當網上眾籌遇上反洗錢(Crowdfunding and AML)

2021年1月26日



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眾籌?網上眾籌?

反洗錢

眾籌與反洗錢

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- Merriam-Webster defines and explains crowdfunding as follows:
 - The practice of obtaining needed funding (as for a new business) by soliciting contributions from a large number of people especially from the online community
 - Term created by entrepreneur Michael Sullivan in 2006
 - Conceptualize "the crowd" as a vast online community from which something needed may be obtained
 - Crowdfunding involves a more specific request:
 - the crowd is solicited for financial contributions to a particular venture or cause, such as a film project or cancer research.



- 眾籌或群眾募資 (crowdfunding)
 - 又稱群眾集資、公眾集資、群募、公眾籌款或眾籌
 - 是指個人或小企業通過互聯網向大群眾募資集資金的一種集資方式
 - 是群眾外包和替代金融(Alternative finance)的一種形式



- 眾籌或群眾募資 (crowdfunding)
 - 主要透過互聯網展示宣傳計劃內容、原生設計與創意作品,並與 大眾解釋通過募集資金讓此作品量產或實現的計劃
 - 支持、參與的群眾,則可藉由「購買」或「贊助」的方式,投入 該計劃以實現計劃、設計或夢想
 - 在一定的時限內,達到事先設定募資的金額目標後即 為募資成功,開始使用募得的金錢進行計劃
 - 一般而言群眾募資是透過網路上的平台連結起贊助者 與提案者,用來支持各種活動,包含災害重建、民間 記者、競選活動、創業募資、藝術創作、自由軟體、 設計發明、科學研究以及公共專案等



- 眾籌或群眾募資 (crowdfunding)
 - 根據 Wiki 的資料,全世界第一個產生的群眾募資活動,是 1997年的英國樂團 Marillion,他們透過從廣大的群眾中募集款項,成功的募集了 6 萬 6666 美金,成功地完成了在美國的巡迴演出



- 投資者及理財教育委員會(投委會)解釋何謂眾籌?
 - 根據國際證券事務監察委員會組織(IOSCO)發表的一份工作文件(2014年2月5日發表題為《眾籌:快速增長的新生行業》("Crowd-funding: An Infant Industry Growing Fast")的員工工作報告中採納此定義)
 - 「<mark>眾籌</mark>」一般是指透過網上平台,從眾多個人或機構取得的 小額款項,用於<u>向某一</u>項目、業務或個人貸款以及其他需要 提供資金。



- 投資者及理財教育委員會(投委會)解釋何謂眾籌?
 - 眾籌的主要類型通常有四種(儘管有關活動亦可能以其他形式進行):
 - <u>**股權眾籌</u>**: 投資者通常透過網上平台,投資於一個項目或一項業務(通常是新成立的項目或業務),回報是一家公司的股份或其發行的債務的權益,或者分享一個集體投資計劃的利潤或收入;</u>
 - <u>點對點網絡貸款(P2P網貸)</u>:投資者作為貸方參與眾籌活動,經網上平台配對借方(即發行人),以向個人或項目提供無抵押貸款;
 - 捐贈眾籌: 透過網上平台為慈善目的籌款;及
 - 報酬/預售眾籌:投資者透過網上平台向發行人支付資金,並以實物 貨品或服務形式收取回報(例如向一項業務預付購買一項產品)。



眾籌風險

- 投資者及理財教育委員會(投委會)解釋眾籌有什麼主要 風險?
 - 投資者於考慮參與財務回報眾籌時,要留意該等活動所涉及的若 干相關風險。這些風險包括(但不限於)以下方面:
 - 違責風險
 - 流通性不足及股份價值被攤薄的風險
 - 平台關閉或無力償債的風險
 - 資訊不對稱及缺乏透明度
 - 欺詐風險
 - 平台在香港境外運作
 - 網絡安全
 - 違法活動



- 稅務局 2020 年 10 月 28 日新聞稿 財經事務及庫務局局 長答覆議員的提問
 - 網上進行的籌款活動,或網上眾籌,一般是指透過網上平台,接 受個人或機構的<u>小額款項</u>,為<u>某一</u>項目、業務、或其他目的<u>提供</u> 資金或貸款。
 - 按網上籌款活動的不同目的及性質,例如若有關網上籌款活動涉及向公眾作出購買證券要約及貸款等與金融服務相關的活動,可受到相關法例例如《證券及期貨條例》(第571章)、《公司(清盤及雜項條文)條例》(第32章)及《放債人條例》(第163章)等的規管,當中或包括申領證監會牌照或放債人牌照。
 - 視乎網上籌款活動的<u>目的</u>,這些適用於在香港進行眾籌活動的相關法例,亦可能規範在海外網上平台籌集資金供在香港使用的眾籌活動。



