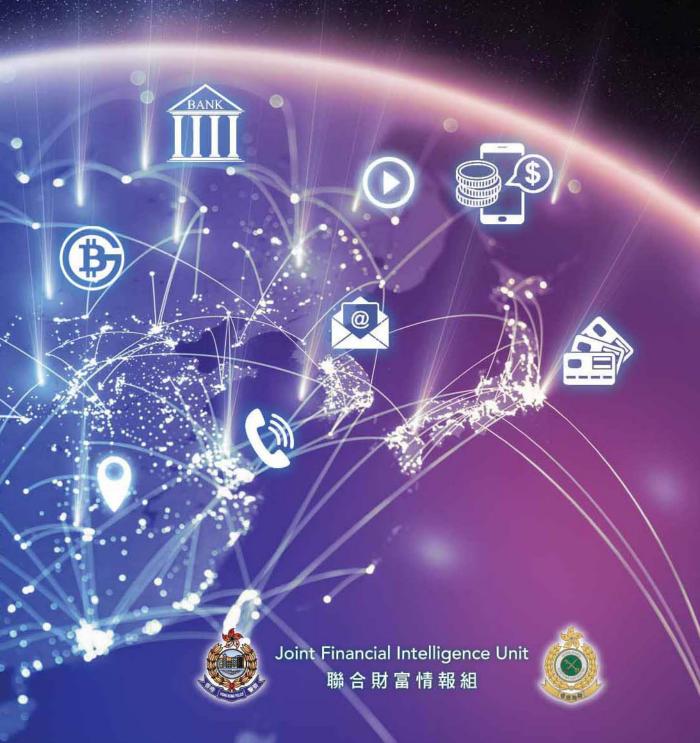
2019

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



抱負及使命 VISION AND MISSION

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
- Fostering and strengthening cooperation with local and international agencies in the exchange of financial intelligence
- Intelligently analyzing suspicious transaction report (STR) 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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香港是環球主要的國際金融中心和充滿活力的大都會,經濟開放,資金自由流動,但也不能倖免於洗錢及恐怖分子資金籌集活動的威脅。儘管如此,政府致力維持良好穩健的打擊洗錢及恐怖分子資金籌集制度,而相關制度須仰賴有效的法例、高瞻的政策導向、嚴格的監督規管、私營機構的合作,以及嚴厲的執法行動所配合,方可成功。

香港對打擊洗錢及恐怖分子資金籌集向來 不遺餘力。去年,打擊清洗黑錢財務行動 特別組織(特別組織)根據國際標準為本 港進行了歷時一年的第四次相互評核,結 果令人鼓舞。評核報告在2019年9月4日公 布。整體而言,香港的打擊洗錢及恐怖分子 資金籌集制度獲評為合規而有效第七個公 功通過特別組織第四輪審核的成員地區。 報告結果肯定了我們的努力,這不僅加強 公眾對本港打擊洗錢及恐怖分子資金籌集 制度的信心,亦同時提升香港作為著名國 際金融中心的公信力。

縱使我們樂見成果,但並不會因此自喜自滿。聯合財富情報組繼續力求卓越,為本港的打擊洗錢及恐怖分子資金籌集制度把關,從四面八方收集洗錢及恐怖分子資金 籌集的情報,以及充公罪犯非法獲取的得益。本組與政府決策局、本地監管機構 蓋。本組與政府決策局、本地監管機構及私營機構攜手合作,共同在策略及行動層面打擊洗錢及恐怖分子資金籌集。適時提交高質素的可疑交易報告已阻遏為數不少的罪案,亦成功凍結數額龐大的非法資金。

另一邊廂,聯合財富情報組竭力加強國際間的支援合作,以應對全球化帶來的挑戰和急增的跨境洗錢及恐怖分子資金籌集活動。除了與世界各地同屬埃格蒙特組織成員的財富情報單位交換財富情報外,我們亦是特別組織及亞洲/太平洋反清洗黑錢組織的活躍成員,歷年為打擊跨境洗錢及恐怖分子資金籌集作出重大貢獻。

展望將來,大數據、人工智能及數碼化轉型的發展如日方中,金融世界變化萬千,時刻急速蜕變。金融科技的應用日趨普及,電子支付、虛擬貨幣及虛擬銀行亦漸受追捧。當金融業界將數碼概念融入業務時,聯合財富情報組亦採取積極行動,爭取相關持份者(包括儲值支付工具持牌人及新成立的虛擬銀行)的支持,促使他們對創新科技及產品背後所隱藏的洗錢及恐怖分子資金籌集風險提高警覺。

年內,我們為本港的打擊洗錢及恐怖分子 資金籌集領域開拓了新的路向,發展邁步 向前。然而,不幸的是,於同年下半年, 社會動盪持續不斷,香港歷經多番波折, 實實在在度過了一段艱難歲月。2020年開 局以來未見曙光,新型冠狀病毒肆虐多時, 本地經濟陷入水深火熱。聯合財富情報組 作為一個官方機構,以及香港的一分子, 定必全力以赴,協助支持特區政府帶領香 港乘風破浪,化險為夷,走出逆境,重新 啟航。

> 香港聯合財富情報組主管 **梁靄琳警司**

As a premier international financial centre and a vibrant metropolis with an open economy and free flow of capital, Hong Kong is not immune from money laundering and terrorist financing ("ML/TF") activities. Nevertheless, the Government is committed to upholding a sound and robust anti-money laundering and counter financing the terrorism ("AML/CFT") regime, the success of which relies heavily upon effective legislations, insightful policy steering, rigorous regulatory supervision, cooperative private sectors and vigorous enforcement actions.

Well done is better than well said. Hong Kong's unfailing efforts to combat ML/TF have yielded very encouraging recognition during the 4th round Financial Action Task Force ("FATF") Mutual Evaluation. After a year of intense assessment against the international standards, the evaluation report was published on 4th September 2019, which rated our AML/CFT regime 'Compliant' 'and 'Effective' overall, making us the first FATF member in the Asia-Pacific region and the seventh jurisdiction universally to have achieved an 'Overall Compliant' result in the 4th round of FATF Mutual Evaluation. This recognition has not only reinforced the public confidence in our AML/CFT regime but also enhanced Hong Kong's creditability as a renowned international financial centre.

However, there is no room for complacency. The Joint Financial Intelligence Unit ("JFIU") continues to strive for excellence in playing its role as the tentacular arm as well as the goalkeeper of the AML/CFT regime to gather ML/TF intelligence and deprive the culprits of their ill-gotten gains. Locally, JFIU collaborates hand-in-hand with government policy bureaux, regulatory authorities and private sectors to combat ML/TF at both strategic and operational levels. With timely and quality suspicious transaction reports ("STRs"), many crimes have been curbed and considerable amount of illicit funds have been frozen.

On the other front, in face of globalization and the upsurge of transnational ML/TF, the JFIU is committed to fostering international support and cooperation. Apart from exchanging financial intelligence with other financial intelligence units ("FIUs") across the globe through the Egmont Group, the JFIU remains an active member of the FATF as well as the Asia/Pacific Group on Money Laundering ("APG"), with significant contribution to myriads of transnational AML/CFT efforts over the years.

Looking forward, with the advent of big data, artificial intelligence and digital transformation, the financial world is in a state of constant flux and undergoes a drastic evolution. The application of financial technologies ("Fintech") is commonplace, and electronic payments, virtual assets and virtual banking are gradually gaining popularity. While the financial industry is integrating the concept of digital identities, the JFIU has taken proactive actions to galvanize the support and alertness of the relevant stakeholders, including the stored value facility licensees and the newly established virtual banks, for the risks of ML/TF behind these innovative technologies and products.

Since its establishment in 1989, the JFIU has expanded its manpower progressively in order to cope with the ever-evolving challenges of AML/CFT and safequard the integrity of the financial system in Hong Kong. After careful deliberation and taking heed of the constructive advice in the FATF Mutual Evaluation report, it will be the opportune moment to undertake an organizational restructuring. The Hong Kong Police Force is considering to combine the JFIU with the existing Financial Investigation Division and Risk Assessment Unit to operate under the umbrella of a newly formed specialist stand-alone bureau named the Financial Intelligence and Investigation Bureau within the Hong Kong Police Force. Alongside restructuring, the JFIU will take forward a wide range of advanced technologies which offer a dynamic approach and superior insights to drive holistic analysis on massive volumes of financial intelligence. The new structure will forge ahead the development of the JFIU and strengthen the harnessing of financial intelligence investigations.

Notwithstanding breaking new ground in the AML/CFT arena, Hong Kong was indeed experiencing some trying times and overwhelming difficulties during the persistent social unrest throughout the second half of 2019. Due to the COVID 19 pandemic, the inception of 2020 was far from easier either and the local economy is facing immense challenges. As an official body and a part of Hong Kong, the JFIU will fully support the Government and is confident that Hong Kong will be able to sail through these adversities.

Carmen LEUNGSuperintendent of Police
HEAD of JFIU, Hong Kong



The The 聯合財富情報組

本組角色

聯合財富情報組由香港警務處及香港 海關人員組成。本組屬執法型財富情 報單位,而非調查單位。本組是負責 管理本港可疑交易舉報機制的唯一機 構,並與世界各地的財富情報單位及 執法機關交換財富情報。

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恐怖分子資金籌集制度出一分力。 我們的合作伙伴,包括政府決策局及 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 金融機構及指定非金融企業及行業。

Our ROLE

The JFIU is co-staffed by officers of the Hong Kong Police Force (HKPF) and the Hong Kong Customs and Excise Department (C&ED). It is a law-enforcement-type of JFIU but not an investigation unit. Apart from being the sole agency to manage the suspicious transaction reporting regime for Hong Kong, it also engages in financial intelligence exchange with FIUs and Law Enforcement Agencies (LEAs) worldwide.

Distinctive in its intelligence analysis capabilities and perspectives, the JFIU 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), FIs and DNFBPs.

相關持份者

聯合財富情報組與不同持份者緊密合作,確保 提交可疑交易報告/交換財富情報的流程完善 穩妥,並鞏固本港的打擊洗錢及恐怖分子資金 籌集制度,令其更趨穩健。

本組與上述持份者建立的長遠合作關係,有助香港符合國際打擊洗錢及恐怖分子資金籌集的標準,使相關制度臻於完善。

Our STAKEHOLDERS

The JFIU maintains close cooperation with various stakeholders to safeguard the integrity of STR / financial intelligence exchange workflow, and strengthen the robustness of Hong Kong's AML/CFT regime.

The interfacing stakeholders include policy bureau of the Hong Kong Special Administrative Region (HKSAR) Government, i.e. the Financial Services and the Treasury Bureau (FSTB) and the Narcotics Division of the Security Bureau (ND, SB), RAU, financial regulators and professional bodies, including the Hong Kong Monetary Authority, the Securities and Futures Commission of Hong Kong and the Insurance Authority, and privates sectors likes FIs and DNFBPs, FIUs and LEAs in the Asia Pacific Region and around the world. With technological advancement, Fintech businesses like Virtual Asset Service Providers (VASP) and Stored Value Facilities (SVF) are new stakeholders that the JFIU closely cooperated with.

The long-term collaboration between the JFIU and all these stakeholders contributes to the compliance with international AML/CFT standards and the improvement in the local AML/CFT regime.

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,鋭意打擊和防範洗 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:

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:

就可疑交易報告進行行動分析 operational analysis of STRs



就財富情報及其他資訊進行策略分析 strategic analysis of financial intelligence and other information

> 就洗錢及恐怖分子資金籌集活動趨勢和類型學進行研究 research on ML/TF trends and typologies

運作可疑交易報告管理系統 (STREAMS) operation of the Suspicious Transaction Report and management System (STREAMS)

> 為防止繼續處理可疑財產的臨時措施提供支援 support on provisional measures to prevent further dealing of suspicious property

參謀本地及國際打擊洗錢及恐怖分子資金籌集的政策事宜 staffing of local and international AML/CFT policy matters

> 籌辦打擊洗錢及恐怖分子資金籌集培訓及外展活動 coordination of AML/CFT training and outreach

本組的發展里程

自1989年起,聯合財富情報組不斷求變 立新,緊貼本地立法進程及國際打擊洗 錢及恐怖分子資金籌集的標準。本組的 主要里程概述如下:

1989年:香港首條打擊清洗黑錢法例-《販毒(追討得益)條例》(第405章) 實施,隸屬香港警務處毒品調查科財富 調查組的聯合財富情報組隨即成立,是 本港專責接收、分析和發布可疑交易報 告的財富情報單位。

1989 — With the first piece of AML legislation, the Drug Trafficking (Recovery of Proceeds) Ordinance (DTROPO, Cap. 405) implemented in Hong Kong, the JFIU was thus formed under Financial Investigation Division of Narcotics Bureau (FID NB) of Hong Kong Police Force (HKPF) as the designated unit of Hong Kong to receive, analyze and disseminate STRs.

1994年:《有組織及嚴重罪行條例》(第 455章)是第二條在香港制定以打擊洗錢 的法例,把洗錢罪行延展至涵蓋本港可 公訴罪行及世界各地類同犯罪行為的得 益。同時,條例賦予本組更多權力,以 管理可疑交易報告的機制。

1994 - The enactment of the second piece of AML legislation, the Organized and Serious Crimes Ordinance (OSCO, Cap. 455), extended the money laundering offence to cover the proceeds of indicatable offences in Hong Kong and similar conduct worldwide. It further empowered the role of the JFIU to manage the STR regime.

1997年:香港成為亞洲/太平洋反清洗 黑錢組織 (亞太反洗錢組織) 的創始成 員。聯合財富情報組密切留意區內的洗 錢及恐怖分子資金籌集活動的趨勢及類型 學分析。

1997 - Hong Kong became a founding member of the Asia/Pacific Group on Money Laundering (APG). The JFIU continued paying close attention to the money laundering / terrorist financing trends and typologies within the region.

