



Financial Intelligence and Investigation Bureau
Hong Kong Police Force

Securities And Futures Commission

AML/CTF

Webinar 2025

Suspicious Transaction Reports,
Introduction of STREAMS 2,
Common Typologies and
Case Sharing

Presented by:

Ms. Julia LEUNG

(Senior Inspector of Police)



www.jfiu.gov.hk



jfiu@police.gov.hk

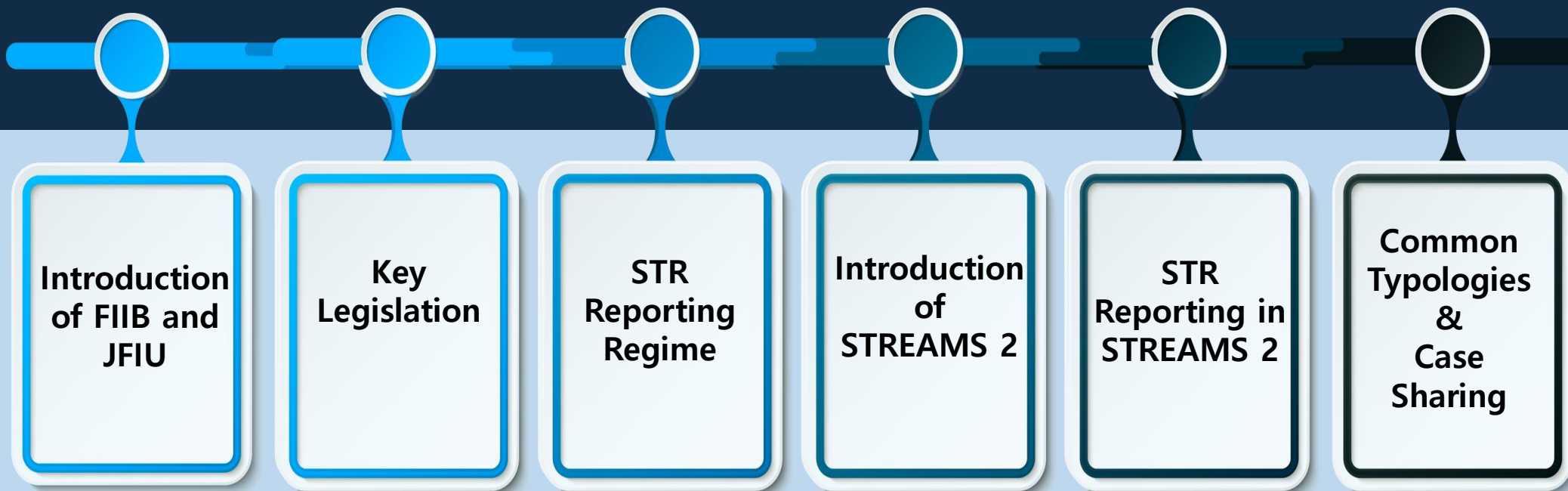
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Agenda of FIIB's Sharing



01. About FIIB & JFIU



1989

Expansion of FID and JFIU



2021

Features of JFIU

✓ Co-staffed

Co-staffed by HKPF and
C&ED and based in Police
Headquarters

✓ Sole Agency in HK

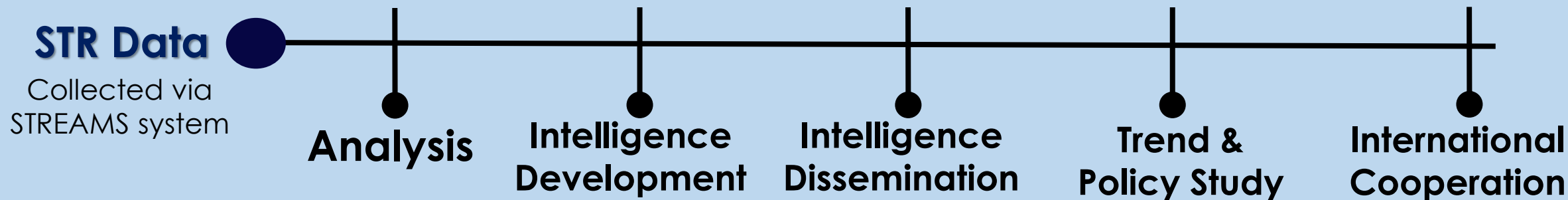
Managing Suspicious Transaction
Reporting Regime

✓ Partnership

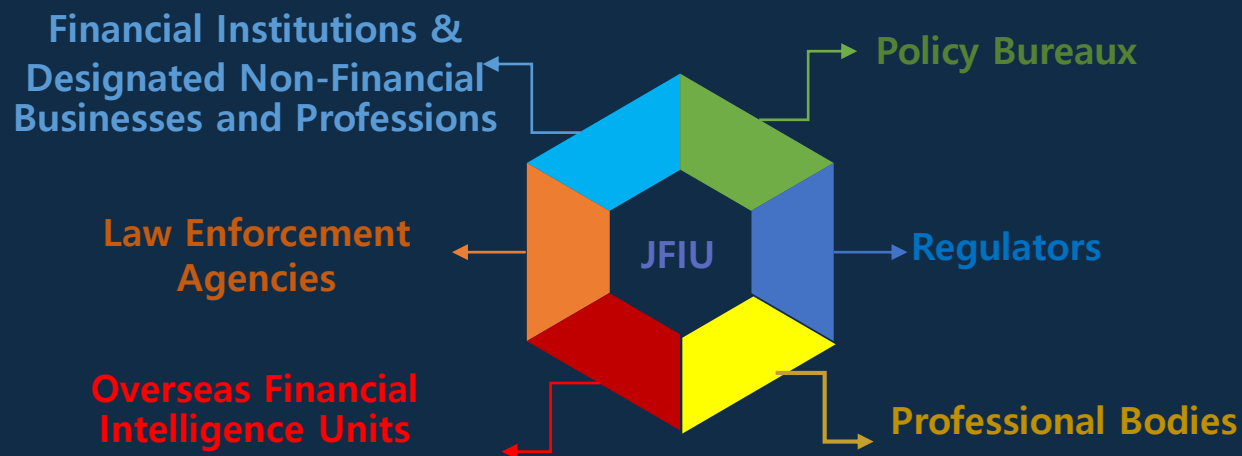
Financial Intelligence
Exchange with LEAs and
FIUs worldwide

01. About FIIB & JFIU

Functions of the JFIU



Public-Private Partnership



02. Key Legislation



Cap. 405

Drug Trafficking (Recovery of Proceeds) Ordinance
販毒(追討得益)條例

Cap. 455

Organized and Serious Crimes Ordinance
有組織及嚴重罪行條例

Cap. 575

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

Cap. 615

AML & CFT Ordinance and Amendment
打擊洗錢及恐怖分子資金籌集
(金融機構)條例及其修訂



02. Key Legislation

Anti-Money Laundering (AML)

(s.25 of Cap. 405 - DTROP and s.25 of Cap. 455 - OSCO)

Any person

- **Knowing or having reasonable grounds to believe**
- **Any property**
- **In whole or in part directly or indirectly represents proceeds of drug trafficking / indicatable offence**
- **Deals with that property**

任何人

- 知道或有合理理由相信，
- 任何財產
- 全部或部分、直接或間接代表任何人的販毒/從可公訴罪行得益
- 而仍處理該財產
- 即屬犯罪

MAXIMUM PENALTY

**FINE OF HKD 5 MILLIONS &
14 YEARS' IMPRISONMENT**



02. Key Legislation

Counter Financing of Terrorism (CFT)

(s.7 of Cap. 575 - UNATMO)

Any person

- **Provide** or **collect** by any means directly or indirectly
- Any property
- **(1)** With the intention that the property be used or **(2)** knowing that the property will be used
- In whole or in part to commit one or more terrorist acts

任何人

- 不得在下述情況以任何方法直接或間接提供或籌集財產：
- (1) 懷有將該財產的全部或部分用於作出一項或多於一項恐怖主義行為的意圖(不論該財產實際上有否被如此使用)；或
- (2) 知道該財產的全部或部分將會用於作出一項/多於一項恐怖主義行為(不論該財產實際上有否被如此使用)

MAXIMUM PENALTY

FINE & **14 YEARS'** IMPRISONMENT



02. Key Legislation

Suspicious Transactions Reporting

(s.25A(1) of Cap. 405 - DTROP; s.25A(1) of Cap. 455 - OSCO; and s12(1) of Cap. 575 - UNATMO)

