years and peaked at 13,566 in 2017, except a slight drop from 8,037 in 2013 to 7,662 in 2014.

本組在2013至2017年發布的可疑交易報告宗數，表列如下：

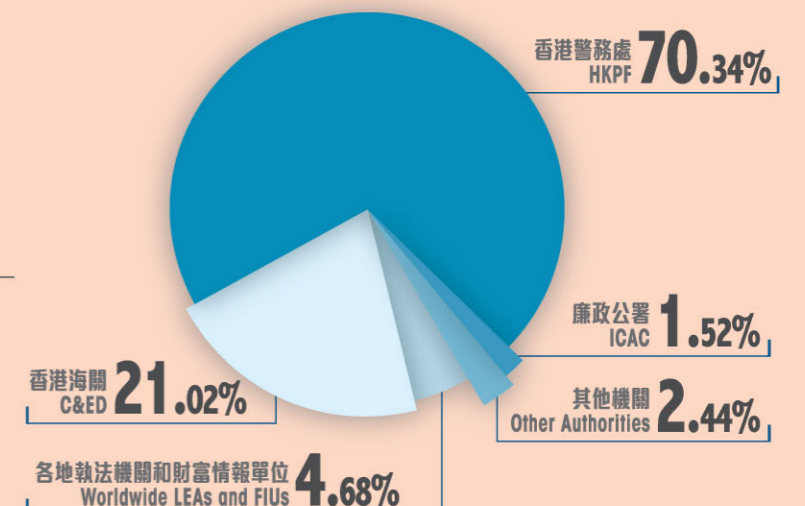
The yearly figures on STR dissemination between 2013 and 2017 are tabulated below:

	2013	2014	2015	2016	2017
Total Number of STRs Disseminated 發布的可疑交易報告總數	8,037	7,662	10,454	12,631	13,566

發布13,566宗可疑交易報告  
**13,566** STRs  
**DISSEMINATED**

2017年，獲發布可疑交易報告的對象主要是香港警務處(70.34%)、香港海關(21.02%)、廉政公署(1.52%)、世界各地的執法機關和財富情報單位(4.68%)，以及其他機關(2.44%)。

In 2017, the major recipients of STRs were the HKPF (70.34%), the Customs and Excise Department (C&ED) (21.02%), the Independent Commission Against Corruption (ICAC) (1.52%), worldwide LEAs and FIUs (4.68%) and other authorities (2.44%).



## 取閱可疑交易報告資料

本組將大量可疑交易報告資料備存在可疑交易報告管理系統(STREAMS)之網絡平台。因應法定要求和資料保安措施，本港執法機關可向本組提出正式申請，要求索取在可疑交易報告管理系統內備存的資料(此類資料可能涵蓋疑犯、可疑公司、可疑帳戶、交易及資金流向)，有助對清洗黑錢、恐怖分子資金籌集及相關上游罪行採取執法行動。本港獲授權用戶(包括香港警務處、香港海關及\*聯合財富情報組人員)亦可直接在可疑交易報告管理系統進行搜尋，以便將財富情報適當地運用於在日常調查/情報拓展上，並為其他工作需要適時提供支援。

2013至2017年，每年要求在可疑交易報告管理系統進行資料索取的次數由1,904次上升至3,301次，錄得73.4%之升幅。而直接在可疑交易報告管理系統進行搜尋的次數，則累計有609,362次。兩項數字均反映各界對可疑交易報告管理系統資料的需求急增。

\*聯合財富情報組人員直接在可疑交易報告管理系統進行搜尋，以便迅速處理本港及世界各地執法機關和財富情報單位索取資料的要求，並於日常監察清洗黑錢及恐怖分子資金籌集相關消息及趨勢時積極回應。

## Access to STR Information

The JFIU has a wealth of STR information available on its web-based STREAMS. In line with the statutory confines and information security safeguards, the JFIU welcomes local LEAs to make formal requests for STREAMS record checks for information (possibly covering suspects, suspected companies, suspicious accounts, transactions and fund flow); it also allows local authorized users (including the HKPF, C&ED and \*JFIU officers) to conduct direct searches on STREAMS to facilitate the appropriate use of financial information in daily investigations/intelligence cultivation, and support various operational needs in a timely manner.

Between 2013 and 2017, the annual number of requests for STREAMS record checks made to the JFIU mounted by 73.4% from 1,904 to 3,301 whilst the total of 609,362 direct searches were made on STREAMS. Both sets of figures reflect the escalating demand for STR information, which is considered conducive to enforcement actions against ML, TF and associated predicates.

\*JFIU officers conduct direct searches on STREAMS to expeditiously process incoming requests for information from local and worldwide LEAs and FIUs and proactively respond to daily monitoring of ML/TF-related news and trends.

2013至2017年，每年要求在可疑交易報告管理系統進行資料索取及直接搜尋的次數，表列如下：  
Below are the annual totals of both requests for STREAMS record checks and direct searches on STREAMS between 2013 and 2017:

	2013	2014	2015	2016	2017
Total Number of Requests for STREAMS Record Checks 要求在可疑交易報告管理系統進行資料索取的次數	1,904	2,362	2,166	3,113	3,301
Total Number of Direct Searches on STREAMS 在可疑交易報告管理系統進行直接搜尋的次數	69,683	101,803	166,592	135,421	135,863

## 管理和提升 可疑交易報告管理系統

可疑交易報告管理系統於2006年建立，又稱"STREAMS"，是一個安全保密的網絡平台，可連結至其他資料庫，便利用家以電子方式呈交、處理、分析和發布可疑交易報告。

過去五年，以電子方式處理的可疑交易報告宗數及所佔比率均有所上升，可見處理可疑交易報告的效率亦有所提升。2017年，高達93%的可疑交易報告以電子方式呈交，本組並以電子方式對呈報機構作出回應。

## STREAMS Management and Enhancement

Launched in 2006, the Suspicious Transaction Report and Management System (STREAMS, a secure web-based platform interfacing with other information databases) facilitates the e-reporting, processing, analysis and dissemination of STRs.

Both the growing number and proportion of STRs e-processed in the past five years illustrate the improving efficiency of the STR workflow. In 2017, as many as 93% of the STRs were submitted and responded to by electronic means, in face of the record high of annual total of STRs received.

2013至2017年，以電子方式和人手處理的可疑交易報告宗數比率，以及電子呈報的宗數，表列如下：  
The respective proportion of electronically and manually processed STRs, as well as the number of e-STRs, between 2013 and 2017 are shown below:

	2013	2014	2015	2016	2017
% of Electronic Processing of STRs 以電子方式處理的可疑交易報告比率 (Total Number of STRs Involved) (涉及的可疑交易報告總數)	77% (25,197)	82% (30,464)	81% (34,500)	89% (67,991)	93% (85,582)
% of Manual Processing of STRs 以人手方式處理的可疑交易報告比率	23%	18%	19%	11%	7%

目前，本組正敲定電子呈報的新方案，鼓勵更多機構以電子方式舉報可疑交易，達至進一步提升處理可疑交易報告和搜集情報的整體能力。

本組致力緊貼有關的技術發展。過往數年，本組持續調配資源改善可疑交易報告管理系統。2017年末，本組開展另一期系統升級工程。這輪優化計劃，着重提升本組處理、分析和發布財富情報的能力，以及借助系統功能互用，應付將來數量龐大的可疑交易報告。

《實體貨幣及不記名可轉讓票據跨境流動條例》(第629章)於2017年6月制定，旨在設立申報及披露制度，以偵測大量貨幣及不記名可轉讓票據跨境進出香港。本組與香港海關緊密合作，也建立了有效的渠道，以便本組獲取相關的申報及披露資料。

To date, the JFIU is finalizing a new e-STR submission solution so as to encourage more reporting entities to file STRs through electronic means, and to further boost the overall competence in STR processing and intelligence gathering.

The JFIU strives to keep abreast of the technical development. In the past years, it has been allocating resources to revamp the STREAMS. In late 2017, the JFIU kicked off another phase of STREAMS upgrade. This round of the STREAMS enhancement project focuses on improving the JFIU's capability in processing, analysing and disseminating financial intelligence as well as leveraging its functional interoperability to better cope with the tremendous volume of STRs in the long run.

The Bill on the Cross-boundary Movement of Physical Currency and Bearer Negotiable Instruments Ordinance (Cap. 629) was enacted in June 2017 to set up a declaration and disclosure system to detect the cross-boundary movement of large quantities of currency and bearer negotiable instruments into and out of Hong Kong. The C&ED and the JFIU have been working closely and established an effective channel for the JFIU to obtain relevant information on cross-boundary movement of currency and bearer negotiable instruments.



## 可疑交易報告質素意見回饋

可疑交易舉報機制能否發揮效用，取決於不同呈報界別所提交可疑交易報告的整體質素。因此，本組會視乎需要，就可疑交易報告的質及量兩方面向監管機構、專業團體和呈報機構提供意見回饋。

本組就可疑交易報告出版《可疑交易報告季度分析》(可於聯合財富情報組網頁限制區閱覽)，藉以加強與私營界別的雙向溝通，同時提升私營界別對打擊清洗黑錢及反恐籌資的意識。金融機構和指定非金融企業及行業可從中獲得最新資訊，例如撰寫優質可疑交易報告的指引和建議格式，顯示呈報趨勢的統計數字，有關洗錢及恐怖分子資金籌集的案例和類型學研究，以及他們日常為符合打擊清洗黑錢及反恐籌資規定而採取的行動及管制措施的良好做法。

2017年，本組就若干議題簡介罪案趨勢和可疑指標，例如商業電郵騙案及信用卡詐騙，人民幣與港元兌換，以及電子錢包等新型支付產品和服務所涉的潛在清洗黑錢及恐怖分子資金籌集風險；又建議持續監察互聯網規約地址，作為打擊清洗黑錢及反恐籌資的措施之一。此外，本港監管機構留意本組就提交具質素可疑交易報告的回饋和建議，敦請各界舉報可疑交易時效法，又為修訂不同界別打擊清洗黑錢及反恐籌資的指引，提供參考意見。

## Feedback on STR Quality

The overall quality of STR input from various reporting sectors is of paramount importance to the effectiveness of the suspicious transaction reporting regime. Thus the JFIU provides quantitative and qualitative feedback on STRs to regulatory agencies, professional bodies and reporting entities as appropriate.

The JFIU publishes *STR Quarterly Analysis* (made available through the secure area of JFIU's website) to enhance mutual communication and raise AML/CFT awareness of the private sector. FIs and DNFBPs are kept up-to-date with useful guidelines and the preferred framework for making quality STRs, STR statistics that indicate their filing trends, case examples on the latest ML/TF-related typologies and other good practices observed in their daily AML/CFT compliance and controls.

In 2017, the JFIU presented crime trends and red flags on business email compromise and credit card fraud, inherent ML/TF risks involved in currency exchange between Renminbi (RMB) and Hong Kong dollars (HKD) as well as new payment products and services such as digital wallets, recommended ongoing monitoring with internet protocol address in AML/CFT measures, etc. In addition, local regulatory agencies were also aware of one of the JFIU's feedbacks on its comments and suggestions on the quality of STRs, encouraged respective sectors to follow accordingly in their STR reporting, and provided reference for revising relevant sectoral AML/CFT guidelines.

## 與本港持份者合作

對打擊清洗黑錢及反恐籌資的社區而言，跨機構合作非常重要，本組亦不遺餘力，務求各方合作無間。在策略層面，本組人員向政府決策局、監管機構及專業團體之涉及可疑交易舉報機制的政策、法例和指引修訂提供意見；又協助整理有關打擊清洗黑錢及恐怖分子資金籌集的統計數字，供政府高層會議討論。在行動層面，本組與不同執法機關和財富情報單位的財富情報交流頻密而迅速，在情報、調查和追討資產方面提供支援。

## Local Cooperation with Stakeholders

The JFIU treasures and seeks to enhance interagency collaboration within the AML/CFT community. At the strategic level, the JFIU offers advice to government bureaux, regulatory agencies and professional bodies on changes of policies, legislation and guidelines that touch on the suspicious transaction reporting regime, as well as assists in collating STR or other AML/CFT-related statistics for the deliberation in high-level governmental meetings. At the operational level, the JFIU provides intelligence, investigative and asset-recovery support through frequent and responsive financial intelligence exchange with various LEAs and FIUs.

## 與舉報可疑交易的機構定期聯繫

香港的金融服務方便快捷，或惹罪犯或恐怖分子(及其聯繫者)覬覦，藉以清洗犯罪得益或進行恐怖分子資金籌集。因此，本組視私營機構為打擊清洗黑錢及恐怖分子資金籌集制度的第一道防線。公私營機構合作，是預防、偵測和阻截此等非法活動的成功關鍵。

本組委派指定的聯絡人員與舉報可疑交易的主要機構協調和溝通，以達致更佳成果。

本組主持舉報可疑交易工作小組(成員包括香港警務處、香港海關、金融監管機構及私營界別代表)，就舉報可疑交易涉及共同關注的議題討論並提出意見。小組又就多項事宜進行交流，範疇涵蓋政策與優先處理的項目、做法和程序，以及在打擊清洗黑錢及反恐籌資方面加強合作等。

2017年9月，本組與各方代表進行舉報可疑交易工作小組會議。

## Regular Liaison with STR Reporting Entities

The JFIU recognizes the private sector as the first line of defence in the AML/CFT regime as criminals or terrorists (and their associates) are inclined to make use of the easily accessible financial services in Hong Kong to launder proceeds of crime or perform TF. Public-private partnership is the key to preventing, detecting and disrupting such illicit activities.

The JFIU has assigned designated liaison officers to better coordinate and communicate with major STR reporting entities.

The JFIU chairs the Suspicious Transaction Reporting Working Group (attended by the HKPF, C&ED, financial regulator(s), and representatives from the private sector) to discuss and advise on matters of common interest in suspicious transaction reporting and share views on policy and operational priorities, practices and procedures, and strengthen other AML/CFT cooperation.

The JFIU held the Suspicious Transaction Reporting Working Group Meeting with various representatives in September 2017.

另外，本組與金融監管機構和舉報可疑交易的主要機構(例如銀行、儲值支付工具持牌人和其他組織)召開會議，監察可疑交易報告的質素和各界面對的清洗黑錢及恐怖分子資金籌集風險，並就此交流意見。本組同時向與會者收集意見回饋，檢視資料轉介機制的效能，財富情報的可用性，以及能否對有關各方行動需要作出支援。

本組歡迎反詐騙協調中心於2017年7月之成立，認為雙方可聯手加強與金融機構之合作，適時交換財富情報，以減低騙案或相關清洗黑錢案件受害者的損失。另外本組亦確保迅速處理與反詐騙協調中心有關的詐騙案的可疑交易報告，並向有關調查小隊發布有用情報。本組也就反詐騙協調中心攔截懷疑騙款提供支援。

The JFIU holds other meetings with financial regulators and key STR reporting entities (such as banks, SVF licensees and other organizations) to monitor and exchange views on the quality of STRs and ML/TF risks faced by respective sectors, as well as obtain feedback on the efficacy of the information referral mechanism, the usefulness of financial intelligence, and the effectiveness in supporting operational needs of the parties concerned.

The JFIU welcomes the establishment of Anti-Deception Coordination Centre (ADCC) in July 2017, as both ends join hands to enhance cooperation with local FIs to exchange timely financial information for mitigating the loss of victims in fraud or its related ML cases. The JFIU diligently processes STRs arising from the ADCC's requests made to FIs so as to ensure swift handling of fraud-related STRs and dissemination of useful intelligence to investigation teams concerned. The ADCC's capacity of stopping payments that are suspected to be fraud proceeds is supported by the JFIU.

# WORLDWIDE FINANCIAL 國際財富情報交流 INTELLIGENCE EXCHANGE

隨著全球邁向一體化及嶄新科技的出現，現今的犯罪類型和手法，亦隨之改變。國際間有效而緊密的合作，是打擊跨國清洗黑錢和恐怖分子資金籌集的成功關鍵之一。

本組自1996年成為埃格蒙特組織成員，一直履行國際義務，透過全球財富情報單位網絡，保密地就財富和其他事宜交換資訊，以作情報和其他合法用途。按照對等互惠原則，這網絡可讓世界各地的財富情報單位(以及司法管轄區(包括香港)內其他有關當局)獲取資訊，以助履行各種打擊清洗黑錢及反恐籌資的職務。

Globalization and the emergence of new technologies have changed the nature and modus operandi of crimes nowadays. Effective and enhanced international cooperation is one of the keys to success in combating transnational ML and TF.

As one of the Egmont Group members since 1996, the JFIU fulfills its international obligation to exchange financial and other information via the worldwide FIU network for intelligence and other lawful purposes in a secure manner. Subject to the principle of reciprocity, this network serves as a gateway for FIUs (and other competent authorities of jurisdictions (including Hong Kong)) to obtain information that assists them in carrying out their respective AML/CFT duties.



The JFIU attended the Egmont Group Working Groups and Heads of FIU Meeting in Doha, Qatar and signed an MOU with the FFMS in January 2017.

於2017年1月，本組在卡塔爾多哈出席埃格蒙特組織工作小組及財富情報組主管會議，並與俄羅斯聯邦金融監管局簽署諒解備忘錄。

## MOU OR AGREEMENTS WITH OTHER JURISDICTIONS

### 與其他司法管轄區簽署諒解備忘錄或協議

根據香港法例，聯合財富情報組無須簽訂諒解備忘錄或其他法律文書，便可就清洗黑錢、恐怖分子資金籌集和相關上游罪行交換情報。儘管如此，為加強合作和了解，本組可與其他司法管轄區簽訂諒解備忘錄，予以對方法律基礎便利情報交換，或反映與其策略伙伴關係。

2017年，本組與俄羅斯聯邦金融監管局，就關乎清洗黑錢及恐怖分子資金籌集的財富情報交流，簽訂諒解備忘錄。這些年來，本組共與11個司法管轄區，簽訂12份諒解備忘錄或合作協議。

The legislation of Hong Kong does not require the JFIU to enter into any MOUs or other instruments for the exchange of information related to ML, TF and associated predicate offences. However, in order to provide a structural framework for enhanced cooperation and mutual understanding, the JFIU could enter into an MOU with a jurisdiction upon their request for either fulfilling their respective legal requirement or symbolising commitment for strategic partnership and intelligence exchange.

In 2017, the JFIU signed an MOU for the exchange of financial intelligence related to ML and TF with the Federal Financial Monitoring Service (FFMS) of the Russian Federation. This brings to a total number of 12 MOUs or agreements that the JFIU has signed on cooperation with 11 jurisdictions over the decades.

## FIGURES OF FINANCIAL INTELLIGENCE EXCHANGE

### 財富情報交流的統計數字

過去五年，本組接獲外地和對外發出的交換情報書信往來次數均有大幅增長，可見財富情報單位之間合作頻繁，互相支援。2017年，交換情報書信往來次數創紀錄新高，共有2,493次。

In the past five years, there has been a substantial growth in both the incoming and outgoing correspondence, marking more frequent cooperation and mutual support among FIUs. In 2017, the annual total of 2,493 correspondence recorded an all-time high.

