

# SARs Reporter Booklet

January 2025

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This is a United Kingdom Financial Intelligence Unit (UKFIU) product for reporters of Suspicious Activity Reports (SARs), produced in line with the National Crime Agency's commitment to share perspectives on the SARs regime.



# SARs Reporter Booklet

## Overview

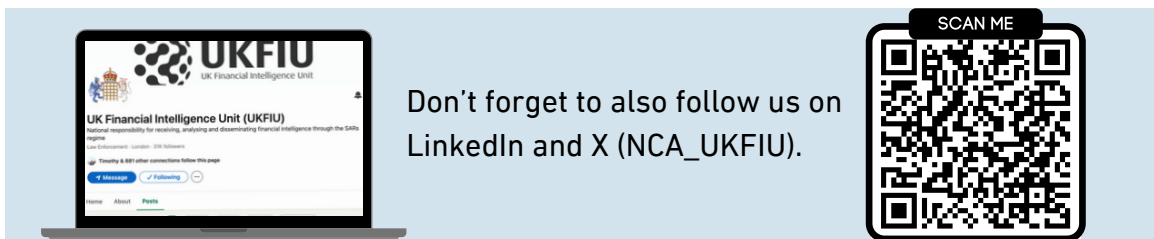
This document is produced by the UKFIU which has national responsibility for receiving, analysing and disseminating financial intelligence submitted through the SARs regime.

This booklet contains a sanitised summary of feedback from law enforcement agencies (LEAs) on their use of SARs.

This booklet is aimed at:

- sharing perspectives on the use of SARs with regime participants
- sharing and encouraging best practice amongst reporters
- providing a feedback mechanism to the UKFIU about the operation of the regime.

More information about the UKFIU, the SARs regime and further guidance notes can be found at the NCA website [www.nationalcrimeagency.gov.uk](http://www.nationalcrimeagency.gov.uk).



We would appreciate your feedback on the effectiveness and format of this document. Please email any comments to [ukfiufeedback@nca.gov.uk](mailto:ukfiufeedback@nca.gov.uk).

## Disclaimer

Cases reported on in this document were collated in response to biannual requests from the UKFIU to LEAs to report on the use of SARs intelligence during the course of their investigations. This Reporter Booklet contains examples received in April 2024.

While every effort is made to ensure the accuracy of any information or other material contained in this document, it is provided on the basis that the NCA and its officers, either individually or collectively, accept no responsibility for any loss, damage, cost or expense of whatever kind arising directly or indirectly from or in connection with the use by any person, whomsoever, of any information or other material contained herein.

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# Foreword from Vince O'Brien

Welcome to the January 2025 edition of the UKFIU's Reporter Booklet aimed at all SAR reporters.

With this publication we aim to provide a snapshot of some of the excellent examples we receive highlighting the work of law enforcement agencies in utilising SAR intelligence to initiate investigations and informing existing ones.

SARs are a critical intelligence resource for law enforcement – they provide information like phone numbers, addresses, company details, investment activity, bank accounts and details of other assets. They have been instrumental in identifying sex offenders, fraud victims, murder suspects, missing persons, people traffickers, fugitives and terrorist financing.

These Reporter Booklets focus predominantly on sanitised case studies. News relating to the UKFIU/SARs regime features instead in the UKFIU magazine, SARs In Action, available via the [NCA website](#).

Don't forget to also subscribe to the UKFIU podcast – this is available on a number of streaming sites including Spotify, Apple Podcasts, Amazon Music and Audible. The most recent episode was released in December 2024. This episode featured a discussion with representatives from the National Economic Crime Centre (NECC), Companies House, and private sector members of the NECC's public private partnership on the recent work that has been done on illicit company formation activity and transformations to Companies House following legislative changes.

## Vince O'Brien

Head of the UKFIU



## UKFIU Assistance

For information or assistance with submitting SARs or SAR Portal enquiries, please visit [www.nationalcrimeagency.gov.uk](http://www.nationalcrimeagency.gov.uk) or contact the UKFIU on 020 7238 8282.