Our MILESTONES

Since 1989, the JFIU has been evolving to keep pace with the local legislation and international AML/CFT standards. The major milestones are outlined below:

1991年:香港成為財務行動特 別組織的成員。此後,聯合財 富情報組掌握國際間打擊洗錢 及恐怖分子資金籌集標準的最 新發展,特別是組織對財富情 報單位施加的標準。

1991 - Hong Kong joined the FATF as a member. The JFIU has been kept up-to-date with the latest development of international AML/CFT standards, especially those imposed on FIUs.

1996

1996年:聯合財富情報組加入 由世界各地財富情報單位合組 的埃格蒙特組織,成為組織成 員。自此,本組善用埃格蒙特 組織的保密網絡,與環球財富 情報單位交換情報,並參與組 織的會議及培訓課程,以提升 處理財富情報的整體能力。

1996 - The JFIU joined the Egmont Group of Financial Intelligence Units (Egmont Group) as a member. Since then, the JFIU has been making good use of Egmont Group's secure network to exchange intelligence with FIUs worldwide, and taking part in the Egmont Group's meetings and training sessions to enhance its overall financial intelligence capability.

2002年:隨着《聯合國(反恐怖 主義措施)條例》(第575章)的 頒布,本組開始接收有關恐怖分 子財產的可疑交易報告。

2002 - The United Nations (Anti-Terrorism Measures) Ordinance (UNATMO, Cap 575) was promulgated and it further empowered the JFIU to receive STRs related to terrorist property.

2014年: 隨着洗錢及恐怖分子資 金籌集風險評估小組在香港警務 處成立, 本組持續為全港風險評 估提供資料。

2014 - Along with the establishment of the Money Laundering and Terrorist Financing Risk Assessment Unit (RAU) under the HKPF, the JFIU has been contributing its input to the territory-wide risk assessment exercise of Hong Kong.

2019年:特別組織於2019年9月 發表了就香港進行的成員相互評 核報告,讚揚香港在打擊洗錢及 恐怖分子資金籌集方面的努力。 香港的打擊洗錢及恐怖分子資金 籌集制度獲評為合規而有效,使 香港成為亞太區首個成功通過特 別組織今輪審核的司法管轄區。

2019 - The FATF published the Mutual Evaluation Report (MER) of Hong Kong in September 2019, commending Hong Kong's efforts in combating Money Laundering and terrorist financing. The MER noted that Hong Kong's AML/CTF regime is assessed to be compliant and effective overall, making it the first jurisdiction in the Asia-Pacific region to have achieved an overall compliant result in the current round of FATF evaluation.

2012年:實施了《打擊洗錢及恐 怖分子資金籌集(金融機構)條 例》(第615章),就客戶作盡職 審查及備存紀錄等的本港防範措 施訂明規定,相關修訂間接提升 業內對打擊洗錢及恐怖分子資金 籌集活動的意識,以致可疑交易 報告的數量急升。

2012 - The enactment of the Anti-Money Laundering and the Counter-Terrorist Financing (Financial Institutions) Ordinance (AMLO, Cap 615) codified Hong Kong's preventive measures such as requirements on customer due diligence and record keeping, which indirectly increased AML/CFT awareness and thus led to an upsurge in the number of STRs.

2018年:《聯合國(反恐怖主義 措施)條例》的修訂,加強凍結 恐怖分子財產的機制,並禁止資 助外國恐怖主義戰鬥人員的旅程。 此外,《打擊洗錢及恐怖分子資金 籌集條例》的修訂,把當中就客 戶作盡職審查及備存紀錄的規定 延展至指定非金融企業及行業人 士。

2018 - The amendment of the UNATMO enhanced the freezing mechanism of terrorist property and prohibited the financing of travel of foreign terrorist fighter. Also, the amendment of the AMLO extended the customer due diligence and record-keeping requirements therein to designated non-financial business or professions.

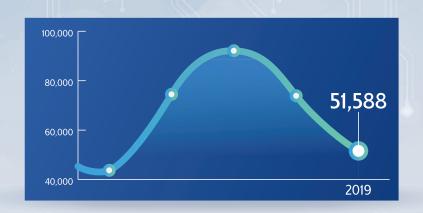


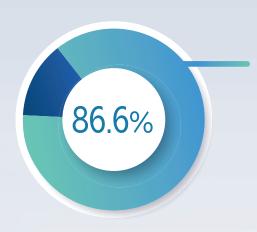
Achievement Highlights in 2019

2019年聯合財富情報組的工作成果概覽



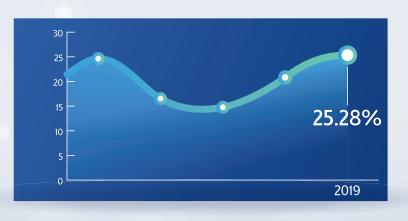
接獲可疑交易 報告總數 Total Number of STRs Received





86.6%的可疑交易 報告由銀行業提交 86.6% of STRs were filed by banking sectors

可疑交易報告 發布比率 STRs Dissemination Rate





發布的可疑交易 報告中,87.2% 發布至香港警務處 87.2 % of the disseminated STRs were referred to the HKPF





87.62%的可疑交易 報告經電子方式提交 87.62 % of STRs were filed via e-submission



10年間簽訂14份諒解 備忘錄或協議

14 MOUs or agreements were signed over the decade





聯合財富情報組與 世界各地財富情報 單位交換財富情報 共錄得2,870次的書 信往來

2,870 correspondences were recorded in Financial Intelligence Exchange between the JFIU & FIUs worldwide



舉辦26個打擊洗錢及恐怖分子資金 籌集講座以向不同業界傳達舉報可 疑交易的資訊

26 AML/CFT seminars were delivered to convey key messages of suspicious transaction reporting to different sectors





Transaction Report 可疑交易報告

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(以舉報可疑交易的 方式),將該知悉或懷疑向獲授權人(即 聯合財富情報組人員)披露。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恐佈分子 資金籌集制度出一分力。我們的合作伙 伴,包括政府決策局及部門、金融監管 機構及其他專業團體、執法機關及財富 情報單位、洗錢及恐佈分子資金籌集風 險評估小組,以及金融機構及指定非金 融企業及行業。

Legal Basis for SUSPICIOUS TRANSACTION REPORT

Pursuant to sections 25A(1) of the Drug Trafficking (Recovery of Proceeds) Ordinance (DTROP, 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). Distinctive in its intelligence analysis capabilities and perspectives, the JFIU 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), FIs and DNFBPs

《打擊洗錢及恐怖分子 資金籌集條例》(第615章)

Anti-Money Laundering and Counter-Terrorist Financing Ordinance, Cap.615 (AMLO)

修訂《打擊洗錢及恐怖分子資金籌集條例》,把當 中就客戶作盡職審查及備存紀錄的規定延展至指定 非金融企業及行業人士,包括法律專業人士、會計 專業人士、地產代理及信託或公司服務提供者;並 引入信託或公司服務提供者發牌制度,規定該等服 務提供者須向公司註冊處處長申請牌照,並符合適 當人選準則,方可在香港經營提供信託或公司服務 的業務。經修訂的《打擊洗錢及恐怖分子資金籌集 條例》已於2018年3月1日實施。

Amend the AMLO to extend the customer due diligence and record-keeping requirements therein to designated non-financial business or professions including legal professionals, accounting professionals, estate agents and TCSPs; and to introduce a licensing regime for TCSPs requiring them to apply for a license from the Registrar of Companies and satisfy a "fit-and-proper" test before they can provide trust or company services as a business in Hong Kong. The amended AMLO commenced operation on 1 March 2018.

《公司條例》(第622章)

Companies Ordinance, Cap.622 (CO)

修訂《公司條例》,要求在香港 成立為法團的公司須備存重要控 制人登記冊,以提升法團實益擁 有權的透明度。經修訂的《公司 條例》已於2018年3月1日實施。

Amend the CO to require the keeping of significant controllers registers by companies incorporated in Hong Kong to enhance transparency of corporate beneficial ownership. The amended CO commenced operation on 1 March 2018.

《聯合國(反恐怖主義措施)條例》(第575章)

United Nations (Anti-Terrorism Measures) Ordinance, Cap. 575 (UNATMO)

《實體貨幣及不記名可轉讓票據 跨境流動條例》(第629章)《R32條例》

Cross-boundary Movement of Physical Currency and Bearer Negotiable Instruments Ordinance, Cap.629 (R32 Ordinance)

實施《R32條例》,以落實貨幣及不記名可轉 讓票據(現金類物品)跨境流動的申報/披 露制度。《R32條例》於2017年6月獲立法會 制定成為法例,並於2018年7月16日實施。

Introduce the R32 Ordinance to implement a declaration/disclosure system for cross-boundary movement of currency and bearer negotiable instruments. The R32 Ordinance was enacted by the Legislative Council in June 2017 and operation commenced on 16 July 2018.

修訂《聯合國(反恐怖主義措施)條例》, 加強凍結恐怖分子財產的機制,並禁止 資助外國恐怖主義戰鬥人員的旅程。修 訂《聯合國(反恐怖主義措施)條例》 的法案於2018年3月獲立法會制定成為 法例,並於2018年5月31日實施。

Amend the UNATMO to enhance the freezing mechanism of terrorist property and to prohibit the financing of travel of foreign terrorist fighter. The bill to amend UNATMO was enacted by the Legislative Council in March 2018 and operation was commenced on 31 May 2018.

接收可疑交易報告

2019年,聯合財富情報組接獲51,588宗可疑交易報告,與2018年比較,下跌30.18%,即減少22,301宗報告。提交可疑交易報告的整體數目持續下降,但儲值支付工具持牌人、金錢服務經營者及法律專業人士提交的報告數目均有上升趨勢。與2018年的觀察相近,所有呈報機構一般都更為謹慎,提交的報告結構完整,更具質素。

Receipt of STR

In 2019, the number of STRs received by the JFIU was 51,588, representing a decrease of 30.18% (or 22,301 STRs) when compared with that in 2018. While the overall number of STR submissions saw a continued decrease, there was a general increasing trend in submissions filed by stored value facilities licensees, money service operators and legal professionals. Similar to the observations made in 2018, all reporting entities in general took a much more prudent approach and submitted more structured reports.

行業 Sectors 金融機構 Fls	2015	2016	2017	2018	2019
銀行 Banks	34,959 (82.15%)	68,745 (89.76%)	86,029 (93.39%)	68,146 (93.99%)	44,689 (86.63%)
證券公司 Securities Firms	1,095 (2.57%)	1,423 (1.86%)	2,090 (2.27%)	1,337 (1.84%)	735 (1.42%)
保險公司 Insurance Companies	495 (1.16%)	928 (1.21%)	1,094 (1.19%)	1,236 (1.70%)	1,335 (2.59%)
金錢服務經營者 Money Service Operators	3,566 (8.38%)	2,554 (3.33%)	908 (0.99%)	1,219 (1.68%)	1,474 (2.86%)
放債人 Money Lenders	33 (0.08%)	24 (0.03%)	28 (0.03%)	39 (0.05%)	34 (0.07%)
儲值支付工具持牌人* SVF Licensees* (*2016年11月起新設的界別) (*New category since November 2016)	/	67 (0.09%)	590 (0.64%)	529 (0.73%)	1,321 (2.56%)
金融機構提交的報告總數 Total Number of STRs Filed by All FIs (佔報告總數比率) (% of all STRs Received)	40,148 (94.34%)	73,741 (96.28%)	90,739 (98.51%)	72,506 (98.13%)	49,588 (96.12%)

行業 Sectors 指定非金融企業及行業 DNFBPs	2015	2016	2017	2018	2019
法律專業人士 Legal Professionals	894 (2.10%)	969 (1.26%)	555 (0.60%)	416 (0.56%)	810 (1.57%)
地產代理 Estate Agencies	31 (0.07%)	58 (0.08%)	71 (0.08%)	47 (0.06%)	74 (0.14%)
貴重金屬及寶石交易商 Dealers in Precious Metals & Stones	6 (0.02%)	59 (0.08%)	60 (0.07%)	70 (0.09%)	20 (0.04%)
信託或公司服務提供者 TCSPs	22 (0.05%)	27 (0.03%)	31 (0.03%)	81 (0.10%)	91 (0.18%)
會計專業人士 Accounting Professionals	6 (0.02%)	3 (<0.01%)	19 (0.02%)	22 (0.03%)	18 (0.03%)
指定非金融企業及行業提交的可疑交易報告總數 Number of STRs Filed by All DNFBPs (佔可疑交易報告總數比率) (% of all STRs Received)	959 (2.26%)	1,116 (1.46%)	736 (0.80%)	636 (0.86%)	1,013 (1.96%)
其他行業提交的可疑交易報告宗數 Number of STRs Filed by Others	1,448 (3.40%)	1,733 (2.26%)	640 (0.69%)	747 (1.01%)	987 (1.91%)
接獲報告總數 Total Number of STRs Received	42,555	76,590	92,115	73,889	51,588

分析可疑交易報告

Analysis of STR

STR is the major and unique source of information for JFIU to conduct operational and strategic analyses. Upon the receipt of STR, 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 a 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

本組接獲呈報機構的可疑交易報告後, 會透徹分析每宗報告。經評估確定有用 及/或可採取進一步行動的情報,向相 關的執法機關及/或世界各地的財富情 報單位發布。2019年,本組共發布 13,039宗可疑交易報告。發布比率達 25.28%,為近五年之新高。

2019年,獲發布可疑交易報告的對象主要是香港警務處(87.22%)、香港海關(7.20%)、證券及期貨事務監察委員會(2.29%)、廉政公署(1.19%)、世界各地的執法機關和財富情報單位(1.63%),以及其他機關(0.47%)。

Dissemination of STR

The JFIU conducts thorough analysis for each STR received from the various reporting entities. If the assessments deem the intelligence to be useful and/or actionable, the intelligence will be disseminated to the relevant legal enforcement agencies and/or financial intelligence units worldwide. For 2019, a total of 13,039 STRs were disseminated. The dissemination rate of 25.28% recorded the highest in the past five years.

