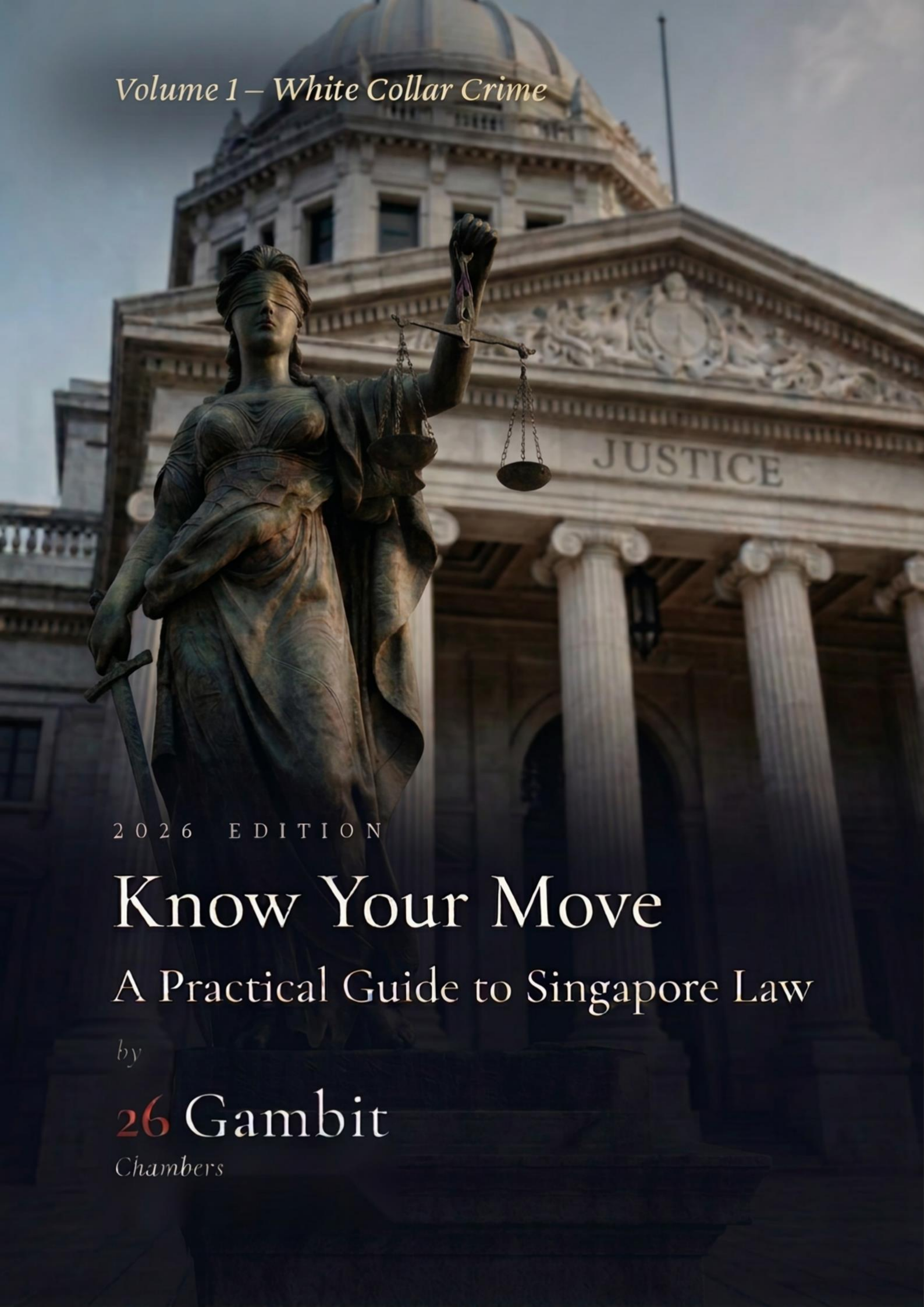


Volume 1 – White Collar Crime

2026 EDITION

Know Your Move

A Practical Guide to Singapore Law

by

26 Gambit

Chambers

Know Your Move – A Practical Guide to Singapore Law
Volume 1 – White Collar Crime
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Chapter 4: Bank Accounts, Singpass and the Movement of Scam Proceeds

1. Chapter Orientation

(1) This chapter is arranged as follows:

(a) **The offences (Parts 2 to 6):** what the offences are, how they differ from the money laundering offences in Chapter 2, their maximum punishments, recent changes to the law, what the Prosecution must prove, and the defences.

(b) **Sentence (Parts 7 to 13):** how the courts decide the sentence for each offence, including the two leading cases and when a person can be caned; the range of sentences seen in decided cases; fines; the factors that reduce the sentence; the effect of a plea of guilty; and how sentences for several charges are combined.

(c) **Young offenders and other consequences (Parts 14 and 15):** the sentences imposed on offenders aged 21 or under, and the consequences of a conviction beyond the sentence.