When contacting the UKFIU please have available your SAR reference number if applicable. If you wish to make a SAR by post you should address your SAR to: UKFIU, PO Box 8000, London, SE11 5EN. NB: post is slower than SAR Portal and therefore it will take longer for your SAR to be processed. You will not receive an acknowledgement if you use post.

General UKFIU matters may be emailed to [ukfiusars@nca.gov.uk](mailto:ukfiusars@nca.gov.uk). All Defence Against Money Laundering (DAML) request queries are only dealt with via email. Should you have any queries please email [DAML@nca.gov.uk](mailto:DAML@nca.gov.uk).

# Case Studies

A review of case studies provided by LEAs and other end users<sup>1</sup> of SARs demonstrates how they continue to be instrumental in instigating and supporting investigations to tackle a wide range of the highest priority threats identified by the National Strategic Assessment of Serious and Organised Crime (NSA).

## Money Laundering

A reporter suspected that a business customer was money laundering and submitted a DAML SAR to the UKFIU to request a defence to return the account's balance to the customer while ending their relationship with them. Suspicious indicators on the customer's account included little evidence of the business being legitimate, cash deposited in small amounts in an apparent effort to avoid detection, and their business exceeding their expected yearly turnover within a few months. The UKFIU fast-tracked the DAML SAR to an LEA who commenced a money laundering investigation into the customer after it was revealed that over £1 million in cash had been deposited into business accounts by the customer. Invoices were provided to account for the cash deposits but the majority did not appear legitimate and funds of over £90,000 were frozen and then successfully forfeited.



<sup>1</sup> A current or potential user of SARs such as an LEA or relevant government body.

A DAML SAR was submitted following concerns by a reporter that a student customer was operating as a money mule. Origins of cash credits entering the customer's account were unknown and rapidly transferred out following deposit. The reporter requested a defence in order to return funds whilst exiting their relationship with the customer. The DAML SAR was fast-tracked by the UKFIU to an LEA for investigation. The LEA recognised the indicators as money muling and the defence was refused. The LEA launched an investigation, during the course of which they obtained an Account Freezing Order (AFO) and successfully restrained funds of over £12,000.



A reporter submitted a DAML SAR while exiting their relationship with a customer they suspected was operating as a money mule. The customer was an international student who had credited a large number of cash payments from unknown origins into their account which were rapidly transferred out, exhibiting behaviour atypical of a student. The UKFIU fast-tracked the DAML SAR to an LEA who supported the suspicion of money muling and submitted a successful AFO application on funds of over £10,000.



A SAR was submitted to the UKFIU following a reporter's suspicion that a subject was using their account to launder the proceeds from suspected illegal lotteries. The subject was listed as unemployed and offered no explanation for their financial activity which included high volume, low value credits between third parties, with some being recirculated between the same benefactors and beneficiaries, and a turnover of more than £1.5 million over a few years. The SAR assisted an LEA in identifying further accounts related to the subject also with activity indicative of money laundering. The LEA requested a production order to gain further financial intelligence and commenced a money laundering investigation, confirming the subject had been operating illegal lotteries through social media. With no funds available to be confiscated, the subject was issued with a caution.



