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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.

## 國際趨勢及發展 —

## 以信用卡／扣帳卡及資金調撥形式清洗黑錢的跡象

- 以信用卡 / 扣帳卡購買賭場籌碼
- 客戶購買籌碼後迅速離開賭場
- 使用多張信用卡 / 扣帳卡購買賭場籌碼
- 利用第三者以信用卡 / 扣帳卡購買賭場籌碼
- 拆細信用卡交易
- 賣碼與買碼數額相同 / 相若
- 所進行的活動與客戶資料不符
- 以不同名字進行相若活動
- 多名不同人士調撥資金至同一受益人
- 轉賬至第三者戶口
- 利用第三者購買賭場籌碼
- 利用第三者進行博彩活動
- 將賣碼現金給予第三者
- 在沒有進行任何博彩活動之情況下買賣賭場
- 頻繁地以避過須提供身份資料門檻的金額購
- 要求以低於須提供身份資料門檻的現金或籌
- 以籌碼、支票及現金等多種不同組合形式提



- 客戶乘賭場職員換更之機會故意作出多次低於須提供身份資料門檻的交易活動
- 客戶在博彩金額到達須提供身份資料門檻前不停更換賭台或賭房
- 客戶以大量小面額紙幣作為賭博之用
- 以小面額紙幣兌換成大面額紙幣
- 固定帳戶持有者突然大幅地增加貨幣找換交易的次數

## INTERNATIONAL TRENDS AND DEVELOPMENTS -

## Indicators of Money Laundering using Credit / Debit Cards and Structuring

- Purchasing casino chips using credit / debit card.
- Customer purchases chips and leaves casino shortly after.
- Use of multiple credit/debit cards to purchase casino chips.
- Use of third parties to purchase chips using credit/debit card.
- Structuring of credit card transactions.
- Chip cash out is same/similar to chip purchase.
- Activity was inconsistent with the customer's profile.
- Use of multiple names to conduct similar activity.
- Multiple individuals sending funds to one beneficiary.
- Transferring funds into third party accounts.
- Use of third parties to purchase gaming chips.
- Use of third party to conduct wagering.
- Cash handed to third party after cash out.
- Purchasing and cashing out casino chips with no gaming activity.
- Frequent "buy in" and "cash out" transactions just under thresholds.
- Requests for winnings in separate cash or chip amounts under reporting threshold.
- Cashing in winnings in a multiple combination of chips, cheque and cash.
- Customer conducts several transactions under reporting thresholds over several shift changes.
- Customer moving from table to table or room to room before the wagering amounts reach the reporting threshold.
- Customer gambling with large amounts of small denomination bills.
- Currency exchange from small denomination bills to larger denomination bills.
- Dramatic or rapid increase in frequency of currency transactions for regular account holders.



下期續 To be continued

內容摘錄自 2009 年 3 月 FATF 和 APG Joint Report “Vulnerabilities of Casinos and Gaming Sector”  
Content extracted from FATF and APG Joint Report “Vulnerabilities of Casino and Gaming Sector”

**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 Government

第三期  
Issue No. 3

## 可疑交易報告統計 (2010年1至6月)

STR數量(份)	2010年 1至6月	2009年 1至6月
由金融及保險機構舉報	131 (30%)	178 (36%)
由幸運博彩經營者舉報	280 (64%)	307 (63%)
由其他機構舉報	26 (6%)	5 (1%)
總數	437	490

- 本辦公室於2010年1至6月所收到的STR數量，較2009年同期下跌了11%。
- 來自金融機構的STR佔總數量的30%，而由博彩公司舉報的STR約佔64%。
- 本辦公室向檢察院舉報的STR共21份。

## Suspicious Transaction Reports Statistics (2010 Jan to Jun)

- The total number of STRs received by GIF for 2010 Jan to Jun decreased by 11%, as compared with the same period in 2009.
- STRs received from financial institutions and gaming sectors constituted 30% and 64% of total respectively.
- A total of 21 STRs were sent to the Public Prosecutions Office for further investigation.

