形成懷疑：數碼支付代幣的類型模式

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數碼支付代幣（DPT）交易在甚麼情況下屬於可疑？財務行動特別組織（FATF）於2020年9月發表的警示指標，以及打擊洗錢及恐怖分子資金籌集業界夥伴關係（ACIP）的類型模式文件，提供了分類框架，新加坡金融管理局（MAS）亦期望公司的監察規則及分析人員培訓能反映這框架。[1] 在新加坡實務中反覆出現的指標如下。將法定貨幣存款或DPT購買拆細至略低於內部門檻。將存入的法定貨幣迅速兌換為DPT，並立即提取至外部錢包，其間並無任何交易，這是詐騙得益進入加密市場的典型途徑。從分析工具顯示與混幣器、暗網市場、受制裁實體、勒索軟件或遭黑客入侵的交易所有關的地址收取DPT。從多個互不相關的地址轉入款項，再集中提取至單一地址。使用私隱幣，或經跨鏈橋在不同區塊鏈之間來回轉移。客戶申報的職業及收入無法支持其交易量。客戶對代幣來源閃爍其詞，或解釋前後不一。交易與帳戶的申報用途不符。

在新加坡的可疑交易報告（STR）中，詐騙得益佔主導地位。新加坡警察部隊報告，自2021年起每年詐騙損失達數億新加坡元，受害人的大部分資金經DPT交易所流出銀行體系。[2] 典型模式是受害人被誘使將法定貨幣轉入傀儡

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帳戶，或直接轉入以其本人名義開立的DPT交易所帳戶，購買穩定幣，再發送至騙徒控制的地址。從交易所的角度看，客戶是受害人，存款來自客戶本人的銀行戶口，提款則轉往客戶申報為自己所有的地址。警示跡象並不明顯：新客戶、首次購買、購買金額相對申報收入偏高、立即提款，以及分析工具顯示與已知詐騙集群有關的目的地址。有時客戶在開戶視像通話期間仍在講電話。MAS一直敦促DPT持牌人正是在這類情況下介入，方法包括延遲交易、發出警告訊息及主動致電客戶，並將公司的詐騙干預統計數據視為其打擊洗錢評估的一部分。

例子

一家新加坡DPT交易所為一名62歲的退休教師開戶，她申報年收入30,000新加坡元，儲蓄400,000新加坡元。開戶後一天內，她從自己的銀行戶口存入180,000新加坡元，購買USDT，並指示提取至一個她申報為自己所有的地址，且以簽署訊息證明控制權。分析工具顯示該地址是新地址。表面上，交易並無任何違法之處。然而，年齡、首次交易、金額相對收入偏高、立即提款及新地址這些因素結合起來，與公司風險評估中的詐騙類型模式吻合。公司政策規定須暫緩處理並主動致電。通話中得知，她正「跟一位網上認識的顧問投資」，對方叫她開立該帳戶。公司拒絕提款，解釋原因，並提交一份註明目的地址的STR。客戶十分憤怒。三星期後，她向公司致謝。STR、通話紀錄及暫緩處理的決定，構成向MAS證明監察機制有效運作的檔案。

註釋

1. FATF, Virtual Assets: Red Flag Indicators of Money Laundering and Terrorist Financing，2020年9月，分為與交易、交易模式、匿名性、匯款人及收款人、資金來源及地域風險有關的指標。 ↩
2. Singapore Police Force, Annual Scams and Cybercrime Brief 2023及2024，報告詐騙損失總額及涉及兌換為加密貨幣的個案比例。 ↩

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