



SARs Reporter Booklet

December 2018

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

Overview

This document is produced by the United Kingdom Financial Intelligence Unit (UKFIU) which has national responsibility for receiving, analysing and disseminating financial intelligence submitted through the Suspicious Activity Reports (SARs) regime. This booklet contains a sanitised summary of feedback from law enforcement agencies (LEAs) on their use of SARs and includes pertinent information and updates from the UKFIU.

The contents of this booklet are aimed at:

- sharing perspectives on the use of SARs with participants of the regime
- sharing and encouraging best practice among 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 You can also now follow us on Twitter – [@NCA_UKFIU](https://twitter.com/NCA_UKFIU)

UKFIU assistance

For information or assistance with submitting SARs or SAR Online enquiries, please visit www.nationalcrimeagency.gov.uk or contact the UKFIU on 020 7238 8282:

Press '2' – General SAR enquiries
Press '3' – SAR Online helpdesk

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 or by fax on 0207 283 8286. **NB:** post and fax are slower than SAR Online and therefore it will take longer for your SAR to be processed. You will not receive an acknowledgement if you use post or fax. 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 email DAML@nca.gov.uk

Disclaimer

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Foreword

Welcome to the latest edition of the SARs Reporter Booklet, created by the UKFIU and aimed at all SAR submitters.

The aim of this publication is 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. It is impossible for us to provide feedback on every single SAR that we receive. This is because of both the volume received (in the last financial year we received over 460,000) and the wide range of ways they are used across the system. However, I hope that that this booklet – as well as other UKFIU products – go some way in indicating the value of SARs.

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. There is a lot that can be done to improve the SARs regime however, and we are pleased to be involved, along with representatives from the reporting sector and law enforcement, in the ongoing SARs Reform Programme, led by the Home Office.

Going forward, these Reporter Booklets will focus predominantly on sanitised case studies. UKFIU/SARs regime news will feature instead in a new look magazine which will be made available via the NCA website www.nationalcrimeagency.gov.uk. The SARs Annual Report 2018 will be published shortly.

Ian Mynot,
Head of the UKFIU

Case studies

A review of case studies provided by LEAs and other end users¹ of SARs demonstrates how they continue to be instrumental in instigating and supporting investigations to tackle a wide range of the highest priority threats.

Money laundering

SAR intelligence was received regarding a subject in prison overseas. A number of linked SARs identified associates and associated companies, links to additional assets and useful investigative leads. An application for a court order in relation to UK property worth over £20m was successful.

A high profile high end money laundering investigation has been heavily dependent on SARs to advance financial enquiries. This is complex multi-jurisdictional money laundering involving offshore structures, front/shell companies and complex layering of funds across multiple regions. There is currently ongoing bilateral working with a number of foreign law enforcement partners.

SARs have instigated a money laundering investigation as there were a huge number in which the main subject was named. One of the subjects has gambled in excess of £12m online and through casinos. There is a national and international angle to the investigation and enquiries are ongoing.

A complex money laundering investigation was launched on the basis of SARs intelligence suggesting that a subject had transferred large amounts of cash overseas. SARs information also brought to light previously unidentified contact details and account numbers and corroborated information that a package addressed to the subject had been intercepted and found to contain Class C drugs. The subject received a suspended prison sentence and a confiscation order of over £50,000.

A reporter sought a Defence Against Money Laundering (DAML) to refund funds after due diligence checks identified that the subject had been convicted for fraud and been served with a confiscation order in excess of £1m. The UKFIU identified that the confiscation was open and refused the DAML, enabling the LEA to apply for an uplift to the confiscation order at court.

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

A reporter sought a DAML to release funds to their customer following information received from local police that he was due to be sentenced for drug trafficking offences. An examination of his financial activity identified unexplained deposits into the account. The request was refused allowing time for a restraint order to be served which formed part of a subsequent confiscation order.

A subject has opened multiple current accounts in quick succession and is using these to launder funds on behalf of others. SARs have identified the criminality and caused an investigation to commence. Subsequent enquiries have identified that the subject has used false instruments in order to open some of the accounts identified. Enquiries are ongoing.

