

SARs Reporter Booklet

March 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.



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Overview

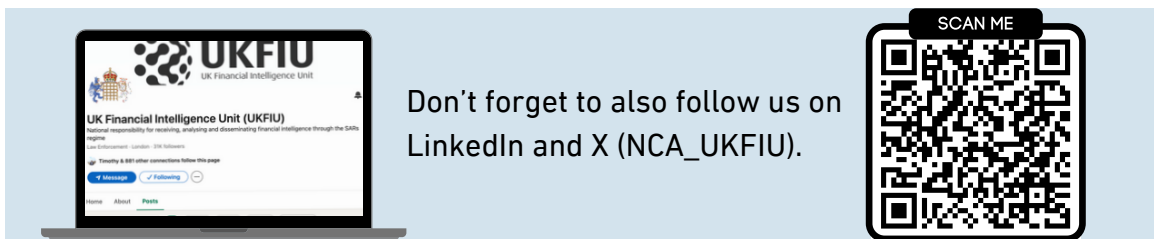
This document is produced by the UKFIU which has national responsibility for receiving, analysing and disseminating financial intelligence submitted through the SARs regime.

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.



We would appreciate your feedback on the effectiveness and format of this document. Please email any comments to 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.

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Foreword from Vince O'Brien

Welcome to the March 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 20 - Illicit Company Formation: The Public Private Partnership Response** was released in December 2024. 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 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. 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.

Case Studies

A review of case studies provided by LEAs and other end users 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).¹

Money Laundering

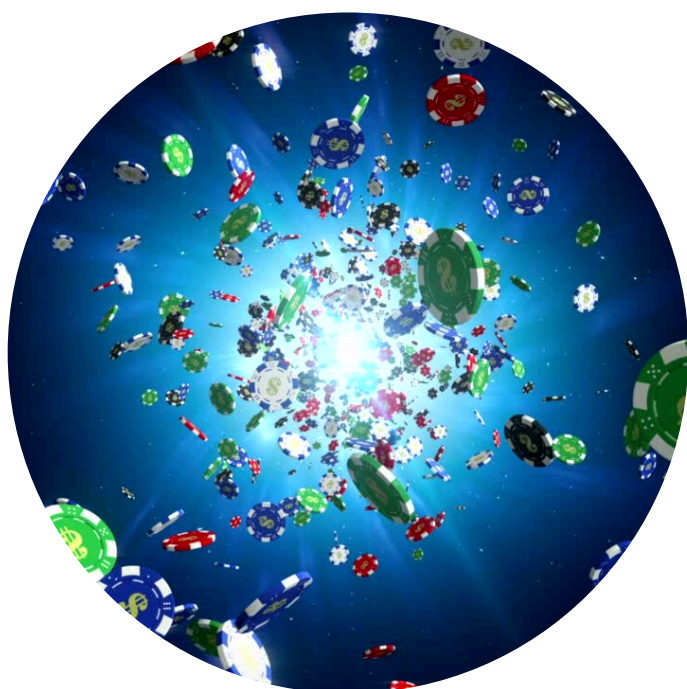
A reporter's transaction monitoring system identified multiple identical payments made by a customer to the same entity, outside of normal business hours. Following enquiries with their customer, the reporter suspected that the customer was committing money laundering by **creating multiple shell companies** in order to layer the proceeds of crime. The reporter submitted a DAML SAR to pay away the customer's account balance whilst exiting their relationship. The DAML SAR was fast-tracked by the UKFIU to the relevant law enforcement agency (LEA) who **successfully applied for an account freezing order (AFO) for over £20,000** whilst enquiries are ongoing.



Suspicious activity in a joint account prompted a reporter to submit a DAML SAR. The reporter had suspicions around an account held by two subjects, following the account's receipt of a **cash payment exceeding £10,000. The account was seeing high turnover and held a balance of over £120,000.** The reporter's internal investigation identified multiple high value cash deposits, along with CHAPS and cheque payments in and out of the account. **Activity was inconsistent with the subjects' profiles under Know Your Customer checks.** Further checks were conducted by the reporter who identified that one of the subjects had previously been convicted of fraud offences and neither subject provided an adequate explanation to the origin of the funds. The reporter submitted the DAML SAR with a view to paying away the account balance while exiting the relationship. The UKFIU fast-tracked the DAML SAR to a local LEA who's enquiries identified that a confiscation order for over £70,000 had already been obtained by another LEA investigating one of the subjects. The UKFIU used this additional intelligence and promptly transferred the DAML SAR to the investigating LEA who were able to obtain an **additional restraint order for over £30,000.**