Any person

- **Knows or suspects any property**
- **(1) represents / was used / is intended to be used in connection with the proceeds of drug trafficking / indictable offences or**
- **(2) is terrorist property**
- **Should disclose that knowledge or suspicion to an authorized officer (i.e. JFIU)**

任何人

- 知道或懷疑任何財產
- (1) 全部或部分、直接或間接代表任何人的販毒/從可公訴罪行得益曾在與販毒/可公訴罪行有關的情況下使用；或擬在與販毒/可公訴罪行有關的情況下使用；或
- (2) 是恐怖分子財產；
- 該人須在合理範圍內盡快把該知悉或懷疑，連同上述知悉或懷疑所根據的任何事宜，向獲授權人披露 (i.e. JFIU)

MAXIMUM PENALTY

**FINE OF HKD 50,000 &
3 MONTHS' IMPRISONMENT**



02. Key Legislation

TIPPING OFF

(s.25A(5) of Cap. 405 - DTROP; s.25A(5) of Cap. 455 - OSCO; and s12(5) of Cap. 575 - UNATMO)

Where a person

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

任何人如知道或懷疑已有任何披露根據第(1)或(4)款作出，而仍向其他人披露任何相當可能損害或者會為跟進首述披露而進行的調查的事宜，

即屬犯罪。

MAXIMUM PENALTY

FINE OF HKD **500,000** &
3 YEARS' IMPRISONMENT



03. STR Reporting Regime

STR Mechanism - Public-Private Partnership

Financial
Intelligence
Units

Reporting
Entities

Law
Enforcement
Agencies

Reporting Entities

- e.g. Securities firms and VATPs
- CDD, KYC
 - Record Keeping
 - STR Filing

Information

LEA

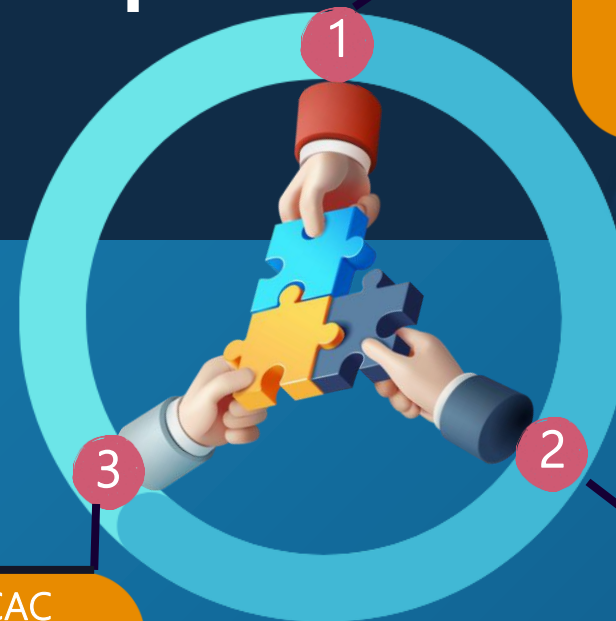
- e.g. HKPF, C&ED and ICAC
- Financial Investigation
 - Asset Tracing
 - Restraint
 - Confiscation

Evidence

JFIU

- Maintaining STR Regime
- Intelligence Exchange
- International Cooperation
- Training and Outreach

Intelligence



03. STR Reporting Regime

Why should you report STRs?

1



Legal obligations for
all citizens in Hong
Kong

2



No reporting
threshold

3



Source of report and
reported details will
be kept confidential

4



Legal protection to
civil and criminal
liability



What's more?



Guideline on Anti-Money Laundering and Counter-Financing of Terrorism (For Licensed Corporations and SFC-licensed Virtual Asset Service Providers)

June 2023



打擊洗錢及恐怖分子資金籌集指引（適用於持牌法團及獲證監會發牌的虛擬資產服務提供者）

2023年6月

Prevention of Money Laundering and Terrorist Financing Guideline issued by the Securities and Futures Commission for Associated Entities of Licensed Corporations and SFC-licensed Virtual Asset Service Providers

June 2023

證券及期貨事務監察委員會發出適用於持牌法團及獲證監會發牌的虛擬資產服務提供者的有聯繫實體的防止洗錢及恐怖分子資金籌集的指引

2023年6月

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<https://www.sfc.hk/en/Rules-and-standards/Codes-and-guidelines>



What's more?

Money laundering reporting officer		
	7.9	<p>An FI should appoint an MLRO as a central reference point for reporting suspicious transactions and also as the main point of contact with the JFIU and law enforcement agencies. The MLRO should play an active role in the identification and reporting of suspicious transactions. Principal functions of the MLRO should include having oversight of:</p> <p>(a) review of internal disclosures and exception reports and, in light of all available relevant</p>

Internal reporting		
	7.13	<p>An FI should establish and maintain clear policies and procedures to ensure that:</p> <p>(a) all staff are made aware of the identity of the MLRO and of the procedures to follow when making an internal report; and</p> <p>(b) all internal reports must reach the MLRO without undue delay.</p>

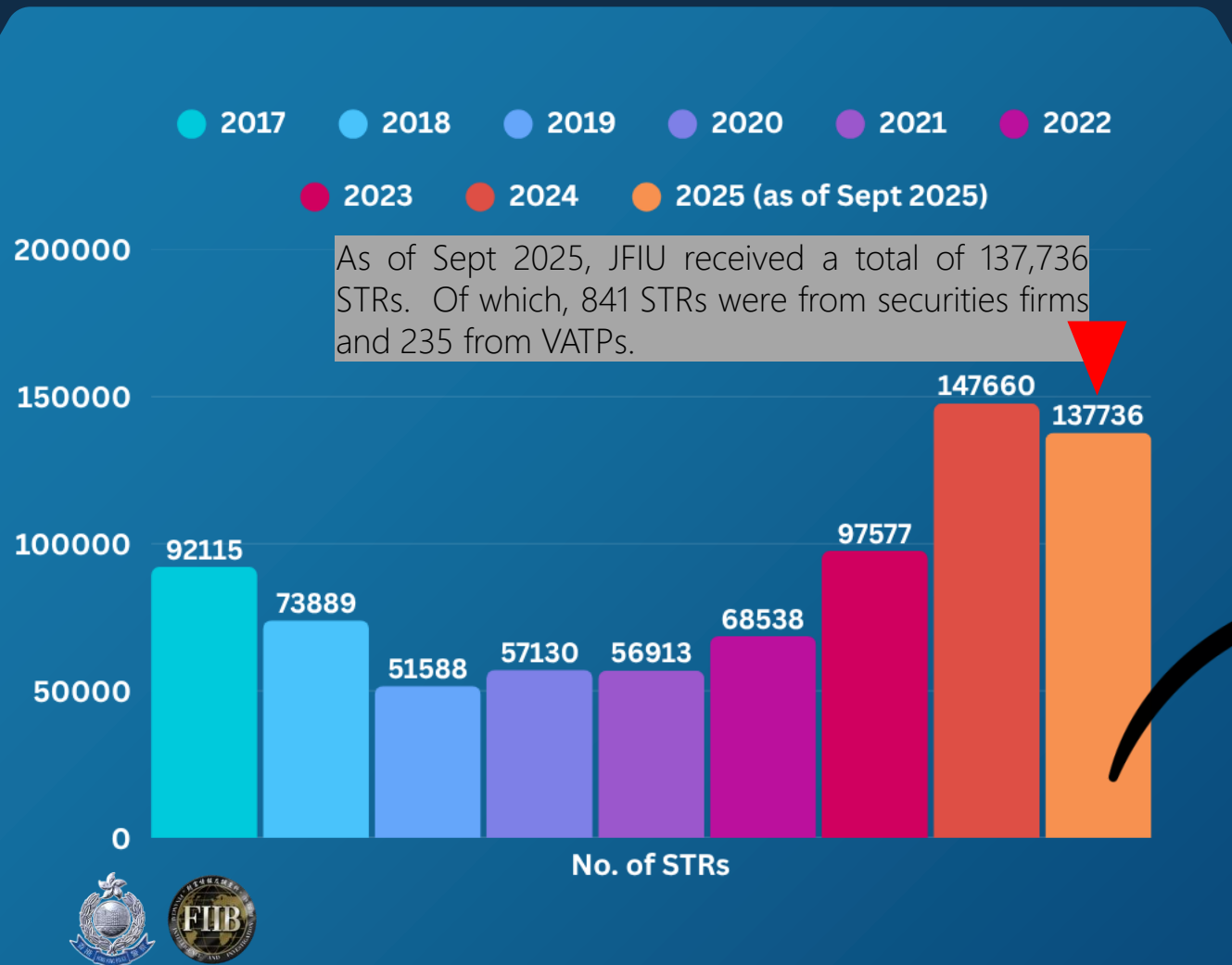
Reporting to the JFIU		
	7.20	<p>If after completing the review of the internal report, the MLRO decides that there are grounds for knowledge or suspicion, he should disclose the information to the JFIU as soon as it is reasonable to do so after his evaluation is complete together with the information on which that knowledge or suspicion is based.</p> <p>Dependent on when knowledge or suspicion arises, an STR may be made either before a suspicious transaction or activity occurs (whether the intended transaction ultimately takes place or not), or after a transaction or activity has been completed.</p>