Drugs

An LEA was already investigating a subject for drugs offences who was suspected of laundering an organised crime group's (OCG) funds through his bank account. As a result, following the submission of a SAR, around £250,000 was restrained; enquiries are ongoing.

DAML SARs were received in relation to suspicious activity on a business bank account. The subject was already awaiting trial on drug trafficking charges (he would subsequently receive a prison sentence for these offences). A forfeiture of just below £100,000 was secured.

A subject deposited over £50,000 into their account which they alleged had come from a compensation claim, and proceeded to use the money to purchase a property. SARs reporting this activity gave rise to an investigation, which revealed that the subject had lied about the money's true origin. The subject was arrested on suspicion of money laundering, their property searched and a significant amount of drugs and cash found. Evidence uncovered during the investigation also revealed that the subject was living a cash-rich lifestyle, having purchased high-value goods in cash, which led to further charges. The SARs submitted instigated the investigation and it is unlikely law enforcement would have otherwise uncovered the criminality. The subject and several associates were convicted and received prison sentences; a confiscation order for over £100,000 was obtained.

A subject was convicted of an offence of possession with intent to supply. An urgent application to obtain a restraint was subsequently made as a direct result of SARs intelligence which indicated that the subject was in a position to dissipate their assets. The subject was subsequently given a prison sentence and a confiscation order of over £90,000 was obtained.

A drug trafficking investigation was underway when a DAML SAR was submitted seeking consent to allow a subject closely associated to the investigation to make an international transfer. The DAML request was refused and an Account Freezing Order was successfully obtained under the new Criminal Finances Act. Enquiries are ongoing into the derivation and intended use of the frozen funds. The DAML SAR directly led to the identification of suspected recoverable property.

Two people were convicted for conspiring to produce Class C drugs. A confiscation order was obtained for over £30,000; however, a SAR assisted in a revisit which culminated with an additional order for one of the subjects to pay a further amount of over £50,000. Details of properties owned showed up in the SAR.

A reporter sought a DAML to proceed with a property purchase. The reporter (acting on behalf of the buyers) was concerned that the property may have been purchased with the proceeds of crime, having identified that the seller had been convicted of drug offences. The UKFIU refused the DAML, enabling the investigating LEA to secure a restraint which was included in a confiscation order on the subject.

A subject had been convicted of conspiracy to import Class A drugs. The subject and an associate ran a business and SARs highlighted a reporter's concern with the amount of cash being deposited into the business accounts. The SAR intelligence provided the catalyst for the financial enquiries and a subsequent successful confiscation order for over £60,000.

A reporter sought a DAML to release funds to their customers after receiving intelligence from police confirming that the customers and a relative had been convicted of drug offences. A confiscation order had been made against the relative and suspicions were raised after the customers received a payment from this relative. The DAML was refused and a restraint order was obtained.

Fraud

SAR intelligence instigated a financial investigation which saw a number of people convicted. The SAR intelligence reported excessive gambling on the part of the subject. During the course of the subsequent LEA investigation they worked closely with the gambling company who helped track and monitor the customers' activity for over a number of months. It was identified that an OCG was involved in drug trafficking and that although having no visible means of income the head of the OCG had deposited over £1.5m into an account over a number of years. A number of individuals received prison sentences while others received suspended sentences and community orders. Confiscation orders totalling just short of £80,000 were secured.

The SARs regime played a significant part in disrupting an international OCG using the UK to hold the proceeds of major crime. A UK LEA was assisting an overseas investigation into foreign national criminals residing in the UK. The investigation focused on a multi-jurisdictional fraud involving a large number of individuals across Europe, with losses amounting to millions of euros. A SAR identified the UK bank account of a subject who was in custody overseas awaiting trial. However, the FI identified – via SAR intelligence – other assets within the UK belonging to the subject which did not feature in the initial SAR. Through enquiries with the reporter the FI identified another account connected to the subject which contained over £1m. As there was a risk that a criminal associate may well withdraw the funds before action could be taken, the reporter submitted a subsequent SAR. The FI liaised with the UKFIU who contacted the overseas jurisdiction and the account was restrained with the funds secured. Enquiries are ongoing.

