



# UKFIU

UK Financial Intelligence Unit



# SARs REPORTER BOOKLET

August 2024

**THIS IS A UK 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.



# NCA

National Crime Agency

## 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).

Don't forget to also follow us on LinkedIn and X (NCA\_UKFIU).

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 2023.

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

Welcome to the August 2024 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 July 2024. This episode featured legal experts discussing the challenges and opportunities of suspicious activity reporting in the legal sector, including money laundering threat indicators, the challenges facing legal professionals and key tips for SAR submission.



[CLICK HERE](#)

**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 the 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 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).

## Fraud

An LEA, conducting a fraud by false representation investigation, found SARs relating to suspects of the group involved. In one of these SARs, the reporter noticed the subject had been transacting in an unusual manner, with numerous credits followed by cash withdrawals and rapid dispersals of funds to third parties, suspecting this to be an intentional attempt to disguise the origins of the funds. In another SAR, a reporter had similar suspicions about a different subject. These SARs enabled the LEA to pursue further directed lines of enquiry and make arrests. Enquiries are ongoing.

A reporter submitted a Defence Against Money Laundering (DAML) SAR to return an account balance to a subject whilst exiting the relationship. The subject's account had received high value funds not reflective of the subject's profile, suggesting these were the proceeds of crime. The DAML was refused and SAR intelligence was sent to the relevant LEA, who launched an investigation. Additional SARs were utilised during the LEAs investigation, which identified the subject had obtained fraudulent funds from social media scams. The LEA obtain a forfeiture order for the subject's account balance of around £20,000.



The UKFIU received a SAR after a reporter suspected that a subject was engaged in an illicit gambling syndicate. The reporter noted a disproportionately high level of turnover on the subject's account in relation to their income, with a high volume of low to mid value transactions with multiple third parties. SAR intelligence was disseminated to an LEA, who utilised this intelligence to ascertain that the subject had been operating an illegal lottery operation promoted through social media. Enquiries are ongoing.



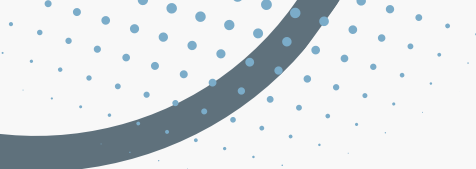
<sup>1</sup> A current or potential user of SARs such as an LEA or relevant government body.

A reporter submitted a DAML SAR to exit their relationship and pay away funds to a customer (the subject) they suspected of opening multiple accounts using fraudulent identity documents, and being in receipt of credits where the subject was not the intended beneficiary. The UKFIU fast-tracked the SAR to an LEA and refused the DAML as the subject was already under investigation. During the course of their investigations, the LEA discovered that the subject had created multiple new identities to claim government benefits, set up companies, and open accounts which were used to launder funds from the sale of goods fraudulently obtained with credit. The subject was charged with a number of fraud offences and whilst under investigation, acquired further false identities to fraudulently claim further government benefits. The subject has now been charged with further fraud offences and an application for a restraint order on over £30,000 of funds was approved. The subject's trial is scheduled to be held this year.

A reporter suspected a subject was engaging in tax fraud due to funds in their account not reflecting the subject's profile. The reporter submitted a DAML SAR to pay away the account's balance, which totalled over £10,000. The UKFIU disseminated intelligence to the relevant LEA whose investigations found the subject was operating an illegal business. The LEA obtained a restraint order on the funds and are progressing the criminal case on the subject and linked persons believed to have benefited from the fraud. Enquiries are ongoing.

A reporter became suspicious after a subject made unusually high value transactions in relation to their salary, providing no additional evidence for source of wealth. The reporter submitted a DAML SAR to pay away funds to the subject after also being made aware by another reporter that the subject was flagged for money laundering concerns. The UKFIU disseminated SAR intelligence to the relevant LEA and refused consent for the DAML. The LEA noted that the subject was already under investigation for identity fraud after stealing personal documents from victims' home addresses. The LEA conducted a search on the subject's address and found numerous stolen identity documents. The LEA obtained multiple account freezing orders (AFOs) totalling over £20,000. Enquiries are ongoing.