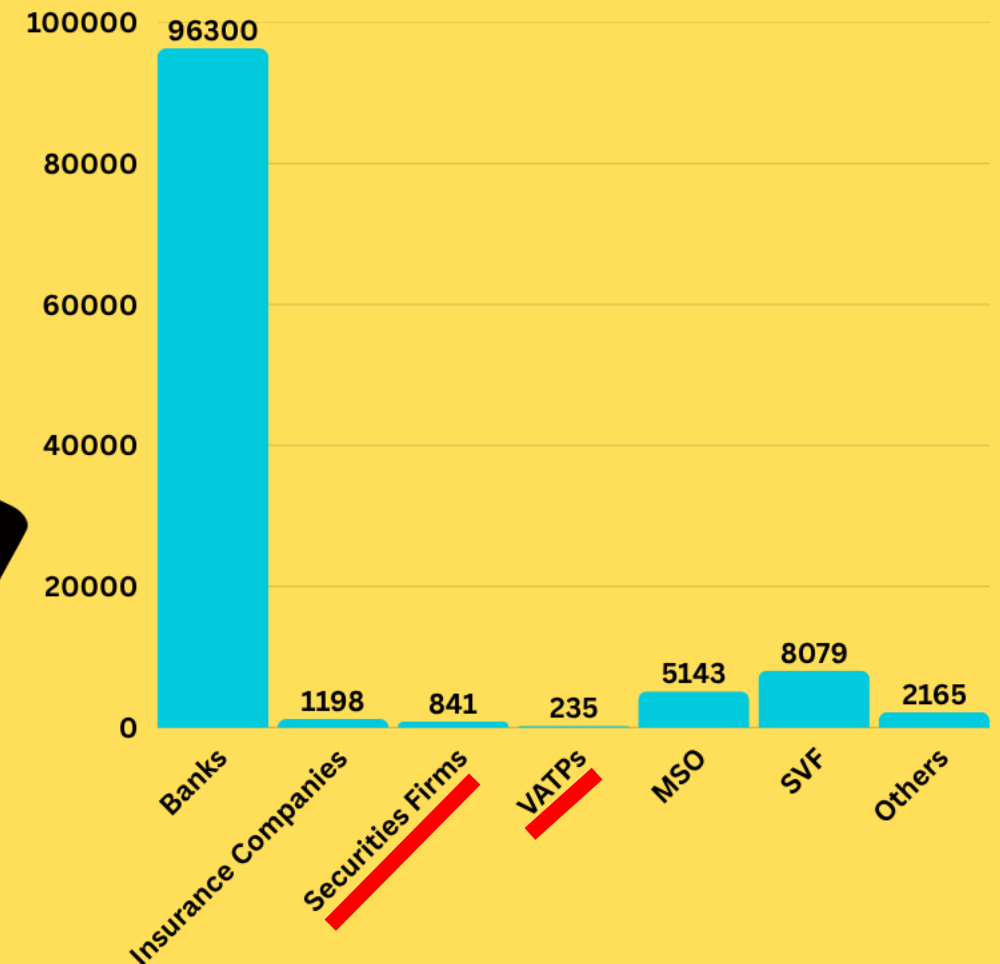


STR Statistics

- from 2017 to September 2025

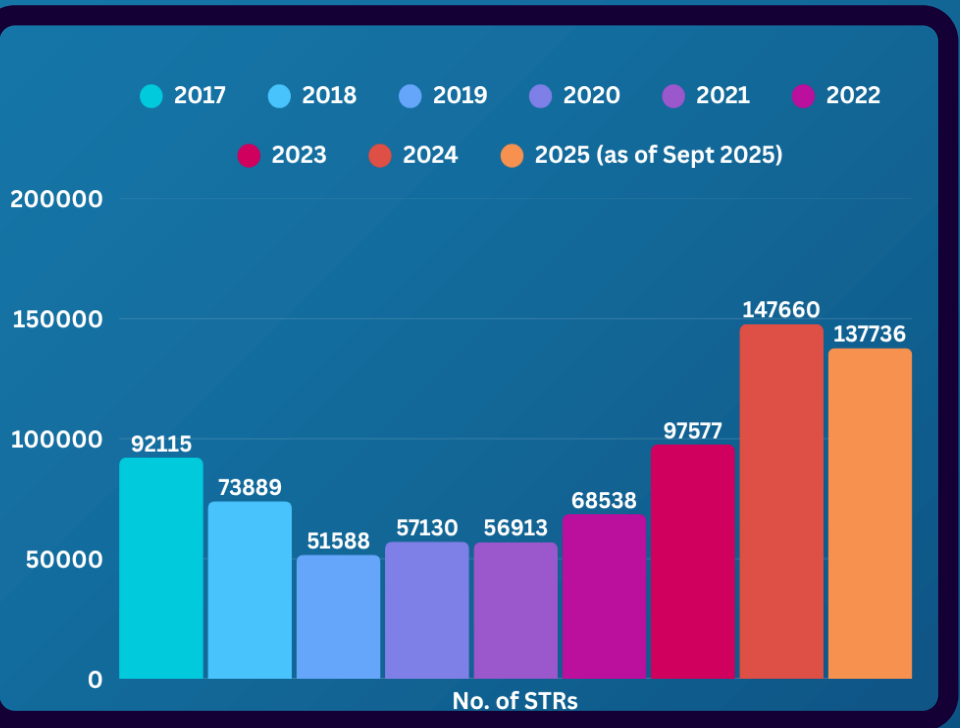


Breakdown of STR filed by different sectors as of Sept 2025

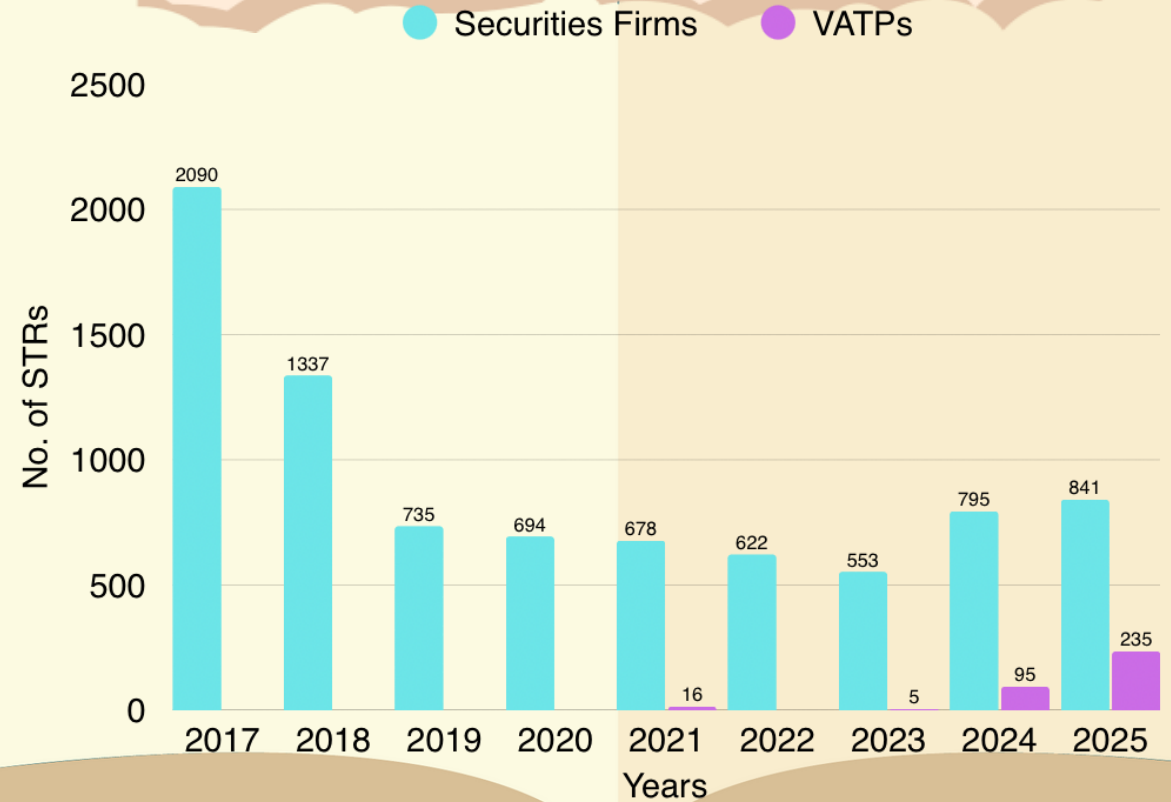




STR Statistics - from 2017 to Sept 2025



STRs filed by Securities Firms & VATPs between 2017 - Sept 2025



Current STR Reporting Methods

- by email and e-submission (STREAMS)

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 an STR via STREAMS to the JFIU either by fax (2529 4013) or by email, please feel free to contact the JFIU for more information, please feel free to contact the JFIU for more information.

