2023年8月案件与实务收紧

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2023年8月，新加坡警察部队逮捕了十名外国公民，查封或冻结的资产最终估值超过30亿新元，此案成为新加坡历史上最大的洗钱案。案情详见第L部分第V章。[1] 对家族办公室而言，相关的发现是：至少有一名被告利用了享有税收优惠的新加坡家族办公室结构。与该团伙打交道的银行、企业服务提供商和家族办公室专业人士都未能识别资金来源。MAS和财政部的回应是对家族办公室行业进行审查，由此产生了上文所述的类别豁免提案。反洗钱跨部门委员会在2024年10月的报告中建议加强把关。2024年间，由于MAS在每份申请中都增加了关于财富来源的问题，第13O条和第13U条的批准明显放缓。[2]

对加密家族而言，实际后果是财富来源说明必须在申请之前完整备妥。MAS会询问家族财富的来源、产生这些财富的业务或投资的历史、在来源地司法管辖区的税务处理，以及将代币与该历史联系起来的链上证据。能够出示创世时的代币分配、归属时间表、交易所记录以及申报了收益的纳税申报表的创始人，其档案就很有说服力。财富来自早期挖矿或在已不复存在的交易所交易的家族，档案则较弱，应预计审批过程更长、问题更多。第F部分第III

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章和第L部分第II章所述的区块链分析报告，如今已是家族办公室申请的标准附件。将为基金开立账户的银行也要求提供同样的材料。第P部分第IX章关于加密财富银行服务的实务做法完全适用。

实务提示

在首次与监管机构会面之前备妥财富来源档案，可以缩短家族办公室的审批过程。档案应包含按时间顺序撰写的财富说明，以及支持每一步骤的公司文件和代币文件。此外还应附上财富积累期间每个居住国的纳税申报表或税务评估、覆盖整个期间的主要钱包区块链分析报告，以及一家已完成自身审查的机构出具的银行推荐信。根据我的经验，这样一份档案可将申请时间从十二至十八个月缩短至六至九个月。没有这份档案，家族办公室就可能遭到一次不说明理由的礼貌拒绝。

注释

1. Singapore Police Force，2023年8月16日及其后关于该洗钱调查中逮捕和查封行动的新闻稿；十名被告于2024年4月至6月间被定罪并判刑。 ↩
2. Inter-Ministerial Committee on Anti-Money Laundering，2024年10月4日报告；MAS，2023–2024年关于基金税收优惠申请强化尽职调查的声明。 ↩

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