- 稅務局 2020 年 10 月 28 日新聞稿 財經事務及庫務局局 長答覆議員的提問
 - 現時社會福利署署長及民政事務局局長可根據《簡易程序治罪條例》(第228章)第4(17)條的規定,分別就為慈善用途及任何 其他用途在公眾地方進行的籌款活動或售賣徽章、紀念品或類似物件的活動發出許可證。
 - 有關法例的立法原意是為了防止在公眾地方進行相關籌款活動時 ,構成妨擾及造成阻礙。
 - 因此,相關法例並不適用於網上籌款活動。
 - 在現階段,我們暫無計劃將相關條例的適用範圍延伸至網上籌款 活動。



- 稅務局 2020 年 10 月 28 日新聞稿 財經事務及庫務局局 長答覆議員的提問
 - 我們留意到其他地方就籌款活動及平台的規管雖然各有不同,但有關法規一般建基於籌款活動的性質(nature)及籌集所得資金的用途(use),而非資金籌集的方式(means)(網上或公眾地方)。
 - 政府會繼續留意及參考其他地方就規管網上籌款活動的最新進展。
 - 我們明白,保障市民利益,避免市民誤墮虛假或不法的籌款活動 而招致不必要的損失,十分重要。
 - 現時,無論籌款活動是在網上或公眾地方進行,若涉及清洗黑錢 、詐騙及其他違法活動等,相關執法部門會根據現行法律進行調查。



- 稅務局 2020 年 10 月 28 日新聞稿 財經事務及庫務局局 長答覆議員的提問
 - 市民在參與籌款活動,特別是透過網上平台進行的籌款活動時, 應先清楚了解



- 籌款活動的目的及
- 所籌集資金的用途,

以免被不法之徒利用作違法行為。

- 我們相關部門會繼續這方面的宣傳教育工作。



- 證券及期貨事務監察委員會 2014 年 5 月 7 日《有關可能 適用於眾籌活動的法規及眾籌活動風險的通知》
 - 眾籌可以不同形式進行 視乎相關安排的具體結構及特性而定 ,某些類型的眾籌活動(尤其是股權眾籌及P2P網貸)可能受《 證券及期貨條例》(第571章)及/或《公司(清盤及雜項條文) 條例》(第32章)的條文所規限。
 - (i) 投資要約
 - (ii) 中介人發牌及業務操守規定
 - (iii) 適用於自動化交易服務及 / 或認可交易所的監管規定



(i) 投資要約

- 如果眾籌活動涉及向公眾作出購買證券(例如股份、債務票據或於集體投資計劃的權益等)的要約,《證券及期貨條例》及《公司(清盤及雜項條文)條例》對其設有限制。具體而言:
 - 根據《證券及期貨條例》,任何人發出任何廣告、邀請或文件, 而他知道該廣告、邀請或文件屬或載<u>有請公眾取得證券或參與集</u> 體投資計劃的邀請,即屬犯罪,但如該項發出獲證監會認可或獲 得豁免,則屬例外。
 - 就某公司的股份或債權證向公眾作出要約的文件,須受《公司(清盤及雜項條文)條例》下的招股章程登記規定所規限,除非獲得豁免。根據《公司(清盤及雜項條文)條例》,有關公司及每名明知自己是發出招股章程其中一方的人發出不符合相關披露及登記規定的招股章程,即屬犯罪。

(ii) 中介人發牌及業務操守規定

- 眾籌平台營辦者應注意,即使投資要約獲得豁免(例如當有關要約僅向專業投資者作出時),但假如眾籌活動及/或眾籌平台營辦者的業務構成《證券及期貨條例》所界定的"受規管活動",他們仍可能須履行申領牌照的責任。
- 視乎業務性質而定,眾籌平台營辦者可能須就經營以下一類或多類受規管活動持有牌照:
 - 第1類(證券交易)、第4類(就證券提供意見)、第6類(就機構融資提供意見)、第7類(提供自動化交易服務)、第9類(提供資產管理)
- 眾籌平台營辦者亦應注意,須根據《證券及期貨條例》獲證監會發牌或註冊的中介人,亦同時受證監會的操守規定及其他相關規定所規限,包括證監會不時發出的適用守則及指引。



