



UKFIU

UK Financial Intelligence Unit



SARs REPORTER BOOKLET

April 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.

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.



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.

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Foreword

Welcome to the April 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 March 2024. This was a two part special featuring a discussion with Barry MacKillop, Deputy Director at FINTRAC and Ian Guildford from National Wildlife Crime Unit, on the role of financial intelligence in combatting the illegal wildlife trade.



[CLICK HERE](#)

Vince O'Brien,
Head of the 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.

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 Online 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 ukfusars@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.

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 identified by the National Strategic Assessment of Serious and Organised Crime (NSA).

Fraud

A reporter became suspicious after noticing that the subject had made a series of large cash deposits in their account which were subsequently debited to an external account. The subject was unable to provide the reporter with a full explanation for all the deposits which led the reporter to submit a SAR. The investigating LEA found that the **subject had been given cash by their employer for work purposes, but that this appeared to have been embezzled for personal uses**. The LEA was able to obtain an account freezing order (AFO) for over £35,000. Enquiries are ongoing.



A reporter submitted a SAR after becoming concerned that the subject was using funds from a business account in order to fund personal spending. The investigating LEA found that the subject had misappropriated over £95,000. As a result of intelligence within the SAR, the **LEA was able to obtain a conviction and a confiscation order for over £130,000**, to be returned the subject's employer.

A reporter **submitted a SAR bearing the hallmarks of layering and money mule activity**. The subject received multiple online payments which they moved to third parties in quick succession or withdrew in cash. The UKFIU disseminated the SAR to an LEA whose investigation uncovered that the payments were proceeds from the sale of a significant number of stolen assets. **As a result, the LEA was able to make multiple arrests**. Enquiries are ongoing.

Money Laundering

A reporter became suspicious when their customer's (the subject) account received multiple cash deposits of unknown origin by various third parties including credits from overseas, raising concerns of money muling activity. Further enquiries made by the reporter also found that some of these transactions were with a third party who themselves were subject to a SAR disclosure. **The reporter held concerns that activity represented a modus operandi of certain money laundering typologies where organised crime groups target specific customers.** The reporter submitted a DAML SAR which was refused by the UKFIU and fast-tracked to the relevant LEA. The investigating LEA obtained an AFO for over £25,000. Enquiries are ongoing.

A reporter submitted a SAR citing concerns of money laundering due to their customer's (the subject) account being credited with unexplained cash credits. The subject's explanation for the source of cash was lacking evidence, heightening the reporter's suspicion. Furthermore, the subject had set up a number of new payments to third parties, leading to suspicion that the subject would disperse funds to third parties in due course. The UKFIU disseminated the SAR to an LEA whose **investigation found evidence of money muling activity, resulting in the LEA obtaining an AFO for over £15,000.** Enquiries are ongoing.



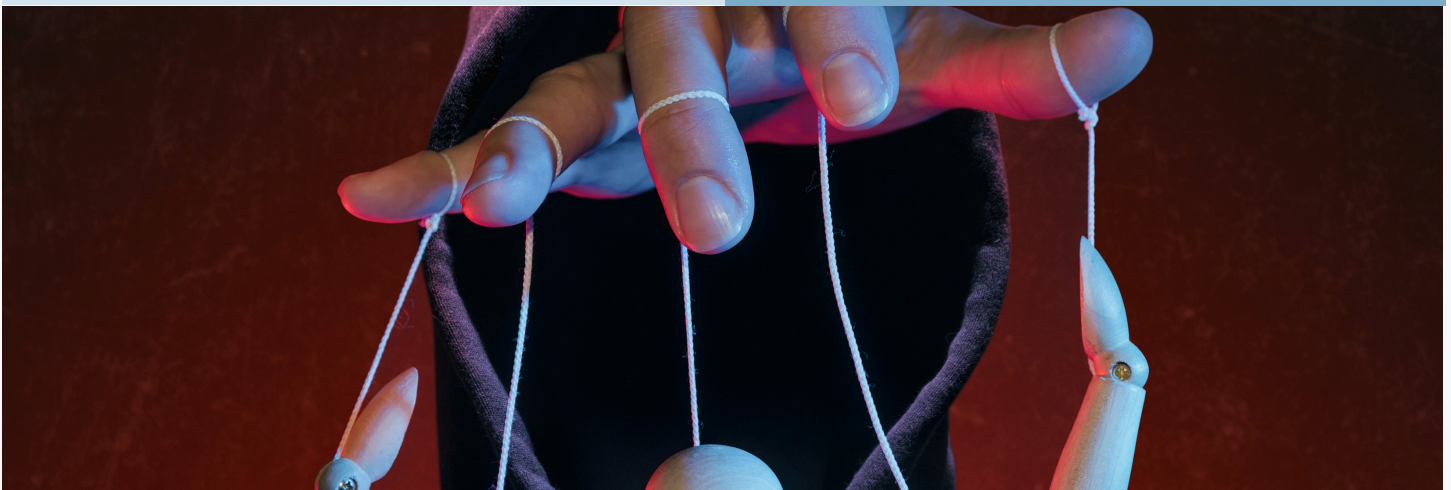
A reporter submitted a DAML SAR due to suspicions of money laundering in an account that **received excessive cash credits which were then rapidly dispersed.** A series of transactions were immediately blocked by the reporter's internal fraud systems. The account holder (the customer) could not provide a valid explanation for the source of the cash or the activity. The UKFIU fast-tracked the DAML SAR to an LEA where it was found that the customer had travelled overseas during the course of the year and not returned. The customer did not seek any further contact with the reporter and all correspondence from the LEA was returned undelivered, **leaving an administrative AFO to be granted and funds of over £10,000 forfeited.**

