



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

Suspicious Transaction Reporting Overview & Statistics

Phoebe TSANG

Detective Senior Inspector of Police



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



**Joint Financial
Intelligence Unit**



Important Notice

All rights, including copyright, in this PowerPoint file are owned and reserved by the Hong Kong Police Force. Unless prior permission in writing is given by the Commissioner of Police, you may not use the materials other than for your personal learning and in the course of your official duty.

重要告示

香港警務處持有並保留本簡報檔案包括版權在內的所有權益。除預先獲得警務處處長書面許可外，本簡報檔案只可用作個人學習及處理公務上用途。



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



- ◆ **About JFIU**
- ◆ **Key Legislation**
- ◆ **STR Statistics**
- ◆ **STR Reporting**
- ◆ **Case Studies**



**Joint Financial
Intelligence Unit**



◆ **About JFIU**

◆ **Key Legislation**

◆ **STR Statistics**

◆ **STR Reporting**

◆ **Case Studies**



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



**Joint Financial
Intelligence Unit**



About JFIU

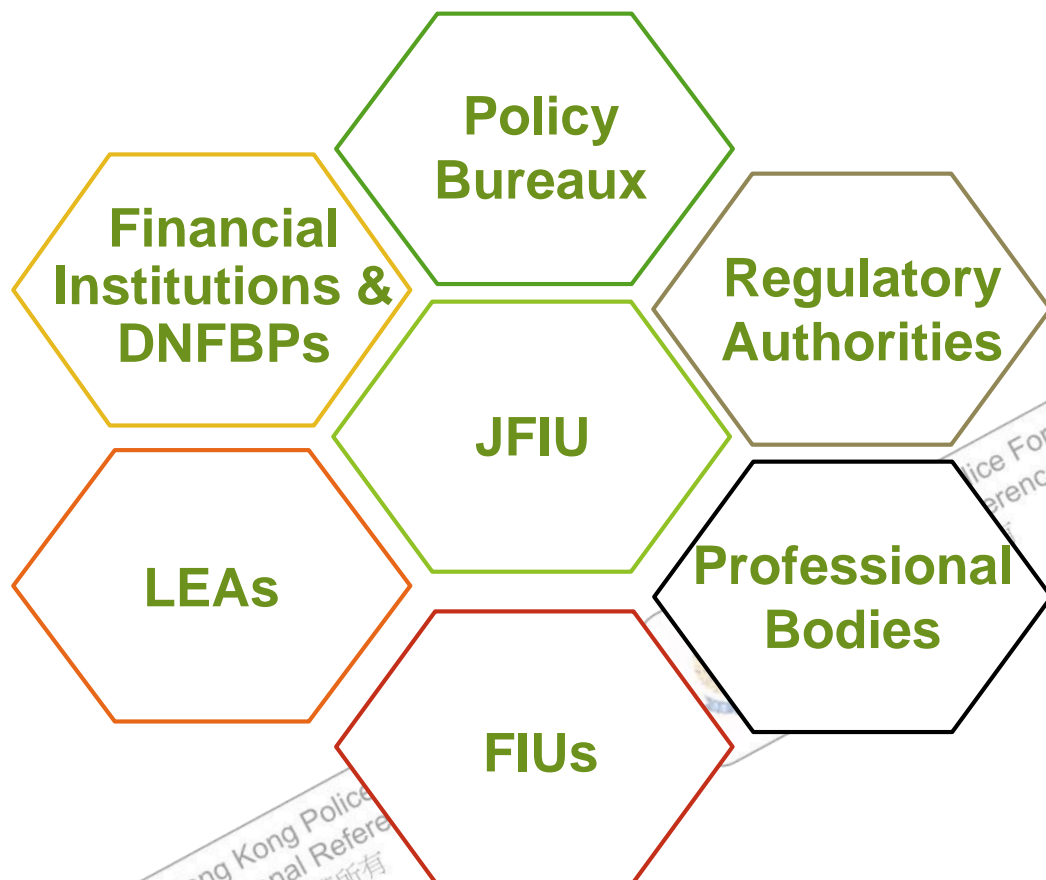
- Set up in 1989
- Not an investigative unit
- Jointly operated by HKPF & C&ED attached to NB
- Strengthened in 2009
- e-Reporting System – “STREAMS”
- Member of Egmont Group since 1996
- Establishment of FIIB in Q1 2021



**Joint Financial
Intelligence Unit**



About JFIU



- Receive, analyse and disseminate STRs
- International cooperation
- Strategic analysis and international policy on AML/CFT
- Training and outreach