2. What are the money mule offences?

(2) A person who allows his or her bank account, other payment account or Singpass credentials to be used by others to move the proceeds of scams is described as a "**money mule**". Since 8 February 2024, this conduct has been dealt with by offences directed specifically at it. The main ones are:

(a) **Handing over a payment account without taking reasonable steps (section 55A(1)(a)(i) read with section 55A(1)(b)(ii) of the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act 1992 ("**CDSA**")).** This covers a person who gives another person access to or control of his or her bank account or other payment account without taking reasonable steps to find out what the other person intends to use it for, where the account is then used to move criminal proceeds.[1]

(b) **Moving money through one's own account without taking reasonable steps (section 55A(1)(a)(i) read with section 55A(1)(b)(iii) of the CDSA).** This covers a person who does not hand over the account, but receives money into it and transfers it on, on someone else's instructions, without taking reasonable steps to find out where the money came from or where it is going.[2]

(c) **Disclosing one's own Singpass credentials (section 8A(1) of the CMA),** knowing or having reasonable grounds to believe that they will be used to commit or facilitate an offence.[3]

(d) **Obtaining, retaining or supplying another person's Singpass credentials (section 8B(1) of the CMA).**

2.1 How do these offences differ from the money laundering offences in Chapter 2?

(3) The difference lies in what the Prosecution must show about the accused's state of mind:

(a) **The money laundering offences (section 51 of the CDSA; Chapter 2)** require the Prosecution to prove something about the accused's state of mind in relation to the money

[1] Before 8 February 2024, this conduct was charged as abetting unauthorised access to computer material under section 3(1) read with section 12(1) of the Computer Misuse Act 1993 ("**CMA**") and, where a new account was opened in order to hand it over, also as cheating the bank under section 417 of the Penal Code 1871 ("**PC**"): *Mohamed Erzan Taib Zohri v Public Prosecutor and other appeals* [2026] SGHC 183 at [5]–[8].

[2] Before 8 February 2024, this conduct was in some cases charged as providing a payment service without a licence under section 5(1) of the Payment Services Act 2019 ("**PSA**"): *Nur Diyanah bte Mohamed Ramdan v Public Prosecutor* [2026] SGHC 174 at [1], [28].

[3] Before 8 February 2024, this conduct was charged under section 8(1) of the CMA: *Erzan* at [9]–[10].

itself: that he or she knew, or had reasonable grounds to believe, that the money was the proceeds of crime (section 51(1)), or was rash or negligent as to that (section 51(1A)).

(b) **The money mule offences (section 55A of the CDSA)** do not. The Prosecution need only prove that the accused handed over the account, or moved money through it, without taking reasonable steps to check the other person's purpose or the source or destination of the money. Whether the accused knew or suspected that the money was criminal is not an element of the offence.

(c) **The sentencing frameworks differ.** The money laundering offences are sentenced under the framework described in Chapter 2; the money mule offences under the benchmark and matrix described in Part 7 of this chapter.

(4) In practice, the same facts may be charged under either set of provisions, depending on what the Prosecution considers it can prove about the accused's state of mind. Which provision is charged therefore matters a great deal, and is a matter on which representations may be made to the Prosecution.

3. What is the maximum punishment?

Offence	Section	Maximum punishment for an individual
Handing over a payment account, or moving money through one's own account, without taking reasonable steps (from 8 Feb 2024)	CDSA s 55A	Fine up to $50,000, imprisonment up to 3 years, or both
Disclosing one's own Singpass credentials, knowing or having reasonable grounds to believe they will be used to commit or facilitate an offence (from 8 Feb 2024)	CMA s 8A(1)	Fine up to $10,000, imprisonment up to 3 years, or both; for offences from 30 Dec 2025, caning up to 12 strokes in specified cases (see Part 7)
Obtaining, retaining or supplying another person's Singpass credentials (from 8 Feb 2024)	CMA s 8B(1)	Fine up to $10,000, imprisonment up to 3 years, or both; on a second or later conviction, fine up to $20,000, imprisonment up to 5 years, or both; for offences from 30 Dec 2025, caning up to 12 strokes in specified cases
Helping someone else keep or control criminal proceeds, knowing or having reasonable grounds to believe (see Chapter 2)	CDSA s 51(1)	Fine up to $500,000, imprisonment up to 10 years, or both; for offences from 30 Dec 2025, caning up to 12 strokes in specified cases involving scam proceeds
Helping someone else keep or control criminal proceeds, rashly or negligently (from 8 Feb 2024; see Chapter 2)	CDSA s 51(1A)	Rashly: fine up to $250,000, imprisonment up to 5 years, or both. Negligently: fine up to $150,000, imprisonment up to 3 years, or both
Before 8 Feb 2024: handing over a bank account (abetting unauthorised access)	CMA s 3(1) read with s 12(1)	First conviction: fine up to $5,000, imprisonment up to 2 years, or both; second or later conviction: fine up to $10,000, imprisonment up to 3 years, or both
Before 8 Feb 2024: opening an account in order to hand it over (cheating the bank)	PC s 417	Imprisonment up to 3 years, a fine, or both

Offence	Section	Maximum punishment for an individual
Before 8 Feb 2024: disclosing one's own Singpass credentials	CMA s 8(1)	First conviction: fine up to $10,000, imprisonment up to 3 years, or both; second or later conviction: fine up to $20,000, imprisonment up to 5 years, or both

4. Recent changes to the law

4.1 Before 8 February 2024: no offences aimed at money mules

(5) Before 8 February 2024, there were no offences aimed specifically at money mules, and the general offences referred to in the footnotes to Part 2 were used.[4] The money laundering offences in the CDSA were available, but required proof that the account holder knew or had reasonable grounds to believe that the money was linked to crime. At the second reading of the amending Bills on 8 May 2023, Parliament was told that of some 19,000 money mules investigated between 2020 and 2022, fewer than 250 were prosecuted.[5]

4.2 New offences from 8 February 2024

(6) The Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) (Amendment) Bill (Bill No 12/2023) and the Computer Misuse (Amendment) Bill (Bill No 13/2023) received their second reading on 8 May 2023. The amendments came into force on **8 February 2024**.[6] They created the offences in section 55A of the CDSA and sections 8A and 8B of the CMA, and added the rash and negligent money laundering offences in section 51(1A) of the CDSA (see Chapter 2). Conduct before that date continues to be charged under the predecessor provisions (see Part 7 on how such cases are sentenced).

