

(d) Trust and Company Service Providers

6. A walk-in customer, Mr. Roberts, came to your company which provides company service and asked to set up a limited company, Company A. He asked this to be done quickly because he will be returning to the United States soon. He provided the name of his wife as another shareholder of the company to be set up. He claimed that he would supply copies of both his and the wife's passport at a later stage. What is the most appropriate course of action?
- a. Refuse Mr. Roberts' business as the circumstances are suspicious
  - b. Proceed with the business and conduct CDD on Mr. Roberts and his wife
  - c. Proceed with the business but make a suspicious transaction report to JFIU because it looks suspicious



7. Following upon Q.6, you interviewed Mr. Roberts with a view to conducting CDD. He stated that he was a company director in the United States (with no further details provided) and claimed that he had not had his passport or picture ID with him. His wife was busy in the United States and could not travel to Hong Kong to sign the documents for setting up the company. Mr. Roberts stated that a “Power of Attorney” will be sent to your office by courier tomorrow so that he is properly authorised to act for his wife. He requested that action be taken now to set up a company in Hong Kong. What should you do?
- Ask Mr. Roberts to be patient and come back tomorrow with the proof of ID of himself and his wife as well as documentary proof of his directorship in the United States company
  - Refuse the business as the circumstances are suspicious
  - Make a STR to JFIU in order to report your suspicion



8. Following upon Q.7, Mr. Roberts told you that he came from the United States and would stay in Hong Kong for a few days only. He claimed that he wanted to deposit the proceeds of a declared dividend he obtained in the United States and invest in real estate in Hong Kong. As he is too busy to open a bank account, he requested to deposit the money (in traveller's cheques and cash) into your company's bank account so that the money could be transferred to the bank account of Company A for property investment. What should you do?
- Ask your staff to deposit the traveller's cheques and cash into your company's bank account and wait for further instruction from Mr. Roberts
  - Make a STR to JFIU as the circumstances are suspicious
  - Refuse the business but no need to make a STR to JFIU
9. Following upon Q.8, Mr. Roberts sent you a letter from the United States saying that as the Hong Kong property market seemed to go down, he had decided to change his investment plan. He requested your company to telegraphic transfer the money to his friends' bank accounts in the United States. What is the best course of action?
- Proceed with the transfer as the money belongs to Mr. Roberts
  - Refuse the request as you suspect that it is a money laundering scheme
  - Make a STR to JFIU to explain the suspicion you have in this case

