

辦公室資訊

2009年10月出版
出版：澳門特別行政區政府
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Published in October 2009
Published by: Financial Intelligence Office, Macao Special Administrative Region Government
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If you have any suggestions and enquiries on this newsletter, or like to have more copies, please feel free to contact GIF.

GIF Information

國際趨勢及發展—
以賭場價值工具清洗黑錢的跡象

- 將現金投入角子機後迅即以積分方式提取；
- 賭客在沒有中獎的情況下，報稱積分來自角子機贏款；
- 賭客提取大額角子機贏款；
- 消費 / 博彩習慣的明顯改變；
- 賭客不斷存入大量的紙幣至高賠率的角子機中，而這些角子機並無任何“最高投注額”限制重大的輸款或贏款，因此不法分子可藉此以極少的投注累積博彩積分；
- 一對賭客經常性在同一局中以同額下注作出對賭行為(如輪盤、百家樂、迷你百家樂、花旗骰等)；
- 賭客贏款的意欲並不顯著或只為次要；
- 兩個或以上的賭客經常以同額注金互相對賭；
- 賭客擁有大量硬幣及紙幣；
- 賭客試圖接近賭場員工；
- 在沒有或只進行少量博彩活動後買賣籌碼；
- 賭客存入現金至贏款，並要求將集合的現金及贏款共同開出一張贏款支票；
- 從帳戶中開出多張支票；
- 短期內作出大量交易；

- 於同一日內兌換多種面值籌碼；
- 將籌碼 / 支票交易之資金拆細；
- 賣碼與買碼的金額相同 / 相若；
- 要求將博彩積分轉帳至其他賭場；
- 以多個別名進行相同活動；
- 以第三者身份買碼；
- 以信用卡買碼；
- 以個人支票、銀行支票、旅行支票買碼；
- 不合乎“客戶盡職審查”措施：如拒絕出示身份資料、虛假文件、一次性交易、旅行過境交易等；
- 賭客在買碼後迅即離開；
- 籌碼購買券及角子機票據的發出日期較真正贖回的日子為早；
- 購買大量籌碼；
- 經常購買賭場贈券；
- 賭客的背景及財務狀況與其收入不相稱；
- 贏款所得與贏款記錄並不相符；
- 正常的帳戶突然間或急劇地大增交易金額及交易量；
- 發現有人從外攜帶籌碼進入賭場。

INTERNATIONAL TRENDS AND DEVELOPMENTS -
Indicators of Money Laundering using casino value instruments

- Inserting funds into gaming machines and immediately claiming those funds as credits.
- Customers claiming gaming machine credits/ payouts with no jackpot.
- Customers claiming a high level of gaming machine payouts.
- Noticeable spending/betting pattern changes.
- Customers frequently inserting substantial amounts of banknotes in gaming machines that have high payout percentages and do not play "max bet" to limit chances of significant losses or wins, thereby accumulating gaming credits with minimal play.
- Frequent even-money wagering when conducted by a pair of betters covering both sides of an even bet (e.g., in roulette, baccarat/mini-baccarat, or craps).
- Customer's intention to win is absent or secondary.
- Two or more customers frequently wagering against one another on even-money games.
- Customer in possession of large amounts of coinage or bills.
- Customer befriending/attempting to befriend casino employees.
- Purchasing and cashing out casino chips with little or no gaming activity.
- Customer requests to add cash to casino winnings and then exchanging the combined cash and winnings for a single cheque.

- Multiple cheques being requested or drawn on account.
- High volume of transactions within a short period.
- Multiple chip cash outs on the same day.
- Structuring of chip/cheque transactions.
- Chip cash out is same/similar to chip purchase.
- Requests for credit transfers to other casinos.
- Use of multiple names to conduct similar activity.
- Use of third parties to purchase casino chips.
- Use of credit cards to purchase casino chips.
- Use of personal cheques, bank cheques and traveler's cheques to purchase casino chips.
- Customer due diligence challenges, e.g. refusals, false documents, one-offs, tourists passing trade.
- Customer purchases chips and leaves casino shortly after.
- CPV, TITO, ticket or voucher dated prior to date of redemption.
- Large chip purchases.
- Frequent purchase of casino gift certificates.
- Unexplained income inconsistent with financial situation/customer profile.
- Supposed winnings do not correspond with recorded winnings.
- Dramatic or rapid increase in size and frequency of transactions for regular account holder.
- Detection of chips brought into the casino.

