商业事务局与可疑交易报告办公室（STRO）

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商业事务局（Commercial Affairs Department，CAD）是新加坡警察部队专门打击白领犯罪的单位，负责调查涉及数字资产的欺诈、诈骗、刑事背信、市场不当行为、洗钱以及无牌金融活动。自2015年起，CAD与MAS依据《证券与期货法》对市场不当行为开展联合调查，这一安排后来扩展至《支付服务法》项下的案件。CAD主导了新加坡对Terraform Labs和Hodlnaut的调查。其反诈骗指挥部（Anti-Scam Command）成立于2022年，负责处理在投诉中占比最大的零售加密诈骗案件。[1] 第N部分第II章介绍CAD如何办理案件，以及受害人或嫌疑人应如何与其打交道。

可疑交易报告办公室（Suspicious Transaction Reporting Office，STRO）是新加坡的金融情报机构，隶属于CAD。《1992年贪污、贩毒及其他严重罪行（没收利益）法》第5条设立该办公室，并规定由部长委任可疑交易报告官员。凡知道或有合理理由怀疑某项财产与犯罪行为有关的人，均有义务依据第45条提交可疑交易报告，这些报告由上述官员接收。STRO还接收现金流动报告和现金交易报告，对其进行分析，并向CAD、MAS和外国同行分发

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情报。它是埃格蒙特集团（Egmont Group）的成员。[2] 对于数字支付代币持牌机构而言，每一份可疑交易报告都须通过在线门户提交给STRO。第L部分第IV章介绍这一义务、泄密罪（tipping-off offence）以及律师的处境。

注释

1. 新加坡警察部队商业事务局，见警察部队网站“Organisation Structure”栏目的介绍；MAS与CAD关于市场不当行为联合调查的安排于2015年3月17日宣布；反诈骗指挥部于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)条（"Suspicious Transaction Reporting Officer"的定义）和第5条（可疑交易报告办公室），文本以Singapore Statutes Online公布者为准；STRO的职能及其埃格蒙特集团成员身份，见新加坡警察部队网站"Suspicious Transaction Reporting Office"页面的介绍。 ↩

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