- (iii) 適用於自動化交易服務及 / 或認可交易所的監管規定
 - 視乎所提供的服務性質及產品類別而定,眾籌平台營辦者應注意 ,《證券及期貨條例》第Ⅲ部有關<u>自動化交易服務及認可交易</u> 所的若干規定亦可能適用於其業務活動。



網上籌款活動所得淨收益是否屬應評稅收入或利潤

- 稅務局 2020 年 10 月 28 日新聞稿 財經事務及庫務局局 長答覆議員的提問
 - 根據《稅務條例》(第112章),任何人士,包括法團或團體, 在香港經營行業或業務而從該行業或業務獲得於香港產生或得自 香港的應評稅利潤,售賣資本資產所得的利潤除外,均須納稅。
 - 進行籌款活動的機構如沒有經營行業或業務,不論該等籌款活動 是否經網上進行,其所收取捐款或餽贈並不會構成行業或業務的 利潤,因此不會引致任何課繳利得稅的責任。



潛在法律責任及確保合規

- 證券及期貨事務監察委員會 2014 年 5 月 7 日《有關可能適用 於眾籌活動的法規及眾籌活動風險的通知》
 - 擬從事眾籌活動的各方應留意,違反《證券及期貨條例》及《公司(清盤及雜項條文)條例》的規定可能帶來嚴重後果,包括引致監禁及/或罰款的刑事法律責任,亦可能因違反相關條文而被提出民事訴訟。
 - 除證券法律和法規外,從事眾籌活動的各方亦應查核是否有其他香港 法律和法規適用於其活動及/或其營辦者,包括例如與放債有關的法 律和法規。
 - 有關各方應確保遵守所有適用的法律和法規,並注意適用的法律和法規可因應所進行的活動的具體特點而有所不同,如有疑問,應尋求專業意見。眾籌平台營辦者及/或任何有意透過眾籌活動籌集資金的人士應注意,上述法律及監管責任並非詳盡無遺,亦不構成來自證監會的法律意見。



當網上眾籌遇上反洗錢(Crowdfunding and AML)

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反洗錢





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Recent developments in money laundering and terrorist financing -1

From recent cases:

- Keeping money with reasonable grounds for believing the money relating to criminal proceeds
- Not necessary to prove the underlying crime
- Not necessary to prove the suspect knew there were reasonable grounds
- Not necessary to assume innocence
- Not necessary to prove the criminal intention before reaching a reasonable doubt

Recent developments in money laundering and terrorist financing -2

- In 2012, HSBC settled US\$1.92 billion with U.S. authorities on alleged laundering of drug money in Mexico.
- Mexico's Sinaloa cartel and Colombia's Norte del Valle cartel between them laundered \$881 million through HSBC and a Mexican unit, the U.S. Justice Department said.

Money laundering a serious problem – Letter to the Editor of SCMP, 21 March 2013

Kevin Zervos, SC, director of public prosecutions - 1

o "... A key ingredient of the offence, which the prosecutor has to prove beyond a reasonable doubt, is that there are facts and circumstances that would lead a right-thinking member of the community to believe that he or she is dealing in the proceeds of serious crime and that the accused knew those facts and circumstances. There is a heavy onus on the prosecution and cases of this type are vigorously determined through the trial process. ..."

Money laundering a serious problem – Letter to the Editor of SCMP, 21 March 2013

Kevin Zervos, SC, director of public prosecutions – 2

o "... First, the woman in question was convicted by the unanimous verdict of a jury. Secondly, she had for a period of over 3½ years maintained nine bank accounts with nine different banks, having made about 22,000 deposits and about 17,000 withdrawals with respect to a total sum of nearly HK\$7 billion. Both the daily average deposits and withdrawals were about HK\$5 million. In this period, she had not filed a tax return. ..."

Woman walks into bank, Hong Kong police arrest her for receiving HK\$16 million of scam money (6 January 2018, SCMP) - 1

- Investigation finds 14 bank accounts in her name and ties to email scams involving at least 10 overseas companies
- A 23-year-old woman was arrested in Hong Kong on Friday for using her own bank accounts to receive HK\$16 million (US\$2 million) of illicit money that was linked to email scams involving at least 10 overseas companies.