In 2019, the major recipients of STRs were the HKPF (87.22%), C&ED (7.20%), Securities and Futures Commission (SFC) (2.29%), ICAC (1.19%), worldwide LEAs and FIUs (1.63%) and other authorities (0.47%).

	2015	2016	2017	2018	2019
發布的可疑交易報告總數 Total Number of STRs Disseminated	10,454	12,631	13,566	13,925	13,039
可疑交易報告發布比率 STRs Dissemination Rate	24.57%	16.49%	14.73%	18.85%	25.28%

可疑交易報告

質素意見回饋

可疑交易報告機制能否發揮效用,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 可疑交易報告的質素及質量兩方面向監 管機構、專業團體和舉報機構提供意見 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 洗錢及恐怖分子資金籌集的意識。金融

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, the preferred framework for making quality STRs and 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 control.

機構和指定非金融企業及行業可從中獲 取最新資訊,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 遵從打擊洗錢及恐怖分子資金籌集的規 定和管制措施而採取的良好行事方法。

2019年,網上的非法活動已亮起紅色警 示,當中涉及網上購買違禁品,例如使用 信用卡或儲值支付工具購買槍械零部件 及爆炸品化合物,情況令人關注,而本 土恐怖主義的潛在威脅亦不容低估。舉 報可疑交易的機構對客戶作盡職審查時 應保持警覺,並向本組報告任何須披露 的懷疑事項。本組會與所有持份者保持 緊密合作,應對日後各種新昌起的挑戰。

In 2019, red flags were observed on illegal activities involving the online purchase of illicit products such as firearms parts and explosive compounds using credit cards or SVF accounts, which give concern to domestic security. The potential threat of home-grown terrorism cannot be underestimated. Reporting entities are encouraged to exercise vigilance during customer due diligence and report to JFIU if any suspicion disclosed. The JFIU will maintain close collaboration with all stakeholders to address the emerging challenges.

與本港

持份者合作

Local Cooperation with

STAKEHOLDERS

The JFIU treasures and seeks to enhance interagency collaboration within the AML/CFT community. At the strategic level, government bureau, regulatory authorities and professional bodies consult with the JFIU on changes of policies, legislation and/or guidelines that touch on the suspicious transaction reporting regime. The JFIU also assists in collating STRs 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,易於使用,或惹罪犯、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。

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。

年內,本港社會動盪,舉報可疑交易工作小組會議 須暫緩舉行。然而,本組與相關政府決策局、監管 機構、金融機構及儲值支付工具持牌人進行了視像 會議,就舉報可疑交易涉及共同關注的議題作出討 論和提出意見,並就政策及需作優先處理的項目進 行交流。此外,本組亦為儲值支付工具持牌人籌辦 外展宣傳活動。因應行動需要,於本組網頁限制區 的告示欄發出警報,以公布最新的罪案趨勢及所得 觀察。

縱使困難重重,聯合財富情報組仍堅定不移,致力為公私營機構建立及維持行之有效的合作伙伴關係。

Regular Liaison with

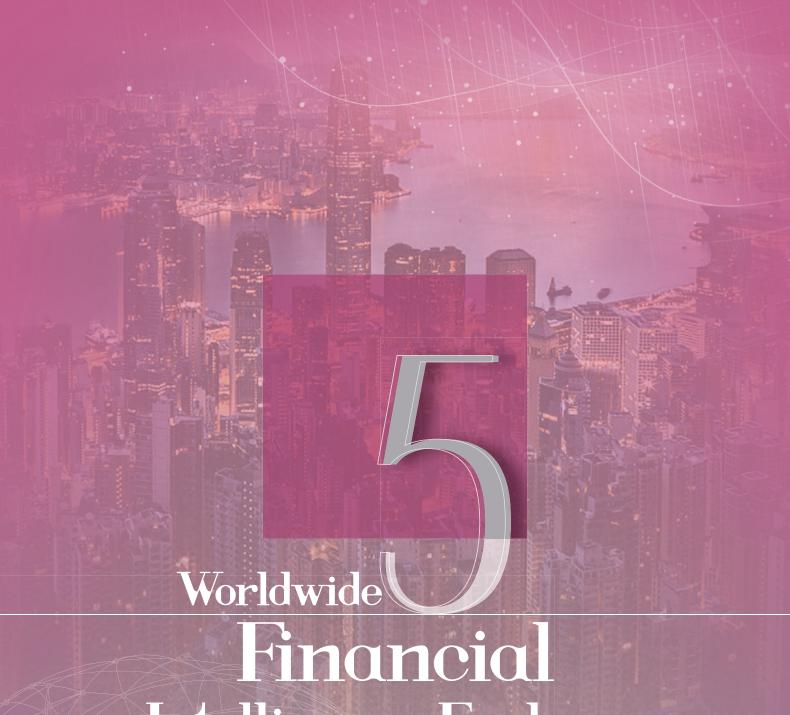
STR REPORTING ENTITIES

The JFIU recognizes the private sectors as the first line of defence in the AML/CFT regime as criminals, 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 Terrorist Financing.

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

Due to the social unrest, the Suspicious Transaction Reporting Working Group Meeting has been put on hold. Instead, the JFIU had held video conferences with relevant government bureaus, regulatory authorities, FIs and SVF licensees to discuss and advise on matters of common interest in suspicious transaction reporting, share views on policy and operational priorities. The JFIU had also conducted outreach to SVF licensees. On an ad-hoc basis depending on the operational needs, alerts have been published on the noticeboard at the secure area of the JFIU's website on latest crime trends and observations from the JFIU.

Despite in hard time, the JFIU is committed to build and maintain an effective public-private partnership.



Intelligence Exchange 國際財富情報交流

本組向來珍視與全球各地財富情報單位 交換的情報。現今科技一日千里,連繫 世界各地從容便易,國際間有效而緊密 的合作無疑是成功打擊跨國清洗黑錢和 恐怖分子資金籌集的關鍵。

過去5年,接獲外地及對外發出的交換情 報書信往來數目顯著增長,反映各地財 富情報單位間相互支援,合作愈趨頻繁。 2019年,交換情報書信往來的全年總數 達2,870次,數字為歷年之冠。

JFIU treasures and values the information exchanged with FIUs worldwide. With the ease of international connectivity, there is no doubt that effective and enhanced international cooperation is the key to success in combating transnational money laundering and terrorist financing.

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 2019, the annual total of 2,870 correspondence recorded an all-time high.

本組與世界各地財富情報單位交換財富情報的統計數字

Financial Intelligence Exchange between the JFIU and FIUs Worldwide

年份 Year		2015	2016	2017	2018	2019
接獲外地的交換 情報書信往來次數 Total No. of Incoming Correspondences	(埃格蒙特組織) (Egmont Group)	824	794	991	1,197	1,283
	(非埃格蒙特組織) (Non-Egmont Group)	6	43	154	123	209
接獲總數 Incoming Total		830	837	1,145	1,320	1,492
對外發出的交換 情報書信往來次數	(埃格蒙特組織) (Egmont Group)	944	866	990	1,036	1,135
Total No. of Outgoing Correspondences	(非埃格蒙特組織) (Non-Egmont Group)	200	293	358	290	243
發出總數 Outgoing Total		1,144	1,159	1,348	1,326	1,378

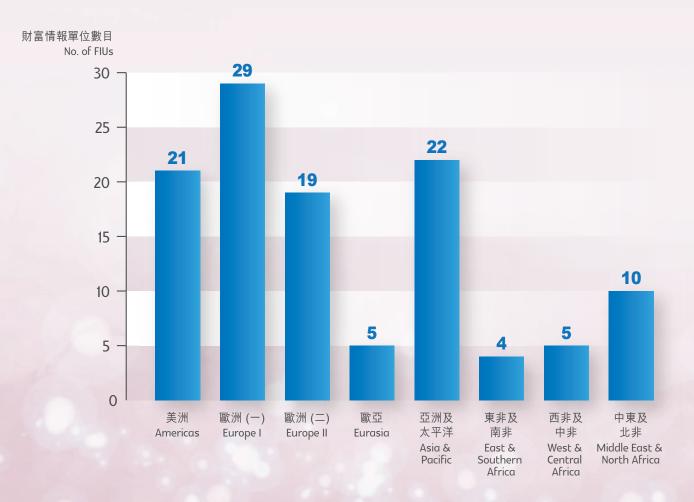
(*非埃格蒙特組織成員主要包括非埃格蒙特組織的財富情報單位及偶爾是其他海外執法機關) (*Non-Egmont Group members include mainly non-Egmont FIU(s) and occasionally other overseas LEAs)

2019年,本組與全球115個埃格蒙特組織成員及3個非埃格蒙特組織成員交換財富情報。各大洲所涉的財富情報單位數目如下:

In 2019, the JFIU exchanged financial intelligence with 115 Egmont Group members and three non-Egmont Group members across continents. The number of FIUs from each continent being engaged is shown as follows:

2019年與本組交換財富情報的埃格蒙特組織及 非埃格蒙特組織單位數目(按地區劃分*)

Number of Egmont and Non-Egmont FIUs Exchanged Financial Intelligence with the JFIU (By Regions*) in 2019



(*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)

如下圖所示,本組與歐洲 (一) 地區的 成員交換情報的次數較頻繁。全年在各 地區接獲的交換情報書信往來次數共錄 得1,283次,而歐洲(一)地區的相關書 信往來總數達400次,高踞各區首位。綜 觀2019年所接獲的交換情報書信往來次 數,美洲地區的相關書信往來數目,與 2018年相比,同樣錄得顯著升幅。

As shown from the graph below, JFIU has more frequent exchange of intelligence with members from Europe I in 2019, of which 400 out of 1,283 incoming correspondence were received from the Region. The year of 2019 also recorded a significant increase in incoming correspondence with the Americas, as compared to 2018.

2018年及2019年接獲埃格蒙特組織成員的交換情報書信往來次數

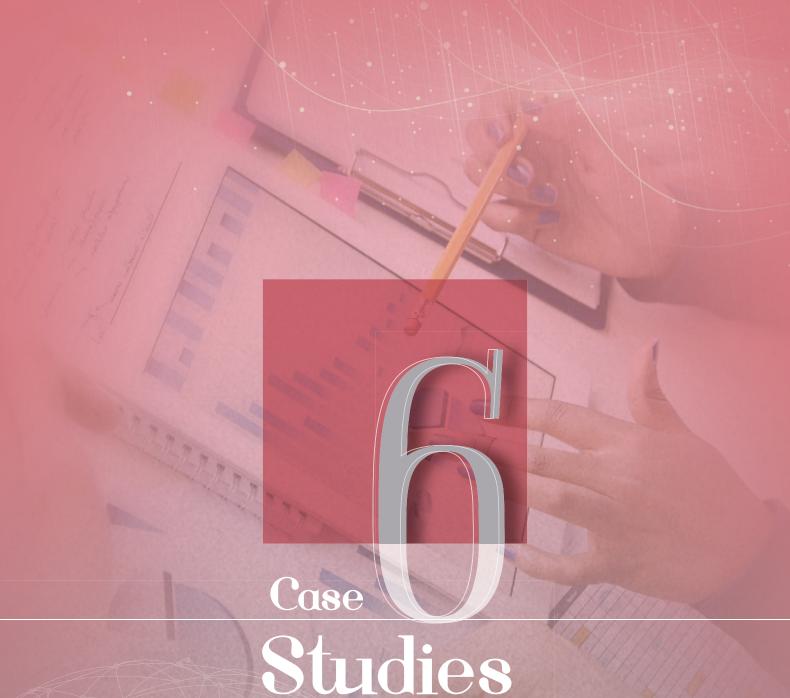
Number of Incoming Correspondence with Egmont Group Members in 2018 and 2019



	1 st 第一位	2 nd 第二位	3rd 第三位	4 th 第四位	5 th 第五位
接獲要求索取情報的性質 Nature of Incoming Requests	訛騙 Fraud (167)	洗錢 Money Laundering (163)	可疑交易 Suspicious Transaction (98)	税務罪行 Tax Crime (61)	貪污 Corruption (34)
接獲自發分享情報的性質 Nature of Incoming Spon. Sharings	訛騙 Fraud (256)	可疑交易 Suspicious Transaction (85)	詐騙 Deception (17)	税務罪行 Tax Crime (9)	貪污 Corruption (8)

	1 st 第一位	2 nd 第二位	3rd 第三位	4 th 第四位	5 th 第五位
發出要求索取情報的性質 Nature of Outgoing Requests	洗錢 Money Laundering (29)	訛騙 Fraud (20)	詐騙 Deception (5)	危險藥物 Dangerous Drugs (4)	税務罪行及 恐怖分子籌資 Tax Crime & Terrorist Financing (2)
自發分享情報的性質 Nature of Outgoing Spon. Sharings	訛騙 Fraud (33)	税務罪行 Tax Crime (12)	洗錢 Money Laundering (8)	可疑交易 Suspicious Transaction (6)	貪污 Corruption (5)