SAR intelligence concerned suspicion that over £230,000 held in a business account was there as a result of unlawful conduct. Investigations found that the business director had used fraudulently obtained genuine documentation to set up the account and enquiries linked the director to other persons suspected of being involved in fraud. A restraint was secured and money returned to the fraud victim.

As a result of SAR intelligence a restraint order for £250,000 was obtained against an individual. Also, property abroad has been identified that will be subject to overseas enquiries.

A SAR supplied detailed information on properties owned by the subject and a relative. The SAR highlighted concerns that the subjects were not declaring all their rental income and some of it was being diverted to third parties. Further checks revealed that the subjects held a rental portfolio worth in excess of £2 million and that income was being declared significantly below what would normally have been expected. The subjects were also meeting repayments amounting to more than £1m, which seemed at odds with their declared level of income. An investigation resulted in over £300,000 being recovered.

A DAML SAR was received relating to a property purchase that the reporter believed was suspicious. The reporter's client had attended the office to sign documents relating to the sale but had failed to bring along identification and when this was subsequently received it was apparent that the person signing the documents was not the person buying the property. Police investigated and established that the suspect was in significant debt. The DAML request was refused enabling police to restrain the £100,000 being used in this fraud and the investigation is ongoing.

An individual was arrested on suspicion of stealing large sums of money. SARs informed that the subject had fraudulently taken out a credit card in another's name in order to secure funds. The defendant pleaded guilty and received a prison sentence.

A SAR indicated that an account had received a large international payment which did not match the profile of the customer who was unemployed and in receipt of benefits. A DAML was sought to pay the balance of over £75,000 to the customer upon closure of the account. Enquiries indicated that the subject was a recipient of funds from a CEO fraud and had unwittingly acted as an account mule.² The subject was interviewed and arrangements made with the reporting bank to return funds to the remitting account.

A number of victims of fraud were located in the UK. These victims were originally defrauded by a fictitious company and had lost significant amounts of money. Attempts were made at a later date to contact these same victims by another company, offering to act on their behalf to recover their losses and charging an up-front fee for the service. This, however, was a 'recovery room' scam and the victims' names had been sold on as a 'sucker list'.

An individual was arrested and during a search of their premises numerous financial and identity documents, bank cards and cash were seized. In light of SARs received the paperwork seized showed little evidence that the subject was running a legitimate business. Significant sums of money had been transferred overseas from their bank account to an account in another name.

The subject gave no explanation as to the legitimate derivation of the cash and it was felt that there was significant evidence to show that the money seized was connected to criminality. Forfeiture of the money was granted.

As a direct result of SAR intelligence an LEA was able to identify several frauds that had taken place and arrest an offender. The frauds related to the fraudulent use of a company credit card and independent wholesaler account. The subject received a suspended sentence.

A reporter sought a DAML to return over £50,000 to its customer. The funds were split between accounts held in trust. The reporter was suspicious following law enforcement intelligence that suggested the funds had originated from a third party to avoid settling a confiscation order. The UKFIU refused the DAML request following LEA confirmation that the source of the funds had been charged with drugs and money laundering offences; this refusal enabled the LEA to secure a restraint for the amount. The customer and the subject both received prison sentences and confiscation proceedings are underway.

A SAR demonstrated that benefits of many different types were being paid into a single account owned by an individual. Further enquiries linked the subject to similar identify fraud across the country. The SARs highlighted the scam and the investigation is ongoing.

² CEO fraud - also called Business Email Compromise.

A reporter sought a DAML to release funds to its customer following adverse media stating that he had been charged with fraud and money laundering offences. The UKFIU refused the DAML request after it was established that the customer had been convicted over fraud years before, however it was believed that he was receiving funds from hidden overseas sources that originated from his initial criminality. The DAML refusal enabled the investigating LEA to vary the original confiscation order which the individual has now paid.