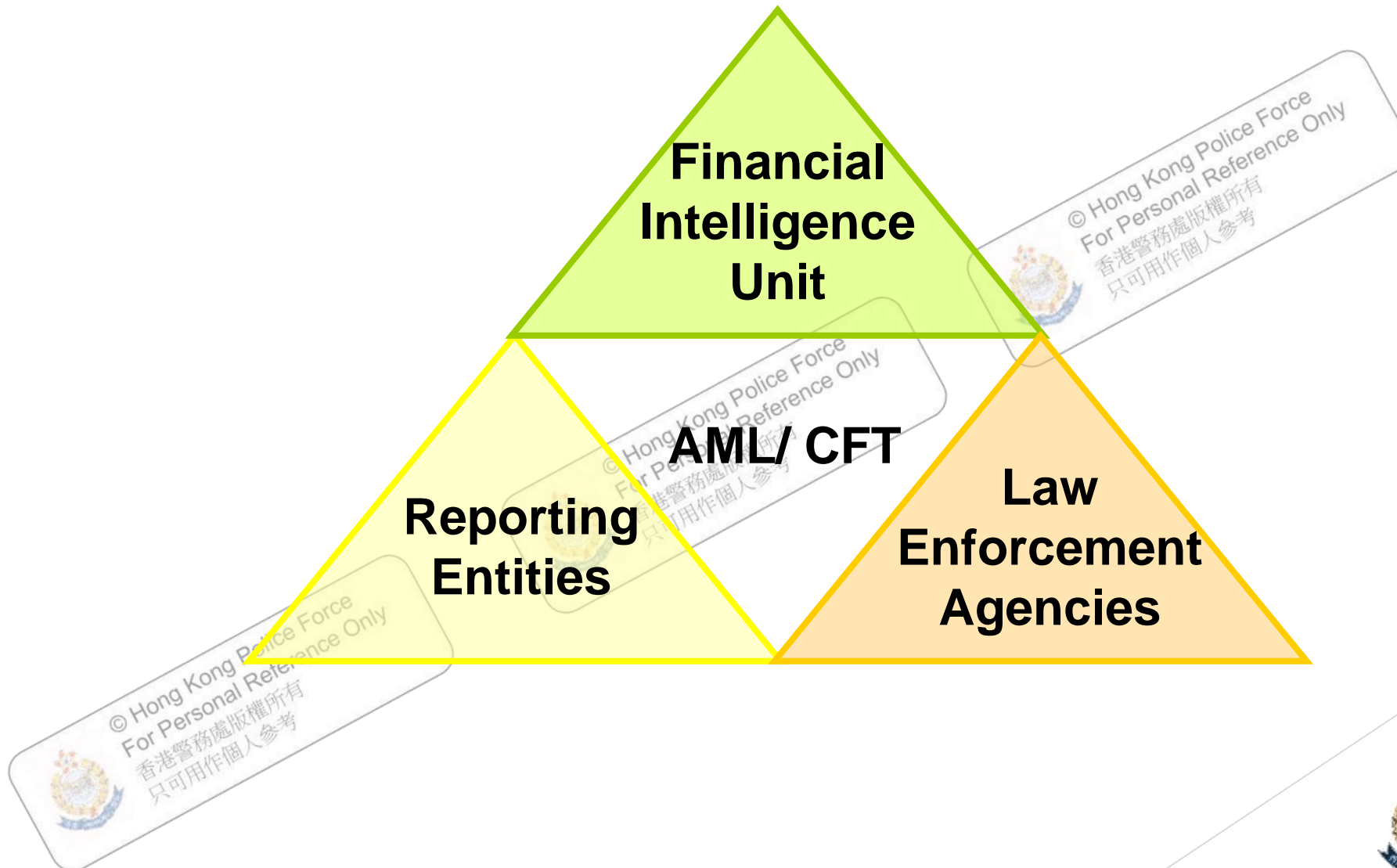
© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