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

A reporter was suspicious of a customer who deposited a large amount of funds, before gambling and winning nearly £25,000. Compliance checks were conducted by the reporter which **identified the amounts being gambled were inconsistent with the customer's profile of a student with a part-time job**. The reporter submitted a DAML SAR, believing the customer to be layering funds in order to disguise their true origins. The UKFIU fast-tracked the DAML SAR to the relevant LEA who identified further bank accounts held by the customer, with similar high-value payments across multiple gambling accounts. The customer was questioned by the LEA but could not provide an adequate explanation for the funds. The LEA applied for an AFO for the full amount, which included the winnings and the customer's original deposit which was uncontested by the customer.



A reporter was notified that a transfer of over £50,000 to their client's business account was the proceeds of fraud. In addition, the business account had a turnover exceeding £10 million including faster payments made to payment service providers believed to be affiliated to crypto-asset trading. The client's business account activity did not match the account application, with **unexpected payment activity and excessive annual turnover for a company of that size**. A DAML SAR was submitted by the reporter to exit the relationship and pay away the remaining balance of over £190,000. The DAML SAR was refused and fast-tracked by the UKFIU to the relevant LEA. The LEA launched an investigation and through their research they identified that a number of other LEA's were involved in a much wider investigation. Further research identified intelligence sharing opportunities across the multiple LEAs allowing for a multi-agency targeted approach for maximum law enforcement impact. The LEA was able to obtain an **AFO on the client's business account for the full account balance of over £190,000**. This remains frozen whilst the wider investigation is ongoing.

Concerns were raised by a reporter, that their client (the subject), originally from a high-risk jurisdiction, was laundering funds via cash deposits of unknown origin and then **layering these funds through multiple business and personal accounts**. The subject's income was inconsistent with their recorded employment. The reporter wished to exit their relationship with the subject and pay away the account balance of nearly £50,000. The reporter submitted a DAML SAR which was fast-tracked by the UKFIU to the relevant LEA. The LEA conducted an investigation which identified multiple personal and business accounts linked to the subject. **Further DAML SARs were submitted by multiple reporters and were also fast-tracked to the LEA**. The SARs identified significant cash deposits of unknown origin, faster payment credits, credits from an unrelated consultancy firm totalling over £15,000, as well as card merchant payments and transfers over £15,000. The reason provided for outgoing transactions was vague, often recorded as salary payments (some for a business which was no longer operating), multiple high value purchases and luxury travel, which was inconsistent with the business profiles. The UKFIU refused consent for the majority of the DAML SARs and **multiple AFOs were obtained by the LEA, with nearly £150,000 successfully restrained**.



As a result of a wider civil investigation into shell companies, an LEA investigated several companies that **appeared to be money laundering by layering funds in a carousel fraud**. Carousel fraud is facilitated by selling goods and charging customers VAT but without declaring the VAT to tax authorities. The VAT is then passed around between companies disguised as legitimate trading. During the LEA's investigation, several companies, with no apparent connection to each other were identified as being involved in the same money laundering scheme. This led to investigations into multiple suspected offences, including money laundering and non-payment of VAT, and the LEA notifying the relevant reporters. After considering this and other information they held on their customers, all the reporters decided to exit their relationships with the companies and submit DAML SARs to pay away any remaining funds within the accounts. All DAML SARs were refused and fast-tracked by the UKFIU to the relevant LEA. **The LEA applied for AFOs across all accounts and over £80,000 was forfeited**.