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

Special Cases with Time Critical Nature:

* Report Related to Existing Investigation: ☐ Yes ☒ No

Attachment:

+ Refresh

No.	File Name	File Size
		KB
Total		KB



04. INTRODUCTION OF **STREAMS 2**



Enhanced Data Collection in **STREAMS 2**



Comprehensive scope of information collected



Facilitate big data analytics to identify network / trends effectively



Social Media

Capture relevant social media identifiers and activity



Digital Footprints

Collect IP, SSID, BSSID, Geohash Data, etc.



Address Format

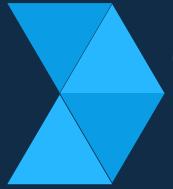
Standardised address input



Crypto-transactions

Dedicated fields for crypto-transactions





Benefits of E-submission

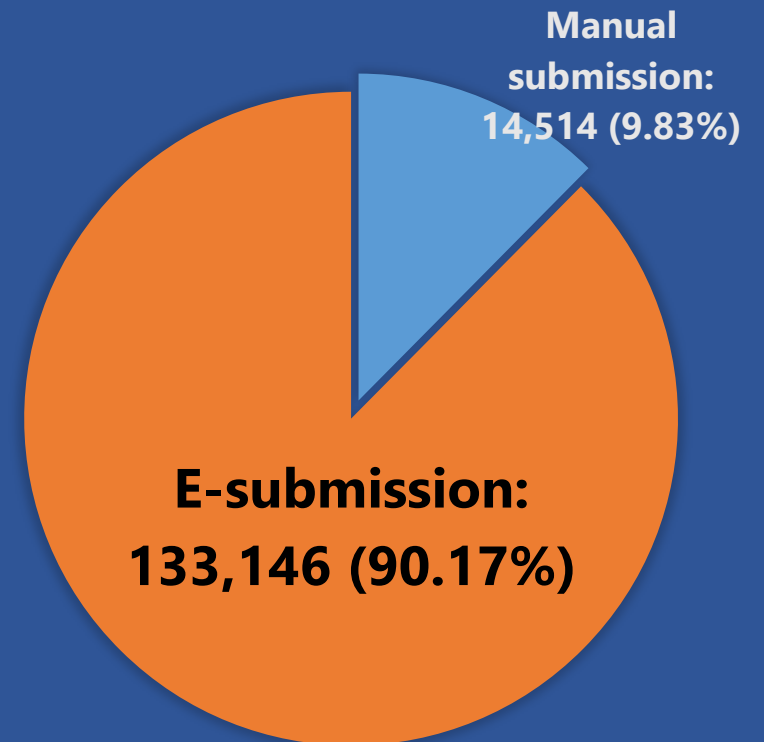
Free and secure system

Negate the need of paper-based reporting

Receive consent decision via STREAMS

Instant Acknowledgement

Total submission of STRs in 2024:
147,660



Mode of STR Submission in **STREAMS 2**



**All regulated entities
will be required to
submit STRs by
electronic means!**

**PDF
Form**

**Structured PDF for offline
completion and secure
upload**

**Web
Form**

**User-friendly online
forms with built-in
validation**

XML

**Direct
system-to-system
reporting**





STR Form Enhancement in **STREAMS 2**

Comprehensive Data Fields

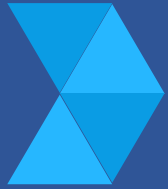
Mandatory Fields

- Core information required for all sectors
- The fields will be remarked by a (*)

Optional Fields (Sector Specific)

- Additional data points tailored to specific industry needs and transaction types





STR Form Enhancement in STREAMS 2

Optional Fields (Sector Specific)

- Additional data points tailored to specific industry needs and transaction types

Example:

Securities Information

Add

Securities Transaction Create

Settle Date *
yyyy-mm-dd

Transaction Description (if others)

Currency *

Amount *

Remarks (if any)

Person *
Instrument (e.g. Stock number)

Avg. Price *

Equivalent Value in HKD *
\$

Transaction Description *
Instrument Name (e.g. Stock name) *

Quantity *

===Subject===
===Organization===
===Account===

The dropdown list displays the entered record, select a related Subject, Organisation, or Account.

Transaction Description *

Buy
Sell
Others

Cancel

Confirm



05. STR Reporting In STREAMS 2



How to identify suspicion?

SAFE approach

SCREEN

- Screen the account for suspicious indicators
- Adverse news, sensitive connections, method of payment etc



ASK

- Check and enquiry
- Clarify any suspicion, such as financial background, source of fund, purpose of transactions etc



FIND

- Find and review clients' previous records
- Analysis on clients' backgrounds



EVALUATE

- Evaluate the available information to determine if the transaction is suspicious
- If affirmative, file STRs



05. STR Reporting

Red Flag Indicators (Securities Firms)

Clients

- Received LEA enquiries/ stop payment
- Politically Exposed Person (PEP)?
- Person / Corporate from high-risk country?
- No known nexus in HK / Adverse news
- Suspected forged document during applications?
- Virtual on-boarding – video injection, replay attacks or presentation attacks to bypass facial recognition systems

Transactions

- Funds from 3rd part(ies) / by cash / cashier order?
- Transactions incommensurate with client's background?
- Drastic change of transaction behaviour and frequent transactions within a short period of time
- Consolidate funds from multiple persons before sending onward to brokerage house
- Transfer funds out of account rapidly without executing any trading activity



05. STR Reporting

Red Flag Indicators (VATPs)

Wallet Holders

- LEA's enquiry / stop payment request
- PEP
- Person or Corporate from high-risk country
- Has no known nexus in Hong Kong / has adverse news
- Suspected using forged document

Transactions

- Wallet used as temporary repository of funds
- Transactions incommensurate with client's background
- Transactions with unrelated parties / high-risk jurisdiction / sanction entity



05. STR Reporting

Red Flag Indicators (Securities Firms & VATPs)

Digital Footprints

- Indexed device IDs or IP addresses commonly appeared and became abusive in several wallets
- Multiple wallets shared common device IDs / IP addresses
- Sudden change of device and geolocation
- Wallet holder claimed to be residing in foreign country but with IP address in HK



05. STR Reporting

Red Flag Indicators (Securities Firms & VATPs)

Further Enquiry

- Background check / open source research unveil adverse news / records
- Unwilling to respond to questions or answers are not convincing
- Unwilling to provide supporting documents

Evaluation

- Information from client is incommensurate with the record in hand
- Information from client could not be verified





05. STR Reporting in **STREAMS 2** - STR Filing Format

Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

Suspicious Indicator

Organisation Name
Org Name

Reporting Officer Name

Your Reference

Phone

Fax

Email *
test@gmail.com

Industry Category *
Financial - Securities Company

Disclosure-related Laws

☐ Drug Trafficking (Recovery of Proceeds) Ordinance [Cap.405]

☒ Organized and Serious Crimes Ordinance [Cap.455]

☐ United Nations (Anti-Terrorism Measures) Ordinance [Cap.575]

☐ Hong Kong National Security Law

Other Information:

Report related to previous / other disclosure

☐ Yes ☒ No



05. STR Reporting in STREAMS 2

- STR Filing Format

Reporting Party Subject Organisation Account Transaction Suspect

Organisation Name Reporting Officer Name Your Reference

Org Name

Industry Category *
Financial - Securities Company

Disclosure-related Laws

☐ Drug Trafficking (Recovery of Proceeds) Ordinance [Cap.405]

☒ Organized and Serious Crimes Ordinance [Cap.455]

☐ United Nations (Anti-Terrorism Measures) Ordinance [Cap.575]

☐ Hong Kong National Security Law

Other Information:

