商業事務局與可疑交易報告辦公室（STRO）

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商業事務局（Commercial Affairs Department，CAD）是新加坡警察部隊專責白領罪行的部門，負責調查涉及數碼資產的欺詐、詐騙、刑事背信、市場失當行為、洗錢及無牌金融活動。自2015年起，CAD與MAS根據《證券及期貨法》就市場失當行為進行聯合調查，這項安排其後亦擴展至《支付服務法》下的案件。CAD主導了新加坡對Terraform Labs及Hodlnaut的調查。其於2022年成立的反詐騙指揮部（Anti-Scam Command）負責處理散戶加密貨幣騙案，這類案件佔投訴的最大比例。[1] 第N部分第II章說明CAD如何處理案件，以及受害人或疑犯應如何應對。

可疑交易報告辦公室（Suspicious Transaction Reporting Office，STRO）是新加坡的金融情報單位，隸屬CAD。《1992年貪污、販毒及其他嚴重罪行（沒收利益）法》第5條設立該辦公室，並規定由部長委任可疑交易報告主任。任何人如知悉或有合理理由懷疑某項財產與犯罪行為有關，均有責任根據第45條提交可疑交易報告，而這些報告即由上述主任接收。STRO亦接收現金流動報告及現金交易報告，加以分析，並向CAD、MAS及外國對口機構發

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放情報。STRO是艾格蒙金融情報組織（Egmont Group）的成員。[2] 對數碼支付代幣持牌人而言，每一份可疑交易報告均須透過網上平台提交STRO。第L部分第IV章說明有關責任、通風報訊罪及律師的處境。

註釋

1. 新加坡警察部隊商業事務局，見警方網站「Organisation Structure」欄目的說明；MAS與CAD就市場失當行為進行聯合調查的安排於2015年3月17日公佈；反詐騙指揮部於2022年3月成立。 ↩
2. Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act 1992 (2020 Rev Ed)，第2(1)條（"Suspicious Transaction Reporting Officer"的定義）及第5條（Suspicious Transaction Reporting Office），文本以Singapore Statutes Online所載為準；STRO的職能及其艾格蒙金融情報組織成員身份，見新加坡警察部隊網站「Suspicious Transaction Reporting Office」的說明。 ↩

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