本組與世界各地財富情報單位的財富情報交流數字摘要，表列如下：

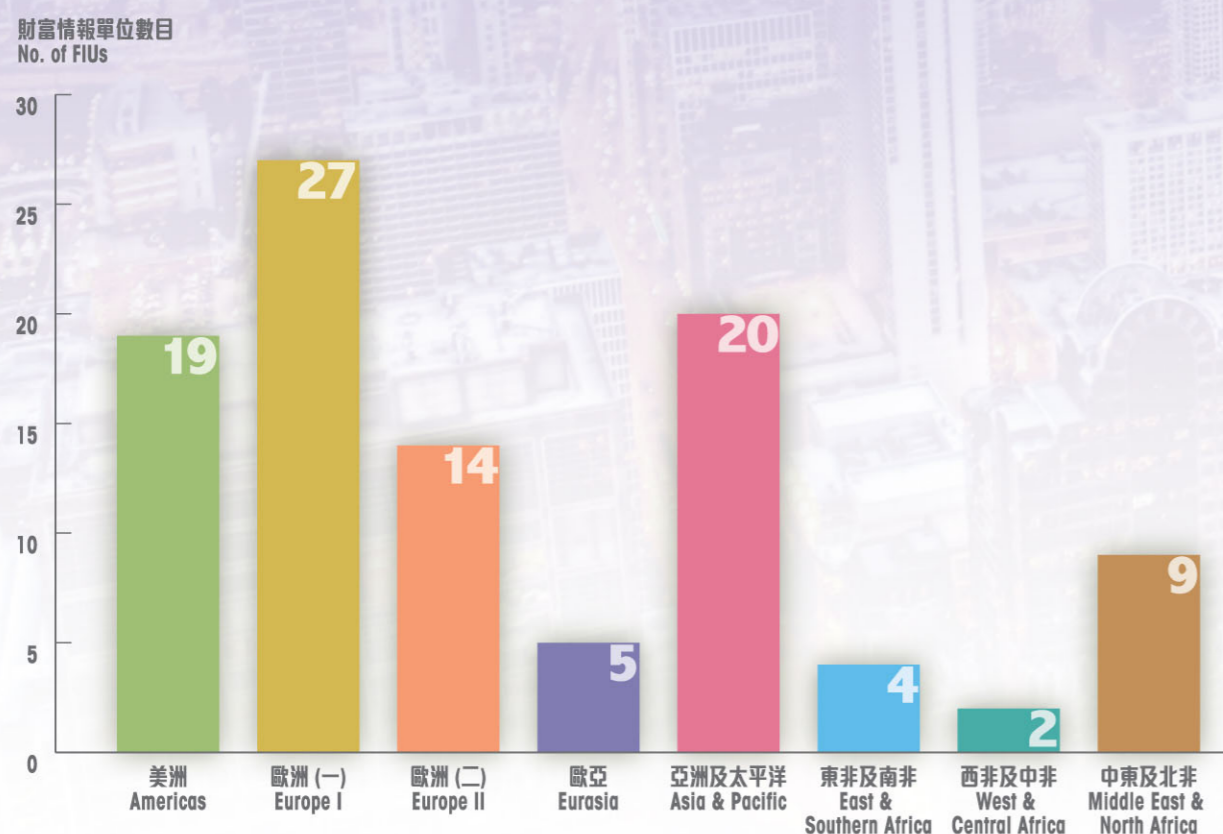
The summary of figures on financial intelligence exchange between the JFIU and FIUs worldwide is tabulated below:

		2013	2014	2015	2016	2017
Total No. of Incoming Correspondence 接獲外地的交換情報書信往來次數	(Egmont Group) (埃格蒙特組織)	705	744	824	794	991
	(Non-Egmont Group*) (非埃格蒙特組織)	20	14	6	43	154
<b>Incoming Total 接獲總數</b>		<b>725</b>	<b>758</b>	<b>830</b>	<b>837</b>	<b>1,145</b>
Total No. of Outgoing Correspondence 對外發出的交換情報書信往來次數	(Egmont Group) (埃格蒙特組織)	613	824	944	866	990
	(Non-Egmont Group*) (非埃格蒙特組織)	18	23	200	293	358
<b>Outgoing Total 發出總數</b>		<b>631</b>	<b>847</b>	<b>1,144</b>	<b>1,159</b>	<b>1,348</b>

(\*非埃格蒙特組織成員主要指不屬埃格蒙特組織的財富情報單位，偶有其他海外執法機關)  
(\*Non-Egmont Group members include mainly non-Egmont FIU(s) and occasionally other overseas LEAs)

# NUMBER OF EGMONT GROUP AND NON-EGMONT GROUP FIUS EXCHANGED FINANCIAL INTELLIGENCE WITH THE JFIU (BY REGIONS\*) IN 2017

2017年與本組交換財富情報的埃格蒙特組織和  
非埃格蒙特組織財富情報單位數目



(\*參考埃格蒙特組織採用的地區分類)  
(\*with reference to categorization of regional groups adopted by the Egmont Group)

## 2017年與 財富情報單位 交換情報的最新趨勢

2017年，共有99個埃格蒙特組織成員和1個非埃格蒙特組織成員曾與本組交換財富情報。各地區\*所涉的財富情報單位數目，如左圖。

本組接收及發布的資料和情報，內容越見複雜。

其中，詐騙是在接獲和發出的資訊之中(不論是受託還是自發提供)最常涉及的罪案類別之一，其更在香港相關風險評估中被評為有高度洗錢威脅的外地或本地上游罪行。

## Latest Trend of Information Exchange with FIUs in 2017

In 2017, the JFIU exchanged financial intelligence with 99 Egmont Group FIUs and one non-Egmont Group FIU. The total number of FIUs from each region\* being engaged is shown in the chart on the left.

The JFIU observed increasing complexity of information and intelligence received and shared.

Fraud, which is risk-assessed to be with high level of ML threat as external/internal predicate offence to Hong Kong, is one of the most prevalent crime types of such incoming and outgoing requests or spontaneous sharing of information.

# CASE STUDIES AND TYPOLOGIES

案件分析及類型學

## 引言

聯合財富情報組作為本港的財富情報單位，致力拓展優質的財富情報，發布予執法機關，以助進行財富調查。香港警務處和香港海關透過不同方式利用本組的財富情報，與其他調查小組或執法機關交換財富情報和採取聯合行動，或以各種形式的國際合作，銳意打擊本港、跨境與跨國清洗黑錢及相關上游罪行。下文舉列各類成功的案例，引證本組、香港警務處和香港海關多年來努力的實質成果，更反映各方矢志瓦解有組織犯罪集團，並追查犯罪得益的共同目標和決心。

## Introduction

The JFIU as the FIU of Hong Kong strives to cultivate and disseminate quality financial intelligence to LEAs for their financial investigation. The HKPF and the C&ED also strive to combat local, cross-boundary/transnational ML and associated predicate offences through making good use of financial intelligence from the JFIU, exchanging information/ launching joint operation with other investigation teams/ LEAs, or engaging various forms of international cooperation. The following assortment of good case examples do not only concretize recent outcomes of the prolonged efforts of the JFIU, the HKPF and the C&ED, but also reflect the shared determination and common goal to neutralize organized syndicates and track down their crime proceeds.

案例Case

1

財富情報引發而達致限制資產的洗錢案  
ML Case Originated from Financial Intelligence Resulting in Restraint

2013年，本組情報指A公司在香港向一個國際網上付款服務供應商申請公司帳戶，以接收售賣化妝品所得的信用卡網上付款。不過，此等存款懷疑是從M司法管轄區一個合法賭博網站所得的網上付款款項。

警務處毒品調查科財富調查組接獲本組情報，就此展開財富調查。該公司帳戶過往錄得3,780萬港元付款，當中包括非法網上賭博的犯罪得益。A公司在香港註冊，其唯一董事及股東J女士來自N司法管轄區，該公司帳戶由她開設，她在該帳戶(結餘860萬港元)暫時凍結後數天潛逃離開香港。J女士不曾在港提交稅務報表，而A公司報稱已停止業務，聲明沒有收入或離岸利潤。

法庭在2015年5月就J女士發出拘捕令，後經潛逃者法律程序，在2017年5月發出限制令，限制860萬港元，以待沒收。

由本案可見，財富情報可引發調查，成功追查有關洗錢及相關外地上游罪行的犯罪得益。

Intelligence from the JFIU in 2013 disclosed that Company A had applied for a merchant account with an international online payment service provider in Hong Kong for receiving online credit card payments as a result of its sale of cosmetics products, but such deposits in the account were soon suspected to be derived from online payments to a legal gambling website in Jurisdiction M.

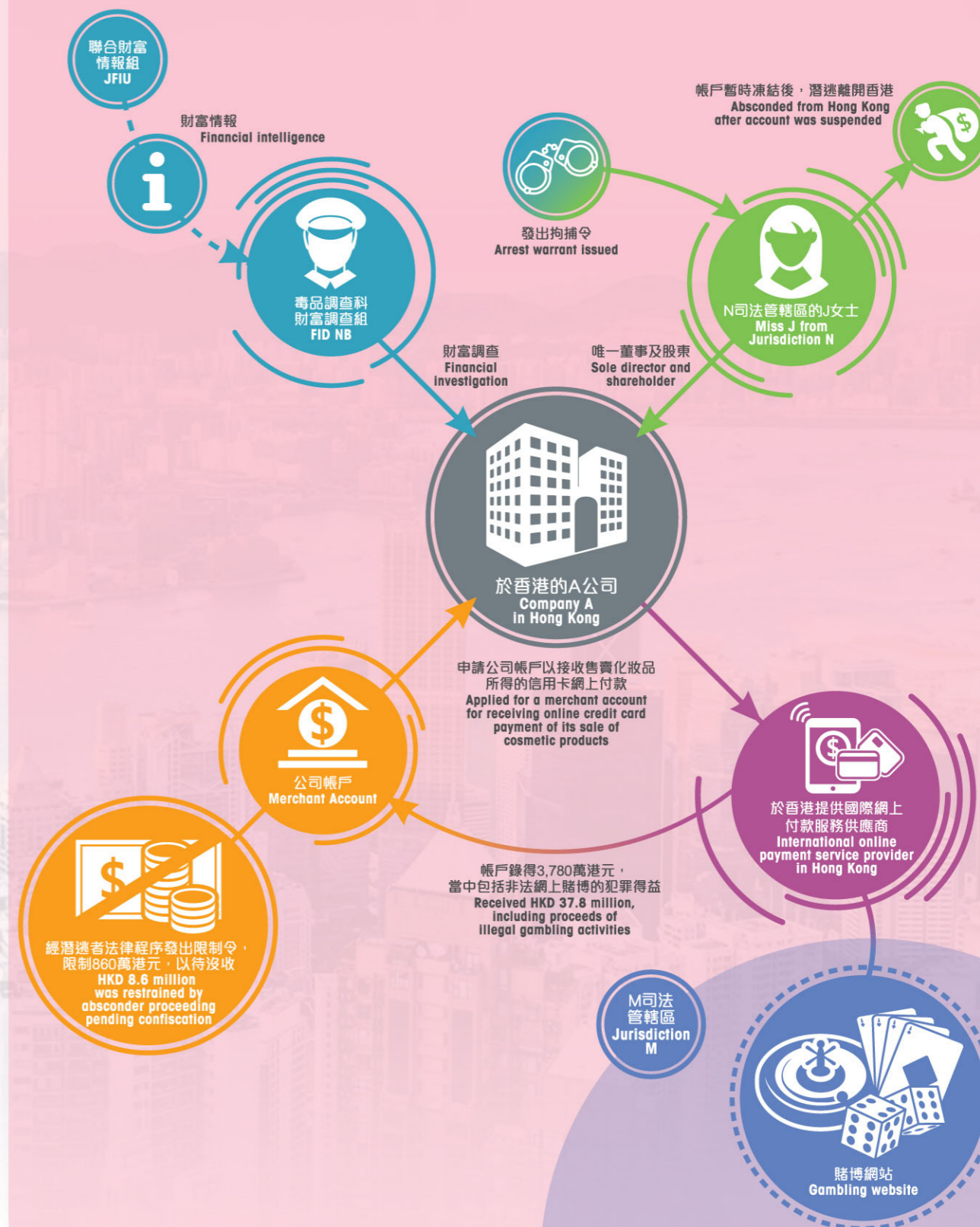
The Financial Investigation Division of Narcotics Bureau (FID NB) of HKPF initiated financial investigation upon the receipt of information from the JFIU. The merchant account recorded payments of HKD37.8 million in the past, including crime proceeds of illegal internet gambling. Company A was Hong Kong-incorporated, and its sole director and shareholder Ms. J from Jurisdiction N who opened the merchant account absconded from Hong Kong a few days after the account (having the balance of HKD8.6 million) was suspended. Ms. J did not file any tax return in Hong Kong, while Company A was reported dormant and declared to have no income and offshore profits.

An arrest warrant was issued against Ms. J in May 2015. By absconder proceedings, a restraint order amounting to HKD8.6 million was granted in May 2017 pending confiscation.

This case example shows how financial intelligence can prompt investigations and result in the tracing of crime proceeds related to ML and associated foreign predicate offences.

案例Case

1 財富情報引發而達致限制資產的洗錢案  
ML Case Originated from Financial Intelligence Resulting in Restraint





案例Case

2

財富情報引發而達致沒收資產的洗錢案  
ML Case Originated from Financial Intelligence Resulting in Confiscation

2013年，警務處毒品調查科財富調查組根據本組情報採取行動，就K先生展開財富調查。K先生名列國際刑警紅色通報，又被O司法管轄區一個執法機關通緝。調查發現，K先生是O司法管轄區一個經營非法賭博網站集團的頭目，在多個省份共聘用超過120名代理人。

經深入分析資金流向，發現K先生不曾在香港報稅。於2006至2012年間，K先生以五個個人銀行及證券帳戶接收非法賭博活動得益，合計4.33億港元，其中可見洗錢特徵，例如暫存資金和大量可疑交易。涉案的犯罪得益，主要經本地無牌金錢服務經營者，由O司法管轄區轉入香港。

自2013年起，毒品調查科財富調查組經國際刑警，與O司法管轄區一個執法機關保持聯繫，最終獲得協助取得針對該集團從犯的法庭判案書，鞏固了有關洗錢案在本港提訴的基礎。

2013年12月，法庭就K先生的現金和證券共4.33億港元資產發出限制令。經2016年5月提出上訴被拒後，沒收令於2017年7月發出，沒收資產共3億港元。

由本案可見，財富情報可引發調查，以致沒收涉及香港以外上游罪行的金額犯罪得益。

Acting upon intelligence from the JFIU in 2013, the FID NB of HKPF commenced financial investigation against Mr. K, who was both on INTERPOL Red Notice and wanted by an LEA in Jurisdiction O. It was unearthed that Mr. K was the ringleader of a syndicate operating illegal gambling website in Jurisdiction O, with more than 120 agents hired across numerous provinces.

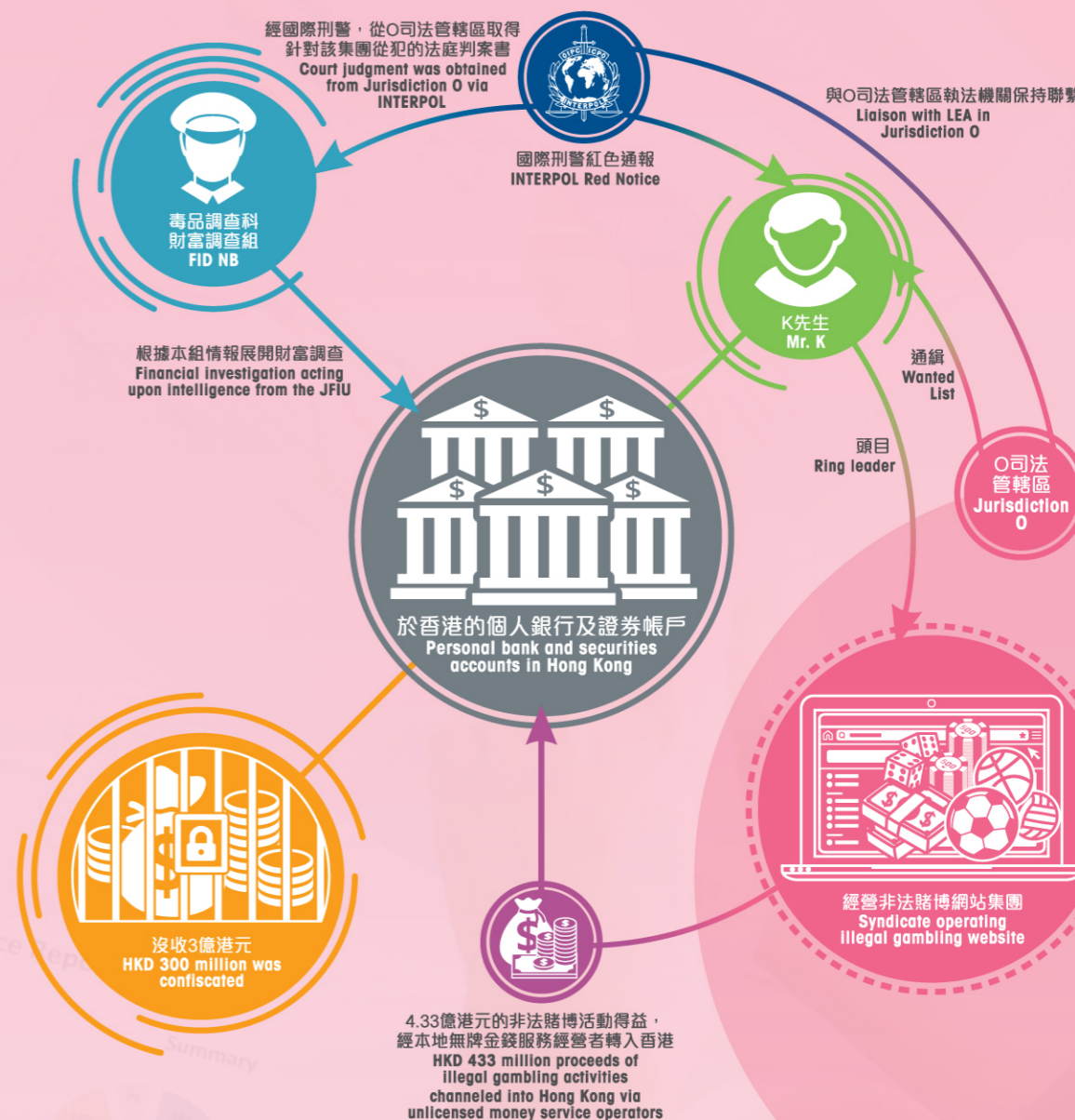
In-depth fund flow analysis revealed that Mr. K, who had not filed any tax returns in Hong Kong, made use of his five personal bank and securities accounts in Hong Kong to receive proceeds of illegal gambling activities amounting to HKD433 million between 2006 and 2012, with hallmarks of ML such as repository of funds and large amounts of suspicious transactions noted. The crime proceeds in question were mainly channeled into Hong Kong from Jurisdiction O via unlicensed money service operators in Hong Kong.

Since 2013, the FID NB has maintained liaison with an LEA in Jurisdiction O via INTERPOL, and successfully sought assistance to obtain a court judgment against syndicate accomplices that strengthened the ML case in Hong Kong.

A restraint order against Mr. K's assets of cash and securities valued at HKD433 million was obtained in December 2013. An appeal was initiated against the restraint order in May 2016, but it was subsequently rejected. A confiscation order amounting to HKD300 million was eventually granted in July 2017.

This case example illustrates how financial intelligence can lead to new investigation and result in significant confiscation of proceeds of crime involving external predicate offences.

案例Case 2 財富情報引發而達致沒收資產的洗錢案  
ML Case Originated from Financial Intelligence Resulting in Confiscation



案例Case

3

就其他司法管轄區關乎詐騙/ 毒品/ 洗錢的  
相互法律協助請求提供實質的協助

Constructive Assistance Provided for Fraud/Narcotics/ML-related  
Mutual Legal Assistance (MLA) Requests from Other Jurisdictions

警務處毒品調查科財富調查組積極回應不同司法管轄區提出的相互法律協助請求，以打擊高度威脅的外地詐騙上游罪行，以及中高度威脅的外地毒品上游罪行和本港洗錢罪行，下文舉列(A)至(D)四個案例：

The FID NB of HKPF has been responsive to MLA requests made by various jurisdictions to combat high-threat foreign predicate of fraud, medium-high-threat foreign predicate of narcotics offences and local ML offences, with four examples (A)-(D) as follows:

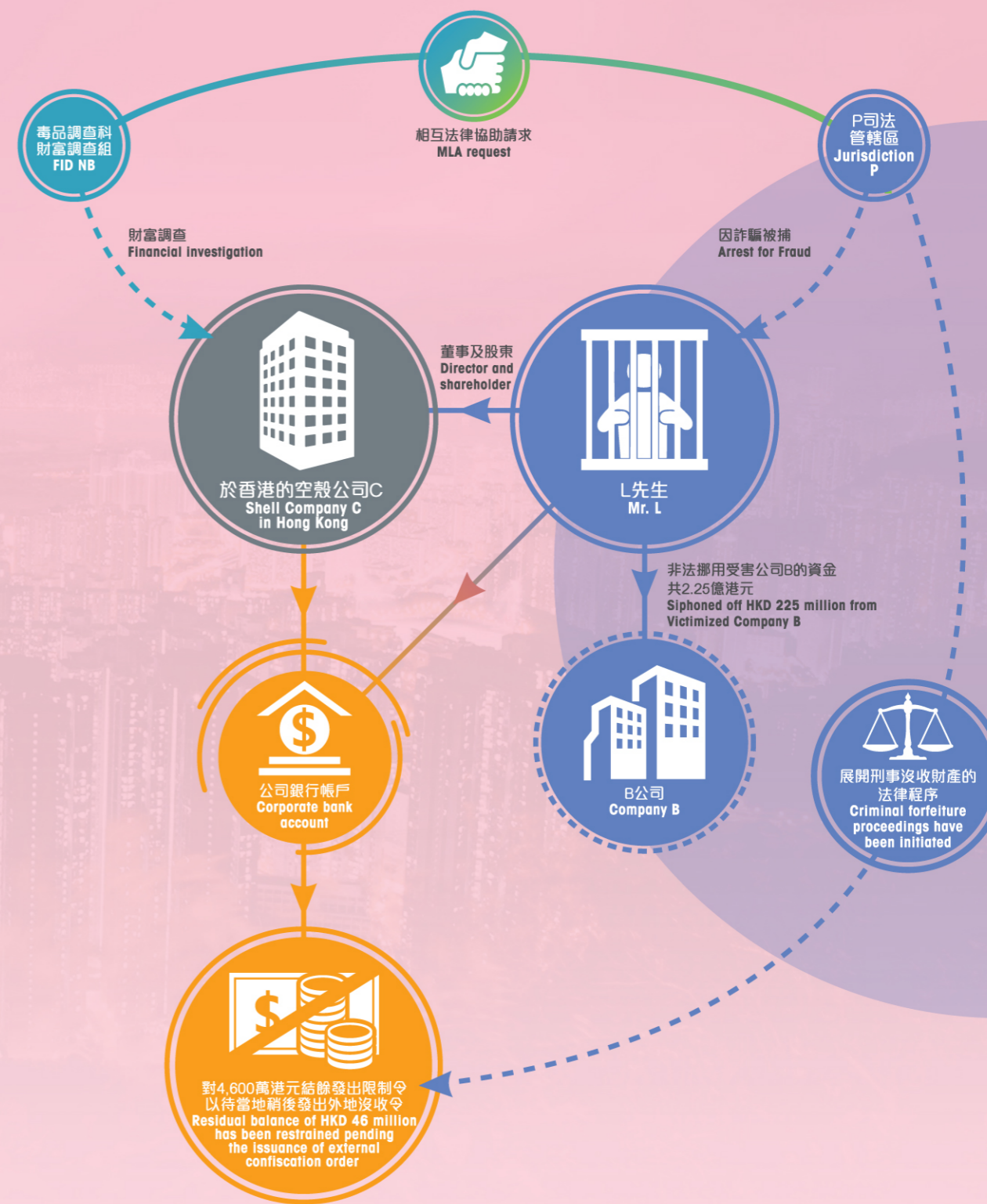
CASE (A) 案例 (A)

P司法管轄區在2015年提出的相互法律協助請求，透露L先生於2014年因詐騙在當地被捕，原因是涉嫌使用虛假和偽造的文件，在P司法管轄區非法挪用受害公司B的資金共2.25億港元，並存入香港一間空殼公司C持有的公司銀行帳戶，而L先生是該空殼公司的董事及股東。在本組協助下，L先生的財務背景和案中洗錢的得益，得以迅速辨識，以便進行財富調查。2017年8月，香港法庭就C公司在本地銀行帳戶內4,600萬港元結餘發出限制令。刑事沒收L先生和C公司財產的法律程序，已在P司法管轄區展開，以待當地稍後發出外地沒收令。

An MLA request from Jurisdiction P in 2015 revealed that Mr. L was arrested for fraud in 2014 thereat as he was suspected of using false and forged documents to siphon off HKD225 million from Victimized Company B in Jurisdiction P to a corporate bank account held by Shell Company C in Hong Kong, of which Mr. L was the director and shareholder. With the assistance of the JFIU, Mr. L's financial background and the laundered proceeds in question were swiftly identified to facilitate financial investigation. In August 2017, a restraint order was granted in Hong Kong against the residual balance of HKD46 million in the local bank account of Company C. Criminal forfeiture proceedings against the property of Mr. L and Company C have been initiated in Jurisdiction P, pending the issuance of an external confiscation order thereat in due course.

