2023年8月案件與實務收緊

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2023年8月，新加坡警察部隊拘捕十名外國人，並檢取或凍結最終估值超過30億新加坡元的資產，這宗案件成為新加坡史上最大的洗錢案。案情載於第L部分第V章。[1] 就家族辦公室而言，相關發現是最少一名被告曾使用享有稅務優惠的新加坡家族辦公室結構。與該集團有往來的銀行、企業服務提供者及家族辦公室專業人士，均未察覺資金來源。新加坡金融管理局（MAS）及財政部的回應，是對家族辦公室行業進行檢討，並由此提出上文所述的類別豁免建議。打擊洗錢跨部門委員會在2024年10月的報告中，建議加強把關。由於MAS在每宗申請中加入有關財富來源的問題，第13O條及第13U條的批准在2024年間明顯放緩。[2]

對加密家族而言，實際後果是財富來源的陳述必須在申請前已經完備。MAS會詢問家族財富的來源、產生財富的業務或投資的歷史、在原居司法管轄區的稅務處理，以及把代幣連繫至該歷史的鏈上證據。創辦人如能出示創世時的代幣分配、歸屬時間表、交易所紀錄，以及申報收益的報稅表，其檔案便相當有力。財富來自早期挖礦或在已不存在的交易所買賣的家族，檔案較弱，應預期程序較長、問題較多。第F部分第III章及第L部分第II章所述的區

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塊鏈分析報告，現已成為家族辦公室申請的標準附件。將持有基金戶口的銀行亦會要求相同資料。第P部分第IX章有關加密財富銀行服務的實務完全適用。

實務提示

在與監管機構首次會面前準備好財富來源檔案，可縮短家族辦公室的審批程序。檔案應按時間順序載列財富陳述，以及支持每個步驟的公司及代幣文件。另應附上累積財富期間各居住國的報稅表或評稅、涵蓋整段期間的主要錢包區塊鏈分析報告，以及一家已完成本身審查的機構所發出的銀行推薦信。按我的經驗，這樣的檔案可把申請時間由十二至十八個月縮短至六至九個月。沒有這樣的檔案，家族辦公室便要承受被禮貌地拒絕而不獲告知理由的風險。

註釋

1. Singapore Police Force，2023年8月16日及其後有關該洗錢調查中拘捕及檢取行動的新聞稿；十名被告於2024年4月至6月間被定罪及判刑。 ↩
2. Inter-Ministerial Committee on Anti-Money Laundering，2024年10月4日報告；MAS，2023年至2024年有關基金稅務優惠申請加強盡職審查的聲明。 ↩

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