5. What must the Prosecution prove?

(7) Each offence has its own elements:

(a) **Handing over a payment account (section 55A(1)(b)(ii) of the CDSA).** The Prosecution must prove:

(i) that the accused was concerned in an arrangement that made it easier for another person to control the proceeds of crime;

(ii) that the accused gave that person access to or control of a payment account, which includes a bank account and a debit or credit card;[7] and

(iii) that the accused failed to take reasonable steps to find out the other person's purpose. The question is whether reasonable steps were taken **at the time the accused entered into the arrangement**. The Prosecution does not need to prove that the accused knew the money was criminal.

(b) **Moving money through one's own account (section 55A(1)(b)(iii) of the CDSA).** The Prosecution must prove the first two matters in paragraph (7)(a), together with:

(i) that the accused received or transferred the money through an account he or she operated; and

(ii) that the accused failed to take reasonable steps to find out the source or destination of the money, at the time the accused entered into the arrangement.[8]

[4] *Erzan* at [5]–[10].

[5] *Erzan* at [11], citing *Singapore Parliamentary Debates* (8 May 2023).

[6] *Erzan* at [17].

[7] *Galvez* at [35]; section 55A(7) of the CDSA.

[8] *Galvez* at [32].

(c) **Disclosing one's own Singpass credentials (section 8A of the CMA).** The Prosecution must prove that the accused disclosed his or her Singpass credentials, and that the accused knew, or had reasonable grounds to believe, that the purpose of the disclosure was the commission or facilitation of an offence. A person who discloses Singpass credentials for a genuine purpose, without such grounds, does not commit this offence.

(d) **Obtaining, retaining or supplying another person's Singpass credentials (section 8B of the CMA).** The Prosecution must prove that the accused obtained, retained or supplied the Singpass credentials of another person, subject to the exceptions described in Part 6.

6. What defences are available?

(8) The following may provide a defence, or an answer to the charge:

(a) **No knowledge and no reasonable grounds (section 55A(3) of the CDSA).** It is a defence for the accused to prove that he or she did not know and had no reasonable ground to believe that the arrangement related to anyone's proceeds of crime.[9]

(b) **Is section 55A a strict liability offence?** A strict liability offence is one for which the Prosecution does not have to prove a guilty mind. The High Court has left open whether the offence of moving money through one's own account (section 55A(1)(b)(iii)) is such an offence.[10] In any case, if it is, the general defence in section 26H(4) of the PC, that the accused exercised reasonable care, applies. And an accused who did exercise reasonable care will in any event have taken the reasonable steps that the Prosecution must prove were not taken, so the charge would fail on its elements.[11]

(c) **Exceptions for Singpass credentials (section 8B of the CMA).** Section 8B does not apply where the credentials were obtained, retained or supplied for a purpose other than the commission of an offence and (for supply) the person did not know or have reason to believe that they would be so used.

(d) **Challenging the elements.** The Prosecution must prove each element: that the money was in fact the proceeds of crime, that the accused was concerned in the arrangement, and how much of the money that passed through the bank account is properly attributed to the accused. On the last point, the High Court has held:

(i) the court may count the full amount that passed through the bank account, not only the sums traced to known scam victims, unless the offender shows that particular transfers were made for innocent reasons;[12] but

(ii) money that passed through a different bank account may not be attributable to the offender. In one of the appeals in *Erzan*, the offender had opened one bank account and handed over its login details. Unknown persons then used that access to open a **second** bank account, through which almost $200,000 of scam proceeds passed. The High Court held that the money in the second account could not be attributed to him, because he was not involved in opening it, it was not explained how he could reasonably have foreseen that handing over the first account would lead to a second being opened, and his charge related only to the first account.[13]

7. How do the courts decide the sentence?

(9) Different sentencing guidance applies to the different offences:

(a) **Handing over a payment account (section 55A(1)(b)(ii) of the CDSA):** the benchmark sentence in *Mohamed Erzan Taib Zohri v Public Prosecutor and other appeals* [2026] SGHC 183 ("**Erzan**") (see Part 7.2).

[9] *Galvez* at [32].

[10] *Galvez* at [31].

[11] *Galvez* at [33].

[12] *Erzan* at [90].

[13] *Erzan* at [193]–[194].

(b) **Moving money through one's own account (section 55A(1)(b)(iii) of the CDSA):** the harm–culpability matrix in *Galvez Mary Joe Blanco v Public Prosecutor* [2026] 3 SLR 1427 ("**Galvez**") (see Part 7.3).

(c) **Singpass offences (sections 8A and 8B of the CMA):** the starting points in the Sentencing Advisory Panel's guidelines, as noted in *Erzan* (see Part 7.4).

(d) **Conduct before 8 February 2024:** the benchmarks for the predecessor offences set in *Erzan* and, for the offence under the Payment Services Act 2019, *Vijay Kumar v Public Prosecutor* [2023] 5 SLR 983 (see Part 7.5).

(e) **Knowing, rash or negligent money laundering (section 51 of the CDSA):** the framework in *Huang Ying-Chun v Public Prosecutor* [2019] 3 SLR 606, explained in Chapter 2.