案例3(A) 就其他司法管轄區關乎詐騙/ 洗錢的相互法律協助請求  
提供實質的協助

Constructive Assistance Provided for Fraud/ ML-related  
MLA Request from Other Jurisdiction



案例Case

3

就其他司法管轄區關乎詐騙/ 毒品/ 洗錢的  
相互法律協助請求提供實質的協助

Constructive Assistance Provided for Fraud/Narcotics/ML-related  
MLA Requests from Other Jurisdictions

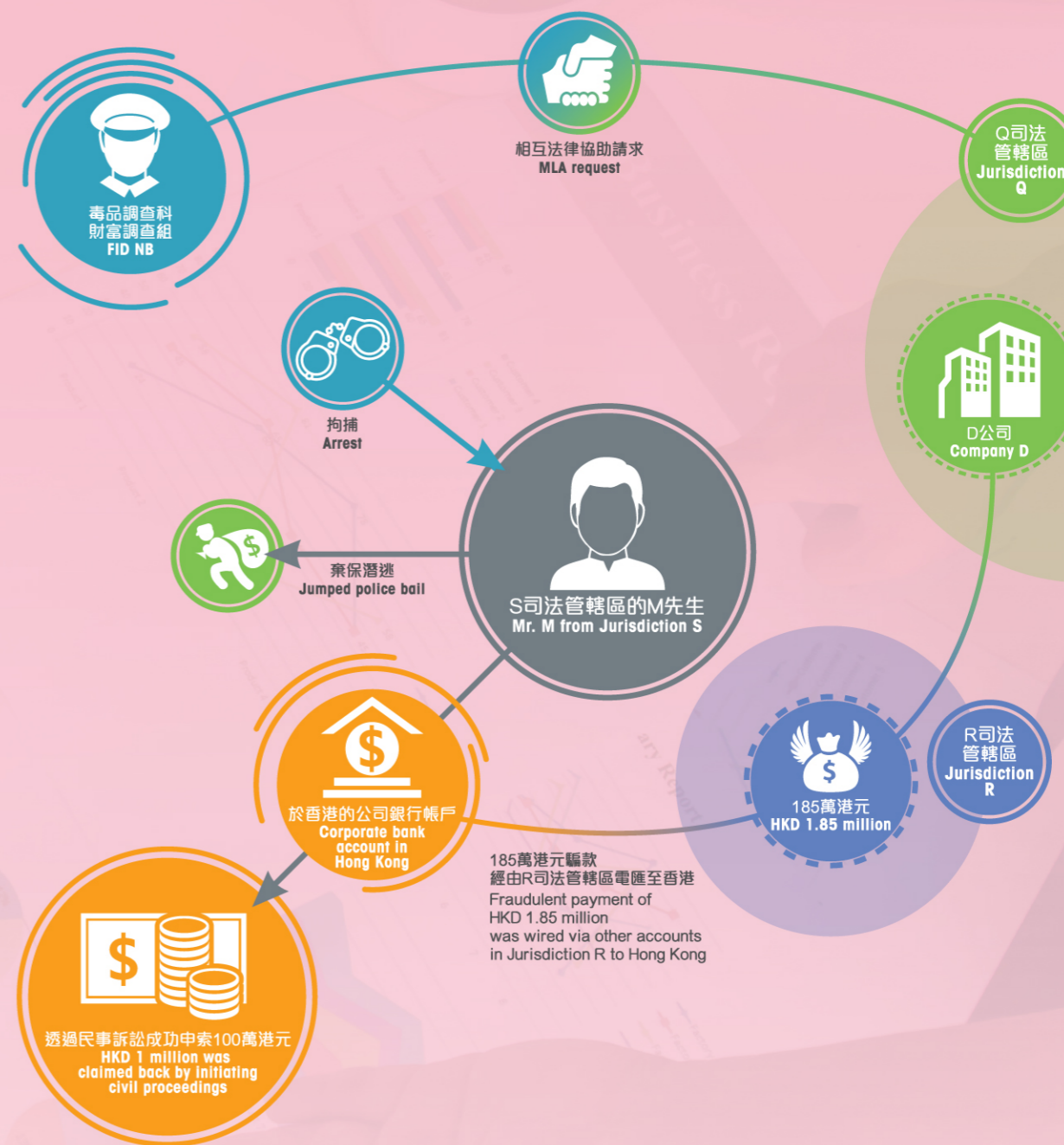
CASE (B) 案例 (B)

Q司法管轄區於2015年就電郵騙案提出相互法律協助請求，透露當地一間受害公司D被騙，把185萬港元(經由R司法管轄區其他帳戶)電匯至香港一個公司銀行帳戶。毒品調查科財富調查組進行財富調查，經國際刑警向R司法管轄區提出請求，取得有關欺詐交易的詳情。其後，帳戶簽署人(即S司法管轄區的M先生)現身本港銀行，就涉案帳戶查詢時被捕。儘管M先生在2015年棄保潛逃，D公司透過民事訴訟，於2017年6月取得針對第三債務人作出的絕對命令，成功申索100萬港元。

An MLA request from Jurisdiction Q related to an email fraud in 2015 revealed that Victimized Company D thereat had been deceived to wire about HKD1.85 million to a corporate bank account in Hong Kong (via other accounts in Jurisdiction R). Through financial investigation, the FID NB gained more information about the fraudulent transactions via an INTERPOL request to Jurisdiction R. The account signatory Mr. M of Jurisdiction S was later arrested when he showed up at the bank in Hong Kong to enquire about the account in question. Though Mr. M jumped police bail in 2015, Company D claimed back HKD1 million by initiating civil proceedings from which a Garnishee Order Absolute was obtained in June 2017.

案例Case 3(B) 就其他司法管轄區關乎詐騙/ 洗錢的相互法律協助請求  
提供實質的協助

Constructive Assistance Provided for Fraud/ML-related  
MLA Request from Other Jurisdiction



案例Case

3

就其他司法管轄區關乎詐騙/ 毒品/ 洗錢的  
相互法律協助請求提供實質的協助

Constructive Assistance Provided for Fraud/Narcotics/ML-related  
MLA Requests from Other Jurisdictions

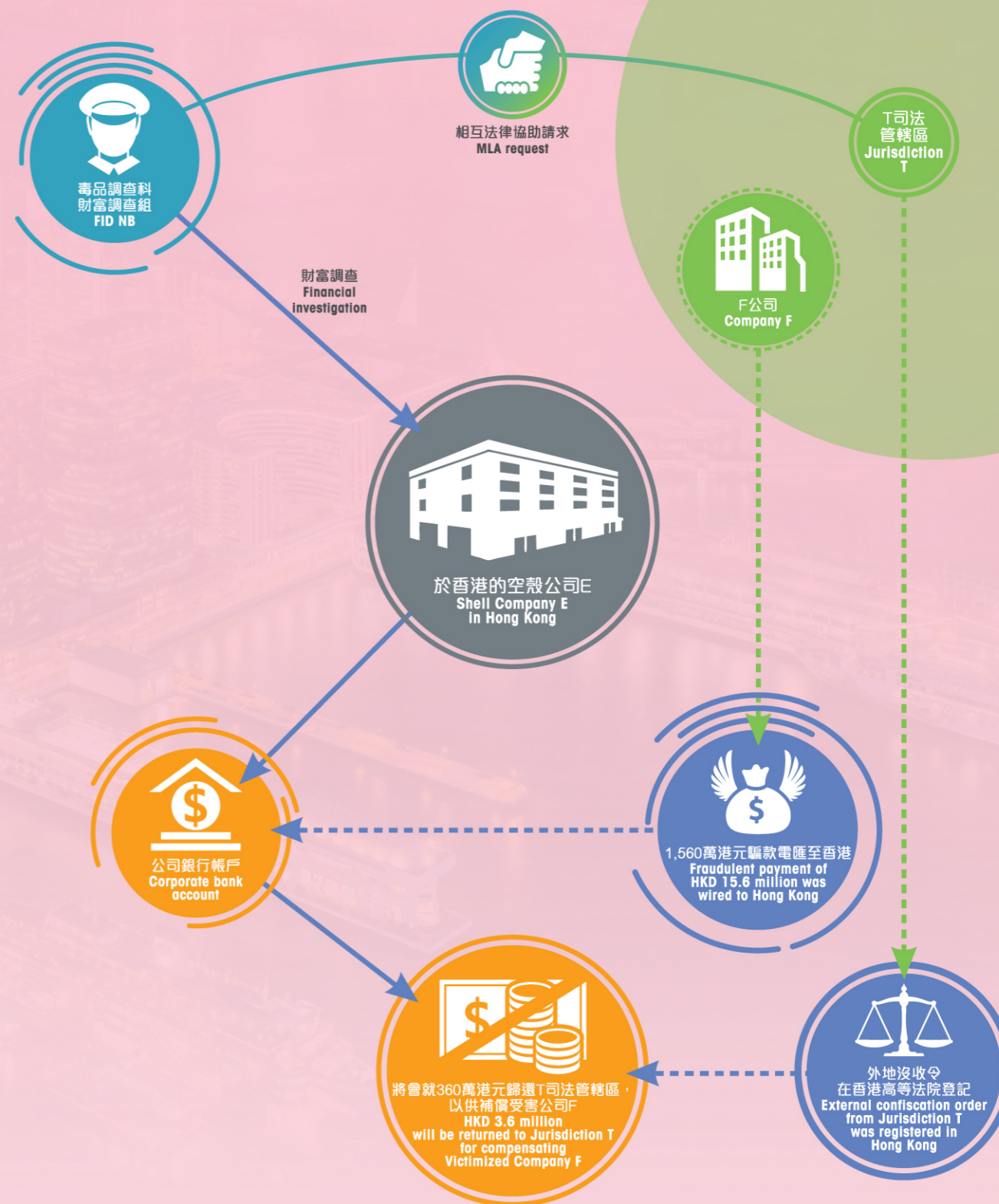
CASE (C) 案例 (C)

2012年，毒品調查科財富調查組接獲T司法管轄區就電郵騙案提出的相互法律協助請求，於是對本港一間空殼公司E進行財富調查，並確認由其持有的本地銀行帳戶，曾接收1,560萬港元騙款。在本組協助下，高等法院在2016年就360萬港元結餘發出限制令。後於2017年8月，T司法管轄區發出的外地沒收令並在香港高等法院登記，使該本地銀行在2017年11月把受限制的款項繳付予高等法院司法常務官。有關款項將歸還T司法管轄區，以供補償受害公司F。

Upon the receipt of an MLA request from Jurisdiction T related to an email fraud in 2012, the FID NB conducted financial investigation and ascertained that a fraudulent sum of HKD15.6 million had been remitted into a local bank account held by Shell Company E in Hong Kong. Facilitated by the JFIU, a restraint order against the residual balance of about HKD3.6 million was issued by the High Court in 2016. Later in August 2017, an external confiscation order from Jurisdiction T was registered at the High Court in Hong Kong. Subsequently, the local bank paid the restrained amount to the Registrar of the High Court in November 2017. The fund will then be returned to Jurisdiction T for compensating Victimized Company F.

案例Case 3(C) 就其他司法管轄區關乎詐騙/ 洗錢的相互法律協助請求  
提供實質的協助

Constructive Assistance Provided for Fraud/ML-related  
MLA Request from Other Jurisdiction



案例Case  
**3**

就其他司法管轄區關乎詐騙/ 毒品/ 洗錢的  
相互法律協助請求提供實質的協助

Constructive Assistance Provided for Fraud/Narcotics/ML-related  
MLA Requests from Other Jurisdictions

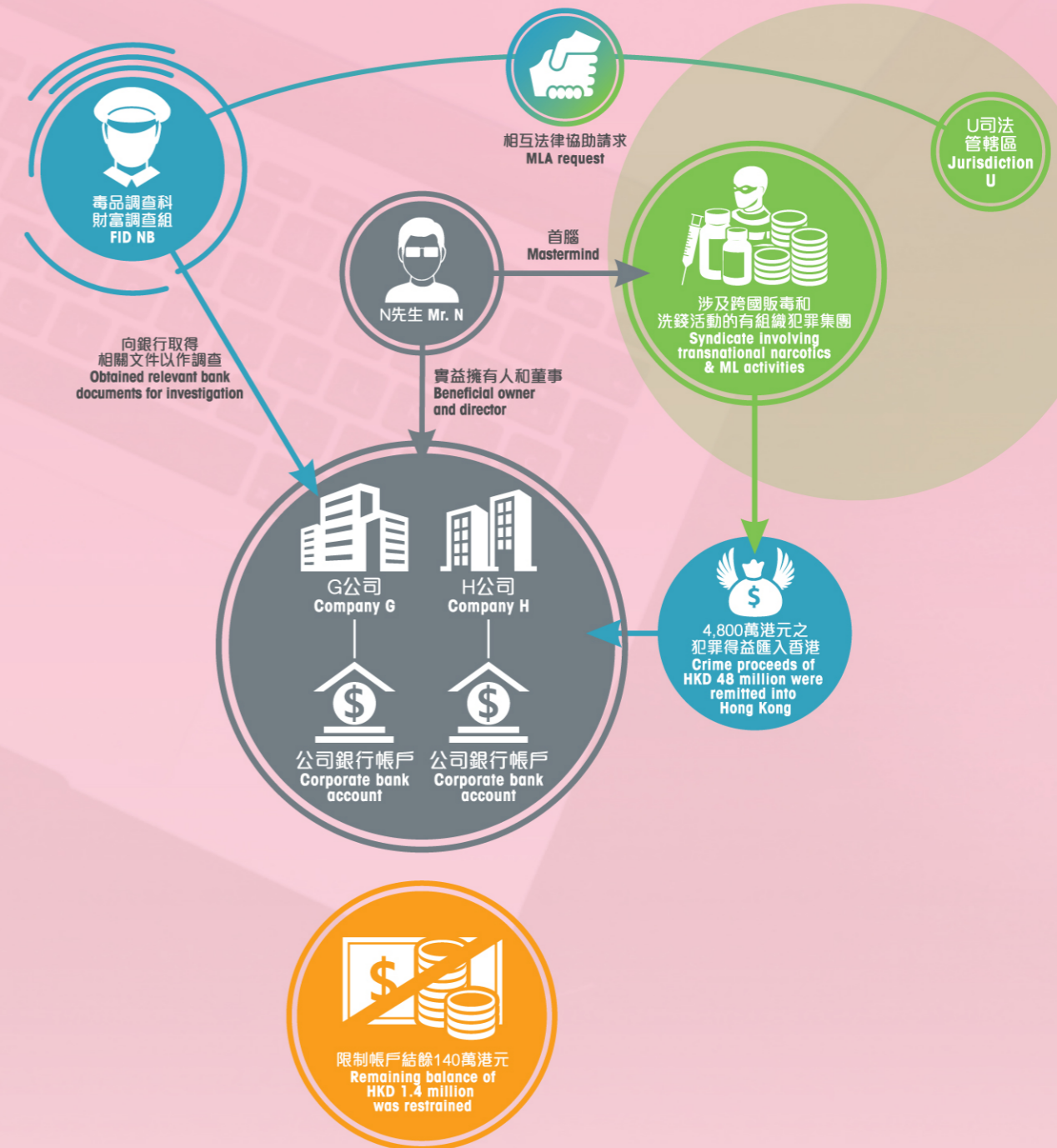
**CASE (D)** 案例 (D)

U司法管轄區於2015年提出的相互法律協助請求，透露N先生為一個涉及跨國販毒及洗錢活動的有組織犯罪集團首腦，操控兩間在本港註冊的公司G和H。而他是該等公司的實益擁有人 and 董事。調查發現，G公司和H公司在香港持有兩個公司銀行帳戶。該等帳戶在2011至2015年間，共接收U司法管轄區4,800萬港元之犯罪得益。毒品調查科財富調查組人員及後向銀行取得相關文件，提供予U司法管轄區以助其調查。本組曾提供相關協助，限制令於2017年6月發出前，辨識帳戶內的140萬港元結餘，預計U司法管轄區有關當局稍後會申請外地沒收令。

An MLA request from Jurisdiction U in 2015 revealed that Mr. N, as the mastermind of an organized crime syndicate involving in transnational narcotics and ML activities, had effective control of two Hong Kong-incorporated Companies G and H that he was the beneficial owner and director. Investigation revealed that Companies G & H possessed two corporate bank accounts in Hong Kong, to which crime proceeds amounting to HKD48 million were found to have been remitted from Jurisdiction U between 2011 and 2015. The FID NB offered investigative assistance by obtaining and providing the relevant bank documents to Jurisdiction U. It also sought assistance from the JFIU before the restraint order against the remaining balance of HKD1.4 million was granted in June 2017. In anticipation, the competent authority of Jurisdiction U would apply for an external confiscation order in due course.

