

# SARs Reporter Booklet

May 2025

---

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

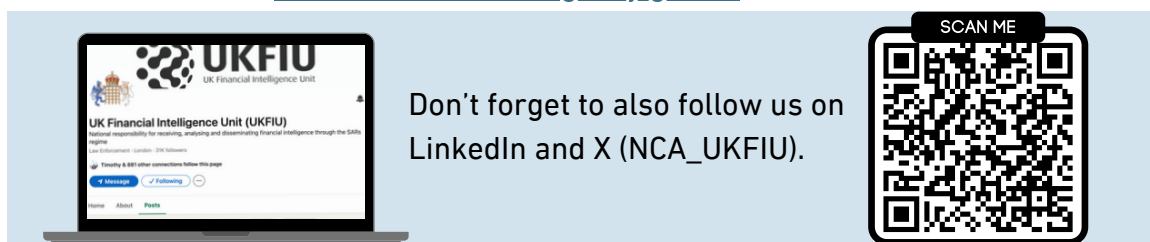
This document is produced by the UKFIU which has national responsibility for receiving, analysing and disseminating financial intelligence submitted through the SARs regime.

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 October 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.

Any use by you or by any third party of information or other material contained in or associated with this document signifies agreement by you or them to these conditions.

# Foreword from Vince O'Brien

Welcome to the May 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 22 - International Co-operation: a Global Network of FIUs** was released in May 2025. This episode features 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).

## Drugs

A Defence Against Money Laundering (DAML) SAR was submitted by a reporter looking to close a customer's business account and pay away the remaining funds. The reporter suspected their customer's business account was being used to launder the proceeds of crime, namely drug dealing. Suspicions were raised after the business account received over £270,000 in cash credits, third-party deposits, faster payments and merchant card payments. Once debited, funds were quickly dispersed to third parties. The amounts in question far exceeded expected turnover for the business. The UKFIU fast-tracked the DAML SAR to the relevant law enforcement agency (LEA) and refused consent. During the course of their investigation, the LEA recovered cash and other high value items worth over £800,000 which was successfully restrained. The case is ongoing.



A subject's business account, which had remained dormant for six months, saw a spike in cash deposits and transactions between secondary accounts, already known to be involved in criminality. This sudden business account activity led to the reporter conducting customer due diligence checks. These checks revealed that the business was laundering and layering funds, and had transferred over £250,000 derived from what the reporter suspected was a wider network of shell companies. Account freezing orders (AFO) were already in place on some of the wider network accounts.

Open source research identified that the subject was known for drug dealing, bringing into question the legitimacy of the significant and sudden spike in cash deposits. A DAML SAR was submitted to the UKFIU by the reporter, who wished to exit their relationship and pay away the remaining balance on the account. The UKFIU refused the DAML SAR and fast-tracked it to the relevant LEA. A review of the subject's personal accounts identified excessive gambling as well as payments to third party accounts, which were also quickly dispersed to gambling companies. Upon interview, the subject disclaimed the cash and an AFO was obtained, and the remaining account balance of over £60,000 was forfeited.

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

# Fraud

Following suspicion from an LEA that a company was falsifying reports relating to the chemical composition of their products, a number of SARs were submitted by various reporters. One SAR identified the purchase of cryptoassets into a low-risk account and the subsequent transfer-in-part of the cryptoassets to a high-risk account. Another SAR identified a chemical company licensed to sell in bulk to trade, was selling chemical samples to individuals via social media, for the purpose of body enhancement. The SARs allowed the LEA to progress their intelligence development into a fraud investigation. The investigation is ongoing.



A reporter became suspicious of a customer following a significant uplift in account turnover, mostly from cash deposits. Due diligence checks were conducted by the reporter who identified adverse media reporting on the customer and previous convictions for drug related offences. Believing that the cash credits were the proceeds of crime, the reporter wished to exit their relationship and pay away the remaining account balance to the customer. The reporter submitted a DAML SAR which was fast-tracked to the relevant LEA. Intelligence checks were conducted by the LEA who disproved the subject's claims that the funds were gambling winnings. The LEA held a reasonable belief that the cash derived from criminality. An AFO was granted for the remaining cash deposits, with over £8,000 forfeited.

A reporter held suspicions that a business account was being used as an intermediary to hide the criminal origin of funds. The business had received in total nearly £400,000 over one month, from companies unrelated to the business's declared industry. Upon receipt, these funds were rapidly transferred by the business to other unrelated company accounts. There was also a lack of legitimate business expenditure. The reporter decided to de-risk by ending their relationship with the business, and submitted a DAML SAR to pay away the remaining balance of approximately £40,000. The UKFIU received and fast-tracked the DAML SAR to the relevant LEA. LEA analysis of this and other SARs identified a subject linked to this business and other companies. The LEA identified and attended a linked address, which revealed it was a rented post-box within a shared building. The subject was interviewed and claimed to have no knowledge of the monies in the business account. This led the LEA to believe that all of the linked businesses were shell companies involved in tax fraud, the case was also referred to the relevant government body. The UKFIU refused DAML consent and the LEA soon after obtained an AFO and subsequent forfeiture on the balance of approximately £40,000.



A subject was convicted of multiple counts of fraud. Following the conviction, the investigating LEA considered whether to seek confiscation orders on the subject. The LEA conducted SARs research and found multiple SARs on the subject from various reporters, all indicating fraud concerns. The LEA conducted enquiries and obtained production orders. This enabled the LEA to seek a Proceeds of Crime Act (POCA) benefit figure that could not be challenged by the subject, and was therefore granted. This would not have been apparent without the initial SARs.





The UKFIU received a DAML SAR following suspicion that the subject was involved in fraud. The reporter's concerns were based on the subject previously using a device linked to fraud and receiving payments from a third party that were addressed to a different beneficiary. These concerns were heightened after the reporter received a disclosure order from a public authority, linking the subject to fraudulent activity and the use of multiple aliases. The UKFIU prioritised the dissemination of this intelligence to the relevant LEA. Following a recommendation from the LEA, the UKFIU refused the DAML request, enabling the LEA to obtain an uncontested AFO and subsequent forfeiture for the full amount totalling over £3,000.



## Money Laundering

A reporter submitted a SAR after they identified several red flag indicators on a company director's (the subject) account, including multiple inconsistencies with the subject's profile. The reporter identified transactional activity with no clear rationale, excessive turnover, a poor quality business website and the possibility of nominee directors and creditors whose industries were inconsistent with that of the subject's reported company, amongst other concerns. The UKFIU disseminated intelligence to the relevant LEA and refused consent. In its investigation, the LEA found that the subject was entirely a front with no legitimate business premises or inventory, and that this was in fact an money laundering operation. The subject, who was also listed as the ultimate beneficial owner, had no actual knowledge of the company or its accounts. As a result, the LEA obtained a forfeiture of a full amount totalling over £300,000.