**Joint Financial
Intelligence Unit**



Role of JFIU



**Joint Financial
Intelligence Unit**



Role of JFIU

← Public-Private Partnerships →

Reporting Entities

**Financial Institutions
& DNFBPs**

CDD + KYC

Record Keeping

Internal Controls

STR Filing

Financial Intelligence Unit

JFIU

STR Regime

Intelligence Exchange

International Cooperation

Training & Outreach

Law Enforcement Agencies

e.g. Police, Customs,
ICAC

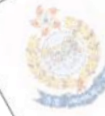
Financial Investigation

Asset Tracing

Restraint &
Confiscation

Mutual Legal
Assistance

**Joint Financial
Intelligence Unit**



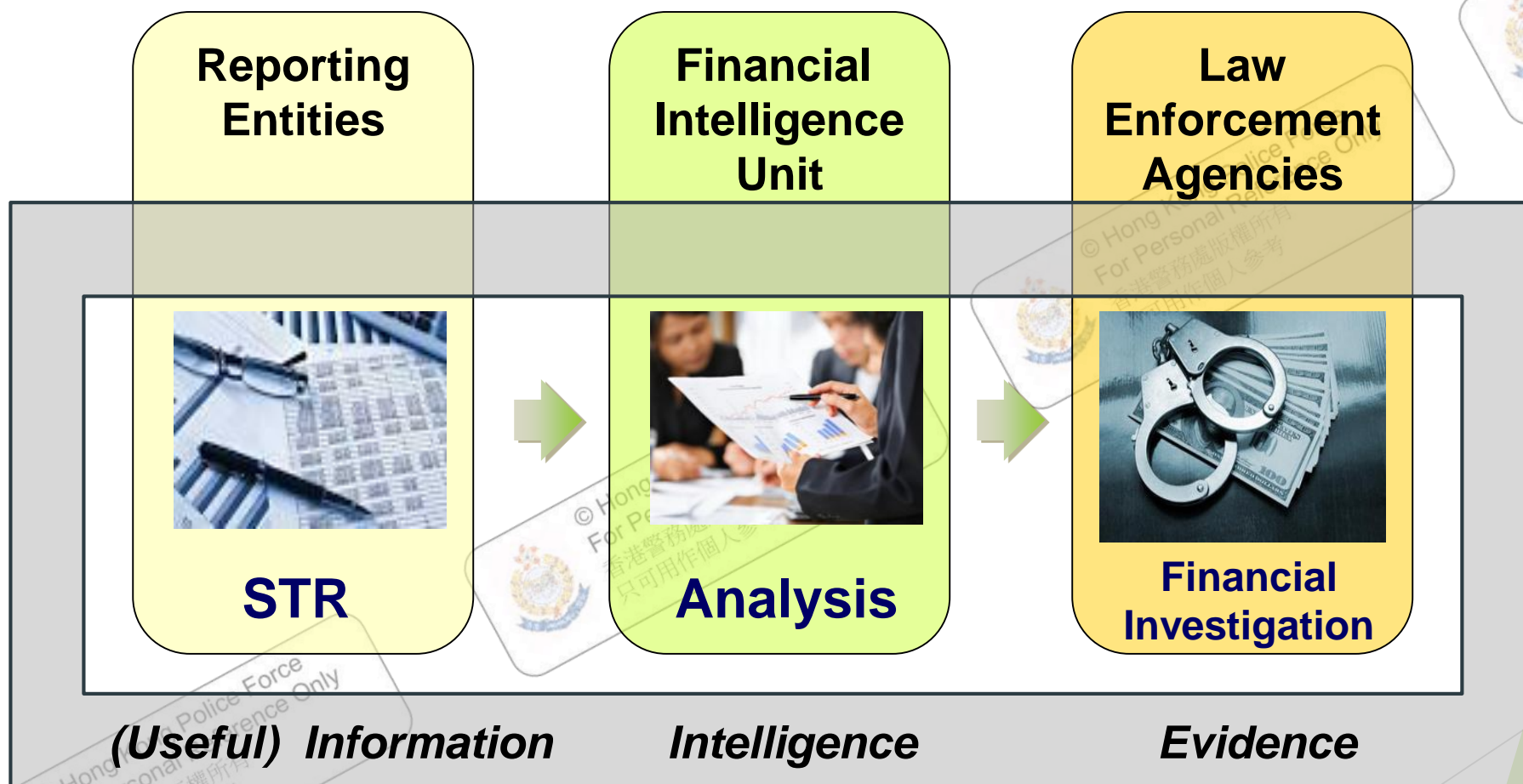
© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

Flow of information



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



**Joint Financial
Intelligence Unit**



- ◆ **About JFIU**
- ◆ **Key Legislation**
- ◆ **STR Statistics**
- ◆ **STR Reporting**
- ◆ **Case Studies**



**Joint Financial
Intelligence Unit**



Key Legislation

1989

Drug Trafficking (Recovery of Proceeds) Ordinance (DTROP)
販毒(追討得益)條例 (第405章)

1994

Organized & Serious Crimes Ordinance (OSCO)
有組織及嚴重罪行條例 (第455章)

2002

United Nations (Anti-Terrorism Measures) Ordinance (UNATMO)
聯合國(反恐怖主義措施)條例 (第575章)

2012

AML & Counter-Terrorist Financing (Financial Institutions) Ordinance (AMLO)
打擊洗錢及恐怖分子資金籌集(金融機構)條例 (第615章)

2018

AML & Counter-Terrorist Financing Ordinance (AMLO)
打擊洗錢及恐怖分子資金籌集條例 (第615章)



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



Key Legislation

Any person

- **Knowing** or having reasonable grounds to believe
- Any property
- **In whole** or in part or indirectly represents proceeds of drug trafficking
- **Deals** with the property

Maximum Penalty:

- **HKD 5 Million** fine
- **14 years' imprisonment**

S.25 of Cap 405 DTROP

S.25 of Cap 455 OSCO



**Joint Financial
Intelligence Unit**



Key Legislation

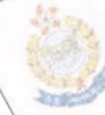
Any person should not

- **provide** or **collect** directly or indirectly
- Any property
- **With the intention that the property be used or knowing that the property will be used**
- **in whole** or **in part** to commit one or more terrorist acts