案例Case **3(D)** 就其他司法管轄區關乎毒品/ 洗錢的相互法律協助請求  
提供實質的協助

Constructive Assistance Provided for Narcotics/ML-related  
MLA Request from Other Jurisdiction



案例Case  
**4**

針對跨境收受賭注及洗錢的行動  
Operation against Cross-Boundary Bookmaking and ML

警務處(毒品調查科財富調查組和有組織罪案及三合會調查科)聯同V司法管轄區一個執法機關,針對V司法管轄區惡名昭彰的本地三合會會員O先生,展開調查和行動。

機密情報揭露,O先生就賽馬、六合彩、足球和美國國家籃球協會(NBA)賽事接受投注。毒品調查科財富調查組的財富調查揭示O先生妻子(O太太)在四年間透過兩個個人銀行帳戶收受賭注的得益共860萬港元並予以清洗,從中可見洗錢特徵,例如大量自動櫃員機提款和「掉頭式」交易。案中採納取用電腦系統的特別調查技巧,以取得收受賭注的紀錄和洗錢證據。

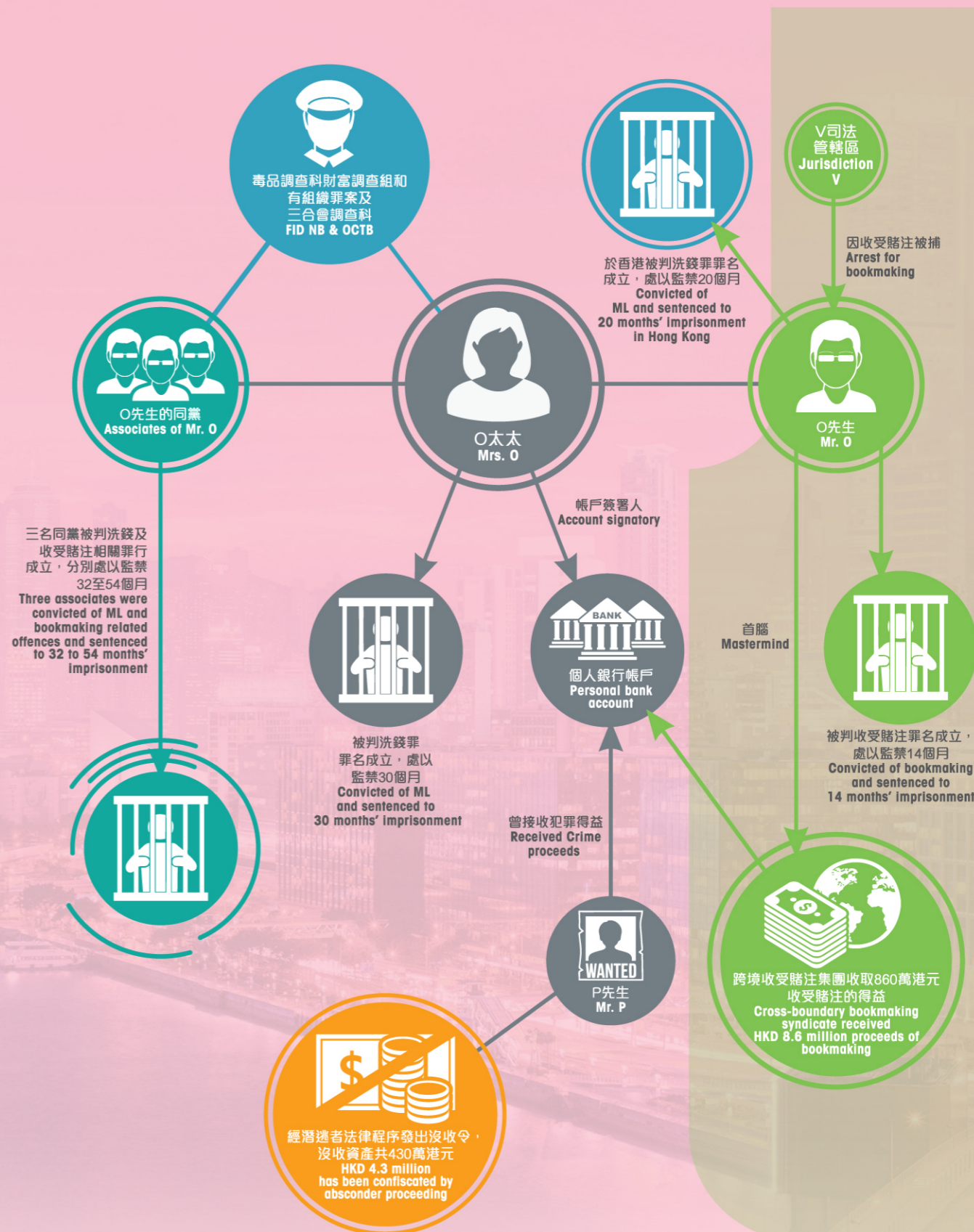
當人員採取行動,在V司法管轄區以收受賭注拘捕集團首腦O先生,而O太太和另外10名同黨,則在香港因收受賭注等相關罪行及洗錢被捕。2010年,O先生在V司法管轄區被判收受賭注罪名成立,處以監禁14個月;2013年,他再在香港被控六項獨立的洗錢罪,被定罪並處以監禁20個月。2011年,O太太在香港被控兩項獨立的洗錢罪,被定罪並處以監禁30個月;另外三名同黨,也就洗錢、收受賭注和向收受賭注者投注被定罪,分別處以監禁32至54個月。此外,通緝犯香港男子P先生曾接收犯罪得益,當局於2016年對他展開潛逃者法律程序。2017年4月,法庭發出沒收令,沒收他的可變現財產(包括現金、銀行帳戶結餘和房地產),總值430萬港元。

The HKPF (the FID NB and the Organized Crime and Triad Bureau (OCTB)) and an LEA of Jurisdiction V initiated a joint investigation and operation against a cross-boundary bookmaking syndicate based in Jurisdiction V led by a notorious local triad member Mr. O.

Confidential intelligence revealed that Mr. O had received bets for horseracing, Mark Six, soccer and NBA matches. The financial investigation by the FID NB revealed that proceeds of bookmaking at about HKD8.6 million had been laundered through two personal bank accounts of the wife of Mr. O (Mrs. O) within four years, with ML hallmarks such as numerous withdrawals via automated teller machines and U-turn transactions observed. A special investigative technique of accessing computer systems was adopted to retrieve bookmaking records and ML evidence.

When the operation turned overt, the syndicate mastermind Mr. O was arrested in Jurisdiction V for bookmaking, while Mrs. O and 10 other associates were arrested in Hong Kong for bookmaking-related offences and ML. In 2010, Mr. O was convicted of bookmaking and sentenced to 14 months' imprisonment in Jurisdiction V; in 2013, he was further convicted of six counts of standalone ML as charged and sentenced to 20 months' imprisonment in Hong Kong. Dated back to 2011 in Hong Kong, Mrs. O was convicted of two counts of standalone ML as charged, and sentenced to 30 months' imprisonment; three other associates were also convicted of ML, engaging in booking and betting with a bookmaker with their sentence ranged from 32 months' to 54 months' imprisonment. In addition, absconder proceedings were initiated against a wanted person Mr. P who was a Hong Kong male having received crime proceeds in 2016. A confiscation order against his realizable property (such as cash, remaining balance in bank accounts and real property) valued at HKD4.3 million was granted in April 2017.

案例Case **4** 針對跨境收受賭注及洗錢的行動  
Operation against Cross-Boundary Bookmaking and ML



案例Case

5

針對跨境販運人蛇及洗錢的行動

Operation against Cross-Boundary Human Smuggling and ML

根據W司法管轄區的情報，警務處(毒品調查科財富調查組和有組織罪案及三合會調查科)聯同X司法管轄區一個執法機關，針對一個涉及六名香港人的跨境販運人蛇集團，展開調查和行動。毒品調查科財富調查組就洗錢進行財富調查，而有組織罪案及三合會調查科則對販運人蛇及偽造文件事宜進行調查。兩者的並行調查發現，該集團為X司法管轄區的人偽造佐證文件，以供在香港申請W司法管轄區的簽證；當中又發現兩名集團成員交易頻繁，資金流量達3,400萬港元；其中兩名為其他司法管轄區之男子及女子報稱為兩間本地公司的執行董事及經理，雙方的資金在個人及公司的銀行帳戶循環轉帳，交易金額與兩名集團成員的財務背景並不相稱。

有關的執法機關於2017年3月採取行動，警務處在香港拘捕該集團三名本地成員；X司法管轄區的執法機關則在當地拘捕另外一名香港人和七名X司法管轄區的人。

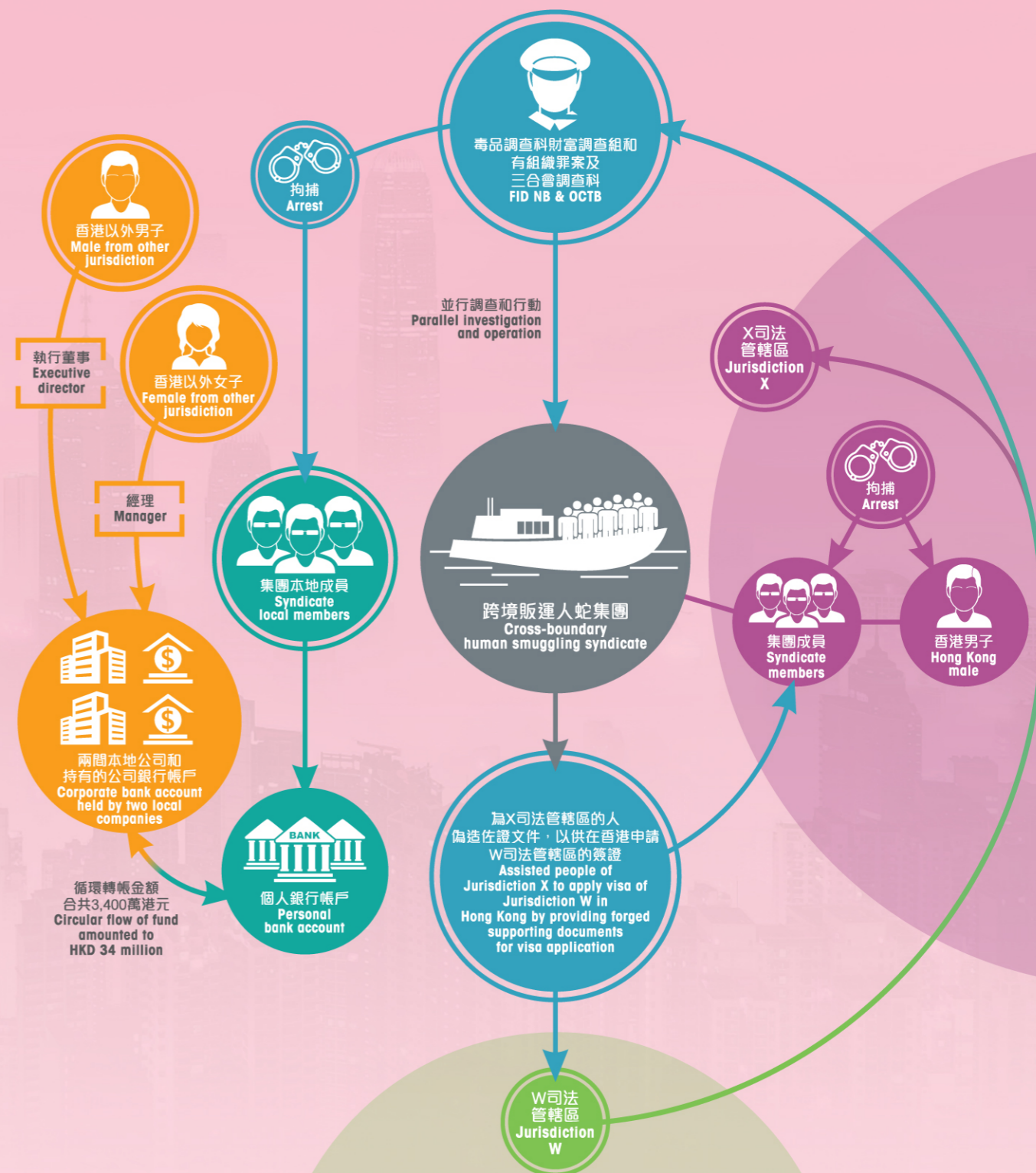
Acting upon information from Jurisdiction W, the HKPF (FID NB & OCTB) and an LEA of Jurisdiction X initiated a joint investigation and operation against a cross-boundary human smuggling syndicate, in which six persons from Hong Kong were involved. Through the parallel investigation by the FID NB on ML and the OCTB on human smuggling and forgery, the syndicate was found assisting people of Jurisdiction X to apply visa of Jurisdiction W in Hong Kong by providing forged supporting documents for visa application; two syndicate members had maintained numerous transactions of substantial turnover at HKD34 million with one male and one female from other jurisdiction who were respectively reported to be the executive director and manager of two local companies, with circular flow of funds in their local personal and corporate bank accounts and transaction amounts incommensurate with the two syndicate members' financial background.

When the operation turned overt in March 2017, three local syndicate members were arrested by the HKPF in Hong Kong, and one other local and seven other persons of Jurisdiction X were arrested by the LEA in Jurisdiction X.

案例Case

5 針對跨境販運人蛇及洗錢的行動

Operation against Cross-Boundary Human Smuggling and ML



案例Case

6

涉及販毒得益的跨國洗錢案

Transnational ML Case involving Proceeds of Drug Trafficking

本案涉及一個活躍於Y司法管轄區和香港的跨國洗錢集團，處理從販毒活動所得的犯罪得益。

在2013至2014年期間，Y司法管轄區一個執法機關拘捕兩名屬於該集團的香港男子，他們在Y司法管轄區被裁定洗錢罪名成立，分別處以監禁39個月和84個月。

根據該Y司法管轄區執法機關的情報，警務處毒品調查科財富調查組就另外五名香港男子(即Q、R、S、T和U先生)控制的七個香港個人銀行帳戶進行財富調查。在2013年兩個月間，這些傀儡戶口獲該集團多次存入款項高達556萬港元。每次存款後，Q等五人隨即提取現金。他們未曾向香港稅務局申報收入，而該等大額存款，與他們報稱的財務狀況並不相稱。

2013至2014年，毒品調查科財富調查組拘捕Q等五人，並請求相互法律協助，以取得證據，包括Y司法管轄區針對該集團相關判案書的蓋印文本，以供本港的洗錢案舉證。Q等五人其後被控七項洗錢罪，涉及總額達489萬港元。2017年3月，他們全部被裁定罪名成立，分別處以監禁12個月至51個月。

This case involved a transnational ML syndicate active in both Jurisdiction Y and Hong Kong, and crime proceeds originated from drug trafficking activities.

Between 2013 and 2014, an LEA of Jurisdiction Y arrested two Hong Kong males of that syndicate, who were convicted of ML and sentenced to 39 months' and 84 months' imprisonment respectively in Jurisdiction Y.

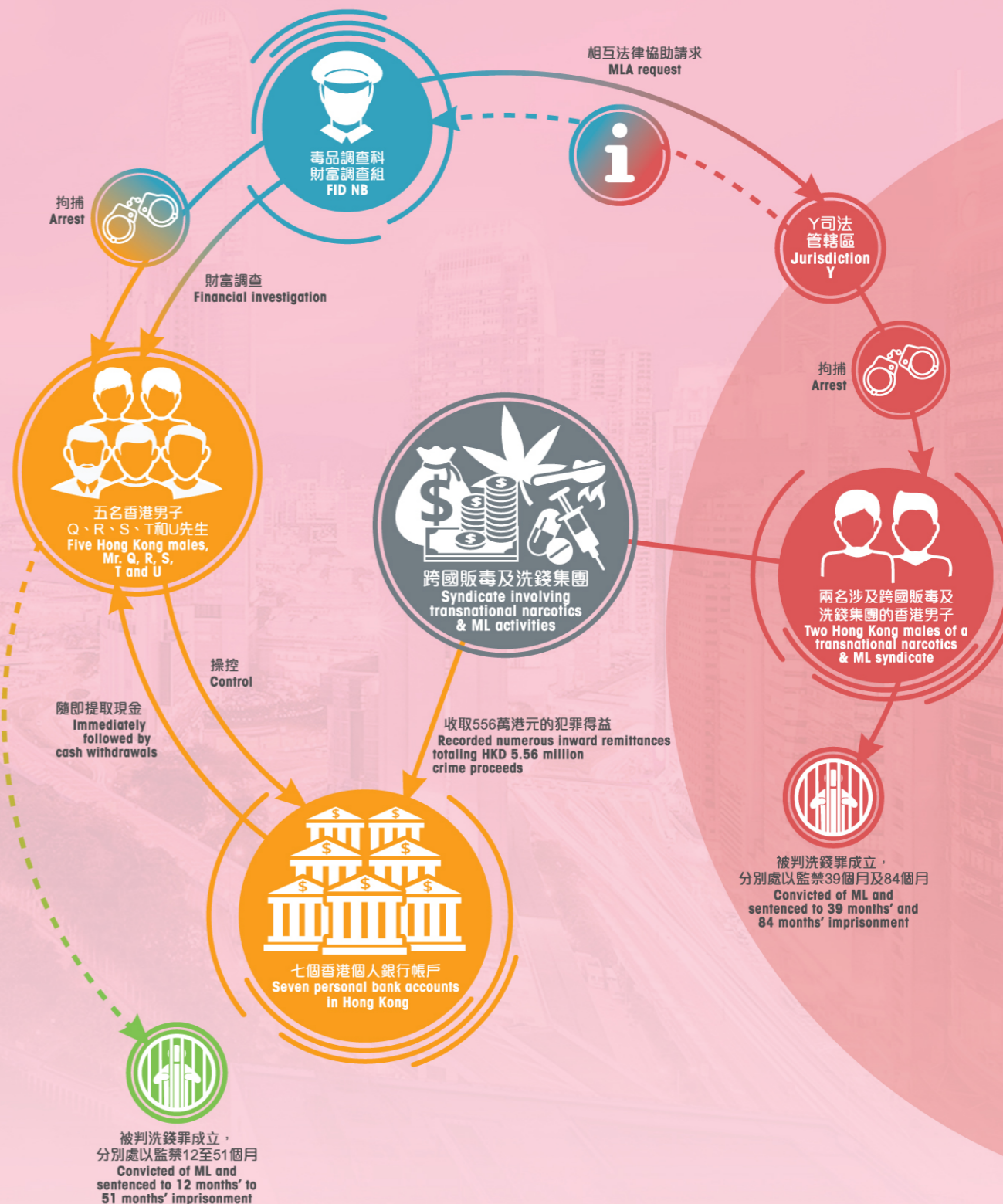
Acting upon information from the LEA of Jurisdiction Y, the FID NB of HKPF conducted financial investigation against seven personal bank accounts in Hong Kong controlled by five other Hong Kong males (namely Mr. Q, R, S, T and U). Within two months in 2013, these stooge bank accounts recorded numerous inward remittances totaling HKD5.56 million from the syndicate immediately followed by cash withdrawals by Mr. Q-U accordingly. Mr. Q-U had not declared any income with the Inland Revenue Department in Hong Kong and the large amounts of the deposits were incommensurate with their reported financial status.

Between 2013 and 2014, the FID NB arrested Mr. Q-U, and sought MLA to secure evidence, including sealed copies of the relevant court judgments of Jurisdiction Y on the syndicate, for the ML case in Hong Kong. Mr. Q-U were subsequently charged with seven counts of ML totaling HKD4.89 million. In March 2017, they were all convicted as charged and their sentences ranged from 12 months' to 51 months' imprisonment.

案例Case

涉及販毒得益的跨國洗錢案

Transnational ML Case involving Proceeds of Drug Trafficking





案例Case

7

涉及販賣私煙得益的洗錢案

ML in Relation to Proceeds of Illicit Cigarettes

自2015年11月起，香港海關針對本港一個集團進行調查，該集團懷疑售賣私煙和清洗私煙業務的犯罪得益。

2016年4月，海關揭發私煙的貯存地點，並識別出該集團若干人物的犯罪手法，包括倉庫管理人和帶家。有關倉庫管理人和帶家，由集團首腦V先生和太太操控。帶家/管理人在運送香煙後，會把售賣私煙的得益，存入V太太的銀行帳戶，或親身直接交予V先生和太太。

2016年8月，海關人員採取行動，拘捕V先生和太太，以及另外五人。其後，V先生和太太、一名管理人和一名帶家，被控串謀處理私煙，而V太太則額外被控一項清洗黑錢罪。財富調查顯示，該集團在2013年6月至2016年8月間，清洗犯罪得益共820萬港元。

於2017年2月及6月，法庭發出若干限制令，共限制260萬港元。2017年10月，所有被告人就該私煙控罪被定罪，而V太太則就私煙和清洗黑錢控罪一併被定罪，處以監禁33個月。

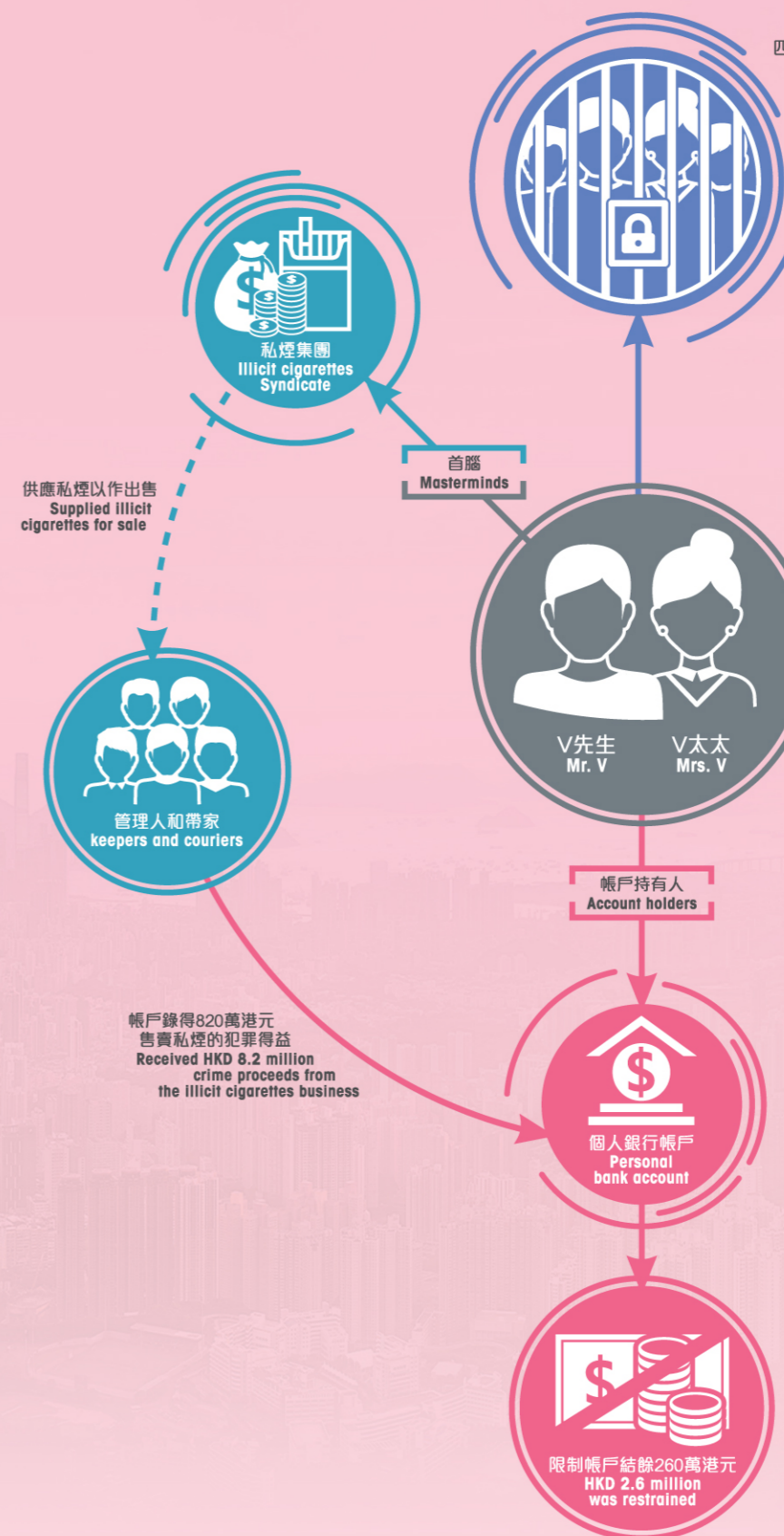
Since November 2015, the C&ED carried out an investigation against a local syndicate suspected of selling illicit cigarettes and laundering crime proceeds from the illicit cigarettes business.