^{*()} 要求索取/分享情報的數目 *() denotes number of requests/ sharing



Studies and 案件分析及類型學 Typologies

香港海關的案件分析

Case Examples from C&ED

案例 Case

與售賣冒牌手袋得益有關的洗錢案

Money laundering in relation to Proceeds of Selling Counterfeit Handbags

2015年3月,香港海關與X司法管轄區的 執法機關就一個犯罪集團進行聯合行 動,有關集團從Y司法管轄區售賣冒牌手 袋至X司法管轄區,繼而將犯罪得益由X 司法管轄區轉移至香港。購買冒牌手袋 的買家在X司法管轄區以國際匯款方式把 款項轉至由集團首腦持有的香港銀行帳 戶。聯合財富情報組在調查初期提供相 關首腦的財富情報,資料顯示各首腦曾 利用他們的銀行帳戶接收大額匯款,而 款項懷疑是售賣冒牌手袋的得益。2016 年3月,香港海關以洗錢罪名拘捕實為夫 婦的集團首腦。2019年12月,根據法律 意見,被捕夫婦被控以清洗4,150萬 港元清洗黑錢罪行。2020年5月,透過法 庭命令限制價值3,480萬港元的可變現資 產。

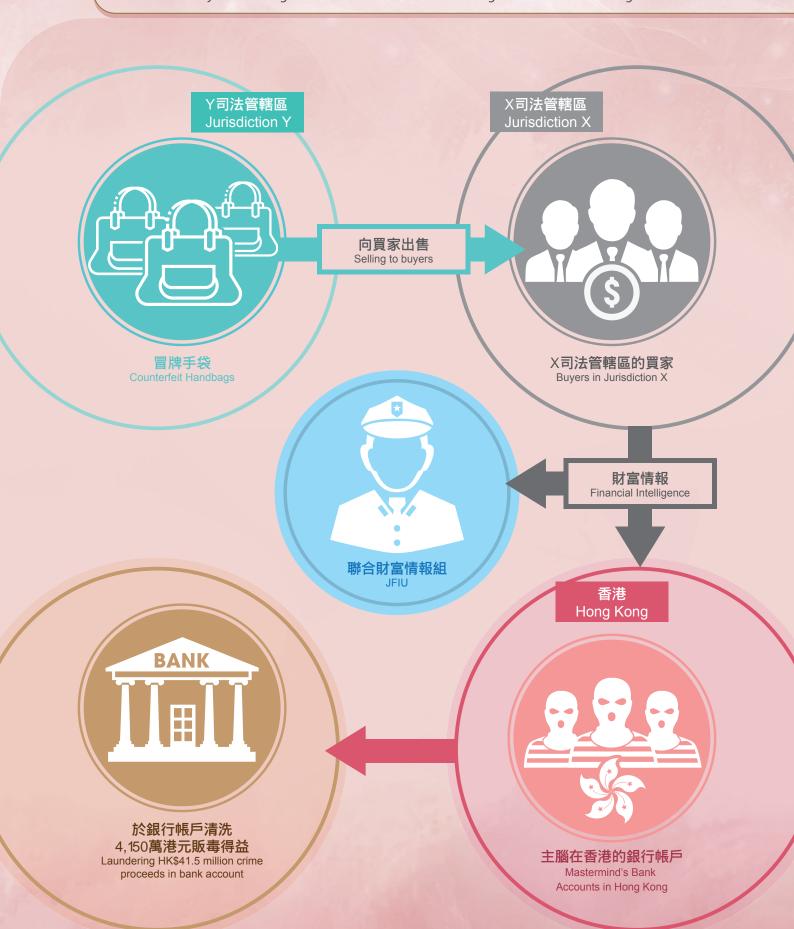
(案件將於2020年裁決。)

In March 2015, the C&ED conducted a joint investigation with a LEA of jurisdiction X against a syndicate involved in selling of counterfeit handbags from jurisdiction Y to jurisdiction X as well as laundering the crime proceeds from jurisdiction X to Hong Kong. Buyers of counterfeit handbags in jurisdiction X made the payments via international remittance to bank accounts in Hong Kong held by the masterminds. Financial intelligence on the masterminds were retrieved via the JFIU at the early stage of the investigation. The relevant financial information supported that the masterminds had made use of their bank accounts to receive a huge amount of remittances suspected to be proceeds of selling counterfeit handbags. In March 2016, the C&ED arrested the masterminds, who were a married couple, for money laundering. In December 2019, pursuant to legal advice, the arrested couple were charged with ML with the laundered amount of HKD 41.5 million. In May 2020, HKD 34.8 million worth of realisable properties were restrained by means of a court

(The case will be judged in 2020.)

案例1:與售賣冒牌手袋得益有關的洗錢案

Case 1: Money laundering in relation to Proceeds of Selling Counterfeit Handbags



案例 Case

與販毒得益有關的洗錢案

Money Laundering in relation to Proceeds of Drug Trafficking

2018年5月,香港海關展開監控遞送行 動 , 涉及一個境外輸入的包裹 , 內藏 11.67公斤 -丁內酯。最終,兩人以販運 危險藥物罪名被捕,並同時檢獲約值140 萬港元的不同類型危險藥物、37萬港元 現金、一部數鈔機,以及兩部存有危險 藥物交易記錄的手提電腦。後未幾,聯 合財富情報組旋即重索被捕人的財富情 報,包括銀行資料及可疑銀行記錄,提 供可靠情報證明兩名被捕人在2016至 2018年間,曾利用個人銀行帳戶或聯名 帳戶,清洗懷疑犯罪得益。經過深入的 財富調查,證據顯示二人共清洗550萬港 元懷疑犯罪得益。2019年2月,根據法律 意見,二人被控以販運危險藥物及清洗 黑錢罪行。2019年4月,透過法庭命令限 制價值557萬港元的可變現資產。

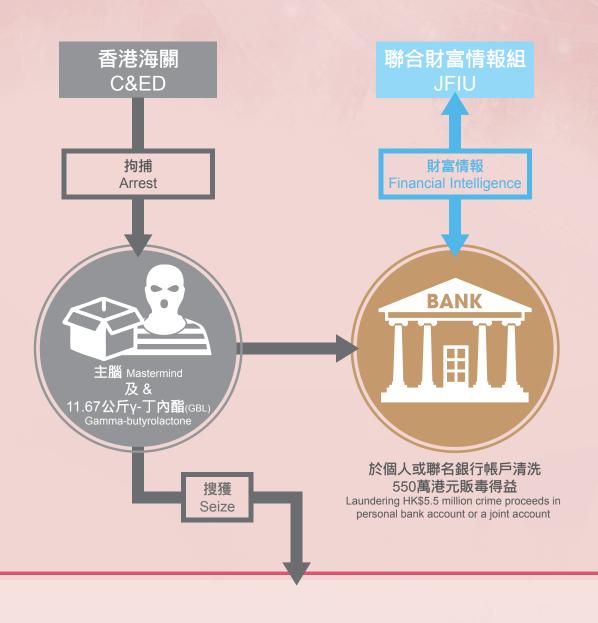
(案件將於2020年裁決。)

In May 2018, the C&ED mounted a controlled delivery operation with an inbound parcel containing 11.67 kg of Gamma-butyrolactone (GBL). As a result, two persons were arrested with further seizure of assorted dangerous drugs valued at about HKD 1.4 million, HKD 370,000 cash, a banknote counting machine and two notebooks with drugs transaction records. Financial intelligence on the arrestees were retrieved via the JFIU soon after the arrest for drug trafficking had been made. The relevant JFIU's information, including banking information and suspicious bank records, provided useful intelligence to support that both arrestees had made use of either personal bank account or a joint account to launder suspected crime proceeds between 2016 and 2018. After extensive financial investigation, evidence showed that they laundered suspected crime proceeds of HKD 5.5 million in total. In February 2019, pursuant to legal advice, the two arrestees were charged with drug trafficking and ML. In April 2019, HKD 5.57 million worth of realisable properties were restrained by means of a court order.

(The case will be judged in 2020.)

案例2:與販毒得益有關的洗錢案

Case 2: Money Laundering in relation to Proceeds of Drug Trafficking





不同類型危險藥物 約值140萬港元

Assorted dangerous drugs valued at about HKD 1.4 million



數鈔機

Banknote counting machine



37萬港元現金

Cash HKD\$ 370,000



存有危險藥物交易 記錄的手提電腦

notebooks with drugs transaction records

毒品調查科財富調查組的案件分析

Case Examples from FID NB

案例 3 Case

針對按揭貸款詐騙集團的行動

Operation against a Mortgage Loan Fraud Syndicate

毒品調查科財富調查組根據線報針對一 個有三合會背景的犯罪集團展開財富調 查。集團成員銀行帳戶的現金流分析揭 示部分成員在2016至2017年間向數間銀 行獲取樓宇按揭貸款,以在香港購買八 間豪宅。支付首期的費用大多來自該集 團操控的公司。

經深入調查後,揭露成員佯裝成不同公 司的高級職員,在申請按揭貸款時聲稱 接收自集團的存款為他們的月薪。然 而,稅務記錄顯示他們各人實際只是低 職級員工,每年入息較低,或甚至是失 業人士。此外,更發現他們聲稱的工資 轉帳在成功獲批按揭貸款的數月後便停 止。

2019年,警方採取行動,拘捕九位集團 成員,包括按揭貸款申請人及公司董事。 被捕人士以詐騙手法騙獲按揭貸款,銀行 帳戶內約1,000萬港元的懷疑犯罪得益遭 扣押。警方正考慮向法庭申請沒收令。

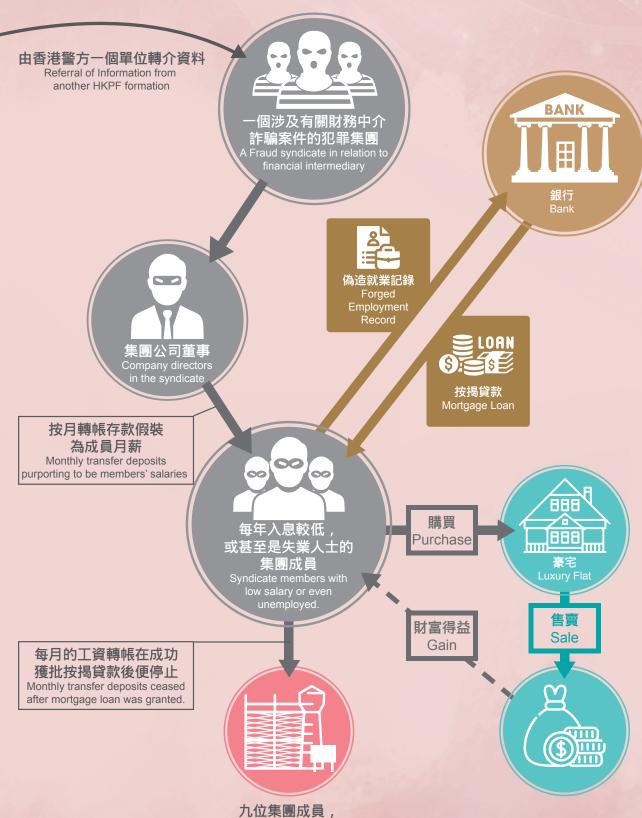
Acting on intelligence, FID NB initiated financial investigation against a syndicate with triad background. Fund flow analysis against bank accounts of the syndicate members unveiled that some of them obtained mortgage loan from various banks for purchase of eight luxury real properties in Hong Kong between 2016 and 2017. The down payments of those purchases were mainly derived from companies controlled by the syndicate.

Further enquiry revealed that some transfer deposits, purporting to be their monthly salaries, were made to bank accounts of the syndicate members. In the mortgage loan applications, they pretended to be senior staff of various companies. However, tax records showed that they were actually junior staff with much lower annual income or even unemployed. It was also found that the monthly transfers were ceased a few months after the mortgage loans had been granted.

In 2019, the operation turned overt and nine syndicate members, including the loan applicants and the directors of the companies, were arrested. About HKD10M of suspected crime proceeds obtained from the mortgage loan fraud was withheld in the bank accounts of the persons for consideration arrested confiscation order application.

案例3:針對按揭貸款詐騙集團的行動

Case 3: Operation against a Mortgage Loan Fraud Syndicate



包括按揭貸款申請人及公司董事被捕。 1,000萬港元犯罪得益被凍結。

Nine syndicate members, including the loan applicants and the directors of the companies, were arrested, with HKD10M of crime proceeds frozen

案例

主動拓展罪犯的財富情報而達致瓦解跨境清洗黑錢集團

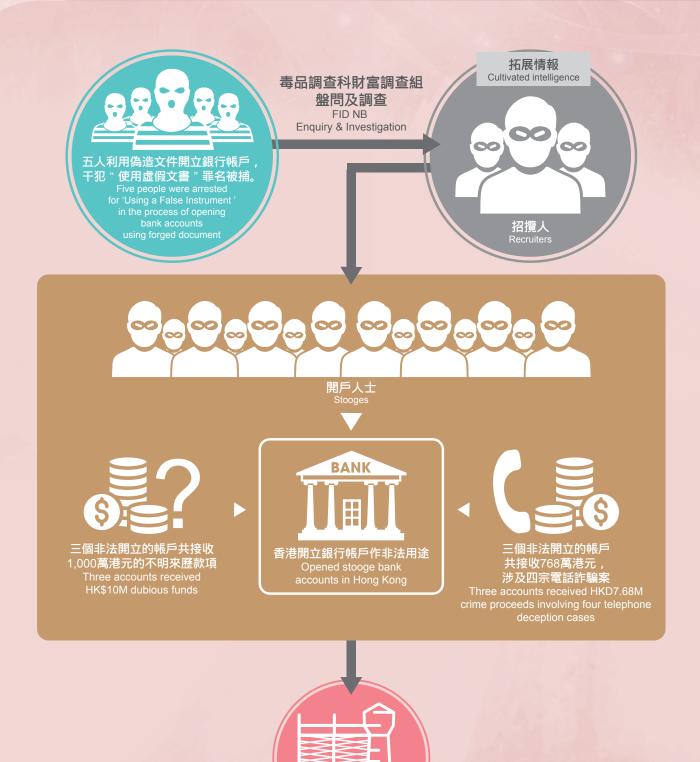
Proactive Cultivation of Financial Intelligence on Criminals Resulting in the Neutralization of a Cross-Boundary Money Laundering Syndicate

2019年3月至4月期間,來自X司法管轄 區的五人利用偽造文件開立銀行帳戶, 干犯"使用虛假文書"罪名被捕。毒品 調查科財富調查組接手調查工作,並拓 展被捕人士的相關財富情報,繼而揭發 一個由17名成員組成的跨境犯罪集團。 該集團派員到香港開立銀行帳戶作非法 用途。三個傀儡帳戶共接收涉及四宗電 話詐騙案的768萬港元。另外三個傀儡帳 戶共接收超過1,000萬港元不明來歷的款 項。警方其後開展行動,拘捕七名集團 成員,包括開戶人士及招攬人。其中四 人被裁定洗錢罪名成立,其中一人將會 在區域法院受審。成功瓦解"清洗黑錢" 集團不單可防止非法資金流入本港,同 時亦維持香港作為世界首要國際金融中 心的地位。

Between March and April 2019, five people from Jurisdiction X were arrested for 'Using a False Instrument' in the process of opening bank accounts using forged document across the territories. FID NB took over the investigation and cultivated intelligence from the arrested persons, resulting in the revelation of a 17-member cross-boundary syndicate that sent stooges to open bank accounts in Hong Kong for illegal purpose. Three stooge accounts had received a total of HKD7.68M involving in four telephone deception cases. Three other stooge accounts had received over HKD10M of dubious funds. An operation was subsequently mounted with seven syndicate members, including the stooges and recruiters arrested. Four of them were convicted of ML offences, while one of them will be tried in District Court. The successful neutralization of the 'Money Laundering' syndicate not only had prevented the influx of illicit funds into Hong Kong but also had preserved Hong Kong's status as the world's premier international financial centre.