Report related to previous / other disclosure ☐ Yes ☒ No

Industry Category *

Financial - Securities Company

DNFBP - Accounting Firm

DNFBP - Casino

DNFBP - Dealer in Precious Metals / Stones

DNFBP - Lawyer

DNFBP - Real Estate Agent

DNFBP - Trust & Company Services Provider

Financial - Bank

Financial - Financial Company

Financial - Insurance Company

Financial - Investment Company

Financial - Licensed Money Lender

Financial - MSO / RAMC

Financial - Securities Company

Financial - Stored Value Facility Licensee





05. STR Reporting in STREAMS 2

- STR Filing Format

Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

Suspicious Indicator

Organisation Name
Org Name

Reporting Officer Name
Testing Company

Your Reference

Phone

Fax

Email *
test@gmail.com

Industry Category *

Financial - Virtual Asset Trading Platform

X

Disclosure-related Laws

☐ Drug Trafficking (Recovery of Proceeds) Ordinance [Cap.405]

☐ Organized and Serious Crimes Ordinance [Cap.455]

☐ United Nations (Anti-Terrorism Measures) Ordinance [Cap.575]

☐ Hong Kong National Security Law

Other Information:

Report related to previous / other disclosure

☐ Yes

☒ No





05. STR Reporting in STREAMS 2

- STR Filing Format

Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

Suspicious Indicator

Organisation Name
Org Name

Reporting Officer Name

Your Reference

Phone

Fax

Email *
test@gmail.com

Industry Category *
Financial - Securities Company

Disclosure-related Laws

☐ Drug Trafficking (Recovery of Proceeds) Ordinance [Cap.405]

☒ Organized and Serious Crimes Ordinance [Cap.455]

☐ United Nations (Anti-Terrorism Measures) Ordinance [Cap.575]

☐ Hong Kong National Security Law

Other Information:

Report related to previous / other disclosure

☐ Yes ☒ No





05. STR Reporting in STREAMS 2

- STR Filing Format

STR triggered by LEA enquiry / intelligence

STR triggered by internal monitoring system

Disclosure-related Laws

- ☒ Drug Trafficking (Recovery of Proceeds) Ordinance [Cap.405]
- ☐ Organized and Serious Crimes Ordinance [Cap.455]
- ☐ United Nations (Anti-Terrorism Measures) Ordinance [Cap.575]
- ☐ Hong Kong National Security Law

Other Information:

Report related to previous / other disclosure

☐ Yes ☒ No

Other Information:

Report related to previous / other disclosure

☒ Yes ☐ No

Your Previous Reference

+ -

Previous STR No.

[E.g. STR 20250001]

+ -

ADCC Ref. No.

[E.g. ESPS 24/2025]
stop payment

+ -

Police Report No.

[E.g. MK RN 25000001]

+ -

Investigation Unit

[E.g. DIT 1 MKDIST]

+ -

Search Warrant (Writ No.)

+ -

FINEST ISR No.

+ -

Other LEA Reference No.

[E.g. SFC 500/EN/0001]

+ -

☐ C&ED

☐ ImmD

☐ Others

IRD Reference No.

+ -

SFC Reference No.

+ -





05. STR Reporting in **STREAMS 2**

- STR Filing Format

Person Create

Family Name * Given Name *

Chinese Name CCC

Gender * Occupation

☐ M ☐ F ☐ U

Role * Nationality (Country / Region)

Identification Information [Add](#)

Other ID Type If Others Other

Phone [Add](#) [Link Existing Phone](#)

Country Code Area Code

Email [Add](#) [Link Existing Email](#)

Email

Address [Add](#) [Link Existing Address](#)

Address Preview

Social Media [Add](#) [Link Existing Social Media](#)

Platform	Account ID	Account Display Name	Group Name	Profile URL	Registered Social Media
----------	------------	----------------------	------------	-------------	-------------------------

New Social Media Section!

< **Reporting Party** **Subject** Organisation Account Transaction Suspected Crimes Suspicious Indicator

- Identification no., age, nationality, residential address, occupation, reported salary, source of wealth, etc.
- **Specify the roles** of the reported entities (suspect, victim, transaction counterparty, etc.)

Role *

Associate

Participant

Suspect

Transaction Counterpart

Victim





05. STR Reporting in **STREAMS 2** - STR Filing Format

Reporting Party Subject **Organisation** Account Transaction Suspected

Organisation Create

Organisation Name (English) * Organisation Name (Chinese) * Date of Incorporation
yyyy-mm-dd

Role * Business Nature *

Registration:

☐ Local Company Registration No. _____

Local Company with Business Registration Certificate

Local Company with Certificate of Incorporation

Local Public Listed Company

☐ Mainland / Overseas Company

Registration Country / Region _____

Reference Information:

☐ Non-government Organisation

☐ Charitable Organisation

Phone Add Link Existing Phone

Country Code Area Code Phone Number

No Data

Email Add Link Existing Email

Email Action

No Data

Address Add Link Existing Address

Business Nature *

- Accommodation and Food Service Activities
- Administrative and Support Service Activities
- Agriculture, Forestry and Fishing
- Arts, Entertainment and Recreation
- Construction
- DNFBP Activities - Accountancy
- DNFBP Activities - Dealer in Precious Metals / Stones
- DNFBP Activities - Estate Agency Firm
- DNFBP Activities - Gaming
- DNFBP Activities - Law Firm
- DNFBP Activities - Trust & Company Services Provider

- Unique identification no., date/place of incorporation, business nature
- Details of connected parties (e.g. directors, shareholders and beneficial owners)



05. STR Reporting in STREAMS 2

- STR Filing Format



Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

Suspicious Indicator

+ Add

Account Create

Crypto-transaction-related

☐ Yes ☒ No

OTC-Related

☐ Yes ☒ No

Name of Institution

If Others

Account No. (no bank code required) *

Type *

If Others

Customer ID

Opening Date

yyyy-mm-dd

Closing Date

yyyy-mm-dd

Account Balance

Add

Total Number of Records: 0

Currency	Balance	Date of The Account Balance	Equivalent Value in HKD	Action
No Data				

Digital Footprint

New

Link Existing Digital Footprint

Total Number of Records: 0

Event Type	Device Name	Device Model	Device OS	IP Address	Period From	Period To	SSID	BSSID	Geohash	Latitude	Longitude	Action
No Data												

Related Company

Link Existing Company

Total Number of Records: 0

Company Name (English)	Company Name (Chinese)	BR No.	CR No.	Role	Relationship
No Data					

Related Person

Link Existing Person

Total Number of Records: 0

Family Name	Given Name	Middle Name	Chinese Name	Date of Birth	Gender	HKID	Other ID Type	if Others	Other ID No.	Issuing Country / Place	Role	Relationship
No Data												



05. STR Reporting in STREAMS 2

- STR Filing Format



Reporting Party Subject Organisation **Account** Transaction Suspected Crimes Suspicious Indicator

+ Add

Account Create

Crypto-transaction-related OTC-Related

☐ Yes ☒ No ☐ Yes ☒ No

*** Mandatory Fields**

Name of Institution **selected "Others"** If Others * XXX Firm

Type * If Others

Opening Date yyyy-mm-dd Closing Date yyyy-mm-dd

Account No. (no bank code required) *

Customer ID

- Current Account
- Fixed Deposit Account
- FX Short Selling Account
- Investment Fund Account
- Loan Account
- Margin Account
- Mortgage Account
- Multi-Currency Savings Account
- Policy Account
- Precious Metals Trading Account
- Safe Deposit Box Account
- Savings Account
- Securities Account**
- Stored Value Facility Account
- Trade Finance Account
- Trust Account
- Others



05. STR Reporting in **STREAMS 2** - STR Filing Format

< Reporting Party Subject Organisation **Account** Transaction Suspected Crimes Suspicious Indicator

+ Add

Account Create

Crypto-transaction-relate

☐ Other

Name of Institution

Type *

Securities Account

Opening Date

yyyy-mm-dd

Account Balance

Add

Currency

Balance

Account Balance Create

Currency *

Balance *

+ / -

Date of The Account Balance

yyyy-mm-dd

Equivalent Value in HKD *

+ / - \$

Cancel

Confirm

* Mandatory Fields

Click “-” to show negative balance





05. STR Reporting in **STREAMS 2** - STR Filing Format

< Reporting Party Subject Organisation **Account** Transaction Suspected Crimes Suspicious Indicator

+ Add

Digital Footprint New Link Existing Digital Footprint

Event Type Device Name Device Model

Digital Footprint

Digital Footprint Create

Event Type	Device Name	Device Model	Device OS
Device ID	IP Address	Period From yyyy-mm-dd	Period To yyyy-mm-dd
SSID	BSSID	Geohash	Latitude
Longitude			





05. STR Reporting in STREAMS 2

- STR Filing Format



Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

Suspicious Indicator

+ Add

Account Create

Crypto-transaction-related

OTC-Related

Yes

No

Yes

No

Cancel

Confirm

Wallet Details

Transaction Platform *

Platform User ID *

Wallet Address *

Opening Date
yyyy-mm-dd

Wallet Balance Create

Token Type *

If Others

Token Amount *

Equivalent Value in HKD *

Cancel

Confirm

Wallet Balance

Add

Token Type

Total Number of Records: 0

Digital Footprint

New

Link Existing

Event Type

Device Name

IP Address

Period From

Period To

SSID

BSSID

Geohash

Latitude

Longitude

Action

No Data

Total Number of Records:0

Related Company

Link Existing Company

Company Name (English)

Company Name (Chinese)

BR No.