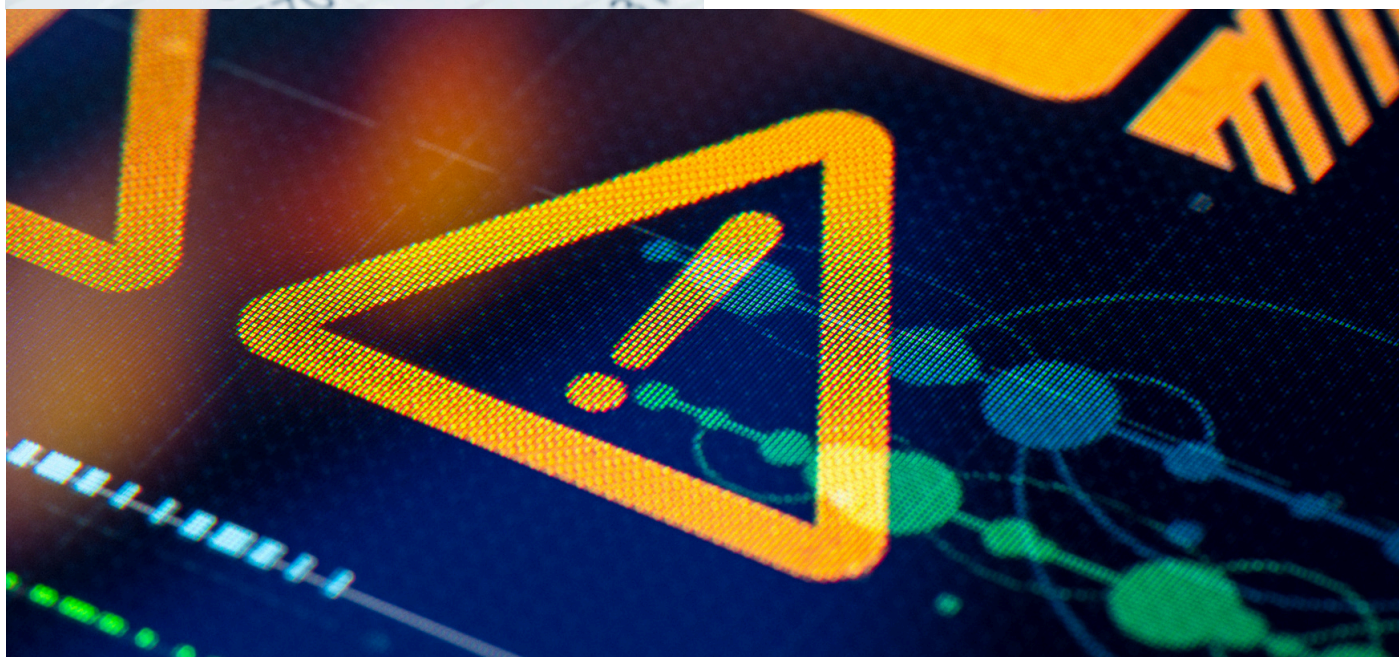
Fraud

A reporter's monitoring system flagged a customer's account due to suspicious transactions. A payment of over £10,000 was received from an overseas company account to which the customer had no apparent links. The customer very quickly attempted to make a card payment for nearly £10,000, which was declined. The reporter wished to exit their relationship with the customer due to their **suspicion of the customer's involvement in an invoice redirection scam**. The reporter submitted a DAML SAR to pay away the remaining account balance. The DAML SAR was refused and fast-tracked by the UKFIU to the LEA who interviewed the customer under caution. The customer denied any knowledge of the funds. **The LEA believed that the customer was an account mule** and applied for an AFO, which was granted and over £10,000 forfeited. An indemnity was subsequently raised by the reporter in order to return the full funds to the victim company, which was agreed.





Nearly 10 years ago, a reporter froze a client's business account due to suspicious transactions totalling over £40,000, which had been flagged as inconsistent with the client's business profile. During an audit of historical frozen accounts, the reporter attempted to contact the client but was unable to. The reporter submitted a retrospective DAML SAR to facilitate the paying away the remaining funds of over £20,000 from the client's business account. The DAML SAR was fast-tracked by the UKFIU to **the LEA who were already dealing with a £30 million confiscation order** which was outstanding for this client. The LEA were previously unaware of this client's business account. Using the information provided by the reporter, the **LEA was able to successfully apply for an AFO on these previously unknown funds**. The wider investigation is ongoing.



Following notification from a public authority that an account holder (the subject) had been arrested for suspected fraud and money laundering offences, a reporter submitted a DAML SAR to pay away the account balance of over £1,500 upon exiting their relationship with the subject. **The subject, who held a senior position within the public authority, had been fraudulently claiming payments** valued at over £250,000 from multiple branches of the public authority. The DAML SAR was fast-tracked by the UKFIU to the relevant LEA. The DAML was refused and the **LEA obtained a restraint order which will be included in the final fraud benefit figure** for confiscation proceedings.