

# SARs Reporter Booklet

November 2025

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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

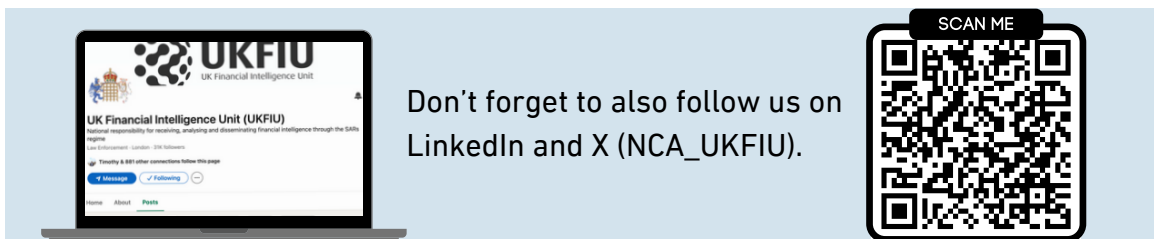
This document is produced by the UKFIU which has national responsibility for receiving, analysing and disseminating financial intelligence submitted through the SARs regime.

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 April 2025.

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 from Vince O'Brien

Welcome to the November 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 25: International Co-Operation: CARIN and Asset Recovery Networks** was released in October 2025. In this episode, panellists from the UK Financial Intelligence Unit (UKFIU) and Crown Prosecution Service (CPS) discuss the UK's assumption of the CARIN presidency, the role of CARIN and the processes of UKFIU and CARIN in working with law enforcement in UK and CARIN member states.

## 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).

## Money Laundering

During an LEA's ongoing money laundering investigation, the **UKFIU provided further intelligence to the LEA which identified over £2m in the subject's business account with potential links to organised crime.** The reporter's suspicions were raised due to the unknown source of funds from unconnected and unrelated international businesses and other third parties, prompting the reporter to submit a DAML to return the full balance on the business account. The excessive account turnover further endorsed this suspicion, given that it was not commensurate with the known business profile of the subject. The UKFIU refused the DAML request. This intelligence **enabled the LEA to obtain an Account Freezing Order (AFO) on the account balance for over £2m.**



Multiple DAMLs were submitted by a reporter after concerns were raised that the subject's company was involved in **fraud and the layering of funds** to benefit an associated subject. Suspicious payments were made to foreign jurisdictions from the company's account, which were inconsistent with the profile of the company. The associated subject had previously been convicted of fraud and money laundering offences, and there was also a related existing LEA investigation into payroll fraud following previous SAR disclosures. The UKFIU disseminated intelligence to the LEA, enabling the LEA to further their investigation. The LEA obtained an additional AFO, and was later able to prove in court that the funds were linked to criminality, **enabling a successful forfeiture of over £800,000.**

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

**S**uspensions were raised after a subject made an excessive level of cash deposits totalling over **£300,000**. The subject's account was almost exclusively funded in this manner, with periods of dormancy and no general living income/expenditure. A third party, claiming to be related to the subject also made cash deposits into the subject's account, further heightening suspicions. Due to the lack of satisfactory explanation as to source of funds, the reporter suspected that these cash deposits may be the proceeds of crime. The reporter submitted a DAML SAR which was refused by the UKFIU. The LEA made extensive enquiries on the subject leading to the identification of further connected accounts, with multiple AFOs obtained. **After a long and complex investigation, the LEA was able to obtain an uncontested forfeiture order for over £165,000.**



**A** reporter submitted two DAMLs for companies which had the same company director (the subject), **after becoming aware of an existing LEA investigation, linking the subject with fraud**. The reporter noted that funds were circulated between the company accounts controlled by the subject. The LEA had already obtained an AFO on a separate account connected to the subject. When questioned by the reporter, evidence of a tax demand was provided by the subject, but no tax payments were seen. **The reporter had suspicions of money laundering**, with the relevant accounts potentially being used to launder the proceeds of crime. The UKFIU refused the DAML requests, **enabling the LEA to update the existing AFO to include the newly disclosed company accounts**. **Altogether, over £850,000 of additional funds were frozen as a result of these disclosures.** Enquiries are ongoing.

