

# SARs Reporter Booklet

July 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

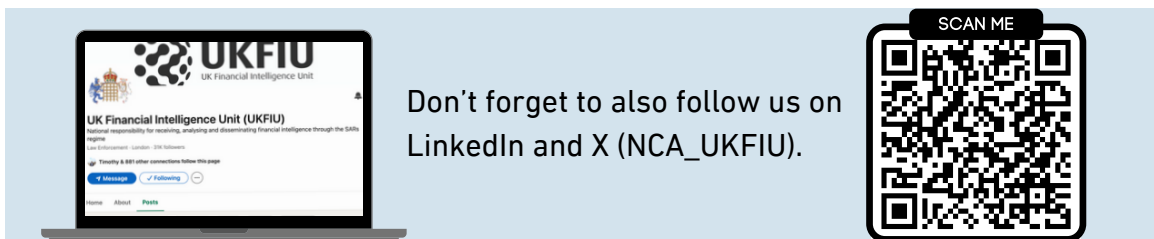
This document is produced by the UKFIU which has national responsibility for receiving, analysing and disseminating financial intelligence submitted through the SARs regime.

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 July 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 23 - Virtual Squatting** was released in July 2025. This episode features a discussion with representatives from the National Economic Crime Centre (NECC), Institute of Chartered Accountants in England and Wales (ICAEW), and Companies House about the role of virtual squatting plays in economic crime, potential signs that professionals should be aware of, and the positive outcomes as a result of public private partnership.

**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).

## Fraud

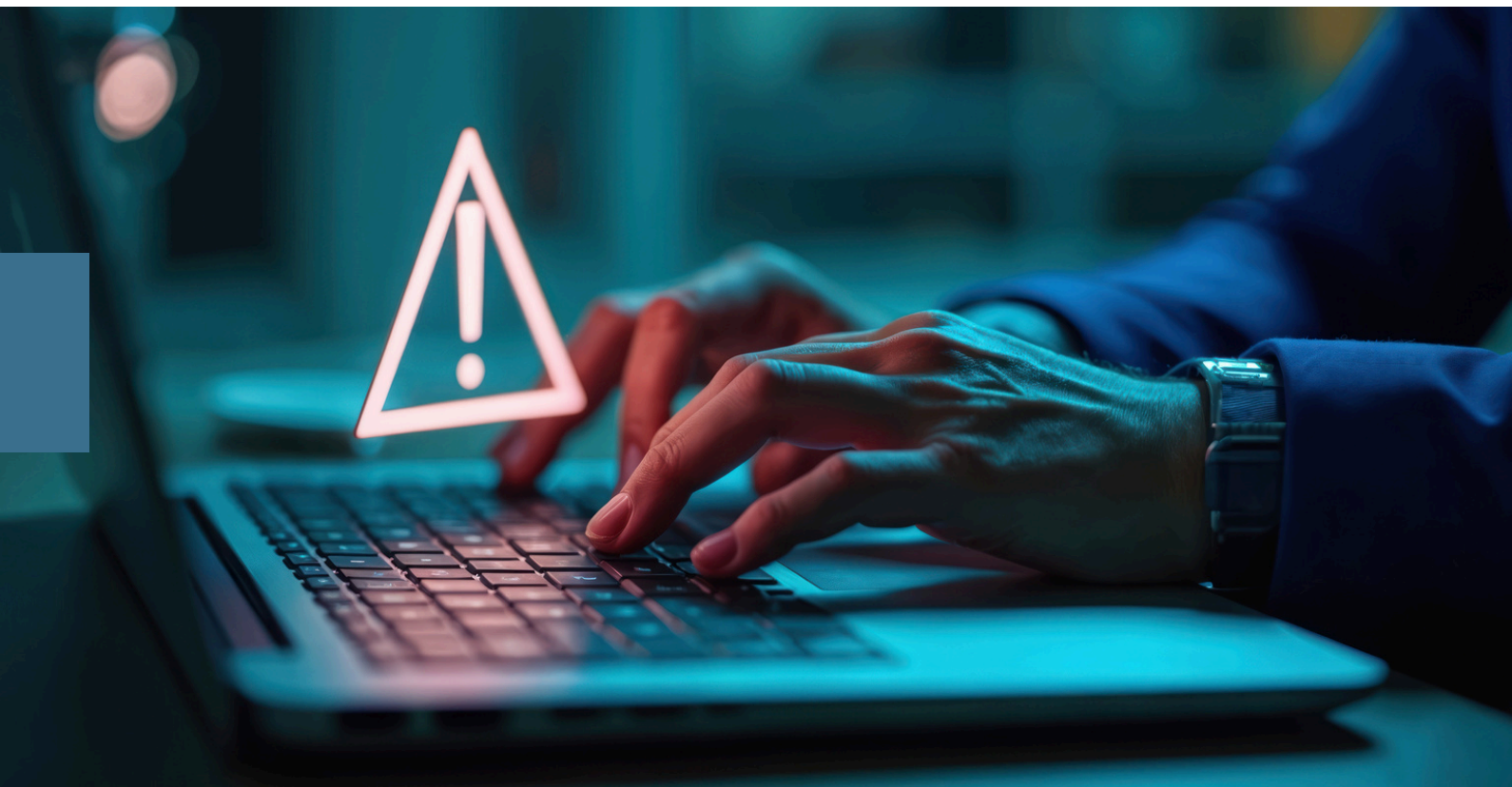
A DAML SAR was submitted following suspicions that a business was not trading in a genuine capacity. The reporter believed the funds received were fraudulent, in addition, activity was not aligned to the business model. The reporter sought a defence to exit the relationship and pay away the remaining account balance. The UKFIU refused the DAML SAR and fast-tracked the intelligence to the relevant law enforcement agency (LEA). Following their investigation, the LEA was able to identify that the funds were the result of invoice redirection fraud and obtained an Account Freezing Order (AFO) on the funds of over £30,000. This enabled the funds to be returned to a business victim in an overseas jurisdiction.