Woman walks into bank, Hong Kong police arrest her for receiving HK\$16 million of scam money (6 January 2018, SCMP) - 2

- Officers later searched her office nearby and seized ATM cards and chequebooks believed to be used to wash black money.
- Suspected fake contracts were also discovered in the workplace. Officers believed she used the forged documents to cover the illicit activities.
- "Initial investigation showed she was employed by a syndicate to open accounts for money laundering," said Fung Wai-ling, a senior inspector with the Commercial Crime Bureau.

Police arrest 22 Hongkongers in money laundering probe linked to scams overseas (07 December 2016, SCMP) - 1

- HK\$13 million paid into city banks by victims of investment frauds and email scams.
- Twenty-two Hongkongers accused of laundering HK\$13 million through their bank accounts were rounded up in a series of police raids across the city on Wednesday.
- She said scammers used various excuses to deceive the victims into remitting money into designated bank accounts in Hong Kong.

Police arrest 22 Hongkongers in money laundering probe linked to scams overseas (07 December 2016, SCMP) - 2

- The money was suspected to have been linked to 18 deception cases in Canada, Singapore, Taiwan, South Korea and Africa last year and this year.
- Senior Inspector Sophia Lau Pak-wing of the commercial crime bureau said the cases included investment frauds and email scams. It is understood one case in Africa involved a loss of HK\$4.8 million.



9

Police arrest 22 Hongkongers in money laundering probe linked to scams overseas (07 December 2016, SCMP) - 3

- "Even though the cases did not happen in Hong Kong, the suspects could be in breach of money laundering laws because their bank accounts were used to collect crime proceeds."
- Lau said money laundering carried a maximum penalty of a 14-year jail term and HK\$5 million fine.

CFA Issues Anticipated Decisions in Carson Yeung and Salim Majed Money Laundering Cases (August 2016, HK Lawyer) - 1

on 11 July 2016, the Court of Final Appeal ("CFA") handed down its judgment in two much anticipated decisions concerning money laundering (see FACC 5 & 6/2015 and FACC 1/2015, heard together). The ruling resolves issues which have taxed Hong Kong courts for some time and will have a significant impact on the way money laundering cases are prosecuted and defended. In this article, Morley Chow Seto outlines the key findings of import for criminal practitioners.

CFA Issues Anticipated Decisions in Carson Yeung and Salim Majed Money Laundering Cases (August 2016, HK Lawyer) - 2

• Carson Yeung was convicted in the District Court on five charges of money laundering, contrary to s. 25(1) of the Organized and Serious Crimes Ordinance ("OSCO") for six years jail sentence.

Conclusion

Yeung's appeal was dismissed, and the HKSAR's appeal in Majed's case was allowed.

CFA Issues Anticipated Decisions in Carson Yeung and Salim Majed Money Laundering Cases (August 2016, HK Lawyer) - 3

- In a comprehensive ruling, the CFA has resolved many unclear aspects relating to money laundering. In particular:
- O The CFA declined to follow the law in England & Wales and confirmed the existing law in Hong Kong that the prosecution does not have to prove that the property being dealt with was, in fact, the proceeds of crime; to secure a conviction it is enough for the prosecution to establish that the defendant had reasonable grounds to believe that it was.

CFA Issues Anticipated Decisions in Carson Yeung and Salim Majed Money Laundering Cases (August 2016, HK Lawyer) - 4

• The prosecution does not have to charge a separate count for every act of dealing if all the acts can fairly be regarded as being part of the same criminal enterprise. A single charge can cover all the deposits laundered through a single bank account. There is no need for the prosecution to aver a single charge for each individual deposit.

CFA Issues Anticipated Decisions in Carson Yeung and Salim Majed Money Laundering Cases (August 2016, HK Lawyer) - 5

On the issue of whether a defendant had the relevant "reasonable grounds to believe" it depends on the state of the evidence. If a Defendant provides no evidence at all of his beliefs and perceptions, the Court is left to draw whatever inferences may be proper based on the prosecution evidence. Such evidence will no doubt be intended by the prosecution to be inculpatory as establishing the indicia of money laundering. But such evidence may also be exculpatory, casting doubt on whether the defendant had the necessary reasonable grounds to believe.