The UKFIU fast-tracked a DAML SAR to an LEA after a reporter suspected that funds in a subject's account were obtained fraudulently. The reporter's suspicion was initially raised after a card payment terminal registered to the subject stopped processing normal business transactions and was used to make a large value refund to another account. The DAML SAR contained intelligence on the subject linked to an ongoing LEA investigation, where it was alleged the subject had used their card payment terminal to redirect sales from a legitimate business into the subject's own account. It was therefore likely that the refund payment had been made by the business owner in an attempt to recover funds. Consent for the DAML was refused and the LEA applied for a restraint order of over £17,000. The investigation is ongoing.



An LEA searched the SAR database to investigate an account receiving the proceeds of counterfeit goods. The LEA identified that the beneficiary company had a further account which had amassed a multi-million pound turnover in a short amount of time. Further SARs identified other companies operating similarly and intelligence suggested that these company accounts were linked via their address, transacting with each other, and being operated with the same device despite having different registered directors. Multiple reporters had noted similar red flags identified on each company account including the immediate transfer of funds to multiple third party companies operating overseas. The LEA's investigation uncovered an organised crime group, suspected to be laundering the proceeds of counterfeit goods. Enquiries are ongoing.

A reporter was suspicious of benefit fraud as their customer was in receipt of a weekly benefit payment despite their income being in excess of the benefit's eligibility threshold. An LEA investigation confirmed this was the case and found an overpayment of over £5,000 which the customer is now repaying weekly.

A reporter became suspicious that a subject had opened an e-commerce account with fraudulent documents, purporting to be another business. The reporter identified discrepancies in the subject's 'Know Your Customer' (KYC) information, and blocked the subject's account, seeking a DAML to pay away accrued funds. The UKFIU refused the DAML request and disseminated intelligence to the relevant LEA. The LEA was able to obtain an AFO for over £10,000. Enquiries are ongoing.

# Money Laundering

A reporter submitted a DAML SAR to pay away funds and exit their relationship with the subject after the subject raised a number of red flags. The reporter noted that the subject's given information was not consistent, that the subject had transacted in unusual sums with a large number of unrelated third parties, added funds to their account without a verifiable source, and that transactions were often followed up by rapid dispersals and/or cash withdrawals. The UKFIU disseminated SAR intelligence to the LEA and refused the DAML. The subject was not known to the LEA, however the LEA was able to obtain an AFO for over £15,000 as a result of the DAML SAR. Enquiries are ongoing.



A reporter submitted a DAML SAR after becoming suspicious of several large credits from third parties entering a customer's (the subject) account which the subject claimed were gifts. The UKFIU refused the DAML and fast-tracked the SAR to an LEA. During the investigation the LEA found that the third party payments had been sent overseas by the subject and it was suspected they were running an illegal money service bureau. An AFO was applied for and further searches of the SARs database found other SARs relating to the subject. After identifying another account belonging to the subject, the LEA made pre-order enquiries to gain further intelligence to assist their AFO application. It was agreed in court that the money had originated from an illegal practice. An AFO for over £60,000 was obtained and subsequently forfeited.

Suspecting a customer (the subject) was using their account to launder money, a reporter submitted a DAML SAR to exit their relationship with the subject and pay away the remaining funds in their account. A number of red flags were identified on the subject's account including; multiple accounts, rapid movement of funds and the same IP address being used to access the subject's account and the accounts of other associated subjects mirroring the suspicious behaviour. It was revealed that the subject had used false identity documents to open the account. The SAR was fast-tracked by the UKFIU to an LEA and the DAML was refused to allow further investigation. The LEA concluded that the account had been opened only to receive and immediately transfer funds out to third parties making it likely that the funds were the proceeds of crime. An AFO was granted and close to £20,000 has been forfeited.