A SAR was submitted on joint account holders after the reporter was convinced they had lost over £10,000 to a scam. The couple believed that they were paying for the release of an item from customs overseas and that they would be refunded their money on release of the item. The reporter had tried to advise the customers that they were victims of a fraud but to no avail. On receipt of the SAR the local LEA visited the couple and was able to convince them that they had become victims of an international scam. They agreed to not send any further funds and were given appropriate advice in an attempt to protect them from any future fraud.

A SAR raised concerns that benefit payments were being paid into an account which held a significant savings balance. An investigation concluded in the defendant receiving a suspended prison sentence for benefit fraud by over £20,000. The overpayment amount was repaid in full.

Vulnerable persons

While fulfilling anti-money laundering and terrorist financing obligations reporters sometimes identify those who are being exploited or who are potential victims of fraud. Common types of fraud encountered include investment fraud (and variations including pension liberation fraud)³, romance fraud⁴ and individuals unwittingly engaged in money mule activity. Relevant SARs are identified and fast-tracked by the UKFIU to police forces who will, in many cases, arrange visits by local officers – whilst maintaining the confidentiality aspect of SARs – to offer advice in order to prevent fraud or further losses.

An investigation was underway into an individual suspected to be involved in the labour exploitation of foreign nationals brought into the UK. SAR intelligence linked the subject to the receipt of funds of unknown origin and a business which was the subject of previous adverse intelligence. The male was subsequently refused entry to the UK on public policy grounds. A safeguarding visit was conducted to another business linked to the subject and the workers there offered safeguarding assistance.

³ Fraud where members of the public are encouraged to access their pension before retirement, following false representations of anticipated levels of returns when investments are either non-existent or incapable of providing such a return.

⁴ Dating or romance scam, when the 'perfect partner', usually online, gains the victim's trust and asks for money.

As the result of a possible vulnerable person SAR fast-tracked by the UKFIU an enquiry was launched into possible human trafficking/sexual exploitation and funds being sent overseas for the benefit of a suspected convicted subject. The investigation is ongoing.

The UKFIU fast-tracked a SAR after it expressed concerns for a potentially vulnerable person withdrawing large sums of money. The report led to joint working between a number of agencies who held multi-agency meetings to safeguard the subject. An investigation is ongoing regarding rogue trader offences which led to the subject being defrauded of over £30,000. The vulnerable person has been safeguarded to try and prevent any further incidents of this nature and to ensure she is not caused any unnecessary upset. An individual has been arrested and enquiries are ongoing.

SAR intelligence was received in relation to a vulnerable person who was ill. Financial enquiries confirmed that the victim had suffered an investment fraud of over £30,000. However the enquiries identified that the victim had also suffered similar scams, believed by the same offenders over a longer period, losing over £100,000 in total. Suspects have been arrested in relation to this and the investigation continues. However, it was identified that the victim had also suffered an unrelated fraud. An individual was convicted of fraud offences totalling more than £40,000 in relation to this and received a prison sentence. This would not have been identified without fully reviewing and expanding on the SAR data.

The UKFIU fast-tracked a potential vulnerable person SAR to a local force after the reporter raised concerns about a customer requesting to send funds to a third party account. Police officers visited the individual who stated he had met someone on a dating website who lived overseas. He had previously sent her over £8,000 and was in the process of sending her a further £10,000 when the SAR was raised. He was advised to make a report to Action Fraud and his expectations were managed with regards to the unlikelihood of recovering the money he had sent.

A subject was visited by local police following SAR intelligence which indicated he had been receiving funds into his bank account and then sending them on to other beneficiaries overseas. He was advised that he was part of a network of money mules and that the funds almost certainly represented criminal property derived from scams/frauds. He was advised that if he continued to do this he risked being arrested for money laundering. The subject was subsequently arrested on separate matters and his computer/devices seized. These were examined and showed that following the initial police visit he had continued to liaise with an individual overseas and had discussed methods of moving funds to avoid detection. Enquiries are ongoing.