Number of STRs	2010 Jan to Jun	2009 Jan to Jun
From Financial Institutions and Insurance Companies	131 (30%)	178 (36%)
From Games of Fortune Operators	280 (64%)	307 (63%)
From Other Institutions	26 (6%)	5 (1%)
Total	437	490



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### 國際趨勢及發展 – 信用卡 / 扣帳卡

承上期的博彩業通訊中，我們已提及由『亞太區打擊清洗黑錢組織』及『金融特別行動組織』所共同進行研究中的一些在賭場較常見的洗錢方法，今期我們將會繼續介紹兩種常見的洗錢方法 – “信用卡/扣帳卡”及“資金調撥”。



#### 清洗從盜用信用卡所得的款項

部份賭場允許客戶使用信用卡購買籌碼，雖然當中賭場為防止客戶使用盜用信用卡或假信用卡通常已備有監控系統，但針對一般信用卡的使用，仍存有一定的洗錢風險，如使用非法得來的資金透過銀行償付信用卡結餘。

#### 信用卡

透過信用卡進行的可疑交易給予有權限當局更容易地追蹤資金流向的機會。



#### 扣帳卡

扣帳卡亦是一個可被利用作為詐騙及洗錢罪行的儲值工具。在一些個案中，疑犯會到賭場使用扣帳卡內最高限額用於購買籌碼，但亦有部份情況犯罪份子會到附近的押店以扣帳卡購買名貴商品（如珠寶或手錶），隨即將其贖回現金，並再以該等現金在賭場買碼。疑犯在沒有或只進行少量博彩活動後兌換籌碼贖回現金，亦有可能會將籌碼轉交犯罪團伙進行大量博彩活動。

內容摘錄自2009年3月FATF and APG Joint Report "Vulnerabilities of Casinos and Gaming Sector"

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### Case Studies

#### Debit Card Scheme

Mr. A, residing in Country C, visited a casino in Country D frequently over the past 12 months, and bought gaming chips for a total of \$3 million paid in cash and by debit card during his visit. A financial institution reported these debit card transactions to the FIU.

Based on the transaction pattern of Mr. A, it was found out that he purchased large volume of high value goods in a retail shop right outside the casino, shortly before each of his visits to the casino. Further investigations found out that he received casino chips instead of goods indicated on the receipt issued by the shop. None of the chips was put at risk, and Mr. A cashed out the chips shortly after.

The FIU later found out that his account had been extremely active: it had been overwhelmed with frequent transfers from companies and, in particular, with many

cash deposits. Intelligence revealed that the spouse of Mr. A ran a business in Country C and maintained underground banking links with organised crime in Country C.

#### Red Flags:

- Frequent visits to the casinos but with little or no gaming activities;
- Cash out chips with no previous buy-in records;
- Perform mainly cash out transactions.

#### Recommendations:

- Identify customers in chips conversion of large amount;
- 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 redeeming chips but without any previous buy-in records.

#### Credit Card Scheme

Mr. F was a senior official in a charitable organisation in Country Z, that carried out charitable activities and received donations from different countries as well as the local public. His spouse, Mrs. F, claimed to be a housewife, had applied for more than 10 credit cards from different credit card companies. She frequently visited the casino and purchased chips using her credit cards, but only a small amount of the chips were put at risk, and the rest were cashed out shortly afterwards.

Mr. F was later arrested and sentenced in Country Z for money laundering. Evidence showed that he had close connection to the local drug syndicate, and received low denominations notes from local drug dealers which they alleged to be donations. He then deposited those drug money into his wife's credit card accounts, and used the

money to purchase chips in the casino.

#### Red Flags:

- Purchase casino chips using credit card;
- Purchase and cashing out casino chips / plaques with no gaming activity;
- Use of multiple credit cards to purchase casino chips;
- Chip cash out is same / similar to chip purchase.

#### Recommendations:

- Unlike debit cards, every credit card should have a credit limit. Casinos should be alerted if a patron purchases chips using multiple credit cards, or the purchase amount exceeds a reasonable credit limit (meaning the card holder must have transferred fund into the account beforehand). Thus casinos have to carry out enhanced CDD measures and trigger suspicious transaction reports to FIU if the transactions are deemed suspicious.

#### Structuring Low Denomination Notes

A group of persons entered the casino and purchased chips with low denomination notes and cashed in amounts below the reporting threshold. There were no gaming activities involved and the group were seen leaving the casino shortly after the chips buy-in.

The group then passed the chips to an individual who later entered the casino and cashed out those chips without any gaming activities. Further investigations revealed that the individual was in fact the leader of a drug trafficking syndicate, which sold drugs in smaller volume to teenagers across town.

#### Red Flags:

- Use of different third-parties to carry out cash buy-in

transactions just below reporting threshold;

- Cash handed to third party immediately after buy-in;
- Cash out chips with no previous buy-in records or any gaming activities record;
- Perform mainly cash out transactions.