下期續 To be continued
內容摘錄自2009年3月FATF and APG Joint Report “Vulnerabilities of Casinos and Gaming Sector”
Content extracted from FATF and APG Joint Report “Vulnerabilities of Casino and Gaming Sector” of March 2009

金融情報辦公室通訊（博彩業）
Financial Intelligence Office Newsletter for Gaming Sector

澳門特別行政區政府
Macao Special Administrative Region

第一期
Issue No. 1

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可疑交易報告統計 (上半年)

隨着第 2/2006 號《預防及遏止清洗黑錢犯罪》及第 3/2006 號《預防及遏止恐怖主義犯罪》兩項法律的誕生，金融情報辦公室亦因應需求於 2006 年 8 月 8 日按第 227/2006 號行政長官批示而成立，並獲賦予收集、分析及向執法機關提供與清洗黑錢犯罪和資助恐怖主義犯罪有關資料的權力，貫徹落實上述兩項法律的執行。

本辦公室其中一項主要職責為將收集的可疑交易報告(STR)資料作出定期統計，並向各監管當局提供具教育用途的資訊，如可疑交易發展趨勢及案件特徵等。

- 與 2008 年上半年比較，本辦公室於 2009 年上半年所收到的 STR 數量上升 25%，證明舉報機構日益重視自身的舉報義務。
- 於 2009 年上半年，來自金融機構的 STR 佔總數量的 36%，而由博彩公司舉報的 STR 約佔 63%。
- 2009 年上半年本辦公室向檢察院舉報的 STR 共 22 份。

Suspicious Transaction Reports Statistics (Semi-Annually)

The Financial Intelligence Office (“GIF”) was set up under Executive Ruling no.227/2006 on 8 August of 2006 with the core function of collecting, analyzing and disseminating information on suspicious transactions of money laundering and terrorist financing. The setting up of the Office is to cope with the implementation of Law no. 2/2006 and Law no.3/2006 on Prevention and Suppression of Crime of Money Laundering and Prevention and Suppression of Crime of Terrorism.

Another important duty is to extract statistical data periodically from STRs received, and to provide instructive information such as trends and typologies to the supervisory agencies and reporting entities.

- As compared with 2008, the total number of STRs received by GIF for the first 6 months of 2009 increased by 25%. Reporting entities are becoming more vigilant to their reporting obligations.
- For the first 6 months of 2009, STRs received from financial institutions and gaming sectors constituted 36% and 63% of total respectively.
- From January to June 2009, a total of 22 STRs were sent to the Public Prosecution Office for further investigation.



個案例子

進行買賣籌碼活動

信用卡系統

清洗黑錢者利用第三者及虛假身份證明

走私現金及地下匯款

個案例子

個案一：進行買賣籌碼活動

有人將一件託運貨物寄予一名可疑人士，內藏有大約3.4公斤鴉片。該名可疑人士稍後在接收該託運貨物時被警方拘捕。經進一步調查後發現該名可疑人士為賭場的常客，他利用出售毒品所得的資金購買現金碼，金額高達HKD6,000,000，其後於賭場內只進行極少量的博彩活動後便將現金碼兌換回現金，且報稱資金來自賭場贏款。

疑點：

- 經常性進出賭場，但只進行極少量甚至沒有進行任何博彩活動；

- 短期間內錄得大量交易記錄；
- 假設之贏款與實際記錄之贏款不相符；
- 主要進行提取現金交易。

建議：

- 賭場帳房的前線員工應當核實贖回大額籌碼之籌碼來源；
- 賭場應該執行定期覆查購買及贖回籌碼記錄，以便偵測出是否有賭客經常地進行金額相似之大額買賣籌碼行為。

個案二：信用卡系統

一名來自A國的人士進入B國一間賭場，並以現金及信用卡購買了HKD4,000,000的現金碼。賭場將有關的交易向當地金融情報機構(FIU)舉報。根據該名人士的信用卡交易記錄資料顯示，有關帳戶交易活動極之頻密：此帳戶經常收到來自公司的轉帳及由個人存入的大量現金存款。該名人士的配偶在A國經營生意，與東南亞的有組織罪犯保持密切的黑道關係；而該名人士亦與懷疑涉及清洗來自有組織犯罪之黑錢的團伙維持緊密的連繫。