案例4:主動拓展罪犯的財富情報而達致瓦解跨境清洗黑錢集團

Case 4: Proactive Cultivation of Financial Intelligence on Criminals Resulting in the Neutralization of a Cross-Boundary Money Laundering Syndicate



七名集團成員,包括招攬人及開戶人士被捕,其中四人被裁定洗錢罪名成立,而一人將會在區域法院受審。

Seven syndicate members, including recruiters and stooges, were arrested. Four of them were convicted of ML offences, while one of them will be tried in District Court.



財富情報引發的洗錢案

Money Laundering case originated from financial intelligence

此案件源自2009年7月的一宗由聯合財富 情報組轉介個案,五名當事人的帳戶錄 得大額現金交易,以及帳戶間的大額轉 帳。調查顯示五名疑犯來自一個家庭, 並以父親A先生為首。

財富調查揭示A先生在2007年1月至2011 年12月期間使用個人,家人和朋友的銀 行帳戶清洗約一億港元犯罪得益。

2011年7月,警方進行突擊搜查,於A先 生住所內發現外圍投注工具,包括投注 單及記有網上投注資料的紙張。行動中 亦檢獲有關賽馬及足球外圍博彩活動的 錄音記錄。A先生、家人及朋友最終被捕, 他們相關銀行帳戶內的大量犯罪得益亦 被凍結。

A先生、家人及朋友遭檢控,並被裁定收 受賭注及洗錢罪名成立。

法庭已就被捕人士的可變換現金資產發 出限制令。

This case originated from a referral from JFIU in July 2009 in relation to five subjects whose accounts recorded large amounts of cash transactions and inter-transfers among the accounts. Investigation revealed that the five subjects were family members and they were headed by the father of the family, Mr. A.

Financial investigation suggested that Mr. A had used his personal bank account and that of his family members and associates to launder crime proceeds of about HKD100M between January 2007 and December 2011.

The residence of Mr. A was raided in July 2011 with bookmaking paraphernalia such as betting slips and papers with Internet betting information found therein. Audio records indicating horseracing and soccer bookmaking activities were also seized. Mr. A, his family members and associates were arrested and a large sum of crime proceeds was frozen in their bank accounts.

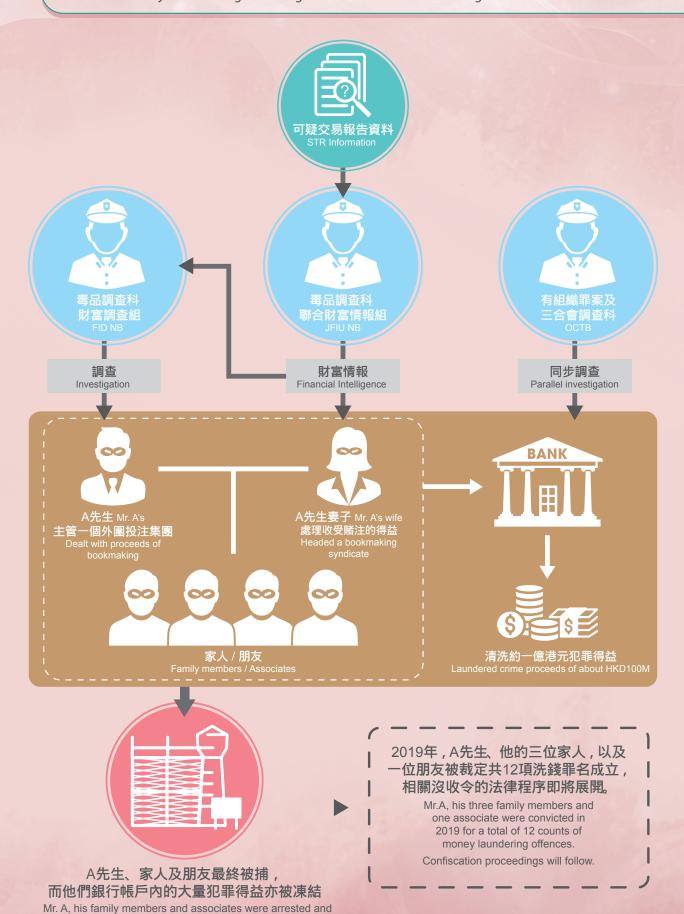
Mr. A, his family members and associates were charged with and convicted of 'Engaging in Bookmaking' and 'Money Laundering'.

A Restraint Order was also granted against the realizable property of the arrested persons.

案例5:財富情報引發的洗錢案

a large sum of crime proceeds was frozen in their bank accounts.

Case 5: Money Laundering case originated from financial intelligence





與虛擬資產有關的詐騙及洗錢案

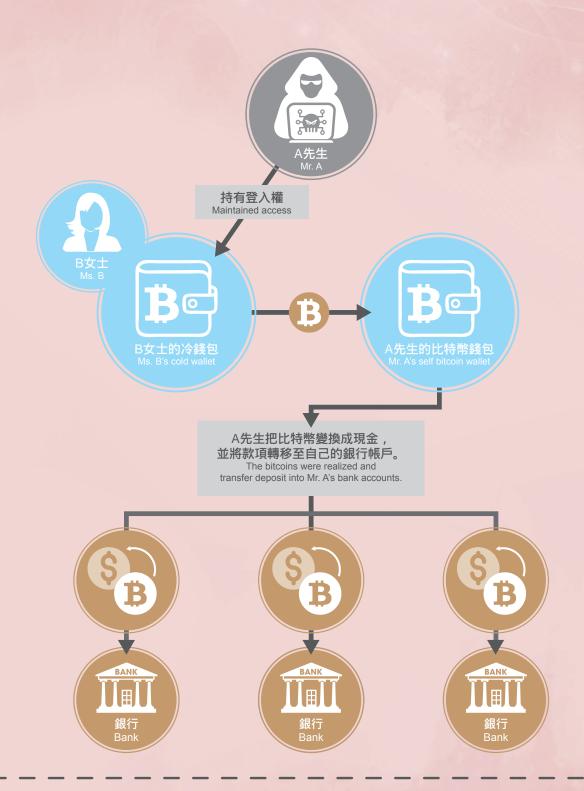
Virtual Asset related Fraud and Money Laundering Case

香港警方接獲B女士有關存放在冷錢包及 保險庫內的1,000個比特幣被盜的案件 後,隨即向一名區塊鏈及虛擬資產業務 東主A先生展開調查。調查期間發現A先 生最初代B女士進行虛擬資產交易,數月 來取得B女士的信任。其後A先生游說B 女士可協助建立冷錢包並一直管有其登 入權包括管有私鑰及修復鑰。根據警隊 進行的資金流分析,發現部分比特幣經 已售出,並換成法定貨幣,而犯罪得益 (以法定貨幣單位計算)亦已轉移至A先 生名下五個不同的銀行帳戶。相關銀行 及比特幣帳戶的資產(約1000萬港元或 130萬美元)亦被凍結,A先生被控以一 項詐騙及四項洗錢罪。

HKPF initiated an investigation against Mr. A (blockchain & Virtual Asset (VA) business owner) following Ms. B's report of stolen VAs (1,000 bitcoins) in her cold wallet stored in a safe (along with the recovery key). During investigation, it is revealed that Mr. A had maintained access to the cold wallet (including private and recovery keys) that he helped Ms. B to set up. Initially, Mr. A had been conducting VA trades on behalf of Ms. B. After securing trust from Ms. B over a span of few months, Mr. A then persuaded Ms. B of setting up of a cold wallet with his assistance. Based on results from fund flow analysis conducted by HKPF, it is found that some of the bitcoins were sold and the criminal proceeds (in fiat currency) were transferred to five different bank accounts in name of Mr. A. The bank and bitcoin accounts (with HKD10 million or USD 1.3 million) have been frozen and Mr. A was charged with one count of fraud and four counts of Money Laundering.

案例6:與虛擬資產有關的詐騙及洗錢案

Case 6: Virtual Asset related Fraud and Money Laundering Case



案件進度:

已追討大部分被盜的比特幣,A先生被控以一項詐騙及四項洗錢罪

Case progress:

Large part of stolen bitcoins were recovered. Mr. A was charged with one count of fraud and four counts of Money Laundering



積極向受害人提供協助處理涉及詐騙得益的跨境洗錢案

Transnational ML Case Involving Proceeds of Fraud with Constructive Assistance Provided for Victims

這宗案件例子闡釋香港警隊不同單位以 協調方式迅速偵查案件、拘捕罪犯,以 及向受害人提供協助,追討損失。

警方接獲X司法管轄區的受害銀行的電子 報案,調查發現2019年初該銀行的內部 訊息系統遭受網絡攻擊。11項總值1億 800萬港元的未獲授權交易在全球多間銀 行進行。當中5,200萬港元成功存入香港 的銀行帳戶,而大部分資金於同日被轉 移。香港警方接獲相關報告後,旋即聯 絡有關銀行,並成功扣押受款人帳戶的 2,700萬港元。

警方在接獲報案後的兩個月內,共拘捕 五名受款帳戶持有人,並立即深入調查 相關銀行帳戶,辨識其他受款帳戶持有 人。調查期間亦發現其中兩個帳戶曾接 收發生在Y及Z司法管轄區的兩宗詐騙案 的犯罪得益。結果,多名受款帳戶持有 人被捕,並控以洗錢罪行,共涉3億 2,200萬港元。其中兩名被告承認控罪, 於2020年5月在裁判法院分別被判監26個 月及28個月。

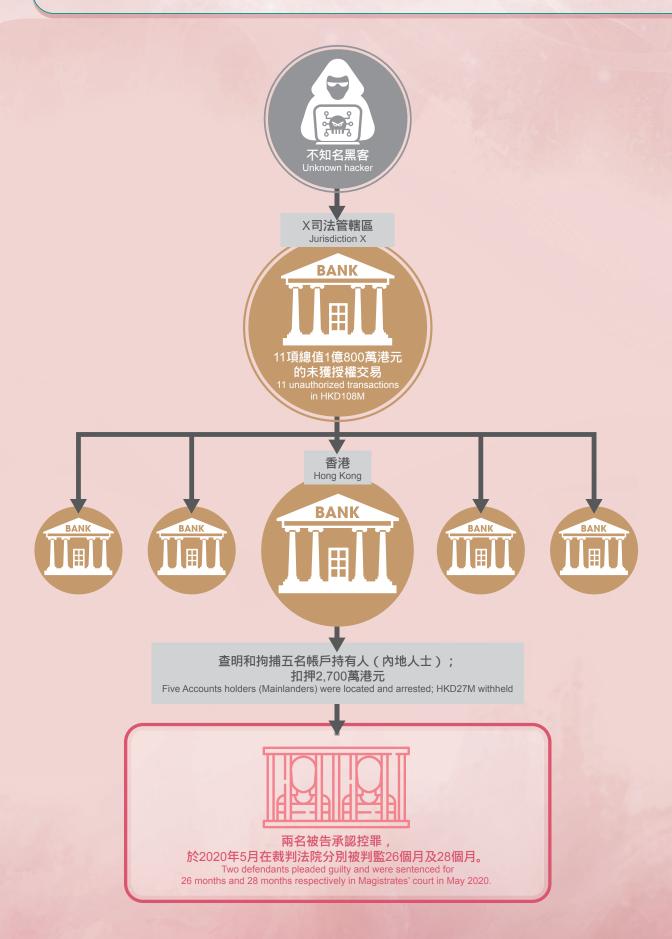
This case example illustrates the coordinated approach conducted by different units of HKPF to swiftly detect the case, arrest the culprits and offer assistance to overseas victims to retrieve the loss.