(10) The Sentencing Advisory Panel's Guidelines for Scams-Related Offences, published in August 2024, treat imprisonment as the norm for these offences. The guidelines are not binding, and the High Court has departed from them in some respects.[14]

7.1 The CDSA grades the offences by state of mind

(11) The High Court has described the offences in Part 6 of the CDSA as a spectrum of culpability, which the sentence reflects:[15]

(a) **at the top**, the person who knows or has reasonable grounds to believe that the arrangement involves criminal proceeds (section 51(1));

(b) **below that**, the person who acts rashly or negligently (section 51(1A)); and

(c) **at the bottom** (arguably), the person who merely fails to take reasonable steps (section 55A).

7.2 Handing over a payment account (section 55A(1)(b)(ii) of the CDSA): the Erzan benchmark

(12) *Erzan* was a set of seven separate appeals against sentence, brought by six young offenders and one adult offender (and, in one of them, by the Prosecution), which the High Court heard together and decided on 10 September 2026 so as to lay down guidance for these offences.

(13) The benchmark is **six months' imprisonment** for a first offender convicted after trial, in the typical case: an existing account is handed over, the account is then used to move criminal proceeds, and the offender was motivated by gain.[16] Departing from the Sentencing Advisory Panel's guidelines, the court held in *Erzan* that being motivated by gain is almost invariably part of the typical case and is **not** an aggravating factor, since in almost all cases the offender was offered something.[17]

(14) A distinction is drawn between being offered a payment and actually receiving it. Where the offender actually received and kept the payment, two things follow:

(a) the court may take the actual benefit into account in fixing the sentence;[18] and

(b) the court may impose a fine equal to the sum received (a "**disgorgement fine**"), in addition to imprisonment, so that the offender keeps no benefit from the offence.[19]

(15) **Factors that increase the sentence** include:[20]

(a) opening a new account in order to hand it over;

(b) handing over more than one account;

(c) abuse of a position of trust (for example, a director handing over a company account);

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[14] *Erzan* at [43].
[15] *Galvez* at [45].
[16] *Erzan* at [88].
[17] *Erzan* at [88], [92].
[18] *Erzan* at [275(c)].
[19] *Erzan* at [276].
[20] *Erzan* at [89]–[91].

(d) continuing after being told that the account had been misused;

(e) significant sums passing through the account; and

(f) the involvement of vulnerable victims, the elderly being presumed to be vulnerable.

(16) The weight given to the sum and to vulnerable victims depends on how far these were foreseeable to the offender; an adult is normally taken to know that scammers are likely to target the elderly, but a young offender may not fully appreciate this.[21]

(17) **Factors personal to the offender** fall on both sides:

(a) **aggravating:** other charges taken into consideration, and previous convictions; and

(b) **mitigating:** remorse, restitution, co-operation with the authorities, and a plea of guilty. The absence of previous convictions is neutral, not mitigating.[22]

(18) **How the benchmark was applied in Erzan itself.** The adult offender in *Erzan* had suspected that her accounts would be used for illegal activity but ignored her suspicion; she handed over her existing bank account and allowed a cryptocurrency account to be opened using her Singpass; more than $600,000 passed through the bank account; and she received and spent the $500 she had been promised. The court started from the benchmark of six months and increased it by five months, to 11 months, for these factors. After a reduction of 30% for her early plea of guilty, her sentence of **seven months and two weeks' imprisonment, with a fine of $500** to take back the payment, was upheld.[23]

7.3 Moving money through one's own account (section 55A(1)(b)(iii) of the CDSA): the Galvez matrix

(19) For this form of the offence, the court uses a harm–culpability matrix of the kind used for the money laundering offences (see Chapter 2, Part 8). The court assesses the **harm** caused (slight, moderate or severe) and the offender's **culpability**, meaning blameworthiness (low, medium or high), identifies the range for that combination, chooses a starting point within it, and then adjusts for factors personal to the offender.[24]

(20) The factors considered include the amount moved; the vulnerability of the victims and whether the offender knew of it; and the duration of the offending and the number and frequency of the transactions.[25] The ranges, for an offender who claims trial, are:

Culpability \ Harm	Slight	Moderate	Severe
Low	Fine up to $50,000 and/or up to 6 months	6–12 months	12–18 months
Medium	6–12 months	12–18 months	18–24 months
High	12–18 months	18–24 months	24–36 months

(21) A fine to take back the offender's gain may be added to the sentence.[26]

(22) **How the matrix was applied in Galvez itself.** *Galvez* was decided on 21 May 2026 by the High Court. The offender was a foreign domestic worker who had been drawn in by an older co-worker. She did not hand over her account. Over about two weeks, she received $118,133 into it on the instructions of a third party and transferred most of it to an account in Thailand, receiving $1,151.50 for doing so. Some of the money was traced to two scam victims, one of them 70 years old.

[21] *Erzan* at [90]–[91].

[22] *Galvez* at [64].

[23] *Erzan* at [264], [275]–[276].

[24] *Galvez* at [46]–[47].

[25] *Galvez* at [48]–[59].

[26] *Galvez* at [47].