S.7 of Cap 575 UNATMO

Maximum Penalty:

- **A fine**
- **14 years' imprisonment**



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



**Joint Financial
Intelligence Unit**



Key Legislation

Any person

- **knows** or **suspects**
- any property **represents the proceeds of**
- **drug trafficking** or any serious crimes or **terrorist property**

shall report to JFIU

Maximum Penalty:

- **Level 5 fine (HKD 50,000)**
- **3 months' imprisonment**

S.25A of Cap 405 DTROP

S.25A of Cap 455 OSCO

S.12 of Cap 575 UNATMO



**Joint Financial
Intelligence Unit**



STR Reporting

Where a person

- **knows** or **suspects** that a disclosure has been made any
- **the person shall not disclose to another person** any information or other matter
- which is **likely to prejudice any investigation** which might be conducted following that first-mentioned disclosure

S.25A(5) of Cap 405 DTROP

S.25A(5) of Cap 455 OSCO

S.12(5) of Cap 575 UNATMO



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



**Joint Financial
Intelligence Unit**



- ◆ **About JFIU**
- ◆ **Key Legislation**
- ◆ **STR Statistics**
- ◆ **STR Reporting**
- ◆ **Case Studies**

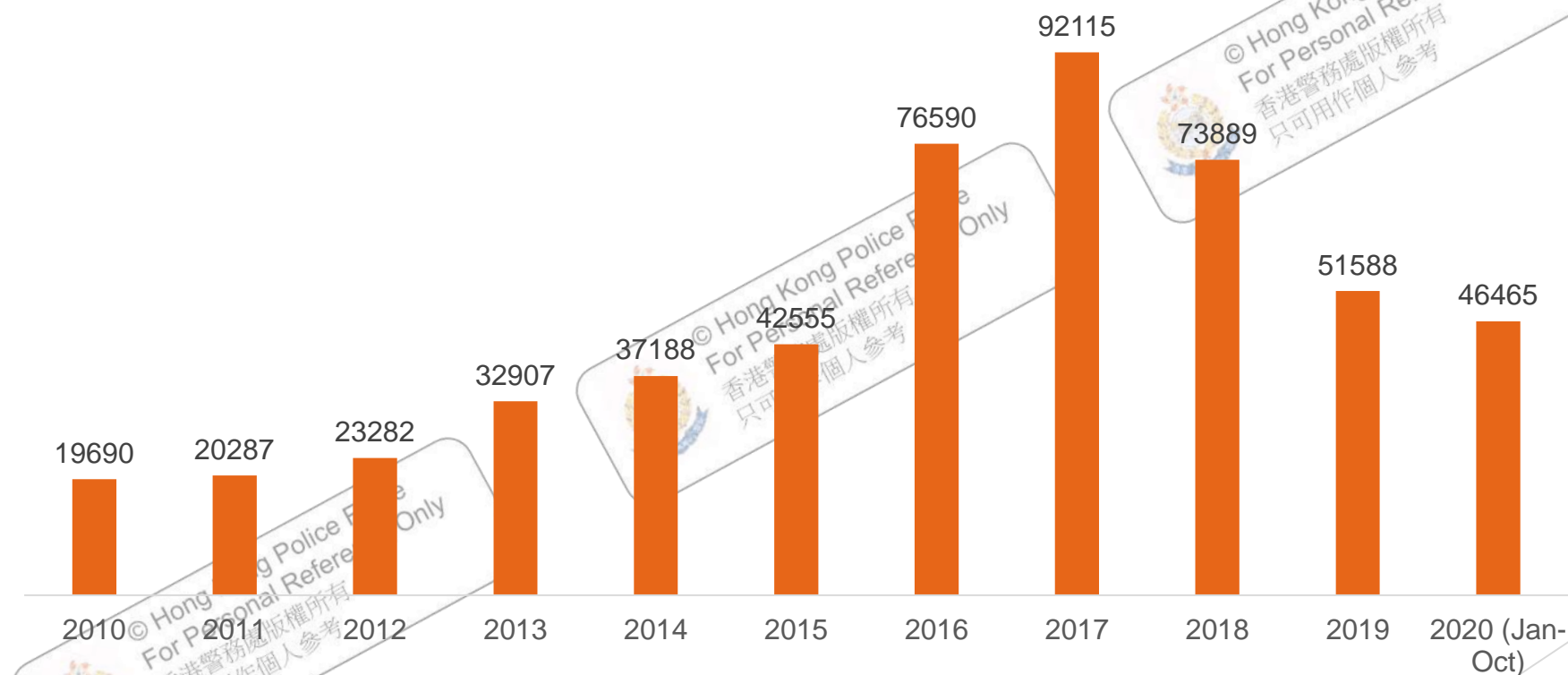


**Joint Financial
Intelligence Unit**



STR Statistics

Number of STRs received in the past 10 years

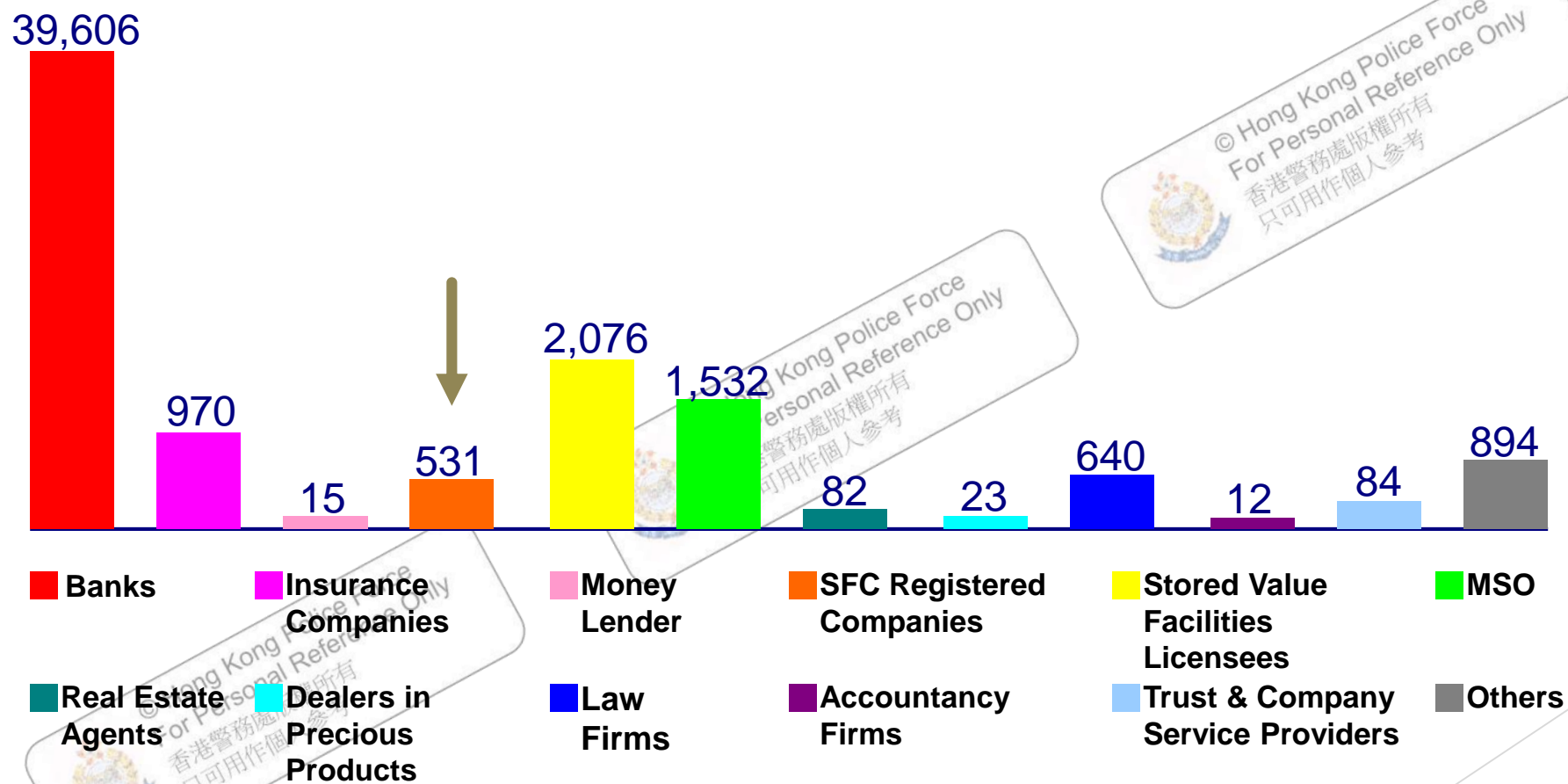


**Joint Financial
Intelligence Unit**



STR Statistics

Sectoral Breakdown of STRs received by JFIU in 2020 (Jan-Oct)



Joint Financial
Intelligence Unit



STR Statistics

STRs filed by SFC registered companies between 2016 and 2020 (Jan-Oct)

No. of STRs	2016	2017	2018	2019	2020 (Jan-Oct)
Total received by JFIU	76,590	92,115	73,889	51,588	46,465
Filed by SFC registered companies	1,423	2,090	1,337	735	531
	1.86%	2.27%	1.81%	1.42%	1.14%



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



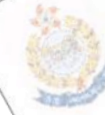
© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



- ◆ **About JFIU**
- ◆ **Key Legislation**
- ◆ **STR Statistics**
- ◆ **STR Reporting**
- ◆ **Case Studies**



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



**Joint Financial
Intelligence Unit**





To Report, or Not to Report?