CR No.

Role

Relationship

No Data

Total Number of Records: 0

Related Person

Link Existing Person

Family Name

Given Name

Middle Name

Chinese Name

Date of Birth

Gender

HKID

Other ID Type

if Others

Other ID No.

Issuing Country / Place

Role

Relationship

No Data

Total Number of Records: 0



05. STR Reporting in **STREAMS 2** - STR Filing Format



Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

☐ The transaction is related to Virtual Assets

Transaction Information

Add

No.	Start Date	Start Time	End Date	End Time	Account	Type	Currency	Amount	Equivalent Value in HKD	Name of Counterparty
No Data										

Securities Information

Add

Display only for securities firms

No.	Settle Date	Person	Transaction Description	Stock number	Stock name	Currency	Avg. Price	Quantity	Amount
No Data									

Any suspicious transactions?



05. STR Reporting in STREAMS 2

- STR Filing Format



Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

Any suspicious transactions?

Securities Information

Add

Securities Transaction Create

Settle Date *
yyyy-mm-dd

Transaction Description (if others)

Currency *

Amount *

Remarks (if any)

Person *
Calendar icon

Instrument (e.g. Stock number)

Avg. Price *

Equivalent Value in HKD *
\$

Transaction Description *
Dropdown menu

Instrument Name (e.g. Stock name) *

Quantity *

Transaction Description *
Buy
Sell
Others

Cancel

Confirm

===Subject===

===Organization===

===Account===

The dropdown list displays the entered record, select a related Subject, Organisation, or Account.



05. STR Reporting in **STREAMS 2** - STR Filing Format



<

Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

☒ The transaction is related to Virtual Assets

Transaction Information

Add

No.	Start Date	Start Time	End Date	End Time	Account	Type	Currency	Amount	Equivalent Value in HKD	Name of Counterpart
No Data										

↓

Display for VA transactions

Virtual Asset Transaction Information

Add

No.	Date	Time	Subject	Token Type	Token Amount	Equivalent Value in HKD	Subject's Address	Platform UID	Counterpart Address
-----	------	------	---------	------------	--------------	-------------------------	-------------------	--------------	---------------------

Any suspicious transactions?



05. STR Reporting in STREAMS 2

- STR Filing Format



Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

Suspicious Indicator

Virtual Asset Transaction Information

Add

No.	Virtual Asset Transaction Information Create		
	Date * yyyy-mm-dd	Time * hh:mm:ss	Subject *
	Token Type *	Token Type	Token Amount * + / -
	Equivalent Value in HKD * \$	Subject's	Platform UID
	Counterpart Address	Counterpart UID	Platform of Counterpart Address
	Platform of Counterpart Account	Transaction Hash	Platform Order ID
	Remarks (if any)		



05. STR Reporting in **STREAMS 2** - STR Filing Format

Reporting Party Subject Organisation Account **Transaction** Suspected Crimes

☐ The transaction is related to Virtual Assets

Transaction Information **Add**

No.	Start Date	Start Time

Transaction Information Create

Start Date * Start Time End Date

End Time Account *

Currency * Amount * Equivalent Value in HKD *

Name of Counterpart Bank Counterpart A/C No. (no bank code required) Name of Counterpart

Remarks (if any)

Type *

- ATM Cash Deposit
- ATM Cash Withdrawal
- ATM Cheque Deposit
- ATM Transfer Deposit
- ATM Transfer Withdrawal
- Autopay
- Bank Charge
- Bank Draft Deposit
- Cash Deposit
- Cash Withdrawal
- Cashier Order Deposit

Any transaction made by 3rd parties?

- Source of fund
- From supporting documents



05. STR Reporting in STREAMS 2

- STR Filing Format

<

Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

Suspicious Indicator

Suspected Crimes Please put a "✓" in the appropriate box(es)
At least one item must be selected in Suspected Crime

National Security

☐ Offence(s) Endangering National Security

Fraud

☐ Email Scam

☐ Investment Scam

☐ Romance Scam

☐ Telephone Deception

☐ Others (Please Specify) _____

Other Crimes

☐ Bookmaking

☐ Crime under Gambling Ordinance

☐ Corruption and Bribery

☐ Counterfeiting Currency

Illicit Trade Activities

☐ Counterfeiting and Piracy of Products

☐ Dealing in Precious Metals and Stones without a license

☐ Endangered Species Smuggling

☐ Illicit Cigarettes

☐ Smuggling (including those related to customs and excise duties and taxes)

☐ Trade Based Money Laundering

☐ Unlicensed Money Service Operator (UMSO)

☐ Kidnapping, Illegal Restraint and Hostage-Taking

☐ Money Laundering

☐ Murder, Grievous Bodily Injury

☐ Participation in an Organized Criminal Group and Racketeering





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05. STR Reporting in **STREAMS 2**

- STR Filing Format

Narrative Comment about the Suspicious Transactions

1. Triggering Factors

- ☐ Commission / Types / Association of Offence
- ☐ Evidence of Suspicious Transaction Patterns
- ☐ Intelligence Received from LEAs
- ☐ Material from Publicly Available Information (e.g. adverse news, SFC alerts)
- ☐ Receipt of Search Warrant / Court Order
- ☐ Upstream Scam Intervention

2. Background of Person / Organisation

3. Details of Investigation / Transaction Analysis

4. Conclusions / Action Taken / Way Forward

< Reporting Party Subject Organisation Account Transaction Suspected Crimes **Suspicious Indicator**

- **Offence** (Fraud, Corruption, Sanction, Terrorist Financing, National Security, etc.)
- **Suspicious Transaction Patterns** (Substantial Cash Deposits, Temporary Repository of Funds, etc.)
- **Intelligence / Enquiry from LEAs** (e.g. JFIU, CSTCB, ADCC)
- **Publicly available information** (Adverse News, SFC Press Release, Sanction, etc.)
- **Receipt of Search Warrant / Court Order**
- **Upstream Scam Intervention** (Client is a victim)



05. STR Reporting in **STREAMS 2**

- STR Filing Format

Narrative Comment about the Suspicious Transactions

1. Triggering Factors

- ☐ Commission / Types / Association of Offence
- ☐ Evidence of Suspicious Transaction Patterns
- ☐ Intelligence Received from LEAs
- ☐ Material from Publicly Available Information (e.g. adverse news, SFC alerts)
- ☐ Receipt of Search Warrant / Court Order
- ☐ Upstream Scam Intervention

2. Background of Person / Organisation

3. Details of Investigation / Transaction Analysis

4. Conclusions / Action Taken / Way Forward

< Reporting Party Subject Organisation Account Transaction Suspected Crimes **Suspicious Indicator**

- Nationality
- Type of ID document - HKID Holder, China Passport Holder, etc.
- Occupation / business nature, source of wealth, source of income
- Family / business background, if known - *e.g. opening accounts together (Ms. CHAN Xxx, HKID No.) or related entity also maintained business relationship with the institution and displayed similar suspicion*
- Date of commencing business relationship with the client





05. STR Reporting in **STREAMS 2**

- STR Filing Format

Narrative Comment about the Suspicious Transactions

1. Triggering Factors

- ☐ Commission / Types / Association of Offence
- ☐ Evidence of Suspicious Transaction Patterns
- ☐ Intelligence Received from LEAs
- ☐ Material from Publicly Available Information (e.g. adverse news, SFC alerts)
- ☐ Receipt of Search Warrant / Court Order
- ☐ Upstream Scam Intervention

2. Background of Person / Organisation

3. Details of Investigation / Transaction Analysis

4. Conclusions / Action Taken / Way Forward

< Reporting Party Subject Organisation Account Transaction Suspected Crimes **Suspicious Indicator**

- Review Period
 - Transactions and linkage with suspicious counterparts / third party, if any
 - KYC / RFI result
 - Open source information / details of the adverse news / sanction list with website links
 - Findings on the digital footprints, if any
-
- Further review
 - Exit relationship



05. STR Reporting in **STREAMS 2** - Appropriate File Attachments



Transaction Records
in Excel Format



Account
Application Forms



Relevant
Documents
obtained during
CDD Process



Records of Digital
Footprints, if any

Reporting Party Subject Organisation Account Transaction Suspected Crimes **Suspicious Indicator**

Attachment

Account Opening Mandate / Document(s)

No.	Person / Account Holder *

Detailed Transaction Record(s)

No.	Person / Account Holder *

Other Bank / Institution Document(s)

No.	Person / Account Holder *

Other Document(s)

No.	