• Seven (five men and two women) current and former Hong Kong bankers were arrested in a series of raids on 19 January 2021 as police moved against an international money-laundering syndicate alleged to have handled HK\$6.3 billion (US\$813 million) in criminal proceeds – the biggest such case in nearly a decade.

- The enterprise, which moved the funds through local bank accounts over the past four years, was the first known to involve Hong Kong bankers.
- Police also seized HK\$7.8 million in cash at the home of one of the suspects, who lives in a public housing flat.

• Police from the commercial crime bureau first began investigating the syndicate in 2017 while handling an email scam involving the London office of a Swiss company that was duped into transferring US\$2 million into bank accounts in Hong Kong.

- The investigation revealed the syndicate had sent 16 people − a combination of Belgians and mainland Chinese − to the city to open 14 business accounts at two banks using forged documents and fake Hong Kong identity cards.
- The seven bankers were accused of using their knowledge of banking operations and customer vetting procedures to assist the gang in opening the accounts used for money laundering.

- The seven, who worked as customer service managers, were suspected of receiving thousands of Hong Kong dollars in return for helping open the bank accounts. Some had already left the banks involved before their arrests.
- "Investigation revealed the 14 bank accounts laundered about HK\$6.3 billion in suspected criminal proceeds between 2017 and 2020," Police said.



- Police said around HK\$3.3 billion of the money was laundered via just one account between 2018 and 2019.
- "The money was transferred into Hong Kong from all over the world including Italy, Vietnam and Germany."

- A police source said some of the money was linked to online deception cases that had taken place abroad.
- The seven suspects were arrested on suspicion of conspiracy to launder money an offence that carries a maximum penalty of 14 years in jail and a HK\$5 million fine.

- The city's largest ever money-laundering case involving HK\$13.1 billion came to light with the 2012 arrest of a 22-year-old mainland man. He laundered the money through his bank accounts between August 2009 and April 2010, making 4,800 deposits over an eightmonth period.
- In January 2013, he was sentenced to $10\frac{1}{2}$ years' jail.



當網上眾籌遇上反洗錢(Crowdfunding and AML)

2021年1月26日



眾籌與反洗錢





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凍結資產

- 《税務條例》(第112章)第76條:
 - 向納稅人的債務人追討稅款
 - (1) 凡任何人拖欠其應繳付的稅款,或任何被徵稅的人並無繳清向其徵收的所有稅款 而已離開香港,或局長認為該人相當可能並無繳清向其徵收的所有稅款而離開香 港,且局長覺得頗有可能有任何其他人(在本款中以下稱第三者)——
 - (a) 欠該人(在本款中以下稱該納稅人)金錢,或行將支付金錢給他;或
 - (b) 為該納稅人持有金錢,或因該納稅人而持有金錢;或
 - (c) 因他人而持有金錢以支付給該納稅人;或
 - (d) 獲他人授權以支付金錢給該納稅人,

<u>則局長可以書面通知該第三者</u>(該通知書文本一份須以郵遞方式送交該納稅人), 規定該第三者將不超出有關的拖欠稅額或徵收稅額(視屬何情況而定)的款項,繳 付給該通知書內所指名的人員。對於該第三者在接獲該通知書之日在其手上的金 錢、他到期應繳的金錢或行將由他支付的金錢,或該第三者在其後 30 天內任何 時間到達其手上的金錢、成為由他到期應繳的金錢或行將由他支付的金錢,該通 知書一概適用。

凍結資產

- 《税務條例》(第112章)第76條:
 - 向納稅人的債務人追討稅款
 - (2) 凡任何人依據本條作出付款,須被當作是在該名須繳稅的人或被徵稅的人以及所 有其他有關人士的授權下行事,而即使任何成文法、合約或協議中另有規定,該 人可在一切民事或刑事法律程序中藉本款就此付款而獲得彌償。
 - (3) 任何人接獲根據第(1)款向其發出的通知書,而不能遵照辦理,則須在接獲該通知書之日起30天屆滿時起計的14天內,將事實情形以書面通知局長。
 - (4) 任何人接獲根據第(1)款向其發出的通知書,能夠遵照辦理而沒有在第(1)款所提述的期間屆滿後14天內照辦,則須個人負上他被規定繳付的全部稅款的法律責任,並可被追討稅款,而追討方法是依循本條例所訂定向拖欠繳稅的人追討稅款的一切方法。