In April 2016, the C&ED successfully ferreted out the illicit cigarettes storage location and identified the modus operandi of the illicit activities by certain key personnel of the syndicate, including the store keepers and various couriers. The keepers and couriers were controlled by a couple Mr. and Mrs. V who were the syndicate's masterminds. After the delivery of cigarettes, the couriers/keepers would deposit the sale proceeds of illicit cigarettes to Mrs. V's bank account or directly hand it to Mr. and Mrs. V in person.

In August 2016, when the operation turned overt, Mr. and Mrs. V, together with five other persons, were arrested. Subsequently, Mr. and Mrs. V, one keeper and one courier were charged with conspiracy to deal with illicit cigarettes and an additional ML charge was laid against Mrs. V. Financial investigation revealed that the syndicate had laundered about HKD8.2 million of crime proceeds between June 2013 and August 2016.

In February and June 2017, restraint orders were granted and a total of HKD 2.6 million was restrained. In October 2017, all the defendants were convicted of the illicit cigarettes offence, while Mrs. V was convicted of the illicit cigarettes cum ML charges and sentenced to 33 months' imprisonment.

案例Case 7 涉及販賣私煙得益的洗錢案  
ML in Relation to Proceeds of Illicit Cigarettes



四名集團成員(包括V先生、V太太、一名管理人和一名帶家)分別被判串謀處理私煙罪成立，而V太太則就私煙和洗錢罪一併被定罪，處以監禁33個月  
Four syndicate members (including Mr. V, Mrs. V, one keeper and one courier) were convicted of illicit cigarettes offence, while Mrs. V was convicted of the illicit cigarettes cum ML charges and sentenced to 33 months' imprisonment.

案例Case

8

### 涉及有組織冒牌集團得益的洗錢案 ML related to the Proceeds of an Organized Counterfeiting Syndicate

自2015年10月起，香港海關就一個有組織冒牌集團展開調查，該集團經營小販攤檔、展銷場和貯存倉庫，以售賣冒牌物品。針對該集團三名主要成員(X、Y和Z小姐)的財富調查顯示，他們的個人銀行帳戶在2014年12月至2016年1月間，錄得大額現金存款，合計超過360萬港元，與他們的財務背景並不相稱，懷疑是售賣冒牌物品的得益。

2016年1月，香港海關對該集團採取執法行動，掃蕩六個固定小販攤檔、搗破六個貯存倉庫和一個樓上展銷場，並突擊搜查三個住宅單位。行動中，共檢獲冒牌物品約12,000件，包括手錶、手袋、皮具和太陽眼鏡等，總值約500萬港元。2017年1月，當局成功取得限制令，限制X、Y和Z小姐名下的可變現財產，約總值216萬港元。

(案件審訊結果將於2018年宣判。)

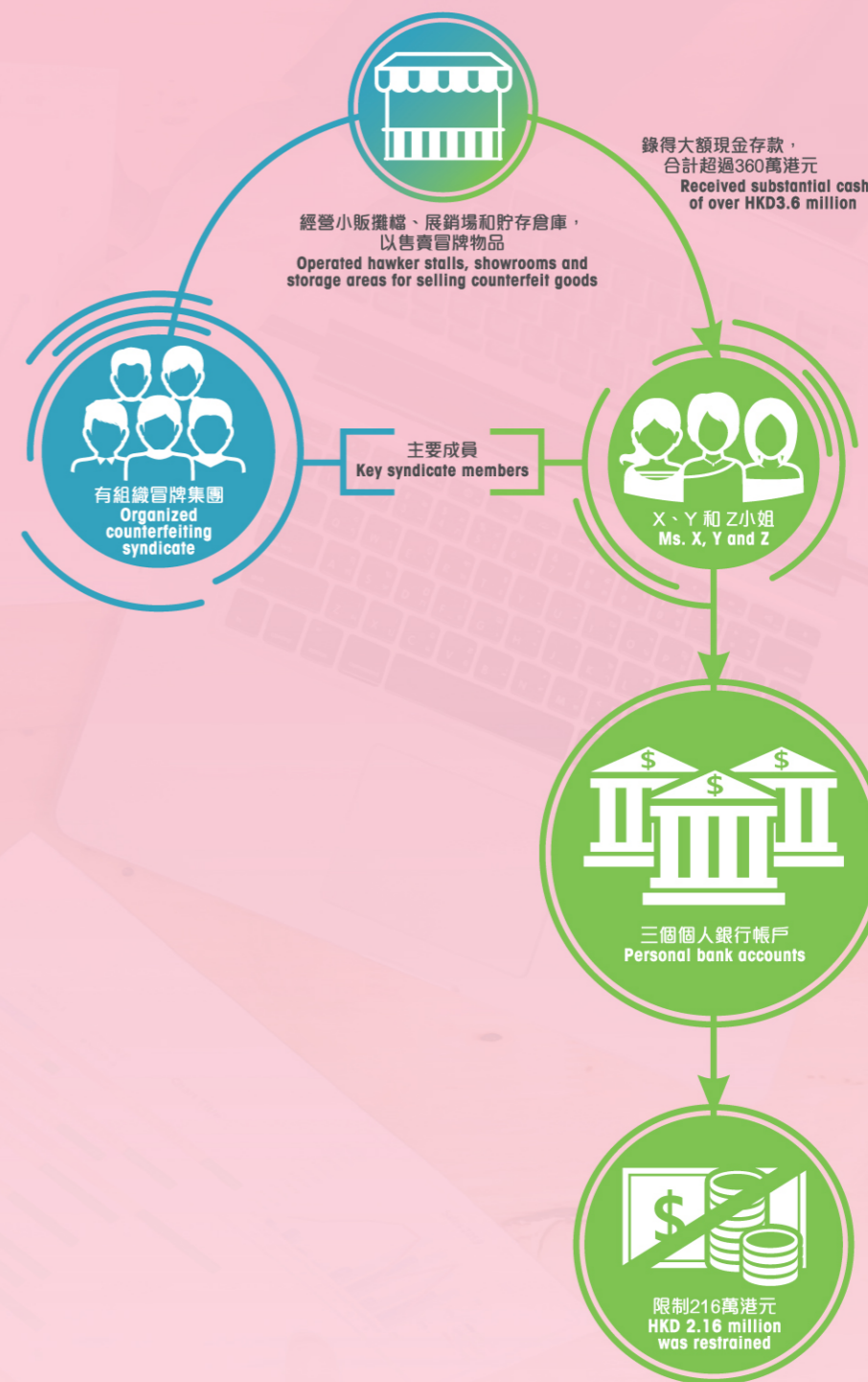
Since October 2015, an investigation was conducted by the C&ED against an organized counterfeiting syndicate operating hawker stalls, showrooms and storages for selling counterfeit goods. Financial investigation into three key syndicate members (Ms. X, Y and Z) revealed that substantial cash of over HKD3.6 million had been deposited into their personal bank accounts between December 2014 and January 2016, incommensurate with their financial profiles. The deposits were suspected to be proceeds generated from the sale of counterfeit goods.

In January 2016, the C&ED mounted an operation against the syndicate and raided six fixed hawker stalls, six storage areas and an upstairs showroom of suspected counterfeit goods as well as three residential premises. During the operation, about 12,000 pieces of counterfeit goods including watches, handbags, leather goods and sunglasses valued at around HK\$5 million were seized. In January 2017, a restraint order was successfully obtained to restrain HKD2.16 million worth of realizable properties held under the control of Ms. X, Y and Z.

(The case will be judged in 2018.)

案例Case 8

### 涉及有組織冒牌集團得益的洗錢案 ML related to the Proceeds of an Organized Counterfeiting Syndicate



# STRATEGIC ANALYSIS

## REPORT ON EMAIL SCAMS

策略分析報告 - 電郵騙案

## OVERVIEW

### 概覽

策略分析是本組持續進行的工作，長遠而言，可提高各機構所呈報資料的質素，以及改善本組的情報分析及發布。

此策略分析報告針對本港的電郵騙案，對象是政府決策局、監管機構、執法機關、財富情報單位及私人界別之中，負責打擊洗錢及恐怖分子資金籌集的伙伴。

本報告重點介紹最新的類型學分析，並撮述就電郵騙案拓展的情報，謹望情報成果進一步促進情報交流，促成執法行動，並就制訂政策及規例提供意見。報告闡述現有/潛在的洗錢風險並提出可行建議，冀助拓展打擊洗錢及恐怖分子資金籌集方面的知識，能在政策和行動層面，應付現時和未來的需要。

To the JFIU, strategic analysis reflects its ongoing efforts to enhance the quality of information reported by entities as well as intelligence analysis and dissemination by the JFIU in the long run.

The JFIU presents this Strategic Analysis Report (Report) on email scams in Hong Kong to target AML/CFT players in government policy bureaux, regulatory agencies, law enforcement bodies, FIUs and private sectors.

The Report highlights the latest typologies and summarizes the value-added intelligence cultivated on email scams. It is hoped that the intelligence product can further promote intelligence exchanges, trigger law enforcement actions and provide insights into policy and regulation formulation. It is also hoped that existing/ possible ML risks illustrated and observations proposed in the Report are conducive to the development of AML knowledge for current and future needs at both policy and operational levels.

## KEY FINDINGS

### 主要結果

#### 戶口詳情

- 2016年，有1,301宗欺詐交易涉及電郵騙案，共涉款22億港元，至於2017年(1月至6月)，則有337宗共涉款5.689億港元的欺詐交易；
- 源自電郵騙案的非法資金，於2016年至2017年6月期間存入香港1,119個銀行戶口；
- 約92%涉及電郵騙案的戶口屬公司戶口；
- 約78%董事持中國身分證明文件<sup>1</sup>，約16%董事持香港身分證；以及
- 約69%戶口在開設逾180天後始接收非法資金。

#### 戶口活動

- 歐洲、北美洲和亞洲乃三大非法資金之來源；
- 以金額計算，約60%非法資金在接收當日移走<sup>2</sup>，約18%於收款次日移走；
- 接收非法資金後，近半資金以本地轉帳形式轉帳至本地銀行；以及
- 約40%資金經由海外匯款轉移。

#### 主題分析

##### 更換公司董事

- 更換公司董事是挪用已有公司銀行戶口以接收非法資金最常見的方法之一；以及
- 18%涉及電郵騙案的公司接收非法資金前0至30日曾更換董事。

##### 戶口簽署人

- 研究涵蓋的75個公司戶口之中，60%公司既不通知銀行更換董事，又不要求更新戶口簽署人。

##### 試驗付款

- 約24%戶口錄得試驗付款交易(很可能用作測試戶口是否有效)；以及
- 金額大多少於500港元。

1. 包括中國身分證/ 往來港澳通行證/ 中國護照持有人。  
Including Chinese ID Card holders/ China Two-way Permit holders/ Chinese Passport holders.

2. 只包括每宗欺詐交易最主要的三次資金轉移。  
Including only the main three fund dissipations in each fraudulent transaction.

#### Account Information

- In 2016, 1,301 fraudulent transactions amounting to HKD2.2 billion were involved in email scams, whilst in 2017 (January to June), 337 fraudulent transactions amounting to HKD568.9 million were involved;
- All illicit fund originated from email scams was sent to 1,119 bank accounts in Hong Kong between January 2016 and June 2017;
- Around 92% of the accounts involved in email scams were corporate accounts;
- Around 78% of the directors were Chinese Identity Document holders<sup>1</sup> and about 16% of the directors were Hong Kong Identity Card holders; and
- Nearly 69% of the accounts were opened over 180 days prior to the receipt of illicit fund.

#### Account Activities

- Top three regions from which illicit fund was sent were Europe, North America and Asia;
- Around 60% of the fund dissipations<sup>2</sup>, in terms of amount, were conducted within the same day as the day of receipt of illicit fund whilst around 18% of the same was conducted on the next day of following the receipt of illicit fund;
- Upon the receipt of the illicit fund, nearly half of the dissipated fund was transferred to domestic banks by means of local transfers; and
- Around 40% of the dissipated fund was sent via overseas remittances.

#### Thematic Analyses

##### Change of Company Directorship

- Changing company directorship is considered one of the most prevalent ways in appropriating readily available corporate bank accounts for the subsequent receipt of illicit fund; and
- 18% of the companies involved in email scams were found to have their directorships changed 0-30 days prior to the receipt of illicit fund.

##### Account Signatories

- 60% of 75 targeted corporate accounts neither informed the banks of the change of directorships nor requested for account signatory updates.

##### Test Payment

- About 24% of the accounts recorded test payment transactions (which were likely used to test the accounts' validity); and
- The amount of the test payment was mainly below HKD500.

## INTRODUCTION 引言

本報告重點介紹本組就電郵騙案進行的策略分析，包括香港現況摘要及相關的主題分析。

本組仔細分析財富情報，向相關持份者提供增值成果。本報告所載資料，主要摘自本組接獲的資料、香港公司註冊處及其他來源。本報告檢視本組在2016年1月至2017年6月(檢討期)接獲的資料<sup>3</sup>，當中包括於戶口詳情、戶口活動、主題分析等。

This Report provides highlights of strategic analysis on email scams conducted by the JFIU, including a summary of the prevailing situation in Hong Kong and related thematic analyses.

The JFIU carries out detailed analysis of financial intelligence and delivers value-added outputs to relevant stakeholders. The information in this Report has been drawn primarily from information<sup>3</sup> received by the JFIU. It also contains information from the Companies Registry in Hong Kong and from other sources. This Report also examines information received by the JFIU from January 2016 to June 2017 (the review period), focusing on account information, account activities, thematic analyses, etc.

## SUMMARY OF EMAIL SCAMS IN HONG KONG

### 本港電郵騙案摘要

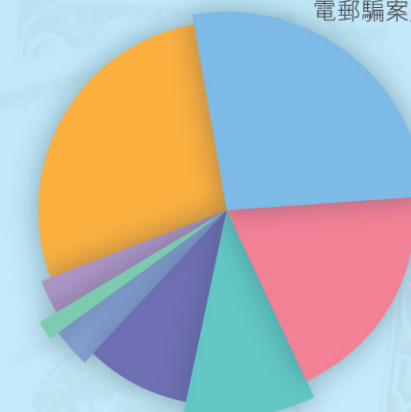
表1  
Table 1

	Total Number of Bank Accounts <sup>4</sup> Involved 涉及銀行戶口 <sup>4</sup> 總數	Total Number of Fraudulent Transactions 欺詐交易總數	Total Amount Involved <sup>5</sup> (HKD million) 涉及金額 <sup>5</sup> 總數 (百萬港元)	Average Amount Involved per Fraudulent Transaction (HKD million) 欺詐交易涉及金額平均數 (百萬港元)
2016	903	1,301	2,151.1	1.7
2017 (January to June) (1月至6月)	216	337	568.9	1.7

- 由於發生電郵騙案至本組得悉事件存在時差，接獲的資料未必全面反映實情。2017年中發生的案件或未能涵蓋。  
The information received by the JFIU may not completely reflect the situation as there is time difference between the occurrences of email scams and the receipt of information. Some of the email scams occurred in mid-2017 may not be covered.
- 銀行戶口數目以首次接收欺詐交易者計算。  
Only bank accounts receiving fraudulent transactions for the first time were counted.
- 包括試圖進行但不成功的交易。  
Including attempted but non-successful transactions.

## Reported Suspicious Indicators in Email Scam Transactions

電郵騙案交易的可疑指標



### 可疑指標分析

「暫存款項」、「交易金額與背景不相稱」及「大額交易」，是涉及電郵騙案的戶口之中，最常見的三個可疑指標<sup>6</sup>。

### Suspicious Indicator Analysis

'Temporary repository of fund', 'transactions incommensurate with the background' and 'large transaction' are three of the most prevalent suspicious indicators<sup>6</sup> in accounts involved in email scams.

- \* 間接交易指交易並非直接轉帳至指定的收款人，而是經一個或多個對手方轉折交易，加以掩藏。  
 \*\* 其他指 i) 離岸公司、ii) 「抽頭式」交易、iii) 空殼公司、iv) 由簽署人控制的帳戶、v) 臨時帳戶、vi) 不合經濟原則的交易、vii) 鈔票帶家或未經註冊的匯款代理人、viii) 客戶堅持進行較不穩妥的交易，以及 ix) 投保巨額保險/ 作出大筆投資後，迅速贖回。  
 \* Indirect transaction refers to transaction that is not sent to the intended recipient directly, but layered by one or more counterparties.  
 \*\* Others refer to i) Offshore company, ii) U-turn transactions, iii) Shell company, iv) Account operated by signatory, v) Transient account, vi) Uneconomical transaction, vii) Money courier or unlicensed money service operator, viii) Customer insisted to use less secured transactions and ix) Heavy insurance policy / investment followed by quick redemption.

## ACCOUNT INFORMATION

### 戶口詳情

### 戶口種類

近92%涉及電郵騙案的戶口屬公司戶口。

### Account Types

Nearly 92% of the accounts involved in email scams were corporate bank accounts.

表2  
Table 2

	Corporate Accounts 公司戶口	Number of Companies Involved 涉及的公司數目	Personal Accounts <sup>7</sup> 個人戶口 <sup>7</sup>	Number of Account Holders <sup>8</sup> Involved 涉及戶口持有人 <sup>8</sup> 數目
2016	825 (91.4%)	798	78 (8.6%)	84
2017 (January to June) (1月至6月)	200 (92.6%)	197	16 (7.4%)	16

- 每宗欺詐交易或涉及多於一個指標。  
More than one indicator may be used for each fraudulent transaction.
- 包括個人聯名戶口。  
Including personal joint accounts.
- 包括個人聯名戶口持有人的實際人數。  
Including the actual number of account holders of personal joint accounts.

## Type of ID Documents held by Directors

董事所持的身份證明文件類型

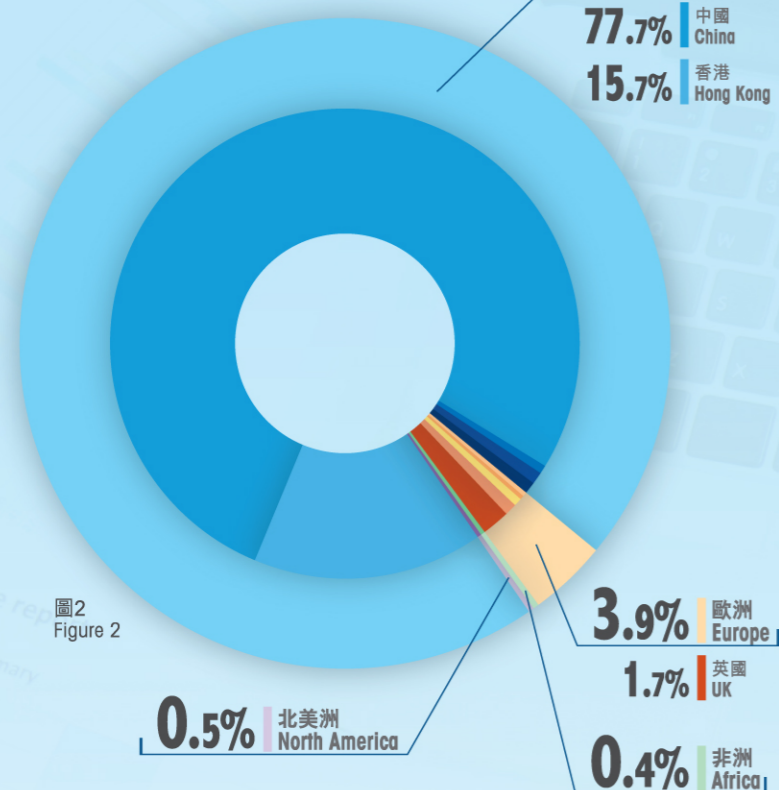


圖2  
Figure 2

### 公司戶口

在涉及的公司戶口之中，即995間公司當中，約94%公司在香港註冊。就2017年1月至6月涉及電郵騙案的公司分析其董事身分<sup>9</sup>，發現229名董事中，218名董事(95.2%)是亞洲人，9名(3.9%)是歐洲人。當中中國身分證明文件及香港身分證明持有者佔總數逾90%。

### Corporate Accounts

Among the corporate accounts involved, around 94% of 995 companies were Hong Kong incorporated.