#### Recommendations:

- Identify customers in chips conversion of large amount;
- Front line cage staff of casinos should be aware when there are frequent chip purchase with large volume of low denomination notes within a short period of time;
- Casinos should carry out regular and timely review of chip purchase/redemption records to detect whether any persons are frequently redeeming chips without previous buy-in records.

Content extracted from FATF and APG Joint Report "Vulnerabilities of Casino and Gaming Sector" of March 2009



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### 個案例子

#### 扣帳卡系統

居於C國的A先生在過去十二個月內經常進出D國某賭場，並以現金及扣帳卡購買三百萬賭場籌碼。某金融機構將該等扣帳卡交易向金融情報組織作出舉報。

追查A先生的交易模式後，發現A先生會於每次進入賭場前在賭場外的一家商店購買大量的高價消費品，進一步調查顯示A先生是收取賭場籌碼而並非發票收據上所標示的貨品。A先生並沒有將籌碼用於博彩而是在短時間內將拿取的籌碼轉換成現金。

金融情報組織往後發現A先生的帳戶交易非常活躍：該帳戶頻密收取來自公司的轉帳及大量的現金存款。情報顯示A先

生的配偶在C國從事生意，並與C國有組織犯罪集團的地下錢莊保持聯繫。

#### 疑點：

- 經常性前往賭場卻只進行少量或沒有進行任何博彩活動；
- 贖回籌碼但無以往購買兌換記錄；
- 主要進行贖回籌碼交易。

#### 建議：

- 查核確認進行大額籌碼兌換的客戶；
- 前線賭場帳房員工在大額籌碼贖回時應核對籌碼來源；
- 賭場應定期採取有效率的買賣碼記錄審查，以偵測是否有客戶經常性地贖回籌碼但卻沒有過往之買碼記錄。

#### 信用卡系統

F先生是Z國某慈善組織的資深要員，該組織從事慈善活動和接收從當地及不同國家得來的捐款。F先生的配偶F太太，申報為家庭主婦，已從不同的信用卡公司申請超過十張信用卡。F太太常出沒於賭場並使用她的信用卡購買籌碼，但她只將少量籌碼用作博彩，但大部分皆於短時間內贖回現金。

F先生及後在Z國以洗錢罪被拘捕。證據顯示F先生與當地販毒集團有緊密連繫，並從當地毒品拆家收取低面值的鈔票，並訛稱資金為捐款。F先生其後把從毒品得來的錢存入其妻子的信用卡戶口，然後在賭場購買籌碼。

#### 疑點：

- 使用信用卡來購買賭場籌碼；
- 沒有進行任何博彩活動之情況下購買及贖回籌碼；
- 以多張信用卡購買賭場籌碼；
- 贖回籌碼及購買籌碼之數額相同/相若。

#### 建議：

- 與扣帳卡不同，每張信用卡應有一定信貸額。賭場應注意如客戶以多張信用卡購買籌碼，或購買銀碼超越合理的信貸額(意即持卡人應已在較早前將款項存入帳戶內)。因此賭場有必要採取強化的客戶盡職審查措施，並在遇到可疑的交易時應提交可疑交易報告到金融情報組織。

#### 分拆細面額鈔票

一組人士進入賭場並以細面額鈔票及以低於需要提供身份資料門檻的金額購買籌碼。該組人等沒有進行任何博彩活動並在購買籌碼後不久便離開賭場。

該組人士及後將購入的籌碼給予第三者，該人進入賭場並在沒有進行任何博彩活動下贖回籌碼。深入調查後發現該名第三者實際上是某毒品販賣集團的首領，在市內售賣細劑量的毒品予年青人。

#### 疑點：

- 運用不同第三者進行低於需要提供身份資料門檻的現金買碼

#### 交易：

- 現金在購買籌碼後馬上給予第三者；
- 在沒有過往購買籌碼記錄或任何博彩活動記錄下賣碼；
- 主要進行賣碼交易。

#### 建議：

- 查核確認進行大額籌碼兌換的客戶；
- 前線賭場帳房員工應注意在短時間內頻密以大量小面額鈔票購入籌碼的情況；
- 賭場應定期採取有效率的買賣碼記錄審查，以偵測是否有客戶經常性地贖回籌碼但卻沒有過往之買碼記錄。

內容摘錄自2009年3月FATF and APG Joint Report "Vulnerabilities of Casinos and Gaming Sector"

二〇一〇年十月

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# 金融情報辦公室通訊（博彩業）

## Financial Intelligence Office Newsletter for Gaming Sector

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第三期  
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### International Trends and Developments — Credit/Debit Cards



We have discussed some of the common money laundering methods pinpointed in the study jointly carried out by the Asia/Pacific Group on Money Laundering (APG) and the Financial Action Task Force (FATF). In this issue, we will continue to take a closer look at the next two methods - '**Credit / Debit Cards**' & '**Structuring**'.