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

- Legal obligation
- Applied to all
- Disclosure based on knowledge or suspicion
- No reporting threshold
- Legal protection against civil or criminal liability
- No disclosure of the reported details to another person
- Source of the report is kept confidential



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

Red Flag Indicators

Client

- Politically Exposed Person?
- Non-resident / Corporate from high-risk country?
- No known nexus with Hong Kong?
- Complex corporate structure (obscuring ultimate beneficial ownership)?



**Joint Financial
Intelligence Unit**

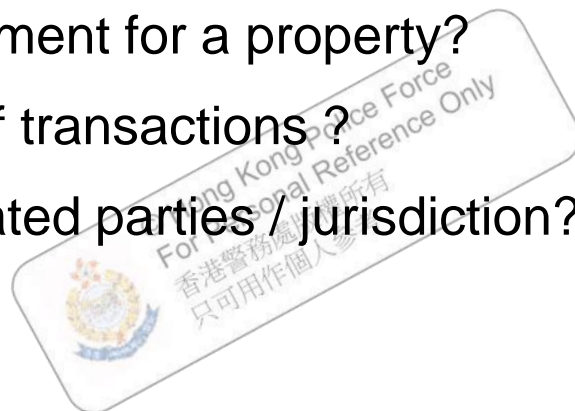


STR Reporting

Red Flag Indicators

Transaction

- Payment from 3rd party / cashier order?
- Unusual high/ low payment for a property?
- Unexpected amount of transactions?
- Transacted with unrelated parties / jurisdiction?



Joint Financial
Intelligence Unit



STR Reporting

Red Flag Indicators

Previous Records/ Further Enquiries

- Background check / open source (adverse news)
- Failing to disclose specific role / relationship / ownership of property
- Unwilling to response to questions or answers are not convincing
- Unwilling to provide supporting document



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

Red Flag Indicators

Evaluation

- Information from client is incommensurate with your record in hand?
- Information from client could not be verified?
- The client appeared to be a stooge in the transaction?



**Joint Financial
Intelligence Unit**



STR Reporting

SAFE Approach

Screen

subject entities' background & transactions

Ask

appropriate questions to clarify circumstances

Find

relevant records for review

Evaluate

whether suspicion is substantiated



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



**Joint Financial
Intelligence Unit**



STR Reporting

Screen

- 1) Background – Sensitive / Political / Connection with Sensitive/ Political person(s)
- 2) Background Vs Invested Amount
- 3) One off payment – Large amount of money
- 4) Change beneficiary frequently and/or without reasonable reason(s)
- 5) Method of payment
(Small amount instalment Vs one off payment)



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

Ask

- 1) Appropriate check and enquiry
- 2) Clarify any suspicion
 - ▶ Financial Background
 - ▶ Source of funds
 - ▶ Purpose of the transaction / application



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



**Joint Financial
Intelligence Unit**



STR Reporting

Find

- 1) Find / Review clients' previous records
- 2) Analysis on clients' background (suspicious?)

Personal	Corporate
Occupation	Business nature / activities
Income / Address	Income and expenses
Age	History
Past transactions	Trade counterparts



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

Evaluate

- 1) Identify risk indicator
- 2) Assess the findings
- 3) Assess the clients / transaction is suspicious or not?
 - ▶ ‘Screen’, ‘Ask’, ‘Find’ – complete the three step?
 - ▶ Review the findings, satisfy the situation?
 - ▶ If confirm / reasonable grounds to believe the suspicious of the clients / transaction

→ **File STR**

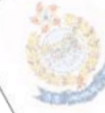


Joint Financial
Intelligence Unit



STR Reporting

- **Title**
- **Precise points**
- **Recommended structure of STR narrative**
 - (1) Triggering Factors
 - (2) Background of Subject(s)
 - (3) Transactions
 - (4) Reporting Entity's Enquiries & Open Source Information
 - (5) Conclusion & Way Forward



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



**Joint Financial
Intelligence Unit**



STR Reporting

Recommended Structure of STR Narrative

(1) Triggering Factors

- Involved crimes (fraud/corruption/sanctions/terrorist acts, etc.)
- Warrants/court orders received
- Open source information (news/list of regulatory agencies, etc.)
- Pattern of suspicious transactions (large transactions/temporary repository of fund, etc.)

(2) Background of Subject(s)

- Personal: Age, occupation, income, transaction history, etc.
- Corporate: Date of establishment, business nature, expected transaction amount, etc.