(23) The court assessed harm as moderate and culpability as low, because she had been misled by her co-worker and the illegality became obvious only in the last six of the 15 days covered by the charge. That gave a range of six to 12 months, and the court took a starting point of seven months to reflect the elderly victim. It reduced this by one month because she had given up her gain and co-operated, and then by 30% for her early plea, arriving at slightly more than four months. As this was more than the **40 days' imprisonment** imposed by the District Court, and the Prosecution had not sought an increase, her appeal was dismissed and the 40-day sentence was left in place. The co-worker who drew her in received five months on each of two charges.[27]

7.4 Singpass offences (sections 8A and 8B of the CMA)

(24) The Sentencing Advisory Panel's guidelines, as noted by the High Court in *Erzan*, give a starting sentence of six months' imprisonment after trial for disclosing one's own Singpass credentials under section 8A of the CMA, and double that, that is, 12 months, for an offence under section 8B, which covers obtaining, retaining or supplying another person's credentials, reflecting the greater culpability of a person who discloses someone else's credentials.[28]

7.5 Conduct before 8 February 2024: the predecessor offences

(25) Conduct before 8 February 2024 continues to be charged under the predecessor provisions, and the sentences for those offences are lower. In *Erzan*, the High Court set benchmarks of three to four months' imprisonment for handing over a bank account (section 3(1) of the CMA) and for opening an account in order to hand it over (section 417 of the PC), with an increase where both are charged together, and four months for disclosing Singpass credentials (section 8(1) of the CMA).[29] Where moving money through one's own account was charged as providing a payment service without a licence under the Payment Services Act 2019 ("**PSA**"), the High Court in *Vijay Kumar v Public Prosecutor* [2023] 5 SLR 983 set a starting point of three weeks' imprisonment for the typical unlicensed transfer.[30]

(26) The High Court explained the position as follows:

(a) the predecessor and the new offences target the same conduct, and the **same sentencing philosophy** applies to both;[31]

(b) the lower benchmarks reflect the **lower maximum punishments** under the predecessor provisions (for example, two years under section 3(1) of the CMA against three years under section 55A of the CDSA), and it was not Parliament's intention that conduct prosecuted under the predecessor provisions should now be punished more severely;[32] and

(c) the guidance in *Erzan* applies to everyone sentenced after 10 September 2026, even if the conduct took place before that date. A person who commits an offence is not entitled to expect any particular sentence; the only limit he or she can count on is the maximum punishment that the statute allowed at the time of the offence.[33]

(27) For a person whose conduct straddles 8 February 2024, or who is charged with offences on both sides of that date, which provisions apply to which conduct is therefore a matter of real importance to the sentence.

7.6 When can a money mule be caned?

(28) For scams and scam-related offences committed on or after **30 December 2025**, caning may be imposed. Parliament made caning **mandatory** for scammers and for members and recruiters of scam syndicates (see Chapters 2 and 3), but **discretionary**, up to 12 strokes, for those who supply bank accounts, SIM cards or Singpass credentials, so that the court decides whether to impose it in the particular case:[34]

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[27] *Galvez* at [61]–[66].

[28] *Erzan* at [51], [111].

[29] *Erzan* at [109]–[111].

[30] *Nur Diyanah* at [28].

[31] *Erzan* at [106].

[32] *Erzan* at [109], [113].

[33] *Erzan* at [107].

[34] *Erzan* at [52]–[53], citing *Singapore Parliamentary Debates* (4 November 2025).

(a) **Singpass credentials.** Under section 8A(5) of the CMA, the offence may attract caning where the offender knew that the purpose of the disclosure was a scam, or where the credentials were in fact used for a scam and the offender **cannot prove** that he or she took reasonable steps to prevent this.

(b) **Payment accounts.** The Government explained in Parliament that discretionary caning would apply where the account was used to launder scam proceeds and the offender failed to take reasonable steps to check the funds. The caning provisions for money laundering involving scam proceeds are explained in Chapter 2.

(29) In April 2026, the Singapore Police Force reported the first money mule to be sentenced to caning: a 23-year-old foreign national who collected cash of about $8,198 from an elderly victim of an investment scam and passed it on. He was charged with the knowing or reasonable-grounds money laundering offence under section 51(1)(a) of the CDSA, and received seven months' imprisonment and one stroke of the cane.

8. How have the courts applied the frameworks since?

8.1 Guilty, and imprisoned, even where the payment was very small

(30) In *Public Prosecutor v Nooryati binte Mion* [2026] SGDC 320, a District Court decision after *Erzan*, a 51-year-old who handed over an existing account for a total payment of $50 was sentenced to the benchmark of **six months' imprisonment**, with a fine of $50 to take back the payment.

(31) **The takeaway:** in the typical case, the benchmark is applied as it stands. The size of the payment received does not reduce the sentence.

8.2 Several accounts, and other offending

(32) In *Public Prosecutor v Jermaine Chan Rou An* [2025] SGDC 246, a District Court case decided before *Erzan*, a 22-year-old handed over two bank accounts for $800 each. She was sentenced to **10 months' imprisonment** and a fine of $1,600. The court started from the six-month starting point in the Sentencing Advisory Panel's guidelines. It increased the sentence for three reasons: $435,920 of criminal proceeds had passed through the account that was the subject of the charge (the guidelines treat $100,000 as significant); the victim was 84 years old; and a second account had been handed over. It then reduced the result by about 30% for her early plea of guilty. The court also increased the sentence because she was motivated by gain, a factor that *Erzan* later held is not aggravating.

(33) In *Public Prosecutor v Haryani binte Juraimi* [2026] SGDC 163, a District Court case also decided before *Erzan*, the offender had opened a new company bank account in order to hand it over. She did so while unlawfully at large from a drug rehabilitation institution, and she faced several other charges. On the section 55A charge she received **12 months' imprisonment** and a fine of $100, after a 30% reduction for her plea of guilty.

(34) **The takeaway:** six months is the benchmark for the simplest case: one existing account handed over, and the offender convicted after a trial. Both of these offenders pleaded guilty, which reduced their sentences by about 30%. Even so, their sentences were well above six months. That is because of the aggravating factors described in Part 7.2: in the first case, the large sum that passed through the account, the elderly victim and the second account; in the second, the opening of a new account in order to hand it over and the offender's other offending.