A victim of an advance fee fraud filed a report with an LEA. The victim had transferred money to the suspect based on the understanding the suspect would assist them in securing legal services. The suspect demanded more money and threatened the victim when they refused to transfer additional funds. The LEA launched an investigation and utilised SARs intelligence from multiple reporters, including SARs that were fast-tracked by the UKFIU. During the investigation, the LEA was able to uncover several accounts held by the suspect, as well as potential accomplices and additional victims. The suspect was arrested and convicted for multiple fraud-related offences.

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

**M**ultiple seemingly unrelated companies opened business accounts with various reporters. Suspicious financial activity on these accounts led to the reporters each commencing internal investigations. The reporters separately found that the funds were likely from investment fraud and linked to a single main subject who had previously been jailed for money laundering offences. Multiple SARs were submitted to the UKFIU. One of the reporters submitted a DAML SAR to return one of the business account balances (over £10,000) to the main subject. The UKFIU refused the DAML request and fast-tracked intelligence to the relevant LEA who used the intelligence from the DAML SAR and other related SARs to launch a criminal investigation, leading to the arrest of the main subject and the identification of multiple victims. The investigation is ongoing.



**A** DAML SAR was submitted by a reporter to pay away an account balance of over £280,000 while exiting their relationship with a business. The reporter held suspicions that funds in the account were the proceeds of crime. The account turnover was in excess of what was expected based on the business profile, including credits from UK and internationally based accounts that were unrelated to the sector that the business operated in. The UKFIU refused the DAML request and fast-tracked the intelligence to the relevant LEA who immediately launched an investigation, uncovering links to an international organised crime group (OCG), with the funds likely originating from fraud. The LEA successfully obtained an AFO for the whole account balance. Enquiries are ongoing.