疑點：

- 頻密使用信用卡購買賭場籌碼；
- 少量或沒有進行任何博彩活動；
- 短期間內將籌碼兌換現金；
- 賣碼與買碼的金額相同 / 相若。

建議：因應此個案，可保存信用卡記錄登記冊以檢視有否經常出現同一客人的交易記錄。若有，賭場可進行特別程序以取得客人對相關行為具理由之解釋。

個案三：清洗黑錢者利用第三者及虛假身份證明

一名毒販假裝成賭場的大豪客，涉嫌利用在C國的一家賭場清洗其犯毒所得的大量資金。該名毒販於賭場內聘請了多名第三者，並給予其象徵性的費用以代替其本人用現金進行買碼。該名毒販取得籌碼後只進行少量的博彩活動，然後將該等由第三者代購的現金碼兌換回現金，並報稱資金為其本人從賭場贏得的款項。『大額交易報告』顯示該名男子的買碼及賣碼之間存在着HKD2,500,000的差額。經進一步調查顯示該名毒販利用別名、多本護照及身份資料進行買賣籌碼的交易，其後亦錄得其多次拒絕提供身份證明資料。

疑點：

- 同一人以不同的身份進行買賣籌碼交易；
- 利用多個別名去進行類似交易活動；
- 利用第三者進行現金買賣碼交易；
- 在短期間內進行多筆交易；
- 假設之贏款與實際記錄之贏款不相符；

- 拒絕提供身份證明文件；
- 買碼、實際進行博彩活動及賣碼記錄之金額存在差異。

建議：

- 當客人進行買賣籌碼交易時應當採用適當的監控程序；
- 特別針對貴賓廳的豪賭客，賭場應該設有持續監控系統，以便偵測出不尋常的、大額及複雜交易記錄；
- 對高風險客人應該加強進行『客戶盡職審查』措施；
- 除了核實客人的身份證明外，賭場應該執行核實客戶資金來源程序。如果資金是來自第三者，應該識別及核實資金的最終擁有者身份；
- 賭場可透過查核客人的博彩活動記錄去複查其博彩活動比率，以及可以利用『賭客追蹤系統』去觀察其是否只進行少量的博彩活動。

個案四：走私現金及地下匯款

一名來自E國而計劃前往F國賭場進行博彩活動的客戶將巨額現金交予一名博彩中介人。該名中介人將有關現金交予一間位於E國及F國邊境的商店。該商店將現金化整為零，並透過多名“職業走私客”將現金運往F國，然後由F國一名人士收集所有現金後，再以現金存款、支票存款、銀行轉帳及電匯方式將現金存入該中介人之帳戶內。該名中介人其後便會開出收款人為賭場貴賓廳的本票或支票，而賭場貴賓廳便會向有關客戶提供泥碼作博彩之用。

疑點：

- 由博彩中介人/賭場中介人代海外的第三者開出本票或個人支票

INTERNATIONAL TRENDS AND DEVELOPMENTS - Use of Casino Value Instruments

Casinos utilise various value instruments to facilitate gambling by their customers. The type and use of the value instruments used differs between casinos and is influenced by local regulation and casino operating structures. Casino value instruments are most often used for money laundering by converting illicit funds from one form to another.

Casino chips are the most common casino value instruments. Casino chips are issued by casinos and used in lieu of cash in gaming transactions between the house and players. Chips are round and marked with the denomination and name of the casino and are negotiable within the

casino, or, in some cases, within casinos in the same group. Casinos may issue “credit chips” which are different in colour and only used by patrons playing on credit. Casinos may issue “dead chips” which are only used by *junket* patrons.

Buying chips for cash or on account, then redeeming value by way of a casino cheque, bank draft of money transfer. Launderers typically buy chips with cash or through their casino account. Chips bought on account may use a Chip Purchase Voucher (CPV) or similar value instrument. Repayment is then requested by a cheque,

draft or transfer drawn on the casino's account. This method can be made more opaque by using a chain of casinos where the chips that were purchased with illicit cash are converted to credit, and transferred to another jurisdiction in which the casino chain has an establishment; the credit is then converted into in the form of a casino cheque at the second casino.