Acting upon the e-report made by the victimized bank in Jurisdiction X, it was discovered there was a cyber-attack on their bank-to-bank messaging system in early 2019. Eleven unauthorized transactions totaling HKD 108 million were made to various banks around the globe. A total of HKD 52 million were successfully credited to bank accounts in HK and most of the funds were further dissipated on the same day. Upon receiving the report, HKPF swiftly liaised with the banks concerned and successfully withheld HKD 27 million in the beneficiary accounts.

Within two months since the case was reported, five beneficiary account holders were arrested. In-depth analysis on the bank accounts were swiftly conducted and other beneficiary account holders were identified. During the course of investigation, it was also discovered that two of the accounts had received crime proceeds from two other fraud cases in Jurisdictions Y and Z. A number of beneficiary account holders were arrested and charged with ML offences involving a total of HKD 322 million. Two defendants pleaded quilty and were sentenced for 26 months and 28 months respectively in Magistrates' court in May 2020.

案例7:積極向受害人提供協助處理涉及詐騙得益的跨境洗錢案

Case 7: Transnational ML Case Involving Proceeds of Fraud with Constructive Assistance Provided for Victims





未獲海外機關提供上游罪行證據而成功裁定洗錢 罪名成立的個案

Conviction of money laundering charges without obtaining evidence of predicate offence from overseas authority

2011年12月,X司法管轄區的執法機關 在疑犯住所檢獲50克甲基安非他命(俗 稱"冰毒")及數百萬元,並隨即將他拘 捕。X司法管轄區的執法機關繼而向香港 警方提供有關資料,並表示有關懷疑販 毒得益經X司法管轄區的匯款代理人轉移 至香港的兩個公司銀行帳戶—A公司及 B公司。

警方對上述兩間公司持有的四個銀行帳 戶展開深入詳細的財富調查。兩間公司 分別由兩名本地男子X先生及Y先生擁 有。四個銀行帳戶共清洗5億4,000萬港 元。逾1,200項交易經過有系統的資金流 分析,發現在2011年5月至12月期間,共 1億3,800萬港元的販毒得益經X司法管轄 區的匯款代理人轉匯至相關的四個銀行 帳戶。四個銀行帳戶錄得的大額交易明 顯與X先生及Y先生的財富狀況及所報稱 的低收入絕不成比例。

X先生及Y先生分別清洗2億6,700萬港元 及2億7,300萬港元。根據法律意見,二 人各被控以兩項"串謀洗黑錢"罪,最 終同被裁定罪名成立,判監38個月。

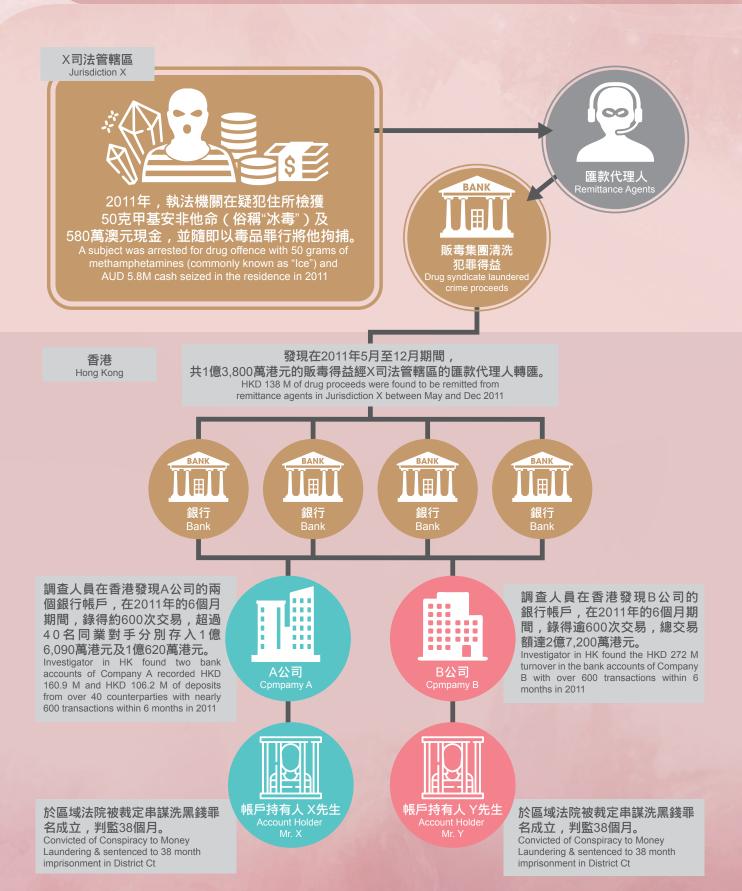
In December 2011, the LEA of Jurisdiction X arrested a subject after having found 50 grams of methamphetamines (commonly known as "Ice") and several million dollars at his residence. LEA of Jurisdiction X further passed information to HKPF and suggested that the suspected drug proceeds were transferred to two companies' bank accounts (Company A and B) in Hong Kong through remittance agents in Jurisdiction X.

A thorough financial investigation was launched against the four bank accounts held by Company A and B, which were separately owned by two local males (Mr. X and Mr. Y). The four bank accounts had laundered a total of HKD540 million. while HKD138 million of drug proceeds were found to be remitted through remittance agents in Jurisdiction X to the four bank accounts between May and Dec 2011 upon systematic fund flow analysis for over 1200 transactions. The voluminous transaction amount in the four bank accounts were obviously incommensurate with Mr. X's and Mr. Y's financial status with minimal reported income.

Pursuant to legal advice, Mr. X and Mr. Y were each charged with two counts of "Conspiracy to Money Laundering" of having laundered HKD267 million and HKD273 million respectively and were subsequently convicted with a sentence of 38 months' imprisonment.

案例8:未獲海外機關提供上游罪行證據而成功裁定洗錢 罪名成立的個案

Case 8: Conviction of money laundering charges without obtaining evidence of predicate offence from overseas authority





對大麻栽植集團進行同步財富調查

Parallel financial investigation into cannabis cultivation syndicate

這宗案件例子闡釋毒品調查科財富調查 組的不同單位以協調方式對一個本地販 毒集團進行的財富調查提供支援。

根據自行蒐集及分析的情報和毒品調查 科財富調查組進行的深入監察行動,人 員於2017年4月突擊搜查香港的兩個大麻 栽植中心, 結果當場拘捕三名香港男子 及一名印尼籍女子,並檢獲1,635株大麻 植物,以及四包共重345.7克大麻,估計 市值4,000萬港元。

針對各被捕人士進行的同步財富調查顯 示,集團首腦X先生於2010至2017年期 間,利用他的銀行帳戶及證券帳戶清洗 約2,250萬港元的販毒得益。經深入調查 X先生的銀行帳戶,發現他的11個銀行及 證券帳戶共錄得約3.500次交易,共700 萬港元存款,其中逾50%的存款為來歷 不明的現金,而餘下的款項則由不同的 同業對手轉移到帳戶。至於Y女士(X先 生的家人),調查發現她操控超過20個銀 行及證券帳戶,錄得約7,500次交易,涉 及共1,550萬港元存款。她報稱是文員, 收入極低。她的銀行帳戶存款顯然與她 的財富背景不相稱。2018年7月,根據法 律意見,三名男士,包括X先生被控以七 項毒品相關罪行,而X先生更被加控五項 洗錢罪,共涉402萬港元。

2019年,三名男士,包括X先生同被裁定 罪名成立,判監5年10個月。Y女士的案 件正等候法律意見。

This case example illustrates the coordinated approach conducted by different units in FID NB to support a financial investigation against a local drug trafficking syndicate.

Acting on self-cultivated information and further surveillance operations handled by FID NB, the officers raided two cannabis plants cultivation centres in Hong Kong in April 2017 that resulted in the arrest of three HK males and one Indonesia female at scene with seizure of 1,635 cannabis plants and 4 packs containing 345.7 grammes of cannabis, with an estimated retail value of HKD 40 million.

Parallel financial investigation into the arrestees revealed that the mastermind (Mr. X) had used his bank accounts and securities accounts to launder drugs proceeds of approximately HKD 22.5 million between 2010 and 2017. In-depth analysis on the bank accounts of Mr. X, his 11 bank and securities accounts recorded total deposits of HKD 7 million with approximately 3,500 transactions, among which more than 50% was deposited by cash from unknown source whereas the remaining was transferred from various counterparties. Regarding Ms. Y (Mr. X's family member), she was found to have controlled more than 20 bank and securities accounts and the total deposits amounted to HKD 15.5 million with approximately 7,500 transactions. She worked as a clerk with minimal reported income. The deposits in her bank accounts were obviously incommensurate with her financial background. Pursuant to legal advice in July 2018, three males, including Mr. X were charged with 7 counts of drug related offences, while Mr. X were additionally charged with 5 counts of ML offences involving a total of HKD 4.02 million.

The three males, including Mr. X were convicted and sentenced to 5 years and 10 months' imprisonment in 2019. Ms. Y's case is pending legal advice.

案例9:對大麻栽植集團進行同步財富調查

Case 9: Parallel financial investigation into cannabis cultivation syndicate



The syndicate



2017年4月 X先生及三名男子因栽植大麻被捕,

大麻類植物,以及450克大麻花。 Mr. X and three other males were arrested for Cultivation of Cannabis with a total seizure

2017年突擊搜查及拘捕

Raid & Arrest in 2017



X先生名下的11個銀行/證券/投注帳戶共錄得 約3,500次交易,共700萬港元存款,其中逾 50%的存款為來歷不明的現金。他其後因洗錢罪 行被捕。

11 bank / securities / betting accounts in the name of Mr. X recorded total deposits of HKD 7 million with approximately 3,500 transactions, among which more than 50% was deposited by cash from unknown source. He was further arrested for money laundering.

> X先生被控以七項毒品相關罪行及五項 洗錢罪,共涉402萬港元。2019年, 他被裁定罪名成立,判監5年10個月。 Mr. X were charged with 7 counts of drug related offences and 5 counts of ML offences involving a total of HKD 4.02 million. He was convicted and sentenced to 5 years and 10 months'

imprisonment in 2019.



Y女士(X先生的家人)操控超過20個銀行及證 券帳戶,錄得約7,500次交易,涉及共1,550萬港 元存款。她報稱是文員,收入極低。她其後因洗 錢罪行被捕。

Ms. Y, Mr. X's family member. Controlled more than 20 bank and securities accounts and the total deposits amounted to HKD 15.5 million with approximately 7,500 transactions. She worked as a clerk with minimal reported income. . She was further arrested for money laundering.

> 等候法律意見 Pending legal advice



針對跨境販運毒品集團的行動

Operation against Cross-boundary DD Trafficking Syndicate

這宗案件涉及多個司法管轄區的跨境聯 合行動及其財富調查。調查揭露A先生安 排漁船從X司法管轄區偷運毒品至其他國 家。A先生亦與一名居於Y司法管轄區的 香港男子B先生合謀添置船隻,並招攬船 員偷運毒品。

同步財富調查顯示A先生、B先生及他們 的家人共操控21個香港銀行帳戶。各帳 戶於2004至2015年期間的總交易額達 1億1,300萬港元。

各執法機關於2015年1月採取聯合行動, 在Y司法管轄區檢獲862公斤冰毒,並拘 捕九人,除了A先生不在香港,其餘人士 包括B先生,A先生的妻子及女兒因洗錢 罪行被捕,最終被控共12項洗錢罪。

2019年8月,A先生的妻子涉及清洗 4,250萬港元,被裁定11項洗錢罪名成立, 判監36個月,而法庭亦就她的4,250萬港 元發出沒收令。2019年10月,法庭通過 潛逃者法律程序就A先生共清洗的2,150 萬港元發出沒收令。

The parallel financial investigation started from a cross-boundary joint operation involving a number of jurisdictions. Mr. A was identified to have arranged fishing vessels to smuggle drugs from Jurisdiction X to other countries. Mr. A also colluded with a HK male (Mr. B) who resided in Jurisdiction Y to procure vessels and recruit crew to smuggle drugs.

Parallel financial investigation showed that Mr. A, Mr. B and their family members had controlled a total of 21 bank accounts in Hong Kong, which had a total turnover of HKD113M between 2004 and

The joint operation turned overt in January 2015 with 862 kg of ICE seized in Jurisdiction Y and arrest of nine persons including Mr. B. The financial investigation in Hong Kong then turned overt but Mr. A was out of Hong Kong. The wife and a daughter of Mr. A were arrested for ML offences and subsequently charged with a total of 12 counts of ML offences.

In August 2019, Mr. A's wife was convicted of the 11 counts of ML offences involving HKD 42.5M and sentenced to 36 months' imprisonment, with a confiscation order of HKD 42.5M issued against her. In October 2019, a Confiscation Order in total sum of HKD 21.5M was issued against Mr. A upon absconder proceedings.