**Joint Financial
Intelligence Unit**



STR Reporting

Recommended Structure of STR Narrative

(3) Transactions

- Reviewed period
- Fund movement pattern (sudden change?)
- Total amount deposited/withdrawn
- Suspicious transactions (Not limited to transactions of large amount/frequent transactions)
- Pattern of suspicious transactions



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

Recommended Structure of STR Narrative

(4) Reporting Entities' Enquiries & Open Source Information

- Suspicious indicators (KYC queries, world check, etc. → not necessary to report all queries carried out)
- Links of open source information

(5) Conclusion & Way Forward

- Conclusion of the report
- Follow-up actions (Enhanced CDD measure , **End of business relationship**, etc.)



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



**Joint Financial
Intelligence Unit**



STR Reporting

How to submit an STR?

Suspicious transaction reports can be made in one of the following ways:



- by e-reporting system, STREAMS
- by email to jfiu@police.gov.hk



- by fax to : (852) 2529 4013



- by mail, addressed to Joint Financial Intelligence Unit, GPO Box 6555 Hong Kong



- by telephone (852) 2866 3366 (for urgent reports during office hours)

If you want to file STR via STREAMS, you have to complete **the application form** and return to JFIU either by fax (2529 4013) or email (jfiu@police.gov.hk). If you need any further information, please feel free to contact JFIU staff.

Suspicious Transaction
Report And Management
System (STREAMS)



Joint Financial
Intelligence Unit



STR Reporting

STR Summary

Reporting Body

Subject

Organization

Phone

Address

Account

Transaction

Suspected Crimes

Suspicious Indicators

Open Source Info.

Entity Lists

Check

Save

Print

REPORT MADE UNDER SECTION 25A OF THE
DRUG TRAFFICKING (RECOVERY OF PROCEEDS) ORDINANCE OR
ORGANIZED AND SERIOUS CRIMES ORDINANCE/
SECTION 12 OF THE UNITED NATIONS (ANTI-TERRORISM MEASURES) ORDINANCE
TO THE JOINT FINANCIAL INTELLIGENCE UNIT ("JFIU")

STR Summary

STR Number:	
Submission Number:	
Date of Submission:	
Acknowledgement Issue Date:	
Consent Letter Issue Date:	
Consent:	<input checked="" type="checkbox"/> None <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Consent Remark:	

Special Cases with Time Critical Nature:

* Report Related to Existing Investigation:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
---	---

Attachment:

+ Refresh

No.	File Name	File Size
1		KB
	Total	KB



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



© Hong Kong Police Force
For Personal Reference
香港警務處版權所有
只可用作個人參考

STR Reporting

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

Reporting Body	
Organization ID:	<input type="text"/>
Organization Name:	<input type="text"/>
Reporting Officer ID:	<input type="text"/>
Reporting Officer:	<input type="text"/>
Organization Reference:	<input type="text"/>
Phone:	<input type="text"/>
Fax:	<input type="text"/>
Email:	<input type="text"/>

*Reason for Disclosure:

Drug Trafficking (ROP) Ordinance [Cap.405]:	<input type="checkbox"/>
Organized and Serious Crimes Ordinance [Cap. 455]:	<input type="checkbox"/>
United Nations (Anti-Terrorism Measures) Ordinance [Cap. 575]:	<input type="checkbox"/>

Other Information:

This Disclosure Related to a Previous Disclosure:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
---	---

Hong Kong Police Force
Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

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

Subject

Sequence No: 1

+ -

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



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

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

Organization			
Sequence No: 1			
English Name:			
Chinese Name:		Date of Incorporation:	
Local Company: <input type="checkbox"/>	BR No.:	CR No.:	Public Listed Company No.:
Oversea Company: <input type="checkbox"/>	Country:		Reg. No.:
Non-Government Organization:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Charitable Organization:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Nature:		Business Nature:	
Phone:			
Email:			
Address:			
Related Person:		Role:	if Others:
Related Company:		Role:	if Others:
Additional Information:			

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

STR Summary

Reporting Body

Subject

Organization

Phone

Address

Account

Transaction

Suspected Crimes

Suspicious Indicators

Open Source Info.

Entity Lists

Check

Save

Print

Phone Entity

Save +

No.	Linked?	Country Code	Area Code	* Subscriber Number	Extension
1	<input type="checkbox"/>				

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

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

Address Entity

Save +

No.	Linked?	Address Detail
1	<input type="checkbox"/>	



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



**Joint Financial
Intelligence Unit**



STR Reporting

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

Account

Sequence No: 1 + -

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

Hong Kong Police Force
Personal Reference Only
警務處版權所有
只用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

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

Suspected Crimes Suspicious Indicators Open Source Info. Entity Lists

Check Save Print

Summary of Suspicious Transaction in the Reviewed Period

+ - ...