Money launderers may hold the chips for a period of time, either using the chips to gamble in hopes of generating certifiable winnings or later redeeming the chips for cash/cheque / transfer.



Casino cheques payable to cash

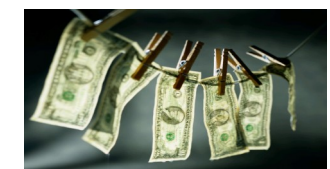
In some jurisdictions, casinos allow winning cheques to be made payable to “cash”. High-value casino cheques payable to cash have been observed in secondary circulation as bearer negotiable instruments and used as payment for goods or for reinvestment in criminal ventures, such as purchasing drugs. High-value casino cheques may originate from VIP rooms, which may provide alternative remittance services between player's home jurisdictions and the casino VIP room.

Use of chips as currency in illegal transactions

Money launderers may retain casino

chips to be used as currency to purchase drugs or other illegal goods. Carrying chips from a drug transaction may also contribute to an alibi for the predicate offence. The recipient of the chips will later cash them at the casino.

Casino chips to be used as currency may be taken across borders and exchanged for payment of an illegal enterprise then returned by the third parties and cashed at the issuing or honouring casino in amounts below a reporting threshold. Most jurisdictions do not list casino chips as money value instruments and therefore do not require Customs declaration.



Purchase of chips from ‘clean’ players at a higher price

Money launderers may purchase chips from other money launderers or un-associated casino patrons with “clean” backgrounds. This is done at a price greater than the chips' face value. This is referred to as *value tampering*.

Purchase of large numbers of ‘casino gift certificates’

Cases have been detected of money launderers purchasing high value or numerous low value casino gift certificates which can be redeemed by third parties. The certificates are then sold or given to other persons distancing the money launderer from the illicit funds.

Purchase of casino reward cards

Money launderers use illicit funds to purchase casino reward cards from legitimate customers paying them a premium above the value of the reward.

Combining winnings and cash into casino cheques

Although few jurisdictions allow this, money launderers seek to add cash to casino winnings and then exchange the combined cash and winnings for a single cheque.

CASE STUDY

Casino used as preferred method to launder millions

*Offence: Money Laundering
Technique: Chip purchase and cash out, claiming credits as jackpot wins, playing games with low return and high win.*

*Mechanism: Casino
Instrument: Casino chips, casino cheques*

Information identified alleged money launderers using the casino as a preferred method of laundering millions of dollars accumulated from criminal activities. The methods used to launder the money included purchasing and cashing out chips without playing, putting funds through slot machines and claiming credits as a jackpot win and playing games with low returns but higher chances of winning. The same group were also utilising bank accounts and businesses to launder funds.

國際趨勢及發展 - 使用賭場具現金價值工具



賭場會使用具有不同現金價值的博彩工具，以方便其客戶進行博彩活動。此類工具的面值及使用原則均會因為不同的賭場而有異，同時亦會因應當地規則及賭場本身的運作模式而轉變。此類工具經常會被犯罪份子用作為清洗黑錢的工具。

賭場籌碼是最常見的博彩工具。籌碼是由賭場發出，以取代現金供客戶進行博彩活動之用。籌碼的形狀為圓形，上面顯示不同面值及賭場

名稱，並可以在賭場內兌回現金，甚至可於同一集團內的其他賭場兌回現金。賭場也可以發行“信貸籌碼”，供博彩人士以信貸形式賭博。此外，賭場也可以發行“泥碼”以供博彩中介人使用。

以現金或賭場存款購入現金碼，再兌換回賭場支票、銀行本票、銀行轉帳等金融工具

洗錢罪犯經常會以現金或賭場存款購入現金碼，以賭場存款購買籌碼可以使用籌碼購買券或其他類

似的工具，之後再要求賭場開出支票、銀行本票或銀行轉帳的方式贖回籌碼。此類做法實際上可以更複雜。罪犯可以在賭場內以非法所得的資金購入籌碼，並將之存入賭場的帳戶內，之後再將款項匯往同一集團所經營的海外賭場，其後再以賭場支票的方式取回有關存款。

