

# SARs Reporter Booklet

November 2024

---

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

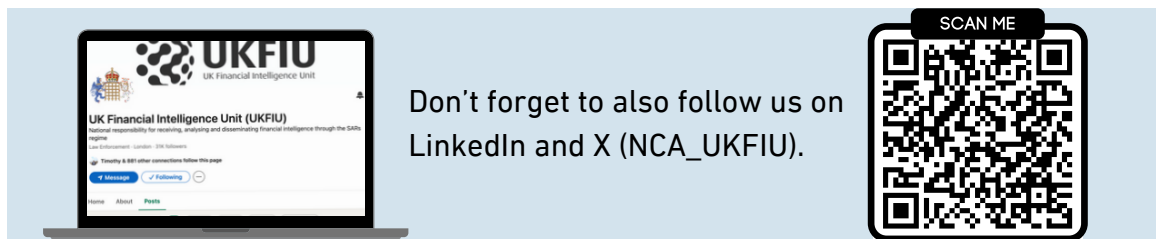
This document is produced by the UKFIU which has national responsibility for receiving, analysing and disseminating financial intelligence submitted through the SARs regime.

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 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.

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 November 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.



## 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 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).<sup>1</sup>

## Bribery

A reporter submitted a number of SARs concerning the bribery of a Politically Exposed Person (PEP) overseas. Payments from a business customer (the customer) had been flagged as suspicious, triggering an investigation by the reporter into the nature of the payments. The reporter's investigation revealed that the customer had been sending bribery payments to the PEP overseas in return for the continuation of contracts being awarded to the customer's business. The SARs enabled the relevant LEA to gain information relating to the frequency of payments, the accounts they were paid from, the individuals associated with the accounts and the amounts paid overseas (in excess of £300,000). This enabled the LEA to pursue further lines of enquiry and progress the case in a shorter timescale than would otherwise have been the case. Enquiries are ongoing.



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

# Fraud



A SAR identified through the SARs database assisted an LEA in a case of confiscation enforcement against a subject who had been convicted for fraud offences. A source of funds belonging to the subject was identified and the LEA requested the subject to voluntarily surrender them as part of a confiscation order. However, the subject claimed they were reliant on the funds with no other source of income. The SAR submitted detailed the reporter's customer (the subject's spouse) was making regular transfer of payments to the subject who was also imprisoned for money laundering offences and provided intelligence which proved the subject was able to be supported by other means. When presented with the evidence, the subject voluntarily surrendered funds of over £300,000 towards the confiscation order.

SAR intelligence led to the forfeiture of over £1.5m after an LEA investigation was instigated, as a result of a DAML SAR reporting on the sale of counterfeit products that breached safety regulations. The LEA requested further financial intelligence from a reporter who was able to detail the suspicious activity of a number of linked accounts with higher than expected turnover and multiple high value transfers between the linked accounts, enabling the LEA to uncover a web of interlinked companies importing counterfeit products. The LEA was able to obtain multiple Account Freezing Orders (AFOs) on funds held in the linked accounts and have shared further intelligence with another LEA who has been able to identify the importer of the counterfeit products and carry out a large seizure as a result. Enquiries are ongoing with the LEA now expected to carry several cases towards a forfeiture of funds.



Reporter suspicions were raised after their identity verification checks revealed doubt over the true identity of a customer, triggering an investigation into the customer's financial activity. The reporter found activity on their customer's account indicative of layering on both the customer's personal and business account and the possibility that the named customer was a victim of identity fraud or had been coerced into opening the account but someone else was operating the account. There were also concerns held around application fraud due to overdrafts and a loan being obtained and used in the customer's name. The SAR was fast-tracked by the UKFIU to an LEA whose further investigations identified a subject of an ongoing police investigation linked to large scale fraud and money laundering and suspected to be in control of the customer's accounts. Enquiries are ongoing.

# Money Laundering

An LEA opened an investigation into a suspect following suspicions of money laundering. During the course of the investigation, a reporter submitted a DAML SAR wishing to exit their relationship with the suspect and return the balance of the suspect's account. The activity on the account was inconsistent with the suspect's profile, including spending on high value assets. The UKFIU refused the DAML SAR and fast-tracked the intelligence to the LEA, enabling the LEA to identify links between credits in the account and the suspect's company that the suspect claimed had ceased trading. During the moratorium period, the LEA was able to obtain a forfeiture on the suspect's account, totalling over £23,000.



Concerns were raised by a reporter after they noticed multiple red flag indicators of underground banking on a customer's account. These included; the customer being an international student with a short association with the reporter, financial activity and cash deposits of high value not reflective of a student and origins of cash credits being unknown. The reporter submitted a DAML SAR to the UKFIU and intended to exit their relationship with the customer by closing the account. The UKFIU refused consent to allow further investigation by an LEA. Following their enquiries, the LEA obtained an AFO on funds for over £3,000. Enquiries are ongoing with forfeiture of the account balance expected.



# Drugs



A reporter submitted a DAML SAR due to suspicion that their customer was using a company account to layer the proceeds of crime. A suspicious transaction was flagged where the explanation from the customer did not match evidence provided. An LEA investigation found the company had been involved in the regular importation of counterfeit products which did not meet safety regulations, the sale of which had accounted for a company turnover five times higher than expected. The LEA also linked the DAML SAR to an ongoing international operation into the company by another LEA after the company had been found attempting to import a large amount of class A drugs into the UK. The LEA shared intelligence with all relevant LEAs and successfully applied for an AFO on funds for over £35,000. Enquiries are ongoing.

A DAML SAR was submitted by a reporter who held concerns about the value and volume of cash being processed through a customer's business account. The customer's retail business income came primarily from high value cash funds deposited via money service bureaus. The reporter found open source media reports relating to the customer and the previous supply of drugs. This raised further red flags for the reporter as the business had made several outgoing payments to retailers linked to equipment that could be used in the production of drugs. The UKFIU fast-tracked the DAML to an LEA who recovered cash and drugs from the customer's property as part of their investigation. The LEA identified additional accounts associated to the customer as part of their financial investigation. The customer and associates were arrested pending further investigation with funds of over £50,000 subsequently restrained.