案例10:針對跨境販運毒品集團的行動

Case 10: Operation against Cross-boundary DD Trafficking Syndicate





A先生的妻子 - 被裁定11項洗錢罪名成立, 判監36個月,而法庭亦就她的4,250萬港元 發出沒收令 B先生 - 在Y司法管區被判處死刑 Mr. A - HKD 21.5M Confiscation Order issued Mr. A's wife - convicted of the 11 counts of ML offences and sentenced to 36 months' imprisonment with a confiscation order of HKD 42.5M issued against her Mr. B - Sentenced to death in Jurisdiction Y

A先生 - 就2,150萬港元發出沒收令



Coperation Representation 國際合作及參與

國際合作及參與

單單在香港採取措施打擊洗錢及恐怖分子資金籌集,而欠缺國際間的合作及聯繫,所施措施的效果定必不彰。本組致力促進與世界各地的政府組織合作,監察全球的打擊洗錢及恐怖分子資金籌集標準,並評核成員所屬的司法管轄區採用的標準是否全面或有何不足,從而作出改善。

為了加強我們與國際伙伴的網絡和關係, 本組積極接待海外財富情報單位及執法 機關的代表團進行交流。就國際層面而 言,本組人員主動參與不同種類的本地 及國際會議、工作坊及拜訪聯絡活動, 以展現我們積極交換財富情報的能力, 並與環球的同業伙伴協力打擊跨國洗錢 及恐怖分子資金籌集的決心。

打擊清洗黑錢 財務行動特別組織 _____(特別組織)

特別組織於1989年成立,屬跨政府組織,目的是促進國際合作,以制定有關打擊洗錢及恐怖分子資金籌集活動的標準。特別組織現時由36個成員司法管轄區及兩個區域組織的代表組成。香港自1991年起成為訂定世界各地打擊洗錢及恐怖分子資金籌集標準的特別組織成員,致力展現其阻截和打擊跨國洗錢及恐怖分子資金籌集的決心。為達目標,本組肩負重任,繼續充當本港指定的財富情報單位,不斷求進,因應變化不定的國際規定以持續提升相關制度的標準。

International

COOPERATION and REPRESENTATION

Without international cooperation and coordination, measures taken solely in Hong Kong would have limited effect in combating money laundering and the financing of terrorism. JFIU therefore is dedicated to fostering cooperation with worldwide intergovernmental organizations which oversee AML/CFT standard worldwide and also assess the extent to which these standards have been adopted by member jurisdictions.

In order to reinforce networks and enhance relationships with our international partners, the JFIU often receives overseas delegations from financial intelligence units and law enforcement agencies. On the international front, to demonstrate our commitment to enhancing financial intelligence exchange and engaging in the global community in combatting transnational ML and TF, JFIU officers actively participated in different local and international conferences, workshops and liaison visits.

Financial Action Task Force on MONEY LAUNDERING (FATF)_

FATF is an intergovernmental body established in 1989 to promote international cooperation on anti-money laundering measures and it now consists of 36 member jurisdictions and 2 regional organizations. As an active member of the global AML/CFT standard setting body Financial Action Task Force (FATF) since 1991, Hong Kong exemplified its determination in deterring and combatting transnational ML and TF. To commensurate with the goal, the JFIU continues to discharge its functions as the designated Financial Intelligence Unit in Hong Kong and constantly advances its standards as per the evolving international requirements.



2019年2月,時任毒品調查科高級警司(財富調查)(右一)及時任毒品調查 科總督察(本組)(左一) 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 February 2019, the former Senior Superintendent of Police of Narcotics Bureau (Financial Investigation) (right one) and the former Chief Inspector of Police of NB (JFIU) (left one) joined the Hong Kong delegation to attend the FATF Plenary and Working Group Meetings in Paris, France.



時任本組人員於2019年3月在以色列特拉維夫出席2019特別組織及 歐洲議會反洗錢及打擊資助恐怖主義評估專家委員會聯合舉辦之專 家會議及反恐融資檢控工作坊。

A former JFIU officer attended 2019 FATF / MONEYVAL Joint Experts Meeting and TF Prosecution Workshop in Tel-Aviv, Israel in March 2019.



2019年6月,本組人員與香港代表團在美國奧蘭多出席特別組織全體會議及工作小組會議。

In June 2019, JFIU officers joined the Hong Kong delegation to attend the FATF Plenary and Working Group Meetings in Orlando, USA.

亞洲 / 太平洋 反清洗黑錢組織 (亞太反洗錢組織)

亞洲 / 太平洋反清洗黑錢組織(亞太反洗 錢組織)由41個泛亞地區成員所屬的司法 管轄區組成,是一個與特別組織形式相若 的地區組織,旨在促進地區合作,倡議採 用國際標準,以及向司法管轄區提供支援。 香港於1997年自亞太反洗錢組織成立開始 已成為成員,本組人員主動參與亞太反洗 錢組織的周年會議及工作坊。

> 2019年8月,毒品調查科高級警司(財富調查)出席亞洲 太平洋反清洗黑錢組織在澳洲坎培拉舉行的周年會議。

> In August 2019, Senior Superintendent of Police of Narcotics Bureau (Financial Investigation) joined the Hong Kong delegation to attend the Asia / Pacific Group on Money Laundering Annual Meeting in Canberra,

埃格蒙特組織

(由世界各地的 財富情報單位組成)

埃格蒙特組織於1995年4月成立,是一個 現有164名成員的國際組織,負責加強全球 財富情報單位在交換情報、培訓和分享專 業知識等方面的合作,共同推行打擊洗錢 及恐怖分子資金籌集的措施。



時任本組人員於2019年6月在荷蘭海牙出席第26屆埃格蒙特組織

A former JFIU officer attended the 26th Egmont Group Plenary Meeting in Hague, Netherlands in June 2019.

Asia Pacific Group on MONEY LAUNDERING (APG)

Consisting of 41 member jurisdictions in the Pan-Asia area, the Asia Pacific Group (APG) on Money Laundering is a FATF-style regional body with the aim to promote regional cooperation, adoption of the international standards and to provide assistance to jurisdictions. Hong Kong has been a member of APG since its formation in 1997 and JFIU officers actively participated in APG annual meetings and workshops.



The Egmont Group of

FIUs (Egmont Group)

The Egmont Group consists of 164 members and is an international organization established in April 1995 with a mandate to improve cooperation on information exchange, trainings and expertise between FIUs around the world engaging in AML/CFT measures.



時任本組人員於2019 年1月在印尼雅加達出 席雅加達工作小組及 埃格蒙特組織會議 2019

A former JFIU officer attended the Jakarta Communique -Working Group and **Egmont Committee** Meetings 2019 in Jakarta, Indonesia in January 2019.

國際訪客及研討會

回顧2019年,本組接待來自澳洲、澳門特別行政區、泰國及美國的代表團。透過此等面談訪問,各地人員可加深了解彼此的相互關係,並直接討論有關打擊洗錢及恐怖分子資金籌集的專項議題。

本組代表亦出席各類研討會及工作坊, 以擴展網絡,並就全球洗錢及恐怖分子 資金籌集趨勢及相互評核的籌備工作, 廣納其他司法管轄區的睿見以作深入了 解。



時任本組人員 (左二)於2019年3月在意大利財政衛隊經濟及財務警察學校參加由經濟合作暨發展組織舉辨的進行財務調查(基礎)課程。

A former JFIU officer (left two) attended Conducting Financial Investigations (Foundation) Programme organized by Organisation for Economic Co-operation and Development (OECD) in Guardia di Finanza Economic and Financial Police School, Italy in March 2019.

International

VISITORS and ____CONFERENCES

In 2019, the JFIU received delegations from Australia, Macao SAR, Thailand and the U.S. Such face-to-face meetings offered valuable opportunities for enhancing understanding mutual rapport and facilitating direct discussion on topical AML/CFT issues.

Representatives from the JFIU also attended various conferences and workshops to extend network and gain insights from other jurisdictions into global ML / TF trend and ME preparation work.



2019年4月,澳洲交易報告分析中心訪問本組。

In April 2019, Australian Transaction Reports and Analysis Centre ("AUSTRAC") visited the JFIU.



2019年5月,財務調查組人員(右四)在中國江西 警察學院參加洗錢犯罪分析模型及情報導偵課 程。

In May 2019, an officer of Financial Investigation Unit (right four) attended Money Laundering Investigation and Intelligence Analysis Course in Jiangxi Police Academy, China.



2019年6月,風險評估小組人員(左)在新 加坡IMF-Singapore Regional Training Institute (STI)參加國際施行打擊洗錢及 恐怖分子資金籌集標準工作坊。

In June 2019, an officer of Risk Assessment Unit (left) attended Workshop on Implementing the International anti-Money laundering and Counter-Terrorist Financing (AML/CFT) Standards in IMF-Singapore Regional Training Institute (STI), Singapore.

本組人員(前右)於2019年7月在澳洲 悉尼參加由澳洲交易報告及分析中心 舉辨的財富情報分析員課程。

A JFIU officer (front right) attended Financial Intelligence Analyst Course organized by AUSTRAC in Sydney, Australia in July, 2019.



毒品調查科總督察(財富調查)於2019年 8月在新加坡參加由聯合國毒品和犯罪 問題辦事處舉辨的第2屆東南亞加密貨 幣工作小組會議。

Chief Inspector of Police of Narcotics Bureau (Financial Investigation) attended UNDDC Cryptocurrencies Conference: 2nd Southeast Asia Cryptocurrencies Working Group Meeting in Singapore in August, 2019.



Mutual Evaluation

打擊清洗黑錢財務行動特別組織 進行的相互評核

作為香港的專門財富情報單位,本組一直不遺餘力,根據不斷演變的國際規定提升本港的相關標準,並與公私營機構的各類持份者合作,加強本組在打擊洗錢及恐怖分子資金籌集所充當的角色。

香港是特別組織的成員之一,須定期接受相互評核,而就香港的打擊洗錢及恐怖分子資金籌集制度進行的第四次評核工作已於2018至2019年期間展開。相關的相互評核工作由十位來自特別組織和亞太反洗錢組織成員所屬司法管轄區及秘書處代表的專家所組成的評核小組負責。特別組織及亞太反洗錢組織的全體成員分別在6月於美國奧蘭多舉行的全會及8月於澳洲坎培拉舉行的年會上審核及通過香港的相互評核報告,並於2019年9月在特別組織的網站公布。

本組人員在財富情報及風險評估方面所付出的努力,以及警隊竭盡全力,務求打擊洗錢及恐怖分子資金籌集,並積極推動政策,使制度行之有效,令香港成為亞太區內第一個成功通過特別組織今輪審核的司法管轄區。報告評定本港的有關制度在風險識別、執法、沒收犯罪得益、打擊恐怖分子資金籌集,以及國際合作等方面取得顯著成效。

聯合財富情報組多年來為打擊洗錢及恐怖分子資金籌集播下的種子,在2019年樂見豐碩成果,而警隊累月經年在財富調查方面所付出的努力亦終獲肯定。儘管年度成績斐然,但我們絕不因此自滿怠傲,來年將根據香港的相互評核報告所作出的建議,積極準備即將進行的跟進程序,以匯報實施有關建議的進度,繼續精益求精,完善本港的制度。

As the designated FIU of Hong Kong, the JFIU spares no effort in advancing its standard as per evolving international requirements through collaborating with various stakeholders from public and private sectors to strengthen its role in AML/CFT regime.

As one of the FATF members, Hong Kong commenced the fourth round of Mutual Evaluation on the AML and CFT regime between 2018 and 2019. The peer review process was undertaken by an assessment team comprising ten experts from the FATF and APG member jurisdictions and the Secretariats. The Mutual Evaluation Report of Hong Kong was examined and adopted by the FATF membership at its June Plenary held in Orlando, the United States, and the APG membership at its August Plenary held in Canberra, Australia, before publication at the FATF's website in September 2019.

With the efforts exerted by JFIU personnel in financial intelligence and risk assessment, as well as the Force's best endeavour in combatting ML/TF and contributing to effective policy outcomes, Hong Kong became the first jurisdiction in the Asia-Pacific region to achieve an overall compliant result in the current round of Mutual Evaluation. Hong Kong was commented to be particularly effective in the areas of risk identification, law enforcement, asset recovery, counter-terrorist financing and international co-operation.

Albeit the achievement unlocked in the year of 2019 which was indeed an affirmation of the Force's efforts in AML/CFT, the JFIU will continue to strive for excellence and contribute in the upcoming follow-up process of Mutual Evaluation in accordance with the recommendation of the Mutual Evaluation Report of Hong Kong.

時任本組人員於2019年 4月出席相互評核會議 與國際評核小組就財富 情報及打擊清洗黑錢及 恐怖分子資金籌集等重 要議題作積極交流。

The former JFIU personnel attended Hong Kong China's Mutual Evaluation Face-to-Face Meeting and exchanged views on FIU and AML/CFT maters with the international assessment team in April 2019.





時任毒品調查科警司(本組)(左)及時任毒品調查科總督察(本組)(右)與本組人員於2019年4月出席相互評核會議,與國際評核小組就財富情報及打擊清洗黑錢及恐怖分子資金籌集等重要議題作積極交流。

The former Superintendent of Narcotics Bureau (JFIU) (left), the former Chief Inspector of Police of NB (JFIU) (right) and JFIU personnel attended Hong Kong China's Mutual Evaluation Face-to-Face Meeting and exchanged views on FIU and AML/CFT matters with the international assessment team in April 2019.



Laundering and Terrorist Financing Risk Assessment

洗錢及恐怖分子資金籌集 風險評估

香港致力維持打擊洗錢及恐怖分子資金籌集 活動的國際標準制度。根據財務行動特別組 織(特別組織)標準,各司法管轄地區應當 辨識、評估及了解其自身的洗錢及恐怖分子 資金籌集活動風險。按風險之本的原則,香 港進行了全港性洗錢及恐怖分子資金籌集風 險評估,並以該評估為基礎,調配資源以減 低有關風險。

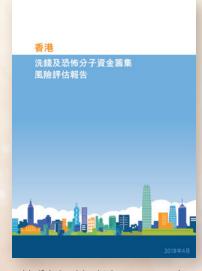
香港在進行洗錢及恐怖分子資金籌集風險評 估時,曾參考相關的國際指引。迄今,香港 仍是亞太區首個成功通過特別組織相互評核 的司法管轄區。相互評核報告亦確認本港對 其洗錢及恐怖分子資金籌集風險有深入的了 解,香港的洗錢及恐怖分子資金籌集風險評 估報告則充分印證相關成果。

洗錢及恐怖分子資金籌集風險評估工作由警 務處轄下的風險評估小組協助進行,並由財 經事務及庫務局主導的洗錢及恐怖分子資金 籌集風險評估督導委員會("督導委員會")負 責監督。督導委員會的成員包括執法監管及 決策機關。持續進行的風險評估結果會向打 擊清洗黑錢及反恐融資中央統籌委員會("中 央統籌委員會")報告。中央統籌委員會的主 席由財政司司長擔任,負責制定及實施本港 打擊洗錢及恐怖分子資金籌集活動的政策。 香港首個《洗錢及恐怖分子資金籌集風險評估 報告》已於2018年4月公布¹。

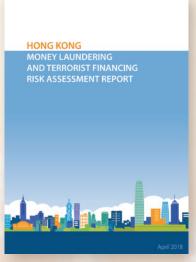
Hong Kong is committed to upholding a robust Anti-Money Laundering and Counter-Financing of Terrorism (AML/CFT) regime that fulfils the international AML/CFT standards. Having regard to the Financial Action Task Force (FATF)' standard that jurisdictions should identify, assess and understand its ML and TF risks. ongoing territory-wide risk assessment is conducted, which forms the basis to apply resources to mitigate such risks, based on risk-based approach (RBA).