洗錢罪犯會將籌碼留用一段時間後再進行博彩活動，期望可以獲得可核實的賭場贏款，或稍後直接以現金、支票、轉帳的方式贖回籌碼。

賭場開出的現金支票

在某些國家，賭場可以向客戶開出贏款的現金支票。此類大額的賭場現金支票會被當現金般用作購買貨品或用於不法活動如購買毒品等。來自貴賓廳之大額現金支票有可能透過貴賓廳提供之另類匯款服務將資金以地下錢莊的方式匯往客戶的原居地。

使用籌碼作為不法交易的工具

罪犯或會使用賭場籌碼，作為購買毒品或其他不法貨品的資金。特有

來自販毒所得的籌碼也會構成上游犯罪。最終持有籌碼的人會將籌碼在賭場內贖回現金。

罪犯也有可能將籌碼攜帶離境，付予境外的不法機構，最後由第三者攜回境內，並將之在賭場內分多次贖回現金，以迴避須報告的門檻。大部份國家或地區並不會將賭場籌碼視為有現金價值的工具，故此無需向其海關作出申報。

某些國家或地區，在一家賭場的籌碼可於另一賭場處使用。過往個案

顯示不法分子會利用這點去避開於一個賭場內被人記下其活動的可能性。該等人士會將籌碼帶往另一賭場。有見及此，有些地區規定每間賭場需有自家標記的籌碼，並且禁止賭場間互用籌碼。



以較高的價值向“合法”的玩家購入籌碼

罪犯或會從其他罪犯或一些“合法”的玩家手上，以較籌碼面值為高的價值購入籌碼。此被稱為價值賄賂。

購買大量的“賭場贈券”

有個案顯示罪犯購入大面值或大量低面值，且可以由第三者贖回現金的賭場贈券。罪犯會將此類贈券售予或贈予其他與該罪犯看似無關連的人士，以達至洗錢的目的。

購買賭場的獎賞卡

罪犯會使用犯罪所得，在賭場內以較高的價值，從合法的玩家手上購入賭場的回贈卡。

將贏款及現金混合成賭場支票

縱使只有極少的國家或地區允許此類行為，罪犯會將現金加入贏款之內，隨後要求賭場開出贏款支票。

案例

使用賭場作為清洗黑錢的渠道

罪行：清洗黑錢
洗錢方式：購入籌碼之後即時贖回現金，報稱款項來自角子機中獎或來自賠率較高的博彩活動
發生地點：賭場
使用工具：賭場籌碼、賭場支票

情報指出涉嫌洗錢人士利用賭場為首選方法清洗數百萬犯罪所得之黑錢。所使用洗錢方法包括：無賭博活動之情況下即時贖回購入之籌碼；通過角子機投入資金後再宣稱資金為中獎贏款；以及進行低回報但贏錢機會高之博彩活動。該團伙亦利用銀行帳戶及公司清洗黑錢。

CASE STUDIES

Case I – Chip purchase and cash out

A cargo consignment addressed to a person contained approximately 3.4 kilograms of black opium resin, concealed within the contents. The person was arrested when attempting to collect the consignment. Further investigation revealed that the person was a regular customer of a casino. He used the proceeds from importations to purchase cash chips totaling HKD 6,000,000, and then predominantly cashed out the chips with very little or no gaming activities, and claimed the funds as winnings.

Red Flags:

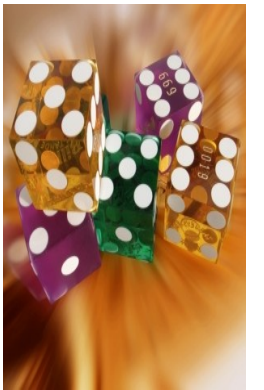
- Frequent visit to the casinos but with little or no gaming

activities;

- High volume of transactions within a short period;
- Supposed winnings do not correspond with recorded winnings;
- Perform mainly cash out transactions.

Recommendations:

- Front line cage staff of casinos should verify the source of chips for chips redemption of large amount.
- Casinos should carry out regular and timely review of chip purchase/redemption records to detect whether any persons are frequently buying and then redeeming chips of similar large total amounts.