Further analysis on the directorship<sup>9</sup> of the companies which accounts were involved in email scams in 2017 (January to June) indicated that 218 out of 229 directors (95.2%) were Asian whilst nine directors (3.9%) were European. Chinese Identity Document holders and Hong Kong Identity Card holders constituted over 90% of the total number.

### 戶口持有人數 Number of Account Holders

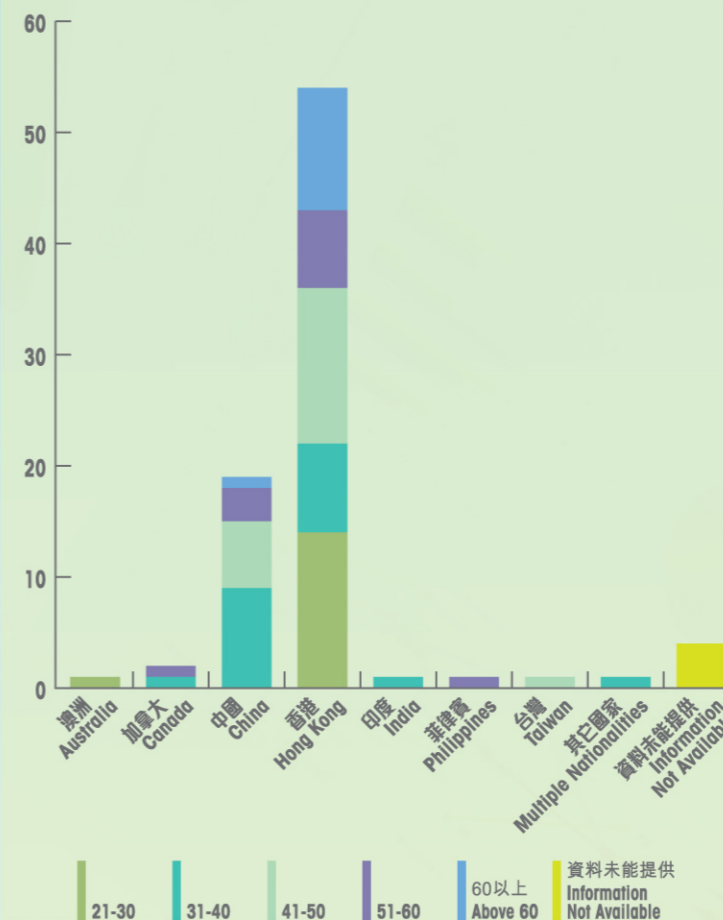


圖4：個人戶口持有人所持之身份證明文件及年齡組別 (2016年)  
Figure 4: Type of ID Document held by and Age Group of Personal Account Holders (2016)

### 戶口持有人數 Number of Account Holders

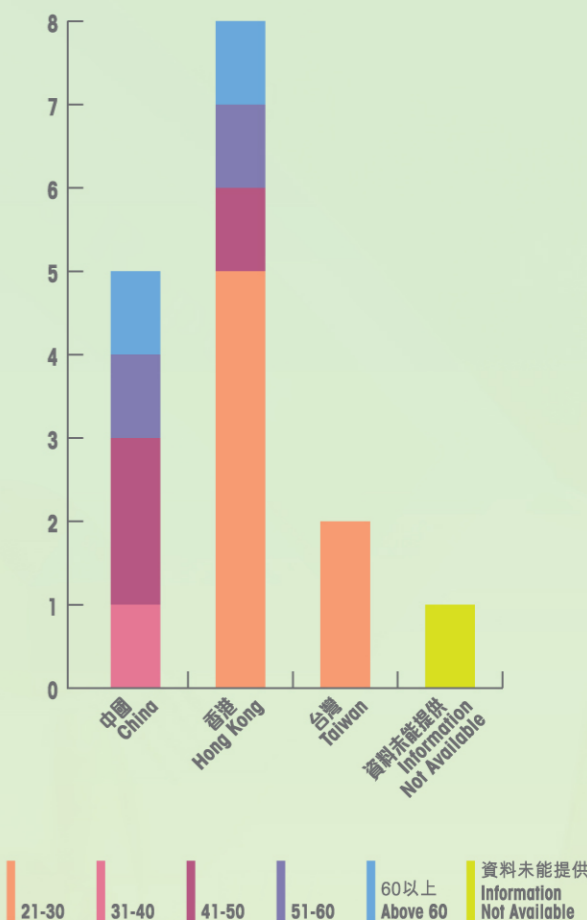


圖5：個人戶口持有人所持之身份證明文件及年齡組別 (2017年1月至6月)  
Figure 5: Type of ID Document held by and Age Group of Personal Account Holders (2017 January to June)

### 個人戶口

65%之個人戶口持有人乃香港身分證持有者，其次是中國身分證明文件持有者。

至於個人戶口持有人的年齡組別，2016年未見特定年齡組別佔多數，而2017年(1月至6月)涉及電郵騙局的個人戶口數目有限，未有定論。

### Personal Accounts

65% of the personal account holders were Hong Kong Identity Card holders, followed by Chinese Identity Document holders.

Regarding the age group of the personal account holders, no particular age group dominated in 2016. Given the limited number of personal accounts involved in email scams in 2017 (January to June), no conclusive observation could be drawn.



\* 其他司法管轄區包括澳洲、加拿大、印度、菲律賓及台灣。  
Other jurisdictions include Australia, Canada, India, the Philippines and Taiwan.

圖3：身份證明文件種類  
Figure 3: Type of ID Documents

### 開設戶口

檢討期內，在1,119個戶口之中，有770個(68.8%)在接收非法資金前逾180天開設。

### Account Opening

During the review period, 770 (68.8%) out of 1,119 accounts were opened over 180 days prior to the receipt of illicit fund.

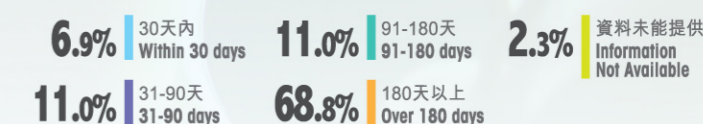


圖6：接收非法資金前開設戶口的時間  
Figure 6: Periods of Account Opening Prior to the Receipt of Illicit Fund

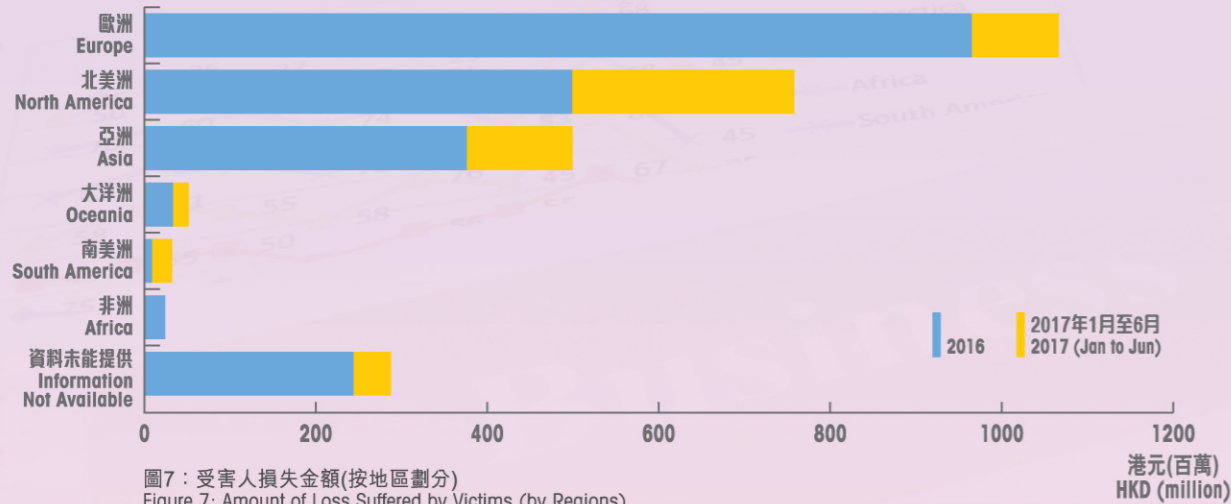
9. 基於開設戶口時提供的資料作分析，重複的記錄已予以修正。  
Analysis was based on the information provided at the time of account opening, with rectification on multiple entries.

# ACCOUNT ACTIVITIES 戶口活動

## 按地區<sup>10</sup>劃分資金來源 Origin of Fund by Regions<sup>10</sup>

歐洲、北美洲和亞洲受害人的損失<sup>11</sup>，分別為10.666億港元、7.581億港元和4.995億港元，分別佔總額27.207億之39.2%、27.9%和18.4%。

The total amount of loss<sup>11</sup> from victims in Europe, North America and Asia were HKD1,066.6 million, HKD758.1 million and HKD499.5 million respectively, equivalent to 39.2%, 27.9% and 18.4% of the total amount HKD2,720.7 million.



按司法管轄區而言，2016年非法資金的三大來源(包括行騙未遂<sup>12</sup>的電郵騙案)，是美國(4.386億港元)、羅馬尼亞(3.408億港元)和香港(1.645億港元)，而2017年(1月至6月)的三大來源則是美國(2.37億港元)、西班牙(4,730萬港元)和中國(3,920萬港元)。

By jurisdiction, in 2016, the top three origins of illicit fund, including unsuccessful email scams<sup>12</sup>, were the US (HKD438.6 million), Romania (HKD340.8 million) and Hong Kong (HKD164.5 million) whilst in 2017 (January to June), they were the US (HKD237 million), Spain (HKD47.3 million) and China (HKD39.2 million).

A breakdown of the total loss<sup>11</sup> in percentage of the top three regions is illustrated at Figures 8-13.

圖8至圖13，分項列出損失<sup>11</sup>最多的三個地區的損失總額百分比。

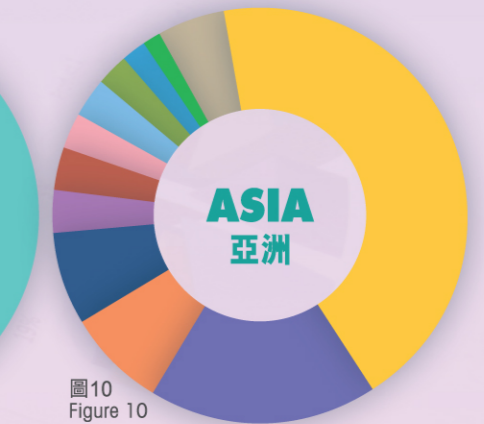
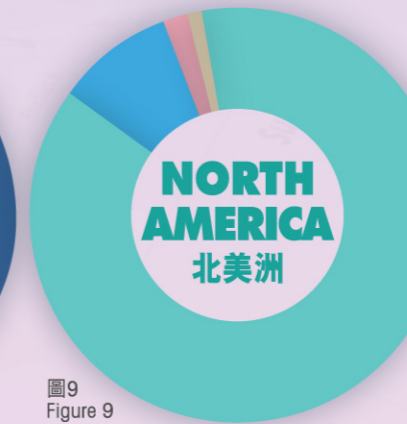
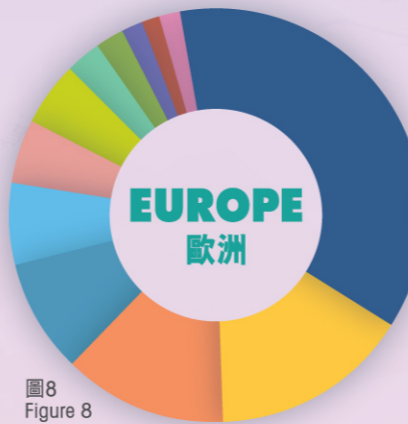
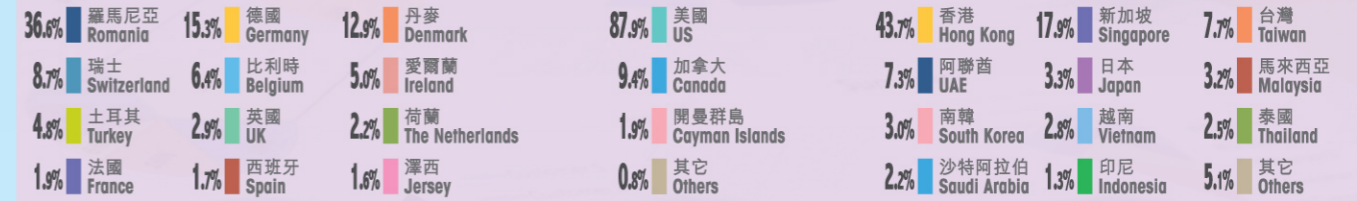
10. 參照特別組織的分區劃分 (<http://www.fatf-gafi.org/countries/World-Wide>)。Reference of Classification of Region was made to the FATF (<http://www.fatf-gafi.org/countries/World-Wide>).

11. 包括因電郵騙案致使非法資金存入疑犯香港戶口的交易，以及原本會進行但基於下列原因未有入帳的交易(行騙未遂的電郵騙案)：(i) 匯款銀行在欺詐款項存入疑犯戶口之前撤回，(ii) 受害人揭發騙案而沒有匯款，以及(iii) 在舉報電郵騙案前，疑犯戶口已遭封鎖。Including those transactions that were actually made with illicit fund being credited to suspects' accounts in Hong Kong as a result of email scams, as well as transactions that would have been made (in 'attempted' email scams) but the fund eventually was not credited to the account (i) the fraudulent payments were recalled by remitting banks before reaching the suspects' accounts, (ii) victims unveiled the scam and did not remit the payment and (iii) the suspects' accounts were blocked prior to the report of email scams.

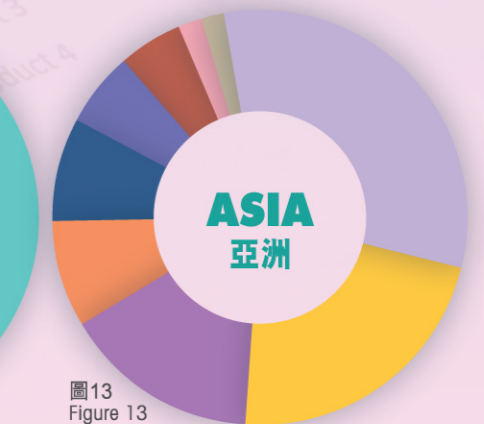
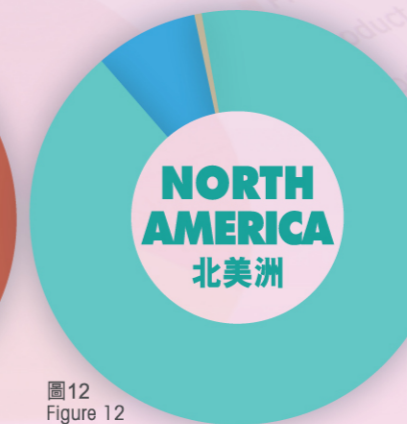
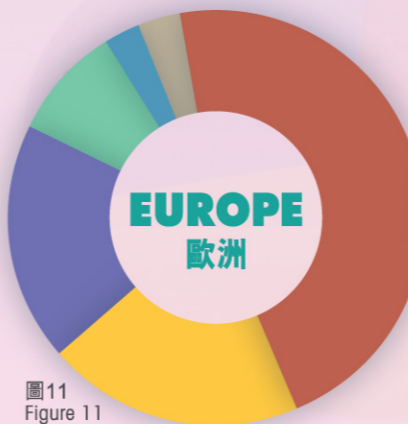
12. 以及原本會進行但基於下列原因未有入帳的交易(行騙未遂的電郵騙案)：(i) 匯款銀行在欺詐款項存入疑犯戶口之前撤回，(ii) 受害人揭發騙案而沒有匯款，以及(iii) 在舉報電郵騙案前，疑犯戶口已遭封鎖。Transactions that would have been made (in 'attempted' email scams) but the fund eventually was not credited to the account (i) the fraudulent payments were recalled by remitting banks before reaching the suspects' accounts, (ii) victims unveiled the scam and did not remit the payment and (iii) the suspects' accounts were blocked prior to the report of email scams.

## Top Three Regions 損失最多的三個地區 (in terms of the amount of total loss)

### 2016



### 2017 (January to June)



2016年，在1,301宗欺詐交易之中，364宗共涉款5.721億港元的行騙未遂交易(即交易總宗數的27.9%或涉及總額的26.6%)；至於2017年(1月至6月)，337宗欺詐交易中，70宗共涉款1.043億港元的行騙未遂交易(即交易總宗數的20.8%或涉及總額的18.3%)，資金未有轉來香港。

In 2016, 364 out of 1,301 fraudulent transactions amounting to HKD572.1 million (27.9% of the total number of transactions or 26.6% of the total amount involved) were unsuccessful whilst in 2017 (January to June), 70 out of 337 fraudulent transactions amounting to HKD104.3 million (20.8% of the total number of transactions or 18.3% of the total amount involved) were unsuccessful that fund was not transferred to Hong Kong.

## 資金轉移<sup>13</sup> Fund Dissipation<sup>13</sup>

### 接收非法資金至移走資金的期間

以金額計算，61.6%資金轉移<sup>14</sup>在收款當日進行，約17.9%非法資金在收款次日移走。

### Duration between the Receipt of Illicit Fund and Fund Dissipation

61.6% of the fund dissipations<sup>14</sup>, in terms of amount, were conducted within the same day as the day of receipt of illicit fund whilst around 17.9% of the same was conducted on the day following the receipt of illicit fund.

### 資金轉移的方法

近50%資金以本地轉帳形式轉至本地銀行，少於40%經由海外匯款轉移。

### Means of Fund Dissipation

Nearly 50% of the dissipated fund was transferred to domestic banks by local transfers whilst less than 40% of the same was dissipated via overseas remittances.

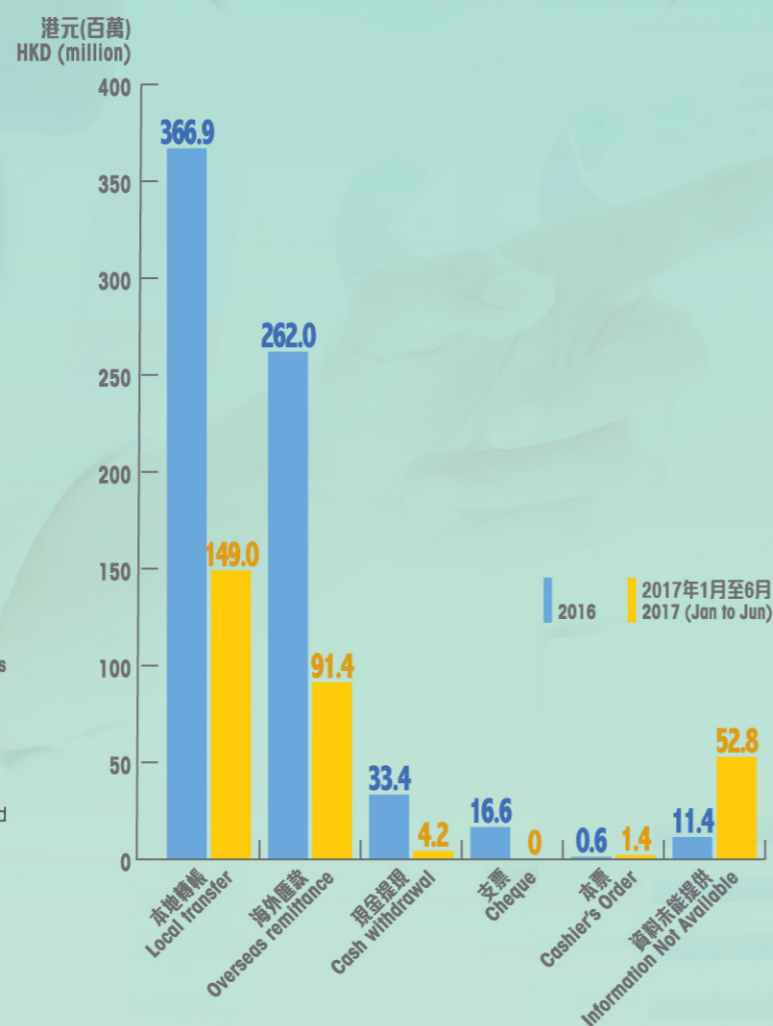
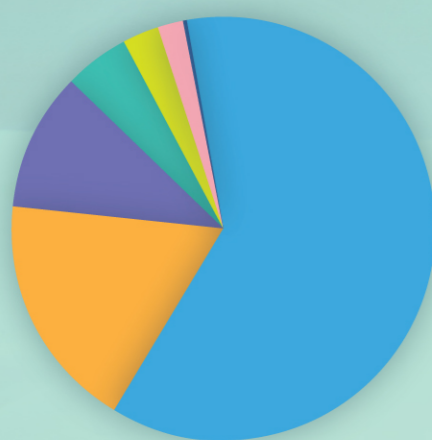


圖14：接收非法資金至移走資金的期間  
Figure 14: Duration between the Receipt of Illicit Fund and Fund Dissipation

圖15：轉移資金的方法  
Figure 15: Means of Fund Dissipation

13. 計算最多計算三個戶口之第二層資金轉移。

The fund dissipation includes up to three destinations of second layer.