8.3 Conduct before 8 February 2024 charged under the predecessor provisions

(35) In *Nur Diyanah bte Mohamed Ramdan v Public Prosecutor* [2026] SGHC 174, the High Court dealt with an offender who, before 8 February 2024, had moved about $159,700 through two bank accounts on the instructions of a person she met through a job offer on social media. After her first bank account was frozen by the bank for suspected scam activity, she gave the same person a second account and carried on. Because her conduct took place before section 55A of the CDSA existed, she was charged with providing a payment service without a licence under the PSA. The District Court had calibrated her sentence by reference to a case decided under section 55A, which carries a six-month starting point. The High Court held that this was an error of principle: a court may not sentence an offender as though a different and graver charge had

been brought, and the applicable starting point for the PSA offence was three weeks. It reduced the sentence from seven months and three weeks to **15 weeks' imprisonment**, the uplift from three weeks reflecting the amount of scam proceeds, the number of victims and her persistence after the first account was frozen.[35]

(36) **The takeaway:** the sentence must be calibrated to the offence actually charged, under the law that applied at the time of the conduct. The new offences, and their higher starting points, do not apply to conduct before 8 February 2024.

9. The sentencing range at a glance

(37) The table below gives the range of sentences seen in the cases reviewed for this chapter, and the main factors that determined where each case fell. Every case turns on its own facts, and the figures are a guide only. Cases marked * concern conduct before 8 February 2024, charged under the predecessor provisions.

Offence	Sentences seen in decided cases	Main deciding factors
Handing over a payment account (CDSA s 55A(1)(b)(ii), from 8 Feb 2024)	**About 6 to 12 months' imprisonment**, usually with a fine equal to the payment received	The benchmark is 6 months after trial for one existing account; higher where more than one account, a new account opened to hand over, large sums through the account, elderly victims, suspicion ignored, or other offending; lower for an early plea of guilty
Moving money through one's own account (CDSA s 55A(1)(b)(iii), from 8 Feb 2024)	**40 days** in *Galvez*, left in place on appeal, although the High Court indicated that slightly more than 4 months would have been appropriate; the matrix runs from a fine to 36 months	The amount moved; whether the offender was misled and when the illegality became obvious; elderly victims; duration and number of transactions; giving up the gain and co-operating; plea of guilty
Disclosing one's own Singpass credentials (CMA s 8A)	Starting point of **6 months** after trial (Sentencing Advisory Panel guidelines, as noted in *Erzan*); **7 months and 2 weeks** after an early plea of guilty in *Public Prosecutor v Haryani binte Juraimi* [2026] SGDC 163	As for payment accounts; caning possible for offences from 30 Dec 2025
Obtaining, retaining or supplying another person's Singpass credentials (CMA s 8B)	Starting point of **12 months** after trial (Sentencing Advisory Panel guidelines, as noted in *Erzan*); no reported judgment to date	Greater culpability than disclosing one's own credentials; caning possible for offences from 30 Dec 2025

[35] *Nur Diyanah* at [24]–[31], [38], [44].

Offence	Sentences seen in decided cases	Main deciding factors
Before 8 Feb 2024: handing over an account (CMA s 3(1)); opening an account to hand it over (PC s 417); disclosing Singpass credentials (CMA s 8(1))*	Benchmarks of **3 to 4 months** after trial for handing over or opening an account, higher where both are charged, and **4 months** for disclosing Singpass credentials (*Erzan*); **4 months** and **14 weeks** after pleas of guilty in two cases where a new account had been opened to hand over (*Public Prosecutor v Nooryati binte Mion* [2026] SGDC 320; *Erzan*)	Lower maximum punishments; the same aggravating factors as above; young offenders have received probation (see Part 14)
Before 8 Feb 2024: moving money through one's own account (PSA s 5)*	Starting point of **3 weeks** for the typical unlicensed transfer (*Vijay Kumar v Public Prosecutor* [2023] 5 SLR 983); **15 weeks** on appeal in *Nur Diyanah bte Mohamed Ramdan v Public Prosecutor* [2026] SGHC 174, where about $159,700 was moved and the offender carried on after an account was frozen	The amount of scam proceeds; the number of victims; persistence; must be calibrated to the PSA offence, not to s 55A
Money laundering, knowing or having reasonable grounds to believe (CDSA s 51(1); see Chapter 2)	**7 months and 1 stroke of the cane** for a cash collector (reported by the police, 2026); **20 months** for a cash collector who collected $124,060 from five victims (*Public Prosecutor v Chan King Vun* [2026] SGDC 208)	Harm–culpability matrix in *Huang Ying-Chun v Public Prosecutor* [2019] 3 SLR 606; caning possible in specified cases involving scam proceeds, for offences from 30 Dec 2025

10. Fines

(38) Fines arise in two ways:

(a) **Fines to take back the payment received.** Where the offender received a payment, the court commonly imposes a fine equal to it, in addition to imprisonment. In the cases reviewed, such fines ranged from $50 to $4,100; the largest was imposed in a 2026 case concerning a company's account (*Public Prosecutor v Lee Yun Han* [2026] SGDC 204), and included payments received for other accounts whose charges were taken into consideration. Where the promised payment was never received, no such fine is imposed.