# Money Laundering

A reporter had concerns of Trade Based Money Laundering (TBML) following previous suspicions of payroll fraud, changes of ownership around linked companies and a poor quality business website which did not support the level of funds received through the subject's account. In addition, the subject had made no payments to HMRC despite their company (the associated subject) being VAT registered. A DAML was submitted to exit the relationship and pay away the remaining balance which was in excess of £60,000. The reporter helpfully mentioned linked subjects enabling prompt dissemination to the LEA. The UKFIU refused the DAML request and funds have been frozen to be used for the liquidation of the subject's company.





A DAML SAR was submitted by a reporter to pay away an account balance held by a newly incorporated business, due to suspicious activity on the account. The business account received credits substantially above the expected turnover, which were then transferred out to multiple individual accounts, whilst operating in a high risk sector. The UKFIU refused the DAML request and fast-tracked intelligence to the relevant LEA. The LEA launched an investigation and was able to prove that the funds were not for legitimate business purposes, and that the business was a front for money laundering. The LEA successfully obtained an AFO for the account balance, which led to a successful forfeiture for over £100,000. The case also uncovered linked accounts which are currently under LEA investigation.



A subject's UK based account received high value credits from several foreign jurisdictions. The credits were then transferred to an account in a foreign jurisdiction. The reporter flagged this activity as indicative of money laundering and swiftly submitted a DAML SAR to pay away the account balance and exit their relationship with the subject. The UKFIU refused the DAML request and fast-tracked intelligence to the relevant LEA, who launched an investigation. The LEA successfully obtained an AFO on the account for over £15,000. During this time, another DAML SAR was received from a different reporter. While initially appearing unrelated, their method of transferring funds and UK address was the same. This DAML was refused by the UKFIU and the LEA utilised this additional intelligence to obtain an AFO on the second account. These DAML SARs led to over £28,000 being forfeited. Enquiries are ongoing.

## Drugs/Other

**A**dverse media alerted a reporter to a subject who had previously been convicted for drugs and mortgage fraud offences a number of years ago. The subject was also in receipt of means tested benefits and third party credits which heightened the suspicion of the reporter. A DAML was submitted as the reporter wished to exit the relationship and pay away funds. Without the submission of the DAML the LEA would have been unaware of these funds. The LEA were able to include these in a confiscation application and successfully managed to obtain a Proceeds of Crime Act (POCA) restraint order on the funds in excess of £35,000.

**A** reporter identified a substantial amount of funds being deposited into a customer's account (the subject) from a family member. The account was funded primarily by the subject's parent who had been in the UK illegally for several years. The reporter therefore believed that the funds were proceeds from working illegally in the UK per Sec 24B of the Immigration Act 1971, and therefore the funds were recoverable under the Proceeds of Crime Act 2002. The subject's account had very little activity and

appeared to be an attempt to store the funds to obfuscate the origin. The reporter submitted a DAML SAR to terminate the relationship with the subject and pay away the remaining account balance. The DAML SAR was fast-tracked by the UKFIU to the relevant LEA who until this time had no knowledge of this account. Consent was refused and this was used to further support an existing AFO on the parent's account and obtain a new AFO on the subject's account for over £30,000. Court proceedings are ongoing.

A subject's account was credited over a short period with funds that vastly exceeded the expected income of the subject. Unable to verify the funds as legitimate, the reporter decided to exit their relationship with the subject and submitted a DAML SAR to pay away the account balance. The UKFIU refused the DAML request and fast-tracked the intelligence to the relevant LEA. This intelligence contributed to an ongoing investigation that the LEA had launched into the subject. The LEA successfully obtained an AFO on the account balance of over £75,000. The LEA's investigation uncovered links to an organised crime OCG, leading to investigations into this OCG and forfeiture applications on the criminal proceeds. Enquiries are ongoing.



A reporter submitted a DAML SAR to pay away an account balance while exiting their relationship with a subject. The subject and a linked subject had been arrested for drug related offences, suggesting that the account balance might be the proceeds of crime. The UKFIU refused the DAML and fast-tracked the intelligence to the relevant LEA. Following an investigation into the origin of the funds, the LEA obtained an AFO for the account balance, which was in excess of £150,000. Enquiries are ongoing.

