



澳門金融管理局
AUTORIDADE MONETÁRIA DE MACAU

EXAMPLES OF SUSPICIOUS TRANSACTIONS

1. Cash Transactions

- a) Transactions of deposit/withdrawal in unusual large amount made in cash and/or by cheques are not in line with customers' nature of profession/business, activity patterns or other relevant factors.
- b) Transactions of overseas inward money transfer/remittance received frequently in short period of time and followed subsequently by one or several withdrawals in cash and/or by cheques are not consistent with the customers' nature of profession/business, activity patterns or other relevant factors.
- c) Transactions of deposit made in cash and/or by cheques on different occasions, in such a way that on each occasion the amount involved is not remarkable, but all together the total of such deposits equals to an unusual large amount, being not consistent with customers' nature of profession/business, activity patterns or other relevant factors.
- d) Transactions of deposit and/or exchange involving an unusual large amount of small-denomination coins or banknotes are not consistent with the customers' nature of profession/business, activity patterns or other relevant factors.
- e) Several transactions for an account are made in different branches of the same institution on the same day, in an amount below the established threshold to avoid monitoring.
- f) Frequent transactions of cash deposit in unusual large amount made into night safe facilities (to avoid direct contact) are not consistent with the customers' nature of profession/business, activity patterns or other relevant factors.
- g) Branches that have a great deal more cash transactions than usual (Head Office statistics should detect abnormal cash transactions in branches).



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- h) Customers whose deposits contain counterfeit notes or forged instruments.
- i) Customers who prefer to pay cash for exchange of foreign currencies in unusual large amount rather than through their account with the institution.
- j) Customers who pay in cash/cheque to their account frequently for application for bank drafts, cashier orders, remittances or other negotiable instruments without apparent economic or visible lawful purpose.

2. Opening of New Accounts

- a) Cases where customers attempt to open accounts in fictitious name or in the name of other persons but fail (including those cases where accounts could not be opened due to absence of proper identification documents or any other reason).
- b) Cases where customers submit only photocopies of their personal identification documents for account opening and refuse to present the originals for verification without any rational reasons.
- c) Cases where customers provide doubtful or unclear information for account opening.
- d) Cases where the details of personal or corporate customer identification (profession or business nature, addresses, telephone numbers, etc.) provided for account opening are found fictitious after subsequent verification.
- e) Transactions made through those accounts held by corporations that are found never existed.
- f) Transactions made by those customers who wish to have statements, advises or notices sent to destinations other than their address or refuse to have any correspondence sent to their address.



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- g) Transactions made by those customers who maintain several similar accounts without apparent economic or visible lawful purpose.
- h) Customers who wish to open a number of trustee or clients' accounts not consistent with their profession or business nature.
- i) An account opened in the name of a moneychanger that receives structured deposits afterwards.
- j) Increased use of safe deposit boxes, particularly for deposit and withdrawal of sealed packages that cast suspicion.

3. Transactions through Existing Accounts

- a) Transactions of deposit/withdrawal in unusual large amount are done through account during a short period of time after opening without apparent economic or visible lawful purpose and then the account is closed or discontinued.
- b) Transactions of deposit/withdrawal in unusual large amount are made frequently without apparent economic or visible lawful purpose.
- c) Frequent transactions of remittance to an unusual large number of people are made without apparent economic or visible lawful purpose.
- d) Transactions of inward remittance from an unusual large number of people are received through an account followed subsequently by withdrawals or outward remittances without apparent economic or visible lawful purpose.
- e) Transactions are suddenly made to an account that has not been active for a long time without apparent economic or visible lawful purpose.



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- f) Customers who have accounts with several institutions in the same district are found processing regular consolidation of the funds in such accounts prior to request for onward transmission.
- g) Customers are found conducting, together and simultaneously with separate tellers of the same institution, cash transactions or foreign exchange transactions that come up with an unusual large amount eventually.
- h) Corporate customers' representatives try to avoid contact with the institution.
- i) Substantially increased deposits of cash or negotiable instruments into client accounts, in-house company or trust accounts by a professional firm or company, especially when such deposits are promptly transferred to other client companies and trust accounts.

4. Investment related transactions

- a) Purchase of securities to be kept in custody by the institution is found inconsistent with the customer's profession/business nature.
- b) Securities transactions through a trust or similar intermediary where the amounts are substantial and in cash, or made through an offshore entity bear no relation to the customer's profession/business.
- c) Purchase of bearer shares by customers, especially if issued by offshore entities, and the related custody or control of such shares is unknown.
- d) Transactions where customers settle trading of securities by remittances or cheques from third parties, which are found rational unless.
- e) Purchase and sale of financial instruments without any apparent economic or visible lawful purpose or in unusual circumstances.



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- f) Back to back deposit/loan transactions with the subsidiaries of, or affiliates of overseas financial institutions locate in those known drug trafficking areas.
- g) Requests from customers for investment handling services, in foreign currency or securities, where the source of the funds is not clear or is inconsistent with the customer's known profession/business.

5. Cross-border Transactions

- a) Transactions involving customers who provide falsified or ambiguous information for their overseas remittances.
- b) Transactions where customers make frequent unusual large overseas remittances within short period of time without apparent economic or visible lawful purpose.
- c) Transactions where customers send or receive unusual large overseas remittances without apparent economic or visible lawful purpose.
- d) Transactions where customers frequently order or encash unusual large amount of remittance or traveller's cheques without apparent economic or visible lawful purpose.
- e) Transactions involving customers who are based in the jurisdictions that are of high-risk and non-cooperative with international anti-money laundering efforts, unless are found rational.
- f) Transactions that customers carry out with those parties (including corporations) based in high-risk jurisdictions or in those jurisdictions shipping illegal drugs, unless are found rational.
- g) Transactions involving customers who are introduced by those parties (including corporations) based in high-risk jurisdictions or in those jurisdictions shipping illegal drugs, unless are found rational.



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6. Loan Transactions

- a) Transactions where customers unexpectedly make full repayment of overdue loans, early settlement of loans before maturity, or overpayment of other banking services (e.g. credit card), unless are found rational.
- b) Customers who request to borrow loan against certain assets, of which the origin is not known or not consistent with the customers' standing.
- c) Request by a customer for arranging finance but the source of the customer's financial income is unclear and third parties' property is involved as collateral.
- d) A customer who is reluctant or refuses to state a purpose of a loan or the source of repayment, or provides a questionable purpose and/or source.

7. Other Transactions

- a) Transactions involving customers who refuse to explain reasons or submit information when requested to verify the intended beneficiary and clear the suspicion regarding whether or not the customers are acting on their own behalf. These transactions include those that are made by representatives of customers and are expected to benefit others than the customers.
- b) Transactions that are made by employees of institution or their relatives to benefit parties that are unknown.
- c) Transactions involving customers who unusually emphasize the secrecy of the deals, and customers who attempt to ask, force or bribe staff of institution not to report the deals to authorities.