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

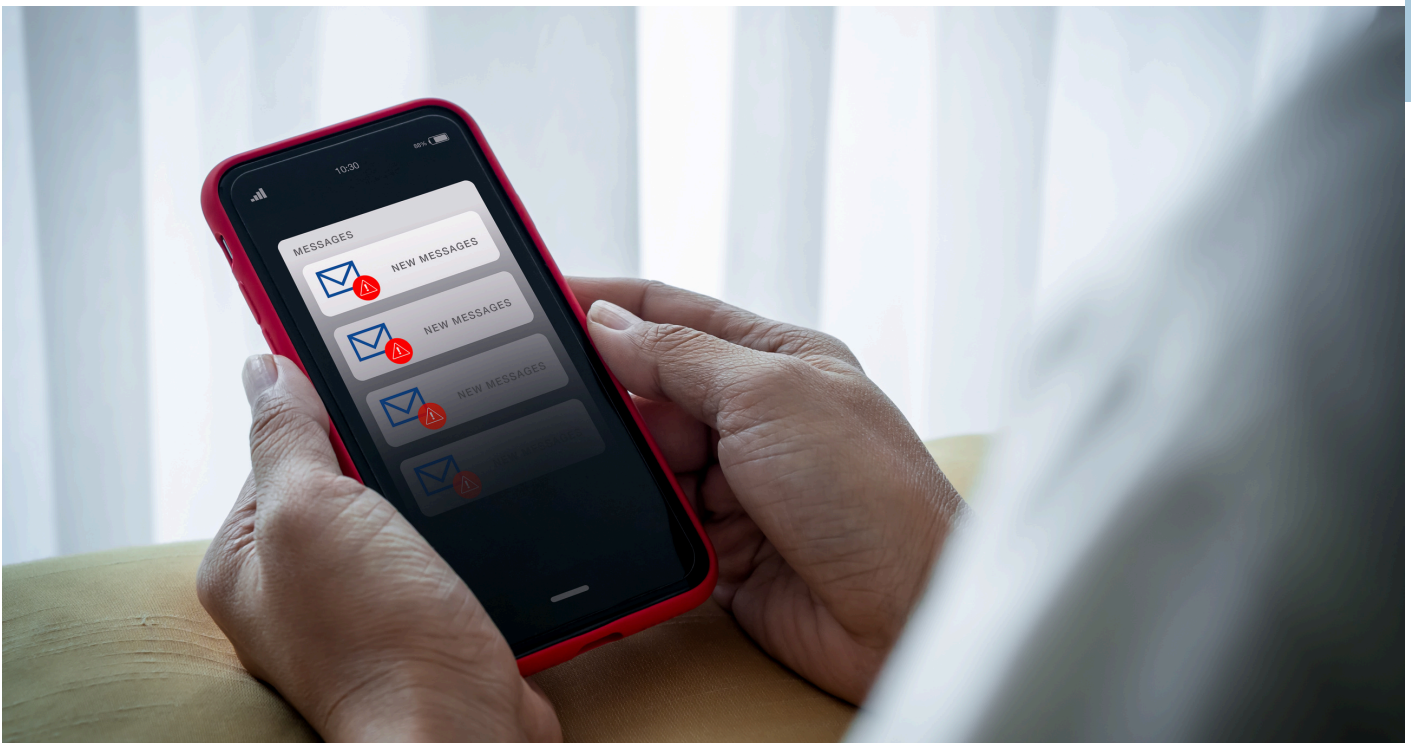
A subject's account saw **excessive credits from external accounts, and a very large number of cash credits over a relatively short period of time.** The origin of funds was unclear, and activity on the account was inconsistent with the subject's profile. The subject made multiple payments to third parties, which were rapidly dispersed by the recipients. The reporter noted that this was **consistent with known layering trends.** When the subject's account activity was queried by the reporter, the subject refused to provide further information and acted evasive, prompting the reporter to submit a DAML SAR. The UKFIU refused the DAML request and disseminated intelligence to the relevant LEA. The LEA found that the subject had not declared income to support the transactions made, and that the unknown source of funds combined with significant cash credits was a major concern. **The LEA obtained an AFO on the account balance totalling over £1.2m.** This is now pending forfeiture.