Vulnerable Persons

A **victim of sextortion was identified by an LEA after a reporter noted suspicious activity by the victim in a SAR.** The victim's transactions were flagged after using different locations to send money overseas. Multiple small transactions (to avoid identity verification) totalling over £25,000 were sent to the same receivers on the same day. **LEA enquiries found that the victim had made these payments to appease their extortionist.** The victim was relieved to speak with the LEA as they had been concealing the extortion from their family. The LEA had welfare concerns following disclosure from the victim in regards to their mental health and consequently confiscated a licensed firearm from the victim and signposted them towards further support.

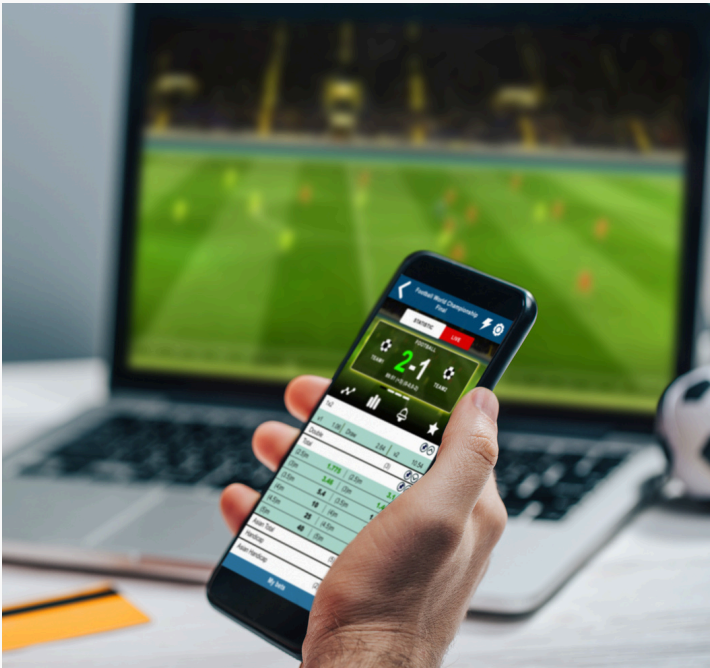
A reporter submitted a SAR after **becoming concerned that the subject (a child) was being coerced into using their recently opened account for fraudulent purposes.** Multiple dispute refunds were made against purchases by the subject in a short period of time and when returned to the account, the refunds were rapidly exited to a third party.

The UKFIU fast-tracked the SAR to an LEA whose fraud protection officers visited the subject and found that they had signed up to a money-making scheme through a social media platform. A money laundering disruption notice was issued and **safeguarding support was provided to the subject and their family.**



An LEA was engaged in an ongoing fraud investigation involving an account that was suspected to have **received fraudulent credits from multiple payers.** Following a search of the SARs database, **the LEA identified one of the payers (the subject) to the account was a victim of phishing fraud.** The LEA made contact with the subject and found that the subject was in fact a victim. As a result of making contact with the subject, the LEA now have evidence that may support a charge against the account holder.

Other



A money mule investigation commenced after a reporter submitted a SAR noting that the subject had made a series of large transactions with gambling companies. **The subject's account was mainly funded by transfers from a single third party, which were later paid back to the same third party.** During their investigation, the LEA determined that the subject had indeed been acting as a money mule for the third party in order to **enable the third party to evade the reporter's Know Your Customer checks and gambling restrictions.** Enquiries are ongoing.

An LEA started an investigation after the UKFIU fast-tracked a DAML SAR. The reporter was suspicious that the subject's account had seen a disproportionately large turnover in relation to the subject's stated income, with numerous credits to third parties without clear explanation or sufficient evidence as to source of funds. **The LEA found that the source of funds was in fact from the promotion of illegal gambling websites.** Enquiries are ongoing.



A reporter held concerns due to their customer (the subject) **making international payments with the intention of purchasing child sexual exploitation material.** The reporter was able to determine this after linking the subject's account to another individual who had been the subject of information requests from multiple LEAs in relation to the same suspected offence. The UKFIU fast-tracked the SAR to an LEA who found the subject had been arrested for a rape offence in another locality. **The subject's personal devices have been seized for further investigation.** Enquiries are ongoing.