(b) **A fine as the only punishment.** The *Galvez* matrix allows a fine in its lowest band (slight harm and low culpability). In *Galvez*, however, the court rejected the submission that people who were themselves deceived into the role (sometimes called "**victim mules**") should start from a fine, holding that most cases have features of both "money mules" and

"victim mules" and that the CDSA already grades culpability according to the offender's state of mind.[36]

(39) In the decisions reviewed for this chapter, no sentence of a fine alone was imposed for an offence under section 55A of the CDSA. Whether a fine alone may be appropriate in a particular case depends on its facts.

11. What can reduce the sentence?

(40) The following have been given weight in decided cases:

(a) **Being misled, and late awareness.** In *Galvez* (see paragraph (22)), the offender's culpability was assessed as low because she had been misled by an older co-worker and the illegality became obvious only in the last six of the 15 days covered by the charge.[37]

(b) **Giving up the gain, and co-operation.** In *Galvez*, these together reduced the starting point by one month.[38]

(c) **Money that is not properly attributable to the offender.** Transfers shown to have been made for innocent reasons, and money that passed through a different account whose opening was not foreseeable to the offender, may be excluded (see paragraph (8)(d)(ii)).

(d) **A mental condition linked to the offending.** An intellectual or psychiatric condition carries weight only if it is a recognised condition causally linked to the offending. In the adult appeal in *Erzan* (see paragraph (18)), a report of borderline intelligence and a trusting disposition was given no weight because it disclosed no mental condition and no causal link.[39]

(e) **Rehabilitative progress (for young offenders).** For an offender aged 21 or under at the time of the offence, the court may take into account how he or she has lived between the offence and the sentence: whether there has been further offending, and evidence of a settled life such as employment, national service, study and family support. Such progress can change the **type** of sentence, for example from reformative training (a custodial programme) to probation (supervision in the community), as happened in four of the appeals in *Erzan* (see paragraph (41) and Part 14).

(f) **A plea of guilty** (see Part 12).

(41) **An example.** One of the appeals in *Erzan* concerned an offender who was 16 at the time of the offence. He had opened a bank account and handed it over to a person to whom he owed a gambling debt, and later handed over a second account; more than $12 million had passed through the two accounts. He had later committed thefts.

(42) The District Court sentenced him to reformative training at Level 1, that is, detention in a reformative training centre for a minimum of six months, which could extend to three years.

(43) By the time of the appeal, more than three years had passed since his last offence. The High Court accepted that reformative training might have been necessary at an earlier point, but found that he had undergone a genuine and substantial transformation: he had completed national service with commendations, reunited with his family, enrolled in university at his own expense and was working to support himself and his family. He therefore no longer needed the structured institutional environment of reformative training.

(44) The court replaced it with 18 months' probation, with a night-time curfew, 80 hours of community service, random blood testing and a bond from his parents, noting that a breach of the conditions would expose him to being sentenced again.[40]

[36] *Galvez* at [44]–[45].

[37] *Galvez* at [62].

[38] *Galvez* at [64].

[39] *Erzan* at [274].

[40] *Erzan* at [146]–[147], [159], [163]–[169].

(45) As the cases show, the outcome depends heavily on identifying the mitigating factors that are relevant and carry real weight on the particular facts, supporting them with evidence, and presenting them at the right stage of the framework.

12. How does a plea of guilty affect the sentence?

(46) A plea of guilty can have a significant effect on the sentence, and its timing matters. The Sentencing Advisory Panel has issued Guidelines on Reduction in Sentences for Guilty Pleas, which suggest that an earlier plea may attract a larger reduction. The guidelines are guidance only: they are not binding on the courts, and whether a reduction is given, and how much, is for the sentencing court to decide in the circumstances of each case.

(47) In *Galvez* (see paragraph (22)), and in the adult appeal in *Erzan* (see paragraph (18)), an early plea attracted a reduction of 30%.

(48) A plea of guilty admits the offence and gives up any defence. In *Galvez*, the court held that by pleading guilty, and acknowledging that the section 55A(3) defence could not be invoked, the offender had conceded that neither that defence nor the defence of reasonable care under section 26H(4) of the PC was available.[41] It is therefore very important that the decision whether, and when, to plead guilty is made only after the evidence, the available defences and the mitigating factors have been properly assessed.

13. How are sentences combined when there are several charges?

(49) Money mule cases often involve several charges.[42] Each charge receives its own sentence, and the court then decides which sentences run **consecutively** (one after another) and which run **concurrently** (at the same time). Where an offender is convicted at one trial and sentenced to imprisonment for three or more distinct offences, at least two of the sentences must run consecutively (section 307(1) of the Criminal Procedure Code 2010).[43]

(50) The overriding principle is **proportionality**: the total sentence must fit the offender's overall criminality. The High Court has explained the main tools in *Mohamed Shouffee bin Adam v Public Prosecutor* [2014] 2 SLR 998:

(a) **The one-transaction rule.** This is a common law principle, developed by the courts rather than set out in legislation: offences that form part of a single transaction should generally not attract consecutive sentences. Whether offences form part of a single transaction is decided as a matter of common sense, having regard to factors such as how close the offences were in time, place and purpose, and whether they invaded the same legally protected interest.

(b) **The totality principle.** The court takes a "last look" at the total. It asks whether the total is substantially above the normal level of sentence for the most serious offence, and whether it would be crushing and out of keeping with the offender's record and prospects. If so, the court may change which sentences run consecutively, or adjust individual sentences.

(c) **No double counting.** The same aggravating factor must not be counted against the offender twice.