SARs reported that the subject had sent numerous payments to a variety of names overseas. The subject was visited by local police and explained that she had been contacted by someone purporting to be from the courts in a particular country and had been told that she could get money back in relation to a previously held timeshare. The money had been invested and she was due some payments if she paid an assortment of fees including tax. She had been contacted numerous times with instructions to send money and she estimated the total payments to be approximately £30,000. The LEA explained that this had all the hallmarks of a fraud and she was advised not to send any further money. She was also advised to block the callers and ignore their emails. Action Fraud and Victim Support were informed.

An investigation is underway into a highly sophisticated series of frauds across the UK, whereby suspects would contact elderly and vulnerable victims by phone claiming to be their bank's fraud department. Victims would be told to transfer funds into other accounts that were being controlled by the suspects. SARs have showed accounts receiving a number of suspicious third party credits and cash. A number of suspects have been identified and enquiries are ongoing.

An individual was convicted of theft/fraud and received a prison sentence in relation to stealing funds from an elderly person's bank account. As part of the investigation a SAR highlighted the stolen funds going into the subject's bank account. A confiscation order of over £25,000 was secured.

DAML requests were received raising concerns that a sexagenarian was the subject of a scam and was being used as a money mule to receive funds from a third party overseas before sending them on. As the result of a visit by local police she confirmed that the funds did not belong to her. International enquiries established that this appeared to be part of a large fraud ring. A cash forfeiture of over £13,000 was made.

The UKFIU fast-tracked a potential vulnerable person SAR to a local force after it reported on a subject who was living in a care home and had sent almost £8,000 to individuals abroad. It was subsequently established that the subject had fallen victim to a romance fraud and had been asked to open an account to send and receive funds. The SAR resulted in appropriate advice being given and referrals made to support services to prevent further losses.

The UKFIU fast-tracked a potential vulnerable person SAR which identified that a septuagenarian was sending money overseas to a woman; there were fears that he was the victim of a romance fraud. Local police visited and established that the suspect had visited the victim's home as part of a 'sham marriage', obtaining over £4,000 from him. The victim stated that he was going through his solicitor in order to have the marriage annulled.

Other

A reporter submitted a SAR indicating that over £100,000 in cash had gone through a subject's account over a number of months and in addition to a legitimate income. There appeared to be no reasonable explanation for this activity and it was therefore suspected that the subject could be laundering the funds for an OCG. Law enforcement was subsequently able to freeze the account under the new Criminal Finances Act.

An investigation was underway into foreign nationals suspected of involvement in human trafficking for the purposes of sexual exploitation. The subjects had a business suspected to be used as a front for laundering the proceeds. SARs indicated that they had received funds of unknown origin, suspected to be the fees paid by sex workers in return for being brought to the UK. They were also linked to the setting up of 'pop-up brothels', payment of airline tickets used by sex workers and paying for online advertising on adult sites. An individual was charged with controlling prostitution and trafficking and received a prison sentence.

A proactive interrogation of Arena by an LEA identified SAR intelligence relating to an individual who appeared to be laundering funds by manipulating loans for vehicle leasing.⁵ Wider financial analysis revealed a network of individuals and it was identified that the group was making cash deposits and transfers to bank accounts at different locations around the country. The group had assets which exceeded their declared income and analysis identified addresses under their control. Law enforcement activity was carried out against the identified properties. High value property and cash was seized from the addresses, together with financial documentation relating to the purchase of a property. Enquiries are ongoing.

Law enforcement was conducting an investigation into a subject suspected of having travelled overseas to align with a terrorist organisation. SARs intelligence provided details of the activity on the subject's account around the time that they were believed to have travelled, and the transactions that took place before the account went dormant (including withdrawals, bookings and payments). The information proved extremely valuable to the investigation and informed the decision to apply for a production order. Without the information supplied in the SAR, this progress would not have been made.

A SAR alerted a local police force to an individual with an outstanding confiscation order who was about to have the contents of an online bookmaker's account returned to them. The DAML SAR was refused enabling the money in the account to be paid towards the order.

⁵ Arena is a search and analysis tool for external end users of SARs.

