形成怀疑：数字支付代币的典型模式

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什么使一笔DPT交易变得可疑？FATF2020年9月发布的危险信号指标以及ACIP的典型模式文件提供了分类框架，MAS期望机构的监控规则和分析人员培训能够反映这一框架。[1] 在新加坡实务中反复出现的指标如下：将法定货币存款或DPT购买拆分为略低于内部门槛的金额；将存入的法定货币迅速兑换为DPT并立即提取至外部钱包，其间没有任何交易，这是诈骗收益的典型入金通道；收到分析工具关联至混币器、暗网市场、受制裁实体、勒索软件或遭黑客攻击交易所的地址所转入的DPT；来自众多互不相关地址的转入资金被归集后提取至单一地址；使用隐私币，或通过跨链桥进行链间跳转；客户申报的职业和收入无法支撑其交易量；客户对代币来源含糊其辞，或解释前后不一；交易与账户声明的用途不符。

诈骗收益在新加坡的STR图景中占据主导地位。新加坡警察部队报告称，自2021年起，诈骗损失每年达数亿新元，受害人资金中有很大一部分经由DPT交易所流出银行体系。[2] 典型模式是：受害人被诱导将法定货币转入“钱骡”账户，或直接转入以其本人名义开立的DPT交易所账户，购买稳定币后发送至诈骗者控制的地址。从交易所的角度看，客户就是受害人本人，存款来自

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客户本人的银行账户，提币则转往客户声明为其本人所有的地址。危险信号十分隐蔽：新客户、首次购买者、相对于申报收入而言金额较大的购买、立即提币、分析工具将目标地址与已知诈骗集群相关联。有时，客户在开户视频通话期间还在接听电话。MAS一直敦促DPT持牌机构在正是此类情形中进行干预，手段包括延迟交易、发出警示信息和主动致电客户，并将机构的诈骗干预统计数据视为其反洗钱评估的一部分。

示例

新加坡一家DPT交易所为一名62岁的退休教师开户，她申报的年收入为30,000新元，储蓄为400,000新元。开户后一天之内，她从本人银行账户存入180,000新元，购买USDT，并指示提币至一个她声明为本人所有的地址，同时以签名消息证明了控制权。分析工具显示该地址是新地址。从表面上看，这笔交易并无违法之处。但年龄、首次交易、相对于收入的金额、立即提币以及新地址这几项因素叠加，与机构风险评估中的诈骗典型模式相吻合。机构政策要求暂停处理并主动致电。通话中得知，她正在“跟着一位网上认识的顾问投资”，正是对方让她开立了这个账户。机构拒绝了提币，说明了原因，并提交了一份指明目标地址的STR。客户很生气。三周后，她向机构表示感谢。STR、通话记录和暂停处理的记录，构成了向MAS证明监控行之有效的档案。

注释

1. FATF, Virtual Assets: Red Flag Indicators of Money Laundering and Terrorist Financing，2020年9月，指标分为与交易、交易模式、匿名性、汇款人和收款人、资金来源以及地域风险相关的几类。 ↩
2. Singapore Police Force, Annual Scams and Cybercrime Brief 2023及2024，报告了诈骗损失总额以及涉及兑换为加密货币的案件比例。↩

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