Hong Kong has made reference to relevant international guidance in conducting its ML and TF risk assessment. As the first, and to date only, jurisdiction in the Asia-Pacific region that passed the FATF Mutual Evaluation (ME) exercise, Hong Kong has been recognized in the ME Report as having a good understanding of its ML and TF risks which is supported by the Hong Kong ML and TF Risk Assessment Report (HRA).

The ML and TF risk assessment is supported by the Risk Assessment Unit (RAU), and overseen by the Steering Committee of Money Laundering and Terrorist Financing Risk Assessment led by the Financial Services and the Treasury Bureau, and comprised of a range of law enforcement, supervisory and policy agencies. Findings of this on-going risk assessment is reported to the Central Coordinating Committee on Anti-Money Laundering/Counter-Financing of Terrorism, which is Hong Kong's steering body of the formulation and implementation of AML/CFT regime chaired by the Financial Secretary. The first HRA was published in April 2018¹.



1 https://www.fstb.gov.hk/fsb/aml/tc/risk-assessment.htm

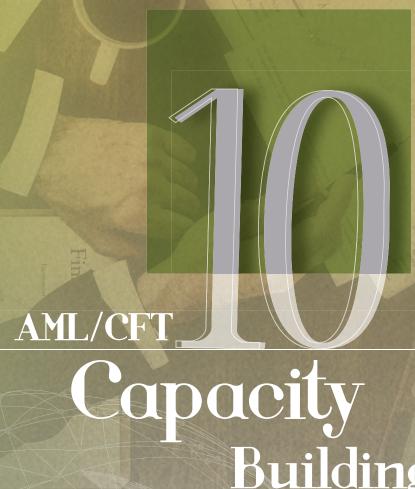


https://www.fstb.gov.hk/fsb/aml/en/risk-assessment.htm

在進行洗錢及恐怖分子資金籌集風險評估時,我們採用世界銀行建議的風險評估工具,各個監管機構、執法機關、政府部門及私營機構作出積極參與。整個過程富有系統性,涉及廣泛諮詢工作數據。有關數據包括但不限於執法統計數字、國際犯罪報告及不同的類型學研究。其間,我們廣納專業意見,集思廣益,解構香港所面對的洗錢及恐怖分子資金籌集風險。

第二輪洗錢及恐怖分子資金籌集風險評 估現正進行中。 Adopting the World Bank Tool, the ML/TF risk assessment is a systematic process that involves extensive consultation, collection, examination and analysis of quantitative and qualitative data, including but not limited to law enforcement statistics, international crime reports and various typologies studies; and engagement with regulators, LEAs, government bodies and private sector entities. By doing so, collective knowledge and expertise are canvassed and consolidated to determine the composition and extent of the ML and TF risks faced by Hong Kong. Based on the results of the risk assessment, all stakeholders would develop concerted ML and/or TF risks mitigating measures, which is central to an effective framework in combatting ML/TF activities.

The second ML and TF risk assessment exercise is currently underway.



Building

提升打擊洗錢及 恐怖分子資金籌集的能力

提升打墼洗錢及

恐怖分子 資金籌集的能力

本港有效的打擊洗錢及恐怖分子資金籌 集制度得來不易,提升能力和公眾教育 均是當中不可或缺的部分。本組致力為 執法機關和其他同業伙伴舉辦財富調查 訓練,並向金融機構和指定非金融業人 士籌辦外展宣傳活動。所有能力提升措 施加強受訓人員在調查打擊洗錢及恐怖 分子資金籌集相關知識和技巧,亦提高 私營機構在打擊洗錢及反恐籌資的機制 擔當的重要角色和責任的認知及了解。

內部財富調查課程

提升人員打擊洗錢及恐怖分子資金籌集 的能力為香港警務處的重點策略項目。 本組每年為香港警務處刑事單位的警務 人員及法證會計辦事處同事舉辦四次財 富調查課程,內容涵蓋打擊洗錢及恐怖 分子資金籌集的最新國際標準、洗錢趨 勢及類型學、調查可疑交易報告以及洗 錢案件的相關技巧。年內,本組向190名 警務人員及2名法證會計辦事處人員提供 相關的財富調查訓練。

AML/CFT

CAPACITY BUILDING

Capacity building and public education form an integral part of an effective regime in combating money laundering and terrorist financing. The JFIU is dedicated to arranging financial investigation training for LEAs and other counterparts, and coordinating publicity outreach to FIs and DNFBPs. All these capacity-building initiatives strengthen participants with knowledge and skills in money laundering and terrorist financial investigations, and increase private sectors' awareness of their important roles and responsibilities in the AML/CFT regime in Hong Kong.

Regional Financial

INVESTIGATION **COURSE**

As part of the HKPF's strategy to enhance AML/CFT capacity, the JFIU organizes four financial investigation courses annually for crime investigators and officers from the Forensic Accountants' Office of the HKPF. The courses cover the latest AML/CFT international standards, money laundering trends and typologies, suspicious transaction reporting and money laundering related investigation skills. The JFIU trained 190 police officers and 2 officers from the Forensic Accountants' Office during the year.



提升打擊洗錢及恐怖分子資金籌集的能力







來自香港警務處不同單位的學員在 內部財富調查課程積極與及講者及 其他學員互動。

Trainees from different formation of the HKPF actively interacted with speakers and each other during the Regional Financial Investigation Course.



國際財富調查課程

本組每年亦會為全球同業伙伴提供兩次 國際財富調查課程,包括英語及普通話 課程。英語課程對象為海外各地打擊洗 錢的伙伴,而普通話課程對象則為大中 華的策略伙伴。課程不僅增進人員對打 擊洗錢及恐怖分子資金籌集方面的認知, 亦提供平台予學員分享實戰經驗和金融 科技的嶄新技術,並在國際的打擊洗錢 及恐怖分子資金籌集工作領域,建立同 業網絡以及加強伙伴關係。相關訓練均 獲本地及海外同業的青睞及好評。

打擊清洗黑錢及 恐怖分子資金 籌集的外展宣傳

本組深信提升較易成為犯罪活動目標界 別人員的能力是有效打擊洗錢及恐怖分 子資金籌集的最佳方法。就此,向市民 大眾及策略伙伴舉辦外展宣傳活動極其 重要,提高認知水平,並爭取支持以協 力為香港建立穩健的打擊洗錢及恐怖分 子資金籌集制度。

除了與財經事務及庫務局和保安局禁毒 處維持合作伙伴關係,本組定期與其他 持份者,例如香港證券業協會、香港證 券及期貨從業員工會及地產代理監管局 聯辦研討會。年內,本組以合辦或派員 演講方式,參加了26場研討會,就可疑 交易報告機制傳達重要訊息,並分享最 新的案例研究,以防止和偵查洗錢及恐 怖分子資金籌集活動。

International Financial

INVESTIGATION **COURSE**

The JFIU also offers special training to global partners through two international financial investigation courses annually, one conducted in English for AML partners across the continents, the other in Putonghua for strategic partners within the Greater China Region. The courses do not only equip participants with knowledge of the financial investigation framework, but also provide them with a forum for exchanging practical experience and new technology on FinTech, building up and further enhancing network and close partnership within the international AML/CFT community. All these courses were well received by local and overseas counterparts.

AML/CFT

PUBLICITY OUTREACH

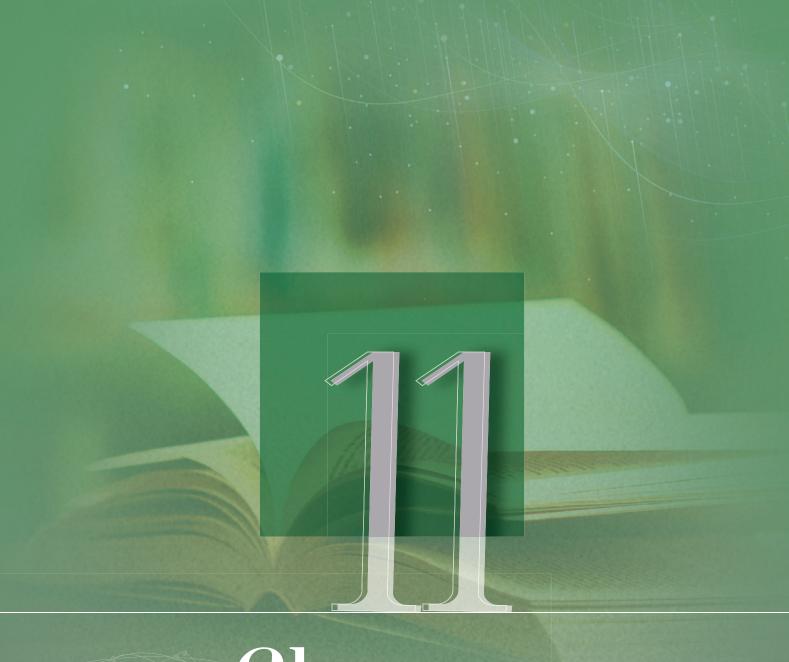
JFIU recognizes that the best way to effectively combat money laundering and terrorist financing is capacity building in those sectors that are more prone to such criminal activities. As such, it is vital to engage the general public and strategic partners through publicity outreach with a view to raising their awareness and enlisting their concerted support to build a robust AML/CFT regime in Hong Kong.

Apart from working in partnership with the FSTB and ND, SB, JFIU regularly provides seminars together with other stakeholders such as Hong Kong Securities Association, Hong Kong Securities & Futures Employees Union and Estate Agents Authority. In 2019, JFIU co-hosted or sent officers as quest speakers in 26 seminars to continue addressing issues arising from the STR regime and share contemporary case studies with a view to preventing and detecting ML/TF activities.



風險評估小組亦竭力與不同持份者接觸,加 深其對香港整體所面對的洗錢及恐怖分子資 金籌集風險的了解,特別與其行業相關的風 險。小組人員會定期出席培訓課程和分享研 討會,與執法機關人員和洗錢及恐怖分子資 金籌集風險評估的界別代表交流最新資訊, 分享工作的實務見聞。

The RAU is also committed to engaging with different stakeholders to enhance their understanding on the ML and TF risks of Hong Kong as a whole and those under their purview. From time to time officers would attend training and sharing sessions to update and exchange knowledge with staff of LEAs and sectoral representatives in ML and TF risk assessment.



Glossary 常用詞彙

ABBREVIATIONS 簡稱	ENGLISH	中文
ADCC	Anti-Deception Coordination Centre	反詐騙協調中心
AML	Anti-money Laundering	打擊清洗黑錢/ 打擊洗錢
AMLO 「《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)
AML(A)O 「《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)
APG 「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
C&ED	Customs and Excise Department	香港海關
CDD	Customer Due Diligence	客戶盡職審查
CFT	Counter-Financing of Terrorism	反恐籌資
DNFBPs	Designated Non-Financial Businesses and Professions	指定的非金融企業及行業
DTROP	Drug Trafficking (Recovery of Proceeds) Ordinance (Cap. 405 of the Laws of Hong Kong)	《販毒 (追討得益) 條例》 (香港法例第405章)
Egmont Group 「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
FATF 「特別組織」	Financial Action Task Force (www.fatf-gafi.org)	財務行動特別組織
FFMS	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)
Fls	Financial Institutions	金融機構
FID NB	Financial Investigation Division, Narcotics Bureau	毒品調查科財富調查組
FSTB	Financial Services and the Treasury Bureau	財務事務及庫務局
FIUs	Financial Intelligence Units	財富情報單位
НКРБ	Hong Kong Police Force	香港警務處
HRA	Hong Kong Money Laundering and Terrorist Financing Risk Assessment Report	香港的《洗錢及恐怖分子 資金籌集風險評估報告》

ABBREVIATIONS 簡稱	ENGLISH	中文
ICAC	Independent Commission Against Corruption	廉政公署
JFIU	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)
LEAs	Law Enforcement Agencies	執法機關
ME	Mutual Evaluation	相互評核
ML	Money Laundering	清洗黑錢 洗錢
MLA	Mutual Legal Assistance	相互法律協助
MOU	Memorandum of Understanding	諒解備忘錄
NB	Narcotics Bureau	毒品調查科
ND	Narcotics Division	禁毒處
ОСТВ	Organized Crime and Triad Bureau	有組織及三合會調查科
OSCO	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)
RAU 「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
RBA	Risk-Based Approach	風險為本原則
SB	Security Bureau	保安局
STRs	Suspicious Transaction Reports	可疑交易報告
STREAMS	Suspicious Transaction Report and Management System	可疑交易報告管理系統
SVF	Stored Value Facility	儲值支付工具
TCSPs	Trust & Company Service Providers	信託及公司服務提供者
TF	Terrorist Financing	恐怖分子資金籌集
UAE	United Arab Emirates	阿聯酋
UK	United Kingdom	英國
UNATMO	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)
USA	United States of America	美國





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