



# Anti-Money Laundering Seminar

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- **STR Trend / Response Time**
- **Quality of STR**
- **Messages to AIs**

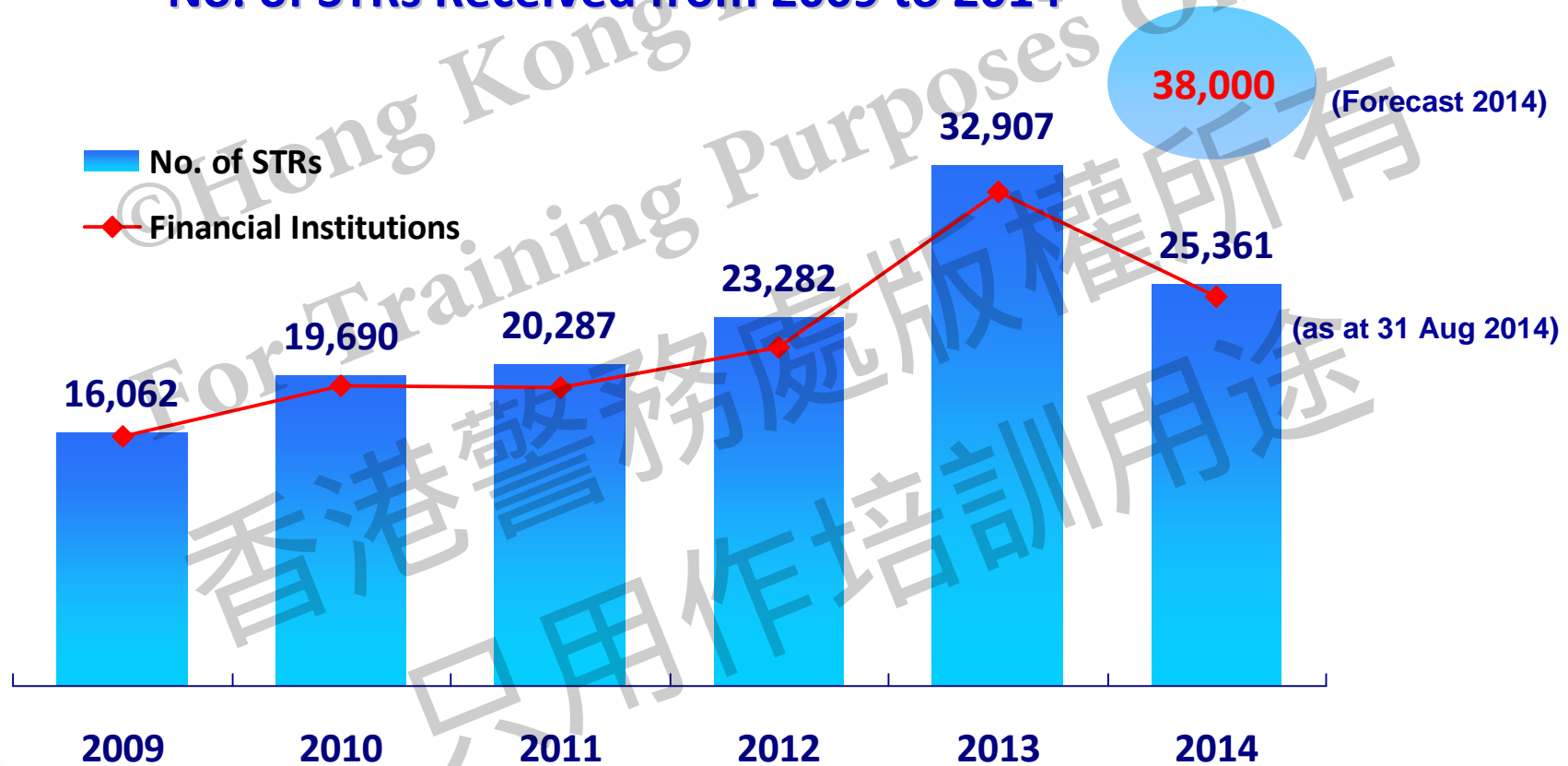


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# STR Trend

## No. of STRs Received from 2009 to 2014

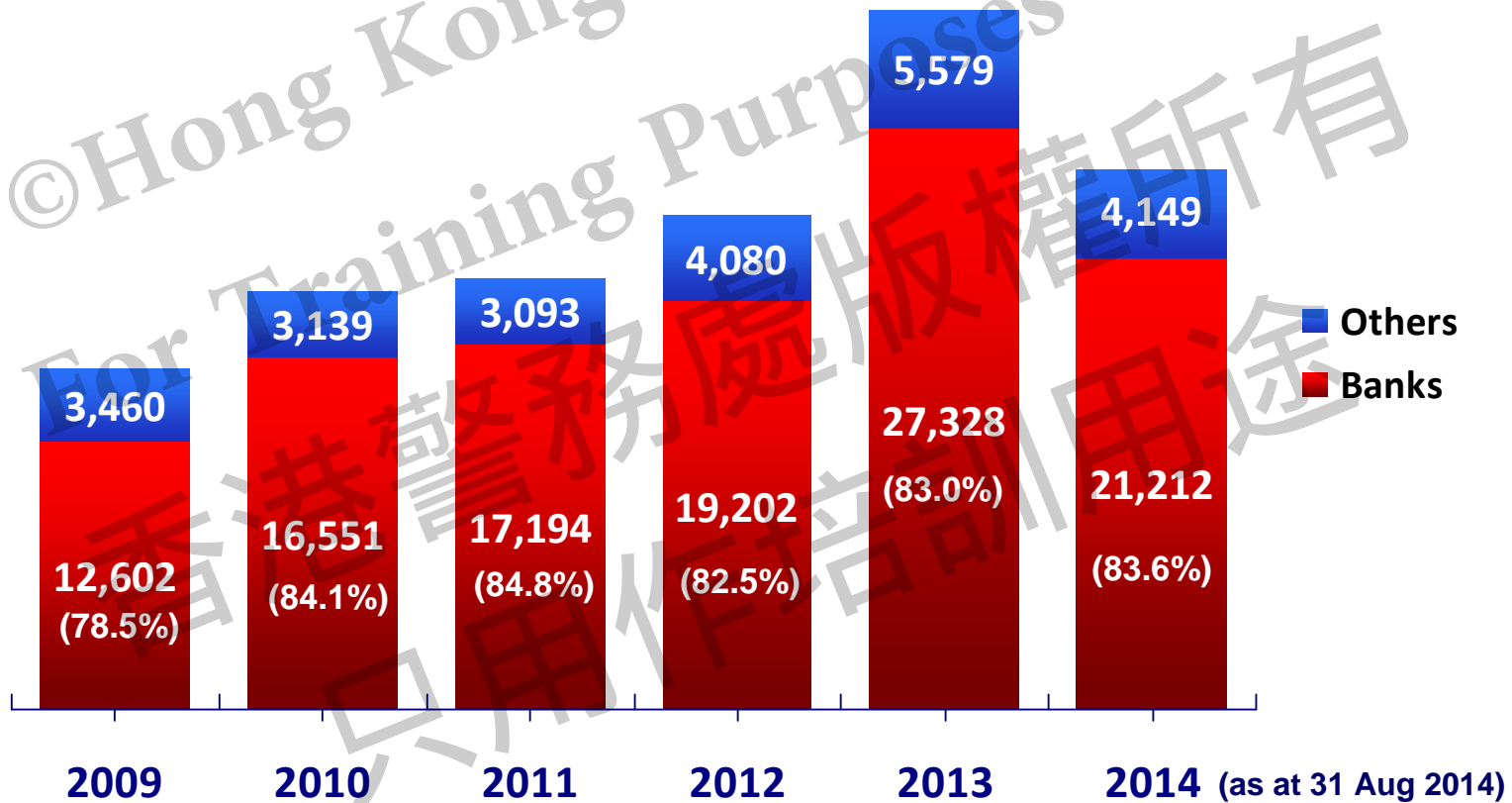


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# STR Trend

## No. of STRs Filed by Banks from 2009 to 2014

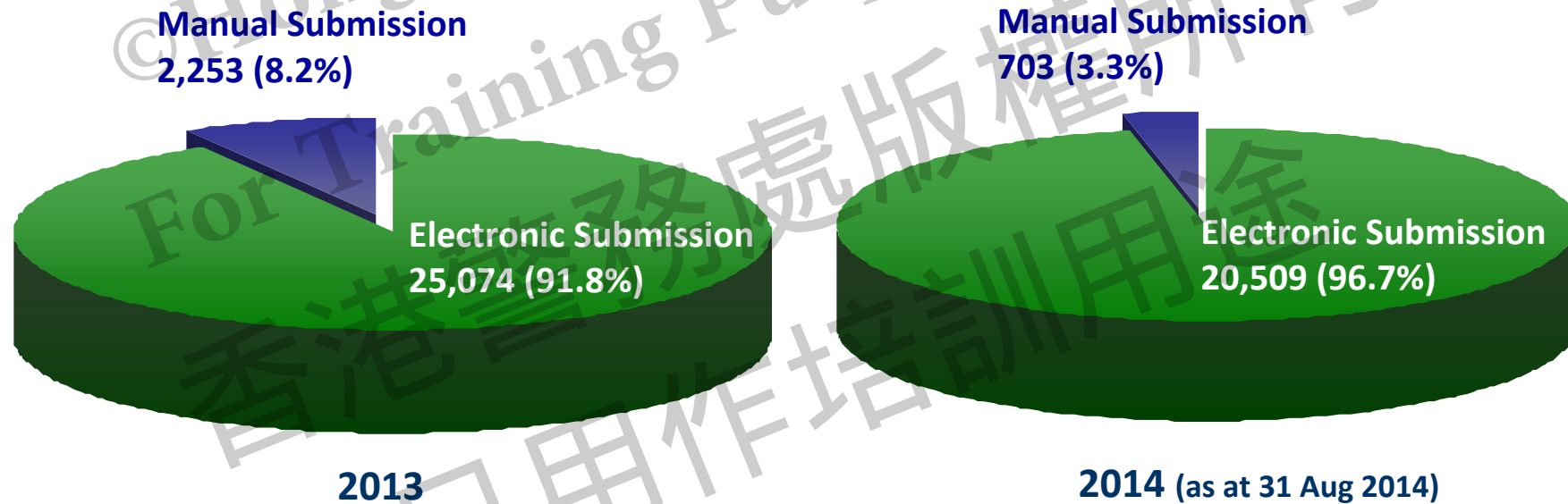


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# STR Trend

## Means of STR Submission by Banks



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# STR Response Time

## Average Response Time of Giving Feedbacks to Banks in 2014

Response Time	Percentage
Within 5 Days	90.9%
Within 14 Days	95.7%
Within 30 Days	98.2%



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# Quality of STR

- Multiple transactions in a single STR
- Problematic transaction not specified
- Narrative vs. Attachment



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# Messages to AIs

## Before an STR was filed ...

section 25(1), Organized and Serious Crimes Ordinance, Cap. 455

*“Subject to section 25A (STR), a person commits an offence if, **knowing or having reasonable grounds** to believe that any property in whole or in part directly or indirectly represents any person's proceeds of an indictable offence, he **deals** with that property.”*



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# Messages to AIs

## When an STR should be filed ...

section 25A(1), Organized and Serious Crimes Ordinance, Cap. 455

*“Where a person **knows** or **suspects** that any property-*

- (a) in whole or in part directly or indirectly represents any person's proceeds of;*
- (b) was used in connection with; or*
- (c) is intended to be used in connection with, an indictable offence.”*



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# Messages to AIs

After an STR was filed ...

section 25A(2), Organized and Serious Crimes Ordinance, Cap. 455

“ If a person who has made a disclosure referred to in subsection (1) does any act in contravention of section 25(1) (whether before or after such disclosure), and the disclosure relates to that act, **he does not commit an offence** under that section if-

(a) that disclosure is **made before he does that act** and he does that act **with the consent** of an authorized officer; or ”



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**Thank You**

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