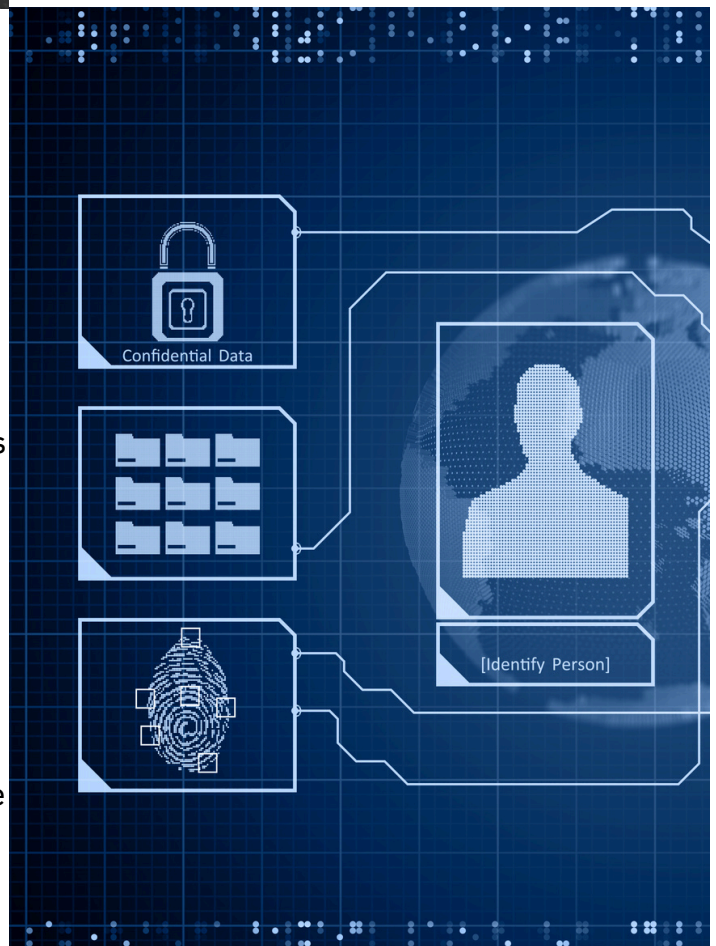
A reporter was concerned that a customer's account was displaying indicators of money muling and submitted a DAML SAR to the UKFIU to detail their suspicions and request a defence to return funds while ending their relationship with the customer. The UKFIU fast-tracked the DAML SAR to an LEA for investigation. The LEA submitted an AFO application which was granted on funds of over £14,000.

# Fraud



A reporter suspected that a subject was using a UK registered account to launder the proceeds of crime. A high value payment received into the account from an overseas company was flagged as suspicious by the reporter due to being both outside the usual subject profile and the overseas company being newly incorporated. The subject provided an invoice to account for the payment which did not appear legitimate. The UKFIU fast-tracked the DAML SAR to an LEA whose investigations revealed that the payments were the result of invoice diversion fraud. The UK based account receiving the funds was registered in a similar name to a legitimate company overseas, which had duped victims into sending the funds. The LEA identified a further fraudulent payment and AFOs were obtained on funds over £200,000 which were subsequently forfeited. The LEA is making enquiries to locate the victims and return the funds.

A reporter submitted a DAML SAR to the UKFIU to return an account balance while ending their relationship with a customer. The reporter discovered fraudulent means had been used to pass identity verification checks while setting up a recently opened company account. Indicators included a lack of everyday spending and the quick movement of money, where funds were deposited and withdrawn in cash or transferred immediately, further adding to reporter suspicions of money laundering. The DAML SAR was fast-tracked to an LEA, who linked the customer's details with a report submitted by a member of the public. This member of the public had been notified of a bank account and company set up in their name without their knowledge, making it likely they were a victim of identity fraud and the funds held within the customer's account were the proceeds of crime. An AFO application was granted and funds of over £30,000 were successfully restrained.



A reporter submitted a DAML SAR to the UKFIU for a defence to pay away a balance while ending their relationship with a customer (the subject). The reporter held suspicion that the subject, who was in receipt of benefit payments with no record of employment, was receiving a series of unexplained funds from external accounts. The UKFIU fast-tracked the DAML SAR to an LEA who commenced a money laundering investigation into the subject, identifying several linked accounts with combined funds of several million pounds which was deposited over a short time period. The LEA determined that the funds were received from overseas and obtained an AFO on over £50,000 from the initial DAML SAR. The LEA arrested the subject and an associate, and seized a large number of luxury goods and assets from addresses linked to the subject. It is suspected that funds were obtained as a result of investment fraud targeting victims across several countries. Additional funds of over £1 million are subject to an AFO with enquiries ongoing.



A reporter submitted a DAML SAR to exit their relationship with a customer after suspecting they were using their account for money laundering purposes. Suspicious indicators included financial activity inconsistent with the customer's declared occupation and income, significant spikes in monthly credit turnover, multiple large cash deposits, often in the same day, and a high number of businesses found to be registered at the customer's address. The UKFIU refused consent for the DAML to allow further investigation by an LEA. The customer was unable to provide a legitimate source of the funds when interviewed by the LEA. Following their investigation, the LEA obtained an AFO and a subsequent forfeiture hearing which the customer did not attend, forfeiting upwards of £40,000 as a result.