14. 包括以本地轉帳、海外匯款、現金提款、支票及銀行本票等方法轉移資金。

Including fund dissipation by means of local transfers, overseas remittances, cash withdrawals, cheques and cashier's orders.

### 轉移至其他司法管轄區

除了本地轉帳外，1.442億港元(14.6%)及1.416億港元(14.3%)之匯款分別轉至中國和阿聯酋。

### Fund Dissipation by Jurisdictions

Other than local transfers, HKD144.2 million (14.6%) and HKD141.6 million (14.3%) were sent to China and UAE respectively.

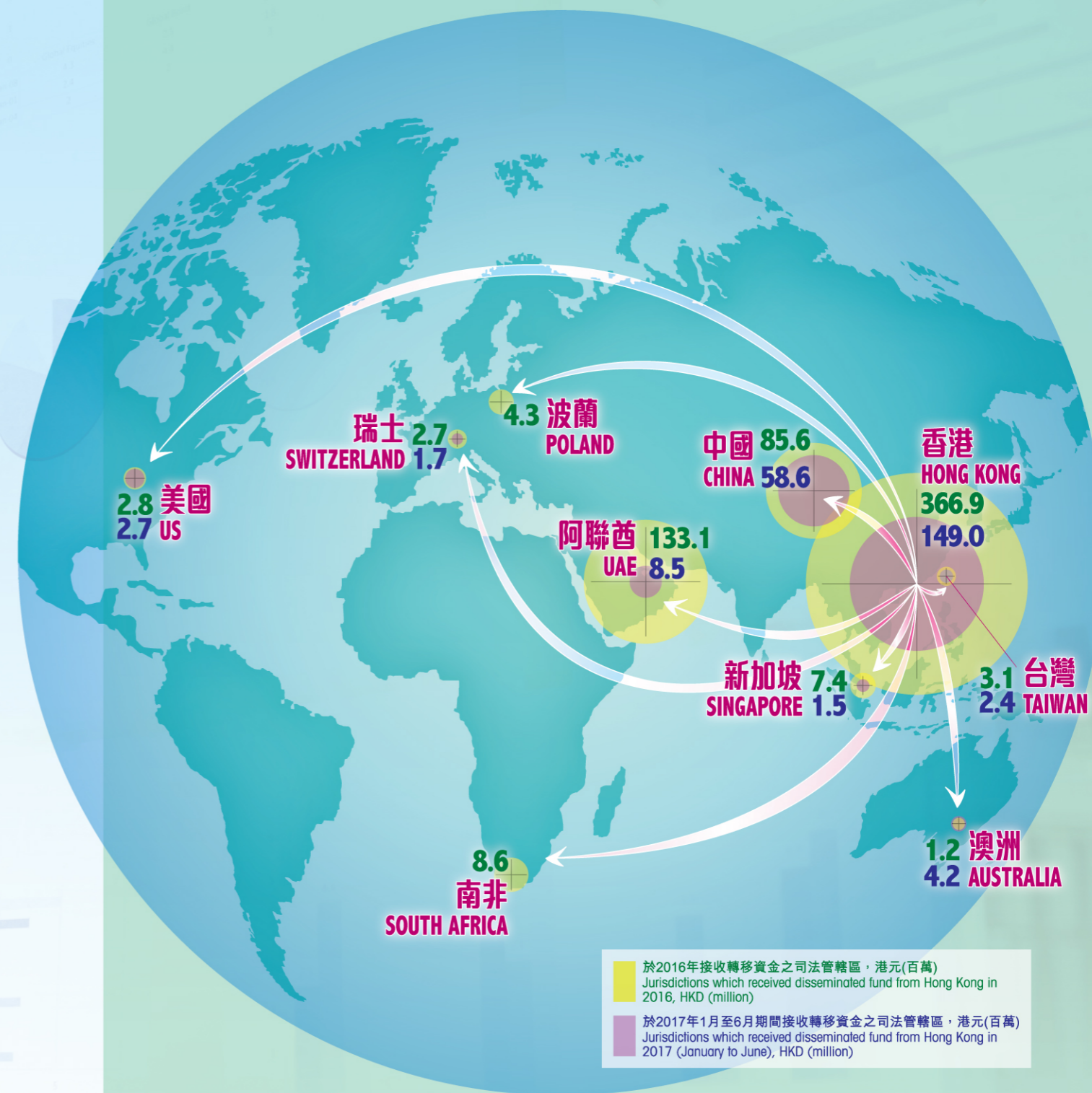


圖16：2016至2017年(1月至6月)的資金轉移情況(第二層交易十大司法管轄區)  
Figure 16: Fund Dissipation in 2016 and 2017 (January to June) (Top 10 Jurisdictions, i.e. the Second Layer)

## THEMATIC ANALYSIS 主題分析

### 主題分析1：更換公司戶口的 公司董事以挪用用戶口 (2017年1月至6月)

更換公司董事，是挪用已有公司銀行戶口以接收非法資金最常見的方法之一。涉及電郵騙案的178香港註冊公司<sup>15</sup>之中，75間(42.1%)在接收非法資金<sup>17</sup>前後180日內曾更換董事<sup>16</sup>，18%在接收非法資金前30日內曾更換董事。在上述75間香港註冊公司之中，90.4%董事在更換董事前<sup>18</sup>，本為中國身分證證明文件持有人。

#### Thematic Analysis 1: Change of Company Directorship for Corporate Account Appropriation (2017 January to June)

Changing the company directorship is considered as one of the most prevalent ways in appropriating readily available corporate bank accounts for the subsequent receipt of illicit fund. 42.1% (75 out of 178 subject companies<sup>15</sup>) Hong Kong incorporated companies were found with their directorship changed<sup>16</sup> in fewer than 180 days before or after the receipt of illicit fund<sup>17</sup> in email scams. 18 % recorded a change of directorship 0-30 days prior to the receipt of illicit fund.

Out of the aforesaid 75 Hong Kong incorporated companies, 90.4% of the directors were Chinese Identity Document holders before the change of company directorships<sup>18</sup>.

15. 在涉及電郵騙案的197間公司當中，178間公司在香港註冊並有公司註冊號碼。  
Among 197 companies involved in email scams, 178 companies were Hong Kong incorporated with known Company Registration Number.

16. 以新董事替代、新增董事或刪減現有董事。  
Either replacement by, addition of new director(s) or reduction of existing director(s).

17. 如某公司涉及多個戶口或多次接收非法資金，在專題分析1有關更換董事的研究中，只計算第一個戶口第一次接收非法資金。  
If a company is involved in multiple accounts or multiple receipts of illicit fund, only the first account receiving the first transfer of illicit fund would be counted in the study of relationship of change of directorship in Thematic Analysis 1.

18. 根據開設戶口時提供的資料。  
Referring to the information provided at the time of account opening.

### Type of ID Documents held by Directors Before the Change of Directorship

更換公司董事前，董事所持的身份證明文件類型

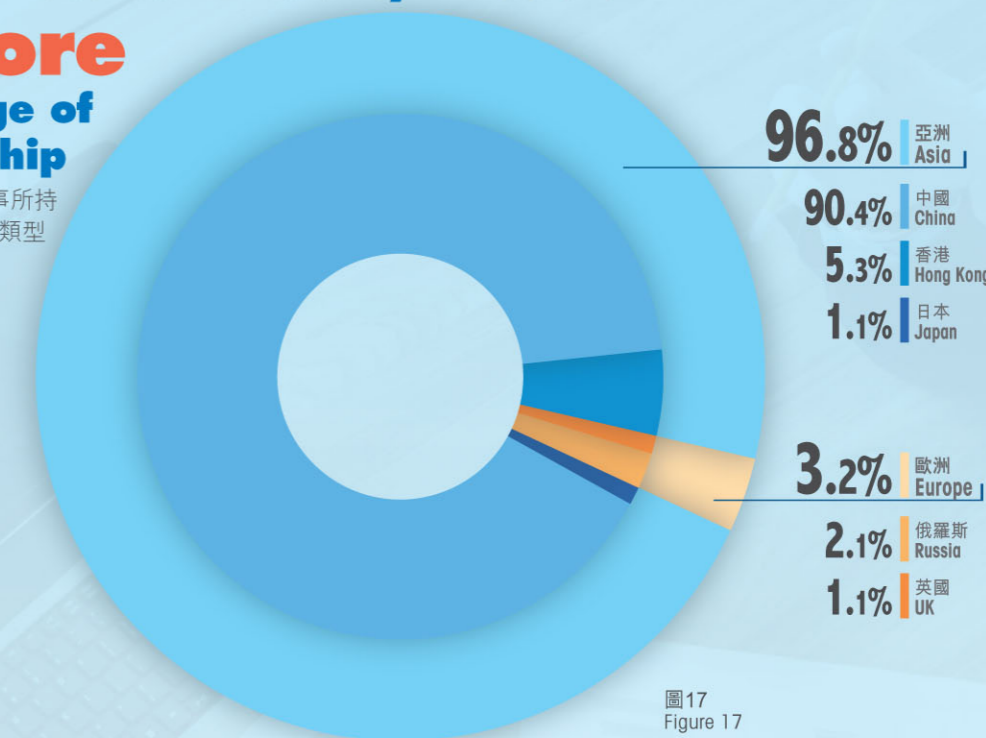


圖17  
Figure 17

在更換董事後，新董事來自歐洲(49.4%)、亞洲(37.7%)和北美洲(11.7%)等地區。

After the change of directorship, the directors were from Regions of Europe (49.4%), Asia (37.7%), North America (11.7%), etc.

### Type of ID Documents held by Directors After the Change of Directorship

更換公司董事後，董事所持的身份證明文件類型

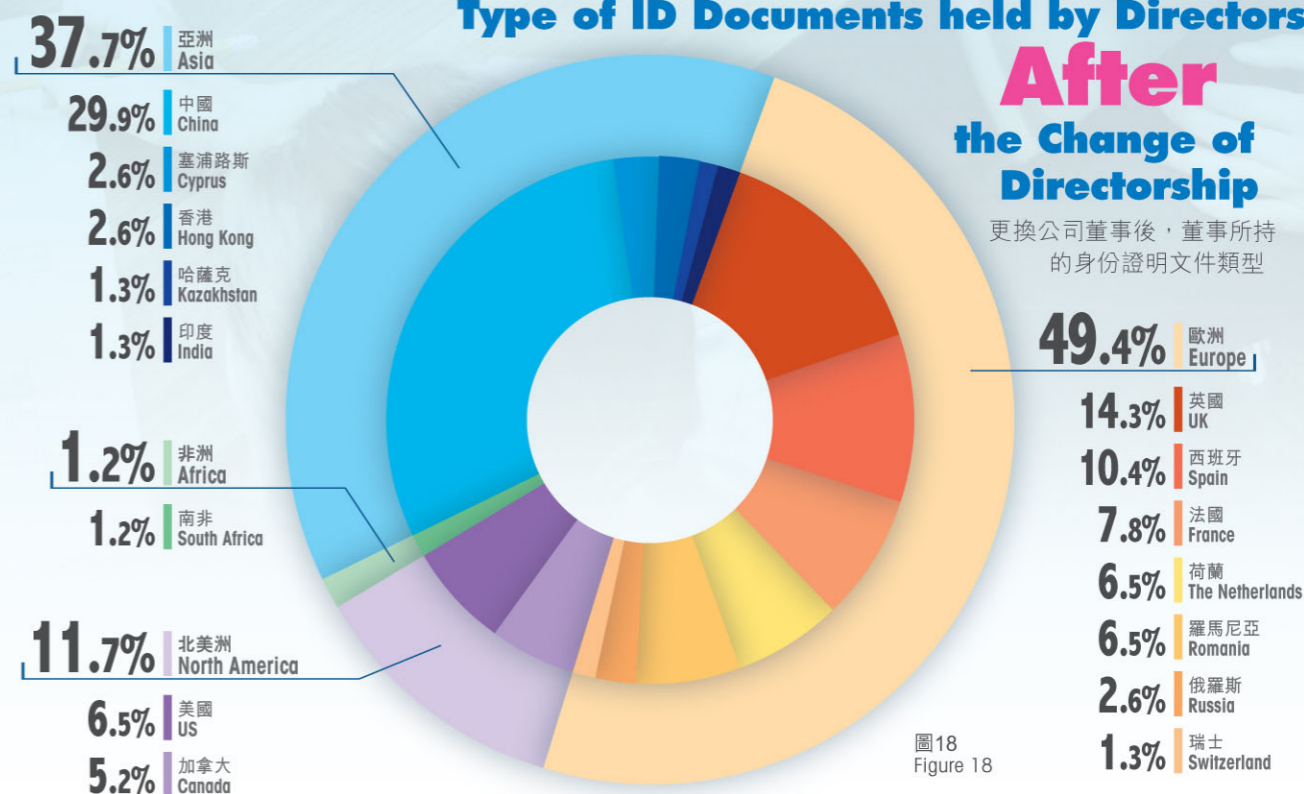


圖18  
Figure 18

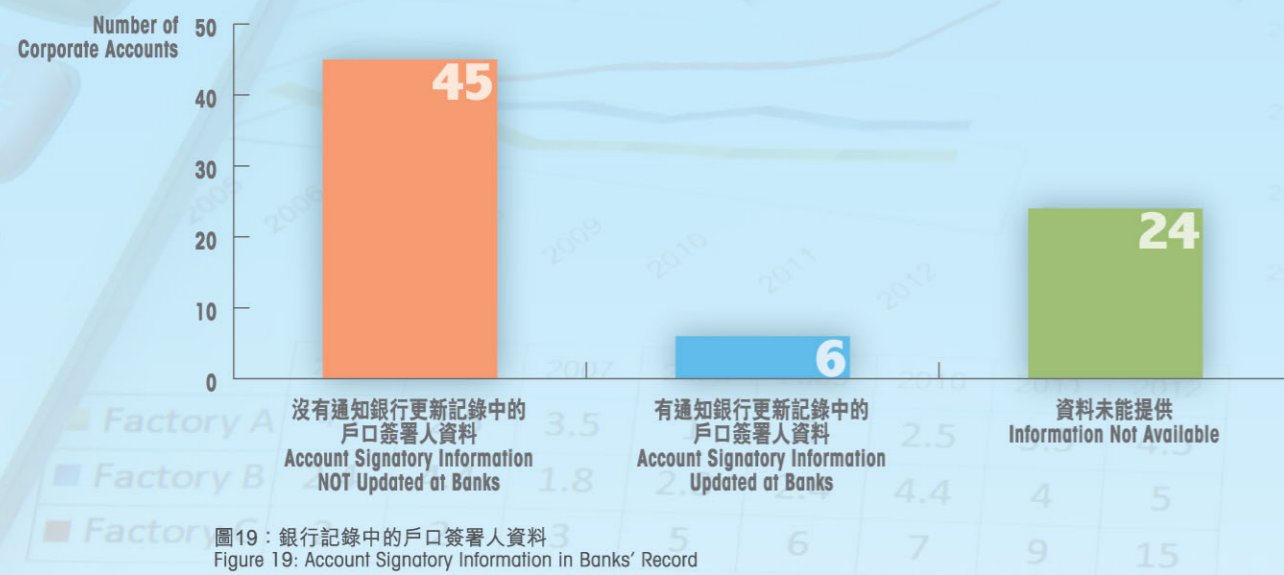


## 主題分析2：戶口簽署人 (2017年1月至6月)

## Thematic Analysis 2: Account Signatories (2017 January to June)

在更換董事的75間香港註冊公司之中，8%在更換董事後，向相關銀行更新戶口簽署人。60%既沒有通知銀行更換董事，又不要求更新戶口簽署人。

Among 75 Hong Kong incorporated companies with directorships changed, 8% had their account signatories updated at respective banks after the change. 60% neither informed the banks of the change of directorships nor requested for account signatories update.



## 主題分析3：試驗付款

一些疑犯就電郵騙案接收非法資金前，會先與第三方或在其綜合貨幣戶口內進行交易<sup>19</sup>。此類交易相信是為了測試戶口是否有效，然後才用以接收非法資金。約24%戶口在接收非法資金前，曾錄得試驗付款交易。



## Thematic Analysis 3: Test Payment

Some suspects would make transactions<sup>19</sup>, either to or from third parties, or among self multi-currencies accounts, prior to the receipt of illicit fund in email scams. The purpose of such transactions was believed to test the accounts' validity before using them to receive illicit fund. About 24% of the accounts recorded test payments before the receipt of illicit fund.

圖20：戶口用作試驗付款之比例  
Figure 20: Proportion of Accounts with Test Payment Observed

19. 在此分析中，試驗付款並不以數目衡量，而是指觀察到/認為異常，涉及細小金額、異於平常交易模式、於接收非法資金前一個月內進行的交易往來，很可能作測試用途。  
The meaning of test payment in this analysis is not defined quantitatively. However, it is considered / observed to be abnormal incoming and/or outgoing transactions of trivial amounts which deviated from the normal transaction pattern and was recorded within one month before the receipt of illicit fund likely for testing purpose.

試驗付款的金額大多介乎50港元或以下(36.5%)至101至500港元(27.4%)，與準備接收的非法資金相比(檢討期內每宗欺詐交易的平均金額達170萬港元)，金額可謂微不足道。

76.7%試驗付款在其綜合貨幣戶口內進行，23.3%往來第三方戶口或以現金存款。

The amount of test payments mainly ranged from HKD50 or below (36.5%) to HKD101-500 (27.4%). The amounts were considered relatively insignificant when compared with the illicit fund to be received (the average amount involved per fraudulent transaction was HKD1.7 million during the review period).

76.7% of the test payments were made among their respective self multi-currencies accounts whilst 23.3% was sent to/ from third-parties or deposited by cash.



### 結論

從上述分析，可見電郵騙案的各種趨勢和模式，以及其中的實質數據。經深入觀察所得的見解和意見，亦已提供予有關當局和銀行採取所需行動。

本組致力在最新的電郵騙案類型學分析方面，提供有用的分析成果。相關界別可藉報告中的增值情報，檢討打擊洗錢的政策和風險警報系統，以捍衛金融體系，免受不法之徒濫用。

### 免責聲明

本組致力在此報告提出全面而透徹的數據分析。然而，此報告之分析多建基於本組所接獲資料內容之準確及明確度，加上各方採用的觀點與定義或有不同，因此差異或會出現。本組不會對因使用本報告任何材料或關乎使用該等材料而直接或間接引致的任何損失、損害、費用或開支負上任何責任。

### 查詢

請致電 (852) 2866 3366，或以電郵 (jfiu@police.gov.hk) 與本組聯絡，亦可於本組網頁(www.jfiu.gov.hk)瀏覽資料。

### 意見回饋

你的意見有助我們訂定未來路向和專題項目，歡迎請把你的意見電郵至jfiu@police.gov.hk。

### Overall Remarks

Different trends and patterns of email scams were observed, with concrete data, during the analysis. More in-depth observations and advice were provided to various competent authorities and banks for actions deemed necessary.

The JFIU strives to provide useful analytical products on the latest typologies of email scams. Relevant sectors are welcome to make use of the value-added intelligence in the Report in reviewing their AML policies and risk alert systems so as to safeguard the financial system from being misused by criminals.

### Disclaimer

The JFIU aims at providing a thorough and comprehensive data analysis in this Report. That said, discrepancies might inevitably exist due to the availability/ accuracy/ explicitness of the information provided to the JFIU, different perceptions or definitions applied, etc. The JFIU accepts no responsibility for any loss, damage, cost or expense of whatever kind incurred directly or indirectly from or in connection with the use of any materials in this Report.

### Enquiries

Please contact the JFIU at telephone: (852) 2866 3366 or via email: jfiu@police.gov.hk. Information is also available on the JFIU website at www.jfiu.gov.hk.

### Feedback

Your feedback is important for us to shape our future directions and specific projects. You are welcome to email your comment(s) to jfiu@police.gov.hk.

# International COOPERATION AND REPRESENTATION

國際合作及參與

香港先後於1991年和1997年，加入特別組織和亞洲/太平洋反清洗黑錢組織(亞太反洗錢組織)，致力聯同全球伙伴打擊洗錢及恐怖分子資金籌集。而本組則於1996年，加入埃格蒙特組織。

Committed to the global fight against ML and TF, Hong Kong has been members of the FATF (international AML/CFT rule-setter) and the Asia/Pacific Group on ML (APG) since 1991 and 1997 respectively, while the JFIU has become a member of the Egmont Group since 1996.