#### Laundering proceeds from stolen credit cards

Some casinos allow customers to purchase casino chips using credit cards. The casinos usually have control systems in place to prevent the use of stolen credit cards or fraudulent cards. However, in cases where the cards are not stolen or fraudulently obtained, there are still money laundering risks that the outstanding card balances are paid by card holders at the bank using illicit funds.

#### Credit cards

Suspected use of credit cards provides an opportunity for authorities to follow the money trail more readily.

#### Debit cards

Debit cards are another value instrument used to conduct fraud and money laundering crimes. In some cases, suspects would join a casino and use their debit cards to draw up to the maximum available in their accounts and purchase casino chips. In other cases, the suspects may simply purchase valuable goods (such as jewellery or watches) from a nearby pawn shop using their debit cards, and then immediately return the goods for cash refund, and use the cash to purchase chips at the casino. The suspects either do not put any funds at risk or there would be minimal play. The suspects would then typically cash out. In similar cases, plaques would be passed to an associate for play. Sometimes all the funds would be put at risk.



Content extracted from FATF and APG Joint Report "Vulnerabilities of Casino and Gaming Sector" of March 2009

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### 國際趨勢及發展－資金調撥

#### 資金調撥

資金調撥或“資金分拆”是以化整為零的方式將巨額現金分散成小額款項，以避免引起懷疑及迴避需報告的門檻。

罪犯通常除透過分拆資金以窺避金融機構向有關當局舉報外，部份罪犯相反會利用賭場觸發一筆現金交易報告以取得交易的證明。



疑犯可利用賭場去整合大量細面額紙幣變成更方便使用的大面額紙幣，部份司法地區得悉這些大量細面額紙幣是從販毒所得；部份疑犯亦以集團形式進行分拆活動，他們會在進入賭場之前將資金分散給團伙，各團伙在賭場內分拆其資金，分拆後在賭場外會合，並將資金再匯集在一起。以下為最常見的技倆：

#### 透過櫃台形式轉換

疑犯透過櫃台將硬幣或細面額紙幣兌換成較大面額之紙幣。



#### 透過“存鈔器”或接受現金的角子機轉換

大部份有角子機的賭場均有“存鈔器”，疑犯在沒有或只進行少量博彩活動下以傳入紙幣方式在角子機累積積分，當金額牽涉較大時，往往需要角子機輔助人員在櫃台以角子機票據或類似文件將該等積分承兌為現金或支票。

#### 透過博彩帳戶轉換

疑犯以細面額現金存入博彩帳戶內，然後以較大面額形式提取。

內容摘錄自2009年3月FATF and APG Joint Report “Vulnerabilities of Casinos and Gaming Sector”

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### International Trends and Developments — Structuring

#### Structuring

Structuring or “smurfing” involves the distribution of a large amount of cash into a number of smaller transactions in order to minimise suspicion and evade threshold reporting requirements.

While money launderers will often structure their transactions to avoid financial institutions filing reports to authorities, it has been found that some money launderers using casinos have the opposite strategy and seek to trigger a cash transaction report to further authenticate a transaction.



Suspects may use casino services to structure large amounts of low denomination bank notes into more manageable high denomination notes. Some jurisdictions note this as being associated with drug dealers who accumulate large amounts of small denomination bills from drug sales. In cases of groups, they may seek to structure money by dividing it amongst the group before entering the casino. The group enter the casino, individually structure their portion of the money and meet again outside the casino to assemble the total amount. The techniques most commonly identified are listed below:

#### Refining using the cashier’s desk

Suspects exchange coins or small denomination bills for larger denomination bills at the cashier’s desk.

#### Refining using ‘note acceptors’ or gaming machines that accept cash

Most casinos with gaming machines have “note acceptors”. Suspects will feed currency notes into the machine to accumulate credit with little or no play before redeeming the credits. As the amount can be quite large, it requires a “ticket” or similar document provided by the slot attendant as proof to enable the exchange for cash or cheque at the casino cashier’s desk.

#### Use of casino account for refining

Suspects pay low denomination cash into their casino accounts and withdrawn funds with higher denominations cash.



Content extracted from FATF and APG Joint Report “Vulnerabilities of Casino and Gaming Sector” of March 2009