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凍結資產

- 在 2002 年 2 月 5 日的會議,立法會保安事務委員會要求 當局提供有關過往根據現行法例凍結資產的資料。當局的 回應:
 - 凍結資產的程序,於《有組織及嚴重罪行條例》、《販毒(追討得益)條例》及《刑事事宜相互法律協助條例》均有訂明。
 - 現行《有組織及嚴重罪行條例》及《販毒(追討得益)條例》訂明,原訟法庭可藉命令禁止任何人處理資產
 - 被凍結的資產,包括現金、銀行存款、證券、公司股權、房地產、車輛、遊艇、珠寶、古董及公司

- 聯合財富情報組(JFIU):
 - 根據《有組織及嚴重罪行條例》(第455章)及《販毒(追討得益)》條例》(第405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,任何人如知道或懷疑任何財產是
 - (i) 全部或部分、直接或間接代表任何人的<u>販毒得益</u>或從<u>可公</u> <u>訴罪行的得益</u>;或
 - (ii) 曾在與<u>可公訴罪行</u>或<u>販毒</u>有關的情況下<u>使用</u>;或
 - (iii) 擬在與<u>可公訴罪行</u>或<u>販毒</u>有關的情況下<u>使用</u>;或是<u>恐怖分</u> 子財產,必須在合理範圍內盡快<u>向聯合財富情報組提交可</u> 疑交易報告。

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- 保安局局長 2021 年 1 月 6 日在立法會答覆議員的提問
 - 有不同組織以不同的名目在網上眾籌,有些組織已被警方揭發涉及刑事罪行。
 - 警方已把這些涉案人士拘捕,並凍結相關資產,作進一步調查。市民應有所警惕,以免被騙徒利用眾籌而受欺騙。
 - 任何籌款得來的金錢,其運用必須合法。
 - 執法部門會按實際情況,監察及留意這些資金運作,如有違法, 必依法處理。

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- 保安局局長 2021 年 1 月 6 日在立法會答覆議員的提問
 - 違法的行為可包括以下罪行:
 - (i) 違反《有組織及嚴重罪行條例》或《販毒(追討得益)條例》 的洗黑錢罪,最高刑罰監禁14年;
 - (ii) 違反《盜竊罪條例》的欺詐罪,最高刑罰監禁14年;
 - (iii) 違反《香港國安法》,以金錢或其他財物資助他人實施《香港國安法》訂下的罪行,包括違反第二十九條的勾結外國或者境外勢力危害國家安全罪,最高刑罰可處無期徒刑,即終身監禁。
 - 特區政府不會評論個別自稱基金的運作情況。市民在參與自稱基金的籌款活動時,應先清楚了解其背景及聲稱目的,以免受蒙騙或損失。

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- 財經事務及庫務局副局長 2021 年 1 月 6 日在立法會答覆 議員的提問
 - 首先,關於《打擊洗錢及恐怖分子資金籌集條例》,我想指出, 在香港,這項條例<u>旨在規範以業務形式經營 13 項財務活動的機</u> 構,從而打擊相關違法行為,而當局亦已參考財務行動特別組織 制訂的標準,規管該 13 項財務活動。
 - 至於麥議員提及的籌款形式,我想再次指出,正如主體答覆所述,網上籌款活動會按其不同目的及性質受到相關法例規管,我不再重複有關的條文。

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- 財經事務及庫務局副局長 2021 年 1 月 6 日在立法會答覆 議員的提問
 - 然而,我想特別指出兩點。
 - 第一,政府和其他地區現時規管不同籌款平台的相關法規, 一般按照籌款活動的性質和籌得資金的用途作出規範,而非 着眼於資金籌集的方式。在資金運用方面,正如局長剛才所 說,籌得的款項必須合法運用,執法部門亦會留意和監察實 際情況,並且執法。
 - 第二,我想指出,我們本身已有相關措施防止眾籌被利用進行可疑交易。根據《有組織及嚴重罪行條例》,任何人士如果知道或懷疑任何財產屬於犯罪得益,必須在合理範圍內盡快向警方提交可疑交易報告。
 - 除非獲得警方同意,否則該人不可繼續處理相關財產。



當網上眾籌遇上反洗錢(Crowdfunding and AML)

2021年1月26日



LAM Chi Yuen Nelson 林智遠

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