Case II – Credit card schemes

A person from Country A visited a casino in Country B and bought gaming chips for a total value of HKD 4,000,000 by means of cash and credit cards. The casino reported these transactions to the local FIU. The credit card account history of the person showed that his account had been extremely active: it had been inundated with various transfers from companies and individuals with many cash deposits. The spouse of the person ran a business in Country A and maintained underworld links with organised criminals from South East Asia. The person also maintained frequent contact with a group of gangsters who were being suspected for the laundering of money deriving from organised crime.

Red Flags:

- Frequent use of credit cards to purchase casino chips;
- Little or no gaming activities;
- Cash out chips shortly afterwards;
- Amount of chips cashed out is same / similar to chips purchased.

Recommendations:

- For this particular case, credit card logs can be maintained to review whether any patron of same name is frequently noted. If so, casinos can apply additional procedures to obtain reasonable explanation on the patron's behavior.

Case III – Money launderer used third parties and false identities

A drug trafficker, disguised as a high-roller of a casino, used the money he was paid for his services and the large sums of money from drug proceeds that needed to be laundered to buy chips at a casino in Country C. The drug trafficker recruited third parties at the casino to purchase, or cash in, chips for him, paying them a nominal fee to do so. After minimal gambling activities, he cashed out some of those chips purchased by the third-parties, claiming these were his gambling winnings. According to the large transactions reports, there was a HKD 2,500,000 discrepancy exist between chips purchased and cashed out. Further investigation revealed that the drug trafficker used aliases and multiple passports and identifications when purchasing and cashing out chips, and refused to provide identification card on numerous other occasions.

Red Flags:

- Cash buy in or cash out transactions performed by a same person using different identifications;
- Use of multiple names to conduct similar activity;
- Use of third-parties to perform cash buy in and cash out transactions;
- High volume of transactions within a short period;

- Supposed winnings do not correspond with recorded winnings;
- Refusals to provide identifications;
- Discrepancies between cash buy in, gaming and cash out records.

Recommendations:

- Adequate control procedures should be applied when patrons want to exchange chips;
- There should be on-going monitoring system to detect unusual, large and complex transactions especially for high-roller VIP customers;
- There should be enhanced CDD measures on high-risk customers;
- Besides customer identification, verification procedures should be carried out to ensure source of fund belongs to patrons. If funding is from third-parties, identification and verification procedure on the beneficial owner should be made;
- Casinos can check the patrons' gaming records to review their gaming rating and may also use the player-tracker system to observe whether they are making only minimal gaming activities.

Case IV – Cash smuggling and underground remittance

A casino agent received large amounts of cash from a customer in Country E who planned to gamble at a casino in Country F. The agent took the cash to a shop at the border of Country E and Country F. The shop divided the sum into small lots, which would be carried to Country F by many “professional commuters”. A collector in Country F would collect these lots and then deposited the monies into the agent's account in the form of cash, cheques, bank transfer and remittance. The agent converted the full amount he received into a cashier order or personal cheque for receipt by the VIP room of the casino. The VIP room would then issue non-negotiable chips to the customer from Country E for his disposals.

Red Flags:

- Cashier orders or personal cheques issued to Junket operators / casino agents on behalf of overseas third-parties.

Recommendations:

- For VIP customers, casino operators including intermediaries should carry out adequate CDD to identify and verify the customers and source of fund. Particular attention should be paid where the beneficial owner of the fund is not the customer himself. Additional CDD measures should be made on the beneficial owner;
- Where origination of funds cannot be verified, casinos/junket promoters should refund the money to the source parties in the same manner that the fund is originally received so that conversion of the forms of funds cannot be achieved;
- Where a winning is claimed by a patron whose origination of fund cannot be explicitly verified, casinos should exercise additional procedures to detect the risk of off-set bet to obtain a casino winning cheque.

