



**PROPOSED AMENDMENTS TO  
THE UNITED NATIONS (ANTI-TERRORISM MEASURES) ORDINANCE  
("UNATMO")**

The Law Society has reviewed the Government's proposed amendments to the UNATMO and has the following submissions:

**(A) The definition of "funds" in the UNATMO**

The Law Society has no comment on the proposed amendment.

**(B) The definition of "terrorist act"**

The Law Society recommends that "international organization" should be defined in the UNATMO and a list of recognised international organizations should be maintained. Such list should be updated from time to time.

**(C) Criminalization of the collection of funds for terrorists or terrorist organizations**

The Law Society considers that "solicitation" of financial (or related) services, by any means, directly or indirectly under the new proposed section 8 may be beyond the scope of the FATF Recommendations and that is too wide. The current definition is so widely drafted that inadvertent infringement is extremely likely.

**(D) Consequential amendments to the Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance and Rules of the High Court**

The Law Society reiterates its comment on "solicitation" of financial (or related) services as stated in the above paragraph (C).

The Law Society of Hong Kong  
26 April 2012