A subject held **multiple accounts with a reporter that showed signs of dormancy.** Upon review, the reporter noted that the subject's accounts were funded by a large number of cash deposits, **indicative of money mule activity especially given the subject's profile** as an international student. The accounts were also funded by payments from third parties based overseas, some of which were later debited back to those third parties, raising further questions as to the true purpose of the original payments. The reporter attempted to query this with the subject but received no response, noting that the subject had likely left the country. The reporter submitted DAML SARs seeking to pay away funds held within the subject's accounts. The UKFIU refused the DAML requests for a majority of the aggregate account balances. A subsequent investigation by the LEA ascertained sufficient evidence to suggest that the funds were recoverable property. **Over £270,000 was successfully forfeited.**

# Fraud

A reporter submitted a DAML SAR after becoming suspicious that the subject, who was in receipt of benefit payments with no record of employment, had received a series of large unexplained payments from external accounts. The UKFIU fast-tracked the DAML SAR to the relevant LEA which commenced a money laundering investigation. The LEA identified several linked accounts with a very large amount of funds received from overseas. The LEA obtained an initial AFO as a result of the DAML SAR for over £49,000, made multiple arrests and seized a large number of luxury goods and other assets linked to the subject. It is now suspected that the funds are the **proceeds of a fraudulent investment scheme targeting victims across multiple countries**. Additional DAML SARs from other reporters have led to further AFOs. **The total amount restrained is now over £1.9m (far exceeding the value of the initial DAML SAR)**. Enquiries are ongoing.



Concerns were raised after a subject, purporting to offer specific online services, utilised payments received from overseas for consumer-focused expenditure, with **no business expenses or tax payments seen**. The reporter conducted a fraud investigation and found that the **subject had provided false documentation to open their account**. The reporter also contacted the remitting bank who noted that the sender would not confirm the reason for making payments, raising concerns of a potential romance scam. The reporter submitted a DAML SAR, noting that overall activity was not in line with the subject's profile, and that there were money mule and money laundering concerns. The UKFIU refused the DAML request and disseminated intelligence to the LEA. **The LEA obtained a forfeiture for over £25,000** after the investigation showed that the funds were recoverable property likely **derived from a romance fraud operation perpetrated abroad**.

**A** SAR was submitted after a reporter noted numerous red flags on a subject. Concerns included an inconsistency in the source of funds, with the subject having been in a position where they could potentially embezzle and/or misappropriate funds from their employer. The subject's account had also shown account activity well in excess of their declared income, and provided a lack of response to transaction clarifications. Payments were made to a third party without any clear explanation of the relationship or purpose, potentially indicative of layering or integration, both stages of money laundering. **LEA enquiries pointed towards theft/fraud by the subject to fuel a gambling habit. Further enquiries by the LEA led to the subject's employer identifying and reporting theft by the subject, in excess of £200,000. The subject was arrested and charged with theft, and a POCA restraint order was obtained on another identified account.**



**A** reporter submitted a DAML due to suspicions that a subject's account was exhibiting money mule activity. There were large credits deposited into the account and limited business activity, upon review the reporter deemed that the activity appeared illegitimate. Checks were conducted by the LEA and it became **clear that the business was part of a large-scale VAT fraud scheme**, the UKFIU provided a refusal decision to allow for further investigation. An AFO was later obtained, and following a detailed investigation, **the LEA successfully obtained a forfeiture order in excess of £450,000, with funds returned to the public purse.**