A large number of SARs have assisted in an organised immigration crime investigation. The intelligence from the SARs has identified subjects for further financial investigation, production orders and the disruption of bank accounts being used. The use of other means of funds transfers have been identified, as well as methodologies being used by the OCG, both in the UK and Europe. The SARs have also identified commonalities in how the accounts are used and businesses associated to the OCG subjects. The reporting on the SARs has also assisted with the reasons the subjects have provided to financial institutions for the reasons behind the patterns on their account, which when put alongside other intelligence, has helped to inform some of the methodologies that they may be using (some of the accounts have now been closed). Enquiries are ongoing.

A SAR raised concerns that the subject's personal account was being used for business purposes in order to evade tax. The SAR contained an email address for the subject, a bankrupt that was a named director of limited companies, who was living at an unknown address. The email address enabled contact to be made with him and action taken to have the companies struck off the Companies Register, thereby obtaining compliance from the subject and preventing offences being committed under the Company Directors Disqualification Act 1986.

A reporter submitted a SAR due to suspicion over the level of activity within an account with no proof of income provided. As there was an outstanding confiscation order the funds in the account were subsequently forfeited, seeing an uplift of over £10,000 to the confiscation.

A DAML SAR came about as a result of an individual's spouse selling a vehicle which was subject to a restraint order. The individual had been convicted of money laundering. As a result of the SAR and other intelligence the LEA was able to extend the restraint to cover the proceeds of the vehicle which had been unlawfully sold.

A subject was stopped on attempting to leave the UK carrying approximately £10,000 in cash. Checks identified a SAR revealing that the subject had attempted to open a current account, but was turned down when they were unable to confirm they had the right to be in the UK. As a result of the information in the SAR officers were able to seize the cash.

NCA website

There is a large amount of information on the NCA website about the SARs regime, the UKFIU, how to report SARs, the legal basis for reporting and requesting a defence against money laundering. Visit www.nationalcrimeagency.gov.uk and click on the UKFIU box on the main page. A link to SAR Online can also be found at the top right corner of every page of the NCA website – click on 'Reporting SARs'.

SAR glossary codes

The latest version of the SARs glossary codes (dated 16 January 2017) is available from the NCA website. The full title of the booklet is 'Suspicious Activity Report (SAR) Glossary Codes and Reporting Routes'. A summary of the latest codes is below.

The use of glossary codes is considered good practice amongst reporters and allows the UKFIU and wider law enforcement to conduct analysis to identify money laundering trends, high risk cases for development and take immediate action where necessary.

Request for a defence under POCA/TACT	
XXS99XX	Request for a defence under POCA
Tick 'Consent' and submit under TACT	Request for a defence under TACT
High-end money laundering	
XXPRFXX	Relates to person(s) providing professional services or specialist knowledge that wittingly or unwittingly facilitates money laundering
XXTBMLXX	Trade-based money laundering
XXPROPXX	Relates to purchases or sales of real estate property
Predicate offences - economic crimes	
XXTEOSXX	Tax evasion overseas
XXTEUKXX	Tax evasion UK-based
XXF1XX	Proceeds from benefit fraud
XXF2XX	Excise evasion (duty on alcohol, tobacco, fuel etc.)
XXF3XX	Corporate tax evasion (tax evasion by businesses, corporations)
XXF4XX	Personal tax evasion (tax evasion by individuals e.g. income tax)
XXF5XX	VAT fraud e.g. carousel – Missing Trader Intra-Community (MTIC) fraud
XXF9XX	Frauds against private sector
XXD9XX	Bribery and corruption
Politically Exposed Persons (PEPs)	
XXD7XX	International PEPs
XXD8XX	Domestic PEPs
Money laundering/terrorist financing relating to vulnerable persons	
XXV2XX	Risk to vulnerable adults
XXV3XX	Risk to children – including sexual exploitation and abuse
Other predicate offences	
XXFIREXX	Firearms
XXOICXX	Organised immigration crime
XXDRUXX	Illegal supply of drugs
Projects/other	
XXPCPXX	Counter-proliferation