## 國際合作中的特定角色

除了日常的財富情報交流，本組積極參與埃格蒙特組織事務，致力促進世界各地的財富情報單位之間的交換情報、進行培訓和分享專業知識。本組主管更於2017年7月，在澳門舉行的第24屆埃格蒙特組織全體會議中，獲選為亞太地區代表之一。

打擊清洗黑錢及反恐籌資的全球標準不斷演化，時有修訂建議，本組人員透過特別組織和亞太反洗錢組織等平台，就此提供意見，同時就其他關乎財富情報單位政策，或案件類型分析，表達看法。

## Specific Role in International Cooperation

Other than daily financial intelligence exchange, the JFIU endeavours to increase its presence in the Egmont Group, the mandate of which is to improve cooperation on information exchange, training and expertise among worldwide FIUs. The Head of JFIU was selected to be one of the Regional Representatives of the Asia and Pacific Region during the 24th Egmont Group Plenary Meetings in Macao in July 2017.

From time to time, the JFIU offers its views to proposed amendments to the evolving global AML/CFT standards and other FIU-related policy or typologies matters as appropriate at the FATF and APG platforms.

與國際伙伴直接會晤，不但可以借鏡全球良好實務做法，知悉打擊清洗黑錢及反恐籌資的發展及籌備相互評核，更加深彼此了解在政策和行動層面限制，從而找出合作契機。

Face-to-face meetings with international partners do not only provide insights into global good practices, AML/CFT developments and ME preparatory work, but also promote mutual understanding of room for cooperation as well as limitations at policy/ operational levels.

## CONFERENCES AND WORKSHOPS 研討會及工作坊

本組不時到外地參與研討會和工作坊，持續拓展人脈網絡，與策略伙伴通力合作。

The JFIU continuously extends network and fosters collaboration with its strategic working partners through attendance at various conferences and workshops outside Hong Kong.



The JFIU officers attended at the Egmont Group Working Groups and Heads of FIU Meeting in Doha, Qatar in January 2017 and the 24th Egmont Group Plenary Meetings in Macao in July 2017. 本組人員於2017年1月，在卡塔爾多哈出席埃格蒙特組織工作小組及財富情報組主管會議；另於2017年7月，在澳門出席第24屆埃格蒙特組織全體會議。

In February 2017, the Senior Superintendent of Police of NB (Financial Investigation) joined the Hong Kong delegation to attend the FATF Plenary and Working Group Meetings in Paris, France. 2017年2月，毒品調查科高級警司(財富調查)與香港代表團在法國巴黎出席特別組織全體會議及工作小組會議。





In December 2017, the JFIU exchanged views and experience with counterparts at the third Tripartite Meeting among the Mainland, Hong Kong and Macao on AML/CFT in Zhuhai. 2017年12月，本組在珠海出席內地、香港及澳門三地反洗錢業務交流會，與對口單位交流意見和經驗。



In October 2017, one JFIU officer took part in the Strategic Analysis Course held by the Egmont Group in Kuala Lumpur, Malaysia. 2017年10月，本組人員參與埃格蒙特組織在馬來西亞吉隆坡舉辦的策略分析課程。



In August 2017, two JFIU officers and other Hong Kong delegates participated in the FATF Standards Training Course in Busan, South Korea. 2017年8月，本組兩名人員和其他香港代表在南韓釜山參與特別組織國際標準培訓課程。

## COURTESY VISITS 禮節性拜訪

回顧2017年，本組禮節性拜訪澳門和中國內地不同機關，並於本港先後接待澳洲、比利時、法國、德國、印尼、愛爾蘭、以色列、中國內地、荷蘭和美國的代表團。透過此等訪問，各地人員可就關於洗錢及恐怖分子資金籌集的案件，以及打擊清洗黑錢及反恐籌資的專項議題，直接進行討論。

In 2017, the JFIU made liaison visits to the authorities of Macao and Mainland China; it also received delegations from Australia, Belgium, France, Germany, Indonesia, Ireland, Israel, Mainland China, the Netherlands and the US in Hong Kong. Such visits allow direct discussion on ML/TF-related cases and topical AML/CFT issues.



In June 2017, the Financial Crimes Enforcement Network of the US visited the JFIU. 2017年6月，美國金融罪行執法網絡訪問本組。



In July 2017, the Indonesian Financial Transaction Reports and Analysis Centre visited the JFIU. 2017年7月，印尼金融交易報告和分析中心人員訪問本組。



In September 2017, the Central Office for the Suppression of Serious Financial Crime, Ministry of the Interior, France visited the JFIU and FID NB. 2017年9月，法國內政部防範金融罪行總部訪問聯合財富情報組及財富調查組。

## 第一季 1st Quarter

美國國土安全調查局在香港就貿易洗錢分享經驗  
Attendance at the Experience Sharing Session on Trade-based ML by the Homeland Security Investigations of the US in Hong Kong

訪問澳門特別行政區檢察院和金融情報辦公室，以及澳門司法警察局清洗黑錢罪案調查處  
Visit to the Public Prosecutions Office and the Financial Intelligence Office of Macao SAR, as well as the Anti-Money Laundering Department of Macao Judiciary Police

廣州市公安局訪問毒品調查科  
Visit to the NB by Guangzhou Municipal Public Security Bureau

在卡塔爾多哈出席埃格蒙特組織工作小組及財富情報組主管會議  
Attendance at the Egmont Group Working Groups and Heads of FIU Meetings in Doha, Qatar

在法國巴黎出席特別組織全體會議及工作小組會議  
Attendance at the FATF Plenary and Working Group Meetings in Paris, France

在澳門出席澳門司法警察局舉辦的澳門博彩相關犯罪訓練工作坊  
Attendance at the Macao Gaming-related Crime Training Workshop run by the Macao Judiciary Police in Macao

以色列警察調查及情報部經濟罪案科訪問聯合財富情報組  
Visit to the JFIU by the Economic Crime, Investigations and Intelligence Division, Israel Police

在北京訪問人民銀行反洗錢局和中國反洗錢監測分析中心、公安部禁毒局及公安部反電信網路詐騙犯罪中心  
Visit to the Anti-Money Laundering Bureau and the China Anti-Money Laundering Monitoring and Analysis Centre of the People's Bank of China, the Narcotics Control Bureau and the Anti-Telecommunications Network Fraud Centre of Ministry of Public Security in Beijing, Mainland China

## 第二季 2nd Quarter

與澳洲聯邦警察在香港進行禮節性會面  
Courtesy Meeting with the Australian Federal Police in Hong Kong

愛爾蘭犯罪資產局訪問聯合財富情報組  
Visit to the JFIU by the Criminal Assets Bureau of Ireland

美國西部聯合跨部特遣隊、國土安全調查局及緝毒局代表訪問聯合財富情報組  
Visit to the JFIU by the representatives of the Joint Interagency Task Force West, Homeland Security Investigations, and Drug Enforcement Administration of the US

與法國總領事館經濟與商務部在香港進行聯絡會議  
Liaison Meeting with the Economic Department of the Consulate General of France in Hong Kong

在西班牙華倫西亞出席特別組織全體會議及工作小組會議  
Attendance at the FATF Plenary and Working Group Meetings in Valencia, Spain

美國金融罪行執法網絡訪問毒品調查科  
Visit to the NB by the Financial Crimes Enforcement Network of the US

## 第三季 3rd Quarter

在澳門出席第24屆埃格蒙特組織全體會議  
Attendance at the 24th Egmont Group Plenary Meetings in Macao

比利時財富情報組訪問毒品調查科  
Visit to the NB by the Belgian Financial Intelligence Processing Unit

在斯里蘭卡可倫坡出席第20屆亞太反洗錢組織周年會議  
Attendance at the 20th APG Annual Meeting in Colombo, Sri Lanka

印尼金融交易報告和分析中心訪問聯合財富情報組  
Visit to the JFIU by the Indonesian Financial Transaction Reports and Analysis Centre

在南韓釜山出席特別組織國際標準培訓課程  
Attendance at the FATF Standards Training Course in Busan, South Korea

美國駐香港總領事館聯邦調查局訪問聯合財富情報組  
Visit to the JFIU by the Federal Bureau of Investigation, US Consulate General

美國司法部聯邦調查局訪問聯合財富情報組  
Visit to the JFIU by the Federal Bureau of Investigation, US Department of Justice

美國國土安全部特勤局駐香港分處訪問聯合財富情報組  
Visit to the JFIU by the Hong Kong Resident Office of United States Secret Service, US Department of Homeland Security

法國內政部防範金融罪行總部訪問毒品調查科  
Visit to the NB by the Central Office for the Suppression of Serious Financial Crime, Ministry of the Interior, France

荷蘭駐港總領事及荷蘭國家警察總局訪問毒品調查科  
Visit to the NB by Consul-General of the Netherlands in Hong Kong and National Police of the Netherlands

## 第四季 4th Quarter

就特別組織對香港進行第四輪相互評核的籌備工作與亞太反洗錢組織代表在香港進行會面  
Meeting with the APG representative on Hong Kong's Preparation for the 4th Round of FATF ME in Hong Kong

德國聯邦情報局訪問毒品調查科  
Visit to the NB by Federal Intelligence Service of Germany (BND)

在馬來西亞吉隆坡出席埃格蒙特組織策略分析課程  
Attendance at the Strategic Analysis Course held by the Egmont Group in Kuala Lumpur, Malaysia

在阿根廷布宜諾斯艾利斯出席特別組織全體會議及工作小組會議  
Attendance at the FATF Plenary and Working Group Meetings in Buenos Aires, Argentina

法國內政部法國國際合作局法國駐華大使館警務參贊訪問聯合財富情報組  
Visit to the JFIU by Home Affairs Attaché, Embassy of France in Beijing, International Cooperation Department, Ministry of Interior, France

在珠海出席內地、香港及澳門三地反洗錢業務交流會  
Attendance at the third Tripartite Meeting among the Mainland, Hong Kong and Macao on AML/CFT in Zhuhai

# AML/CFT CAPACITY BUILDING

打擊清洗黑錢及反恐籌資的  
能力提升

能力提升和公眾教育是打擊清洗黑錢及反恐籌資世界持續發展的不二法門。本組積極舉辦財富調查訓練，以增強執法機關、財富情報單位和其他伙伴的整體能力，而為金融機構和指定非金融企業及行業而籌辦的外展宣傳，亦能提高他們作為打擊清洗黑錢及反恐籌資機制中第一道防線的能力。

Capacity building and public education are the path to sustainability in the AML/CFT world. The JFIU takes pride in arranging financial investigation training to boost overall capability of LEAs, FIUs and other counterparts, and coordinating AML/CFT publicity outreach to FIs and DNFBPs to enhance their competence as the first line of defence in the AML/CFT regime.

## INTERNATIONAL FINANCIAL INVESTIGATION COURSE 國際財富調查課程

本組每年舉辦兩次國際財富調查課程，均會邀請專家，為執法機關、財富調查單位和監管機構提供專門訓練，分享實務經驗。其中一個課程以英語授課，為世界各地打擊清洗黑錢及反恐籌資的伙伴而設；另一個則以普通話授課，對象是大中華區的策略伙伴。2017年，共有97名來自14個不同司法管轄區的人員修讀課程。打擊清洗黑錢及反恐籌資的工作範疇廣泛，環環相扣，課程旨在增進人員對此的認知，涉獵課題包括法律和監管架構的發展、財富調查和情報的價值、跨機構合作的重要性，以及加密貨幣和新型付款方法等涉及的清洗黑錢及恐怖分子資金籌集風險。更重要的是，各地專業人員可藉此平台，拓展人脈，交流經驗，實在難能可貴。

The JFIU invites experts to deliver specialist training and share practical experience for participants from LEAs, FIUs and regulators through two classes of the annual international financial investigation course. One is conducted in English for AML/CFT partners worldwide while the other is conducted in Putonghua for strategic partners within the greater China Region. In 2017, a total of 97 participants from 14 different jurisdictions attended these courses. These two classes aim to enrich participants' knowledge on the interplay of diverse AML/CFT works such as development of legal and regulatory framework, value of financial investigation and intelligence, importance of interagency cooperation, and emerging ML/TF risks associated with crypto-currencies and new payment methods, etc. More importantly, they provide a valuable forum for professional networking and experience exchange.





# IN-HOUSE FINANCIAL INVESTIGATION COURSE

## 內部財富調查課程

本組每年為警務處刑事調查及其他人員舉辦四次財富調查課程，鼓勵參與單位着重及投放更多資源加以運用財富情報，針對有組織犯罪集團及其非法活動展開財富調查。本組每季均會舉辦課程，旨在培訓更多警務人員令其掌握實務財富調查的技巧，提高他們對打擊清洗黑錢及反恐籌資的最新國際標準、有關法例及案件類型等的意識。鑑於金融罪案盛行，此課程有助警務處提升組織能力，令打擊清洗黑錢及反恐籌資的知識伸延至總部、區和分區層面。2017年，共有453名人員接受訓練(其中有451名警務人員，另外2名人員來自法證會計辦事處)。

The JFIU also organizes four financial investigation courses for crime and other officers of the HKPF each year. Participating units are encouraged to accord priority and resources to use financial intelligence and initiate financial investigation against organized crime groups and their illicit activities. The courses are run quarterly to keep equipping more and more officers with the hands-on financial investigation skills and promote awareness of the latest AML/CFT international standards and ML/TF legislation and typologies. Given the prevalence of financial crimes, such courses serve to enlarge the organizational capacity and manage the tacit knowledge in AML/CFT enforcement of the HKPF at Headquarters, Regional and District levels. In 2017, the JFIU trained 453 officers (451 were police officers while two officers were from the Forensic Accountants' Office).



Representatives of LEAs, FIUs and regulators put their heads together to discuss topical AML/CFT concerns at the annual international financial investigation course.  
執法機關、財富調查單位和監管機構代表在年度的國際財富調查課程中，埋首討論有關打擊清洗黑錢及反恐籌資的專項議題。



Visits to the Hong Kong Exchanges and Clearing Limited and the Hong Kong Monetary Authority provided an opportunity for international delegates to better understand the most recent development and initiatives of local financial sector.  
參觀香港交易及結算所有限公司和香港金融管理局，讓各地代表加深了解本港金融界的最新發展和措施。



Participants interacted with one another during practical sessions on "Financial Intelligence Analysis" and "Complex ML Investigations".  
學員在「財富情報分析」及「複雜洗錢調查」環節互動。

# LOCAL SEMINARS

## 本港的打擊清洗黑錢及反恐籌資研討會

本組深明，要有效打擊清洗黑錢及恐怖分子資金籌集，公私營機構之合作日益重要。本組定期為金融機構和指定非金融企業及行業舉辦講座，不但有助鞏固相關的合規文化，而且協助提高各個行業對清洗黑錢及恐怖分子資金籌集的風險和脆弱程度的認識。這些對於各行業偵測非法活動和可疑交易報告的質素，極為重要。與此同時，本組也可向各界從業員直接了解有關行業在打擊清洗黑錢及反恐籌資演化中的最為關注的事項，或所採取的風險緩減措施。善用此等外展途徑，與私營機構合作，更能發揮打擊清洗黑錢及反恐籌資機制的效能。

年復一年，本組協助負責相關的決策局(即財經事務及庫務局和保安局禁毒處)，以及主要的監管機構，舉辦此類講座。另外，本組亦有派員到香港證券業協會和地產代理監管局等專業團體所舉辦的培訓講座主講。年內，本組以合辦或派員主講方式，參加了24場研討會，就舉報可疑交易報告的法律責任傳達重要訊息，訂定高質素可疑交易報告的標準，並與個別行業分享案例。

The JFIU recognizes the growing importance of public-private partnership to combat ML/TF more effectively. Regular delivery of seminars to FIs and DNFBPs helps uphold the culture of AML/CFT compliance and increases their vigilance to ML/TF risks and vulnerabilities within their respective sector, which are crucial to their abilities in detecting illicit activities and the quality of reporting suspicious transactions. At the same time, it provides direct opportunities for the JFIU to understand from practitioners their top concerns or risk mitigation measures in the AML/CFT dynamics faced by different industries. Capitalization on such outreach avenues to the private sector can enhance the effectiveness of the AML/CFT regime.

Year after year, the JFIU assists the AML/CFT policy bureaux, namely the Financial Services and the Treasury Bureau and the Narcotics Division of the Security Bureau, and key regulatory agencies to hold such seminars. The JFIU also speaks at seminars organized by professional bodies such as the Hong Kong Securities Association and the Estate Agents Authority. In 2017, the JFIU co-hosted or sent officers as guest speakers in 24 seminars to convey key messages of legal obligations to report suspicious transactions, set standards for filing high-quality STRs, and share case studies relevant to specific sectors.



The JFIU provided training to members of the Hong Kong General Chamber of Commerce in July 2017. 2017年7月，本組為香港總商會成員提供訓練。



A JFIU officer (left) spoke at a seminar for the insurance sector in November 2017. 2017年11月，本組人員(左)在保險業界的講座演講。



A JFIU officer spoke at a seminar for the money service operators and took part in the Q&A session in October 2017. 2017年10月，本組人員在金錢服務經營者的講座演講，以及參與答問環節。

# GLOSSARY

## 常用詞彙

ABBREVIATIONS 簡稱	ENGLISH	中文
<b>ADCC</b>	Anti-Deception Coordination Centre	反詐騙協調中心
<b>AML</b>	Anti-Money Laundering	打擊清洗黑錢／打擊洗錢
<b>AMLO</b> 「《打擊洗錢條例》」	Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance (Cap. 615 of the Laws of Hong Kong)	《打擊洗錢及恐怖分子資金籌集(金融機構)條例》(香港法例第615章)
<b>AML(A)O</b> 「《打擊洗錢(修訂)條例》」	Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) (Amendment) Ordinance (Cap. 615 of the Laws of Hong Kong)	《打擊洗錢及恐怖分子資金籌集(金融機構)(修訂)條例》(香港法例第615章)
<b>APG</b> 「亞太反洗錢組織」	Asia/Pacific Group on Money Laundering (www.apgml.org)	亞洲／太平洋反清洗黑錢組織
<b>C&amp;ED</b>	Customs and Excise Department	香港海關
<b>CDD</b>	Customer Due Diligence	客戶盡職審查
<b>CFT</b>	Counter-Financing of Terrorism	反恐籌資
<b>DNFBPs</b>	Designated Non-Financial Businesses and Professions	指定非金融企業及行業
<b>DTROP</b>	Drug Trafficking (Recovery of Proceeds) Ordinance (Cap. 405 of the Laws of Hong Kong)	《販毒(追討得益)條例》(香港法例第405章)
<b>Egmont Group</b> 「埃格蒙特組織」	The Egmont Group of Financial Intelligence Units (www.egmontgroup.org)	埃格蒙特金融情報組織
<b>FATF</b> 「特別組織」	Financial Action Task Force (www.fatf-gafi.org)	財務行動特別組織
<b>FFMS</b>	Federal Financial Monitoring Service (the Financial Intelligence Unit of the Russian Federation)	俄羅斯聯邦金融監督局(俄羅斯的財富情報單位)
<b>FIs</b>	Financial Institutions	金融機構
<b>FID NB</b>	Financial Investigation Division, Narcotics Bureau	毒品調查科財富調查組

ABBREVIATIONS 簡稱	ENGLISH	中文
<b>FIUs</b>	Financial Intelligence Units	財富情報單位
<b>HKPF</b>	Hong Kong Police Force	香港警務處
<b>ICAC</b>	Independent Commission Against Corruption	廉政公署
<b>JFIU</b>	Joint Financial Intelligence Unit (The Financial Intelligence Unit of Hong Kong)	聯合財富情報組(香港的財富情報單位)
<b>LEAs</b>	Law Enforcement Agencies	執法機關
<b>ME</b>	Mutual Evaluation	相互評核
<b>ML</b>	Money Laundering	清洗黑錢／洗錢
<b>MLA</b>	Mutual Legal Assistance	相互法律協助
<b>MOU</b>	Memorandum of Understanding	諒解備忘錄
<b>NB</b>	Narcotics Bureau	毒品調查科
<b>OCTB</b>	Organized Crime and Triad Bureau	有組織及三合會調查科
<b>OSCO</b>	Organized and Serious Crimes Ordinance (Cap. 455 of the Laws of Hong Kong)	《有組織及嚴重罪行條例》(香港法例第455章)
<b>RAU</b> 「風險評估小組」	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>STRs</b>	Suspicious Transaction Reports	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>SVF</b>	Stored Value Facility	儲值支付工具
<b>TCSPs</b>	Trust or Company Service Providers	信託或公司服務提供者
<b>TF</b>	Terrorist Financing	恐怖分子資金籌集
<b>UAE</b>	United Arab Emirates	阿聯酋
<b>UK</b>	United Kingdom	英國
<b>UNATMO</b>	United Nations (Anti-Terrorism Measures) Ordinance (Cap. 575 of the Laws of Hong Kong)	《聯合國(反恐怖主義措施)條例》(香港法例第575章)
<b>US</b>	United States	美國



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