Our Observations

On STRs received from reporting entities

Common pitfalls

STR contains a group of **unrelated** subjects / did not specify their commonality in the narrative part

Only mention “**refer to Attachment**” in the narrative part of the STR

Report STR **solely** because other companies of the same group report STRs of the subject

Suggestions

- If there is no correlation among the subjects, report STR separately for each subject;
- If syndication is observed, specify the commonality in the narrative part
- Narrative comment should be included in STR Form.
- Only transactions or supporting documents be provided in form of attachment
- Compliance officers should critically review if the accounts of the same subject were used to channel illicit funds / related to terrorist financing



Feedback from JFIU

Acknowledgement
of Receipt

Consent /
No Consent /
Not Applicable

Quarterly STR
Analysis published
by JFIU

Meetings with
stakeholders



Upcoming Arrangement for **STREAMS 2**

Final UAT

- STR Submission
- Check STR status including consent decision
- Receive LNC and Notification Letters from Police



Seminar to different sectors

- Starting from October / November 2025



Enquiry Hotline (General)

- Senior Inspector Owen TSE
- Tel: 3660 0533 / Email: owencytse@police.gov.hk



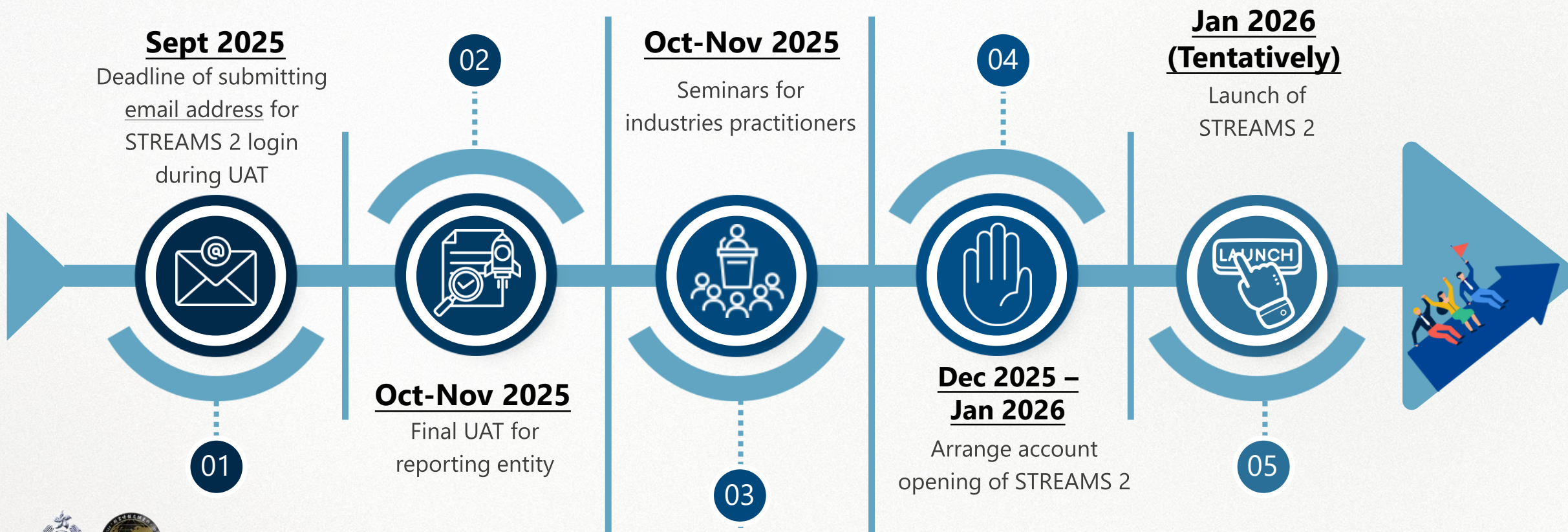
Enquiry Hotline (Technical)

- System Analyst Mr. Christopher CHAN
- Tel: 3660 9682 / Email: christopherchan@police.gov.hk





TIMELINE OF LAUNCHING STREAMS 2



06. Common Typologies & Case Sharing





Common Typologies & Case Sharing (Securities Firms)

#1 Typology involving the laundering of proceeds of fraud through brokerage houses



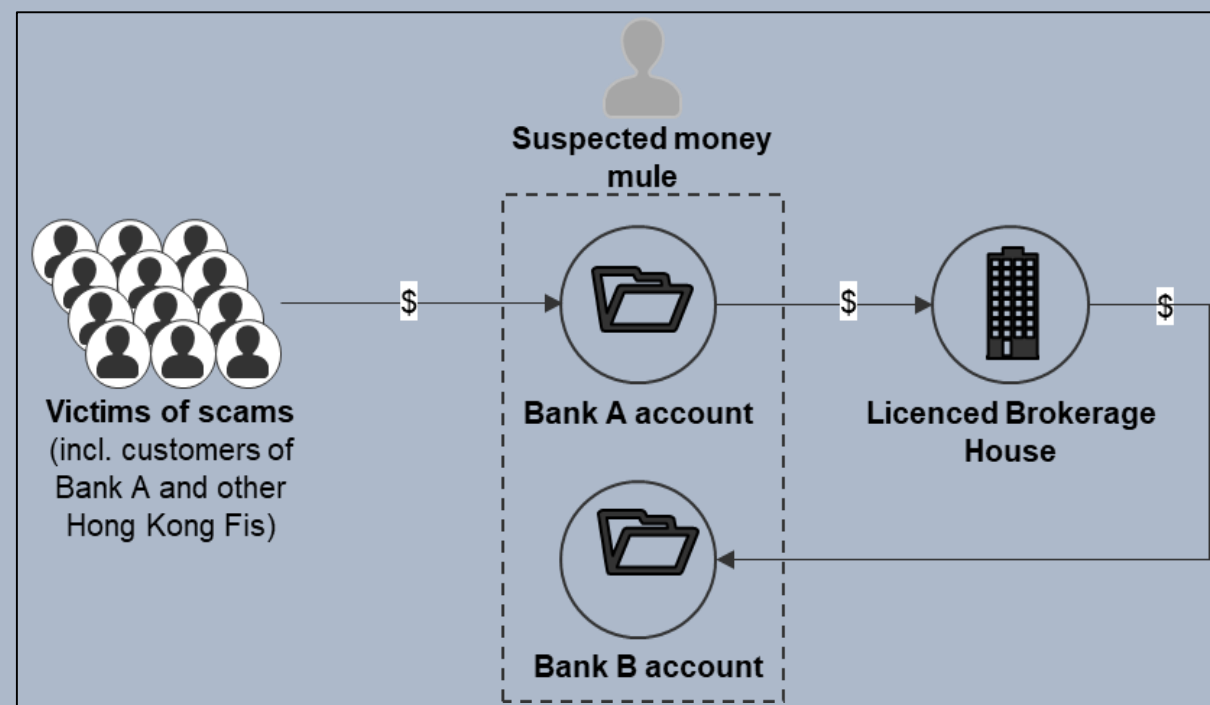
Money mule received proceeds of fraud from victims, who were instructed to send funds to the money mule's account in Bank A (first layer account)



Money mule held an investment account at a brokerage house and sent the funds onward to a brokerage house account (second layer account)



Funds were then withdrawn from the brokerage house into an account held in another bank ("Bank B") under the same person



*Transfer the money out of brokerage house account rapidly without executing any trading activity



Common Typologies & Case Sharing (Securities Firms)

#1 Typology involving the laundering of proceeds of fraud through brokerage houses



Money mule recruitment of victims, who are then used as money mules



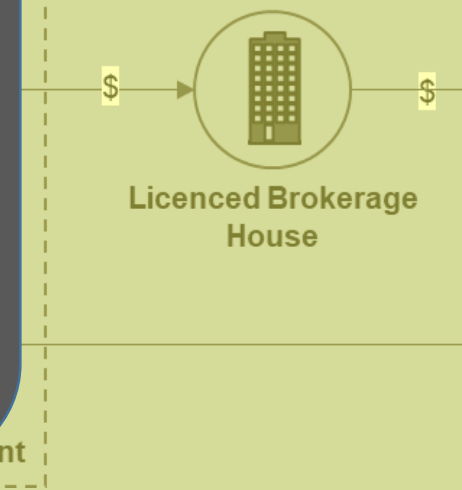
Money mule activity through brokerage houses



Funds were transferred from one brokerage house into another (e.g., "A" to "B") under the same person/ or other money mules

Counter-measures?