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

* Total Amount of Suspicious Transactions Reported (in HKD)

* Total Period covering the Suspicious Transactions (in days)

* Daily Average of the Suspicious Transactions Reported



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考

STR Reporting

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

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

Designated Categories of Offences by FATF

Clear Checkbox

- | | |
|--|---|
| <input type="checkbox"/> Participation in an Organized Criminal Group and Racketeering | <input type="checkbox"/> Counterfeiting Currency |
| <input type="checkbox"/> Terrorism including Terrorist Financing | <input type="checkbox"/> Counterfeiting and Piracy of Products |
| <input type="checkbox"/> Trafficking in Human Beings and Migrant Smuggling | <input type="checkbox"/> Environmental Crime |
| <input type="checkbox"/> Sexual Exploitation including Sexual Exploitation of Children | <input type="checkbox"/> Murder, Grievous Bodily Injury |
| <input type="checkbox"/> Illicit Trafficking in Narcotic Drugs and Psychotropic Substances | <input type="checkbox"/> Kidnapping, Illegal Restraint and Hostage-Taking |
| <input type="checkbox"/> Illicit Arms Trafficking | <input type="checkbox"/> Robbery or Theft |
| <input type="checkbox"/> Illicit Trafficking in Stolen and Other Goods | <input type="checkbox"/> Smuggling (including in relation to customs and excise duties and taxes) |
| <input type="checkbox"/> Corruption and Bribery | <input type="checkbox"/> Tax Crimes (related to direct taxes and indirect taxes) |
| <input type="checkbox"/> Fraud | <input type="checkbox"/> Extortion |
| <input type="checkbox"/> Email Scam | <input type="checkbox"/> Forgery |
| <input type="checkbox"/> Investment Scam | <input type="checkbox"/> Piracy |
| <input type="checkbox"/> Romance Scam | <input type="checkbox"/> Insider Trading and Market Manipulation |
| <input type="checkbox"/> Telephone Deception | |
| <input type="checkbox"/> Others (Please specify) | |
-
- | | |
|---|---|
| <input type="checkbox"/> Money Laundering | <input type="checkbox"/> No Crime Related |
| <input type="checkbox"/> Self Laundering | <input type="checkbox"/> Other (Please specify in 'Additional Information') |
| <input type="checkbox"/> Third-Party Laundering | |

Additional Information:



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

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

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

Fund Movement Pattern

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

Accounts

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

Customer Background/Behavior

Clear Checkbox

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

Others

Clear Checkbox

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

Narrative comment about the questioned transactions:



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

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

Open Source Information

Website:

Additional Information:



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

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

Entity Lists

Subject List

No.	Linked	English Name	Chinese Name	HKID	Other ID No.	Country	Occupation	
1	<input type="checkbox"/>							+ - ...

Organization List

No.	Linked	Company Name	Registration Type	Person Name	Person Role	Company Name	Company Role	
1	<input type="checkbox"/>							+ - ...

Phone List

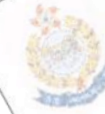
No.	Country Code	Area Code	* Subscriber Number	Extension	
1					+ - ...

Account List

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

Address List

No.	Address Detail	
1		+ - ...



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



STR Reporting

- Acknowledgement of receipt
- Consent/ No Consent/ N/A



- ◆ **About JFIU**
- ◆ **Key Legislation**
- ◆ **STR Statistics**
- ◆ **STR Reporting**
- ◆ **Case Studies**



**Joint Financial
Intelligence Unit**



Case Study 1 – Insider Dealings



Mr. X

The purchase of Company Y's stocks exceeded 50% of the daily turnover



Made large profits by selling the stocks of Company Y two weeks later

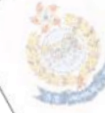


Country Z Stock Exchange

Consolidation plan was announced on the same day after the market closed. The stock price increases 70% within two weeks



Company Y



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



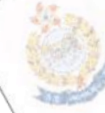
Joint Financial
Intelligence Unit



Case Study 1 – Insider Dealings

Suspicious Activity Indicator

- Unusual large-volume trading
- The purchasing behavior does not match with the client's investment portfolio – Mr. X never trade stocks listed in Country Z's stock exchange
- The trading took place around the same time when market-sensitive information was announced



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit



Case Study 2 – Market Manipulations



Mr. A

Purchasing of Company B's stocks
continuously for half month

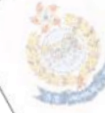


Stock Market

After investigation, it was found that Mr. A
was an employee of Company B



Company B



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



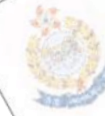
Joint Financial
Intelligence Unit



Case Study 2 – Market Manipulations

Suspicious Activity Indicator

- Purchase price is higher than normal
- Transactions usually made few minutes before closing of market
- Transactions exceeded 50% of daily turnover and raised the stock price



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



© Hong Kong Police Force
For Personal Reference Only
香港警務處版權所有
只可用作個人參考



Joint Financial
Intelligence Unit





Police Force
Reference Only
版權所有
只可參考

Thank You!

Website: www.jfiu.gov.hk

Telephone: (852) 2866 3366

Email: jfiu@police.gov.hk



**Joint Financial
Intelligence Unit**