CASE STUDIES

Chip purchase and cash out

Credit card schemes

Money launderer used third parties and false identities

Cash smuggling and underground remittance

國際趨勢及發展

賭場面臨的顯著風險

賭場本身屬非金融機構。然而，賭場業務範圍除提供賭博娛樂外，亦承辦各種各樣類似金融機構所提供之金融活動，致令賭場有可能牽涉洗錢風險。即使非全部，大部份賭場一般會提供類似金融機構之金融活動如：接受帳款；貨幣兌換；匯款服務；外幣兌換；儲值服務；以扣賬卡兌現服務；兌票服務；保險箱等。在許多情況下，以上種種都是 24 小時服務的。

由於賭場交易的多樣性、頻繁性及大額性，因而導致博彩業特別容易被利用作洗錢的途徑。賭場本身業務性質涉及現金為主，且大部分交易以現金進行。只須進入賭場，客人就可在買碼階段、博彩過程或在贖回籌碼時進行一次或多次之現金或電子交易。就是這些常規性的以現金換碼或牌、角子機票據、保付支票、賭場內存款帳戶間或與其他司法管轄區之賭場進行電子交易、以及資金進出金融機構之活動，令賭場成為吸引企圖進行洗錢人士之場所。

賭場內的清洗黑錢方法及技巧

鑒於賭場容易被利用進行清洗黑錢活動，一些國際組織如『亞太區打擊清洗黑錢組織』及『金融特別行動組織』曾就有關方面共同進行一項研究。下列為一些在全球各個賭場最常用的洗錢方法：

- 使用賭場具現金價值工具 (現金 / 現金碼 / 角子機票據 / 本票 / 賭場支票 / 禮券 / 籌碼購買券 / 賭場獎賞卡)；
- 資金調撥 / 分拆 / 拆細；
- 使用賭場帳戶 (信貸帳戶、借貸記錄帳戶、使用外地帳戶) / 設施；
- 故意輸款；
- 贏款 / 故意輸款；
- 貨幣兌換；
- 員工共謀；
- 信用卡 / 扣帳卡；
- 虛假文件。

上述各點會在本期及續後數期的博彩業通訊內續一詳細介紹，以供博彩業界人士參考，從而制定對策以減低不法分子利用賭場洗錢的風險。在本期的通訊內，我們先會就第一種洗錢方法“使用賭場具現金價值工具”作出闡述。



『賭場業務範圍除提供賭博娛樂外，亦承辦各種各樣類似金融機構所提供之金融活動，致使賭場有可能牽涉洗錢風險。』



INTERNATIONAL TRENDS AND DEVELOPMENTS

Broad risks in casinos

Casinos are by definition non-financial institutions. As part of their operation casinos offer gambling for entertainment, but also undertake various financial activities that are similar to financial institutions, which put them at risk of money laundering. Most, if not all, casinos conduct financial activities akin to financial institutions including: accepting funds on account; conducting money exchange; conducting money transfers; foreign currency exchange; stored value services; debit card cashing facilities, cheque cashing; safety deposit boxes; etc. In many cases these financial services are available 24 hours a day.

It is the variety, frequency and volume of transactions that makes the casino sector particularly vulnerable to money laundering. Casinos are by nature a cash intensive business and the majority of transactions are cash based. During a single visit to a casino a customer may undertake one or many cash or electronic transactions, at either the “buy in” stage, during play, or at the “cash out” stage. It is this routine exchange of cash for casino chips or plaques, TITO tickets, and certified cheques, as well as the provision of electronic transactions to and from casino deposit accounts, casinos in other jurisdictions and the movement of funds in and out of the financial sector, which makes casinos an attractive target for those attempting to launder money.

Money laundering methods and techniques in casinos

In view of the vulnerabilities of casinos to money laundering, international organizations like the Asia/Pacific Group on Money Laundering (APG) and Financial Action Task Force (FATF) carried out a joint study of vulnerabilities in the gaming and casino sector. The following are some of the most common money laundering methods being used in casinos globally:

The major kinds of money laundering methods are:

- Use of Casino Value Instruments (cash / casino chips / TITO / gaming machine credits / cashier's orders / casino cheques / gift certificates / chip purchase vouchers / casino reward cards);
- Structuring / Refining;
- Use of Casino Accounts (credit accounts, markers, foreign holding accounts) / facilities;
- Intentional losses;
- Winnings / intentional losses;
- Currency Exchange;
- Employee Complicity;
- Credit Cards / Debit Cards;
- False Documents.

The above money laundering methods will be discussed one by one in this newsletter and future issues for reference of casino operators so that they can implement adequate counter measures to mitigate the risks involved. In this newsletter, we will first take a look at the first method “Use of Casino Value Instruments”.



“As part of their operation casinos offer gambling for entertainment, but also undertake various financial activities that are similar to financial institutions, which put them at risk of money laundering.”