- Red flag indicators
 - Funds from self-named accounts may also be illicit
- Abnormal trading pattern – large funds in/out with no trading activity
 - Amount of Account Turnover vs Financial Background
- Inward and outward funds can only transact with the same account
 - Filing STRs
- Step up monitoring strategies



*Transfer the money out of brokerage house account rapidly without executing any trading activity



Common Typologies & Case Sharing (Securities Firms)

#2 Identity Fabrication during Remote On-boarding



Used stolen / lost
HKIDs



Videos / photos
generated by
deepfake
technology



To circumvent facial
recognition
authentication
measures

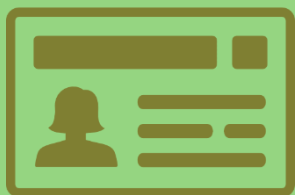




Common Typologies & Case Sharing (Securities Firms)



#2 Identity Fabrication during Remote On-boarding



Used



Video
ge
c
tec.

Counter-measures?

- Pre-scanning & Device Integrity Verification
- Pre-Verification Environment & Metadata Collection
 - AI-Generated Content Detection
- Enhanced Authentication Protocols – Multi-factor authentication
- Cross-Referencing & Continuous Monitoring

umvent facial
cognition
entication
measures



Common Typologies & Case Sharing (Securities Firms)

#3 Insider Dealings (1)



Mr. X

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



**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





Common Typologies & Case Sharing (Securities Firms)



#3 Insider Dealings (1)

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



Mr

Suspicious Activity Indicators

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



Country Z
Stock
exchange



Company
Y

price increases 70% within two
weeks



Common Typologies & Case Sharing (Securities Firms)

#4 Insider Dealings (2)





Common Typologies & Case Sharing (Securities Firms)

#4 Insider Dealings (2)

1 Mr. Y deposited funds to Mr. X's account

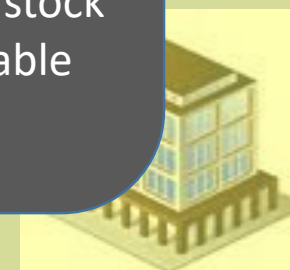
2 First occasion for purchase of Company A's stock

Suspicious Activity Indicators

- Funds from third party
- Mr. Y had close connection with Company A, he might have obtained insider information
- First occasion of purchasing Company A's stock
- The purchase is shortly before the favorable announcement



Stock Market



Company A

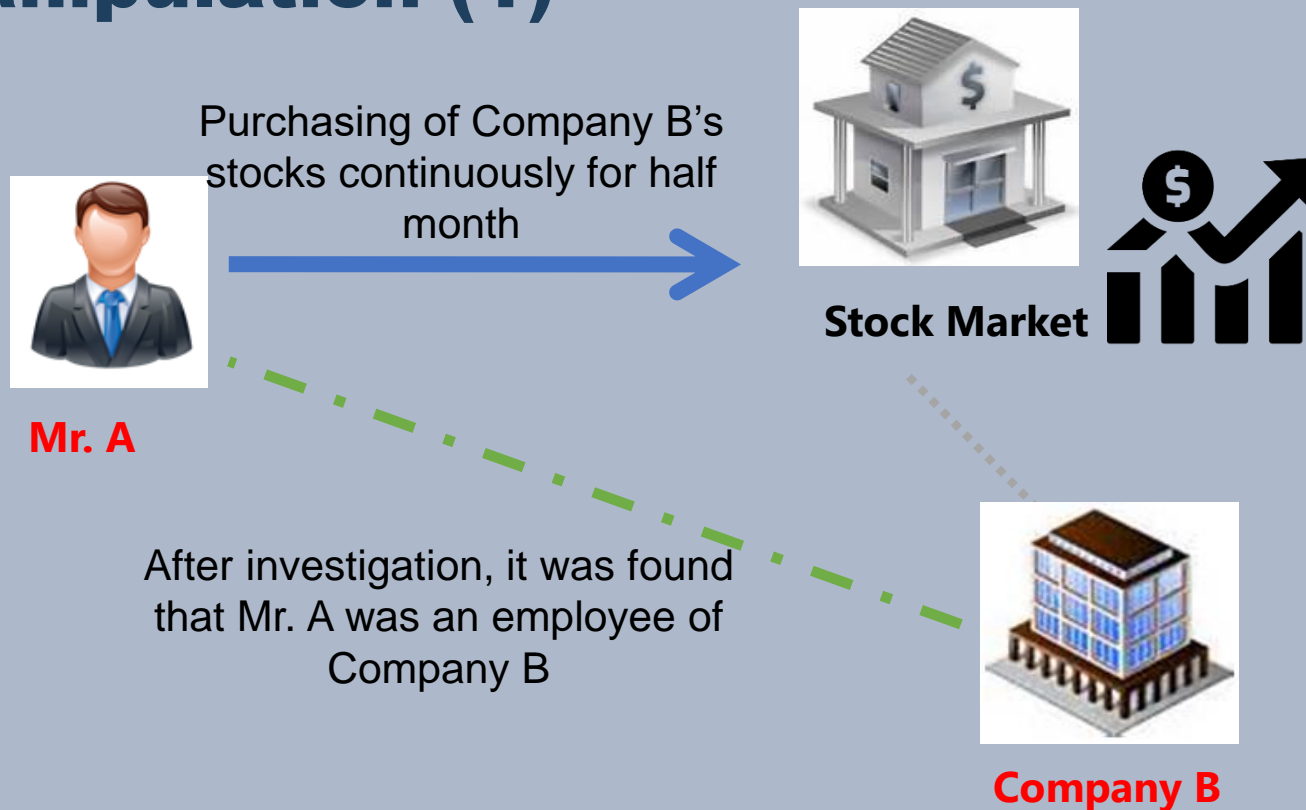


Mr. Y, senior position at Company A



Common Typologies & Case Sharing (Securities Firms)

#5 Market Manipulation (1)





Common Typologies & Case Sharing (Securities Firms)

#5 Market Manipulation (1)

Purchasing of Company B's

Suspicious Activity Indicators

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



Company B



Common Typologies & Case Sharing (Securities Firms)

#6 Market Manipulation (2)



Three separate clients of security firm X, they shared the same contact number and IP address

Frequent trading of Stock Y,
Three accounts placed similar price and quantities



Stock Market





Common Typologies & Case Sharing (Securities Firms)



#6 Market Manipulation (2)

Suspicious Activity Indicators

- Purchase price is higher than normal
 - Pattern of “High Buy but Low Sell”
 - Sources of fund were in doubt
- Shared contact number and IP address indicating their accounts were counted by the same gang



Common Typologies & Case Sharing (VATPs)



#7 VA in ML – Exploitation of OTC



Common Typologies & Case Sharing (VATPs)



#8 VA in ML – Exploitation of VATPs



**Syndicate eventually
received the proceeds in
their wallets on VATPs**

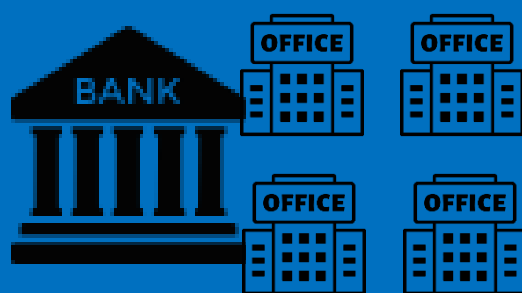
Common Typologies & Case Sharing (VATPs)



#9 VA in ML – Using accounts and wallets of shell companies



**Crime Proceeds
originated from
local and overseas
scams**



**Syndicate used the
bank accounts of shell
companies to receive
crime proceeds**



**Syndicate opened
crypto-wallets in name
of the shell companies
on VATPs and made
fiat deposits using the
crime proceeds**



**Syndicate eventually
received the virtual assets
in their wallets on VATPs**



Financial Intelligence and Investigation Bureau
Hong Kong Police Force

THANK YOU FOR YOUR ATTENTION



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