13.1 Parity and consistency with past cases

(51) Proportionality is also measured against the sentences imposed on others:

(a) **Parity between co-offenders.** Where several people took part in the same criminal enterprise, their sentences should generally be in line with each other, allowing for relevant differences in their roles and personal circumstances. The High Court has held, in *Lim Bee*

[41] *Galvez* at [34].

[42] For example, charges for different accounts; charges for conduct on both sides of 8 February 2024, some under the predecessor provisions and some under section 55A of the CDSA; or charges for both handing over an account and disclosing Singpass credentials.

[43] In *Nooryati* (see paragraph (30)), for example, a sentence under section 55A of the CDSA and a sentence under the predecessor provisions were combined to give six months and six weeks' imprisonment, with a fine of $50; in *Public Prosecutor v Syed Faizal bin Syed Abubakar* [2026] SGDC 119, which was under appeal at the time of writing, a section 55A sentence was combined with a sentence under section 8A of the CMA to give 14 months and four weeks.

Ngan Karen v Public Prosecutor [2015] 4 SLR 1120, that this applies even where co-offenders are charged with different offences, and that where co-offenders are sentenced separately, the Prosecution should place their sentences and the relevant facts before the court. Differences in role matter: in *Galvez* (see paragraph (22)), the co-worker who drew the offender in received five months on each of two charges; the court indicated that the offender's own sentence should properly have been slightly more than four months, although her sentence of 40 days was left in place.

(b) **Consistency with past cases.** Courts compare the case with sentences imposed in similar cases, but the comparison must be with the offence actually charged and the law that applied. In *Nur Diyanah* (see paragraph (35)), a sentence for an offence under the PSA was reduced because the lower court had calibrated it against a precedent for a different and more serious offence under section 55A of the CDSA.

(52) Other choices also affect the total, such as whether some charges are taken into consideration rather than proceeded with, and whether conduct is combined into a single amalgamated charge (see Chapter 3). These questions involve a number of factors and judgments, and are frequently the subject of submissions on sentence.

14. What sentences do young offenders receive?

(53) For offenders aged 21 or under at the time of the offence, the High Court in *Erzan* held that the Sentencing Advisory Panel's guidelines should not be read as making imprisonment or reformative training the default. The commission of a scam-related offence does not by itself displace rehabilitation as the primary consideration, and probation and community-based sentences remain available. The court should ordinarily call for pre-sentencing reports. Reformative training is more appropriate where there is a stronger need for specific deterrence (deterring the offender himself or herself), such as knowing or repeated offending.[44]

(54) Of the six young offenders in *Erzan*:

(a) four had reformative training replaced with probation of 12 to 18 months (see paragraph (41) for one of them);

(b) in one, the Prosecution's appeal against a combination of community-based sentences for a 16-year-old was dismissed:

(i) she had opened and handed over two bank accounts to a school friend for a promised $500 that she never received, and $64,500 of scam proceeds had passed through one of them;

(ii) the District Court had imposed a seven-day short detention order, 60 hours of community service and a three-month day reporting order with an electronically monitored night-time curfew;

(iii) the High Court upheld this because the reports showed that she had minimal intervention needs and did not require the structured environment of reformative training; she had not reoffended; her caregivers were committed to supervising her; and the offending was brief and the product of youthful naivety; and

(iv) the court held that community-based sentences tailored in this way, including a short period of detention, could adequately serve both deterrence and rehabilitation;[45]

(c) in one, the offender had been under 21 when some of the offences were committed but was 24 when sentenced and had continued offending after turning 21. He was treated as an adult, and his sentence of 14 weeks' imprisonment was upheld.[46]

(55) For adults, probation is generally inappropriate for these offences, and for a foreign worker it will be "extremely rare".[47]

[44] *Erzan* at [43]–[66].

[45] *Erzan* at [218], [234]–[240].

[46] *Erzan* at [134]–[145].

[47] *Galvez* at [41]–[42].

15. Beyond the sentence

(56) Money in the account may be frozen or seized by the police, and may become the subject of confiscation proceedings (see Chapter 2, Parts 16 and 17). A conviction carries a criminal record, and whether it may later be treated as spent is governed by the Registration of Criminals Act 1949. For foreign nationals, a conviction may have immigration consequences, including the cancellation of work passes.

Note. This chapter sets out the framework. It does not attempt to indicate where any particular case falls within it – that assessment depends on the charge brought, the evidence, and matters that are rarely apparent to the person affected. 26 Gambit Chambers advises and acts for individuals and companies in these matters. Short answers to common questions on money mule offences are available at 26gambitchambers.com/answers.

About the authors



Jeremy Marc Sia

Jeremy Marc Sia is the Founding Director of 26 Gambit Chambers. He is an Advocate and Solicitor of the Supreme Court of Singapore and a Solicitor of the Senior Courts of England and Wales, and was previously an Associate Director at one of Singapore's Big 4 law firms. His practice covers cross-border commercial litigation and international arbitration, civil fraud and conspiracy, regulatory proceedings and criminal defence, including matters involving aggravated cheating, bribery and the falsification of accounts. He works in English and Mandarin.



Jonathan Oh

Jonathan Oh is a Director of 26 Gambit Chambers. He is an Advocate and Solicitor of the Supreme Court of Singapore, and previously practised at an international firm and a top-ranked boutique firm in Singapore. His practice covers restructuring and insolvency, corporate and commercial advisory work and commercial litigation and international arbitration, with a focus on special situations.

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26 Gambit Chambers LLC
63 Market Street, #06-00, Bank of Singapore Centre, Singapore 048942
Email: enquiries@26Gambit.com
Telephone: +65 6978 4033
Website: 26gambitchambers.com