

SARs Reporter Booklet

March 2026

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.



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Overview

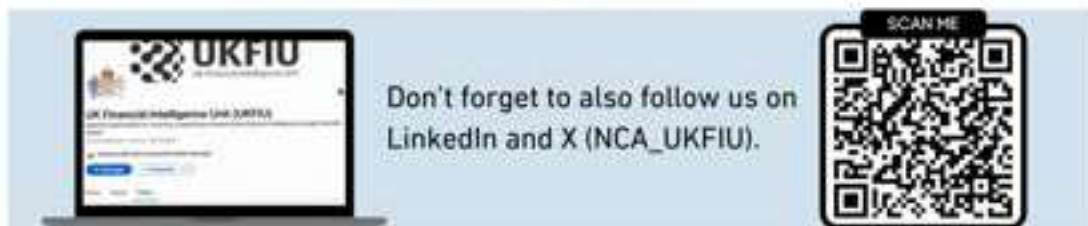
This document is produced by the UKFIU which has national responsibility for receiving, analysing and disseminating financial intelligence submitted through the SARs regime.

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.



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 2025.

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Foreword from Vince O'Brien

Welcome to the March 2026 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 27: Payment Diversion Fraud in the Legal Sector** was released in January 2026. In this episode, panellists from the UK Financial Intelligence Unit (UKFIU), National Economic Crime Centre (NECC) and legal sector discuss the issue of Payment Diversion Fraud (PDF) in the legal sector including how PDF can impact the legal profession, and the collaboration and work of this sector and law enforcement to combat this crime.



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 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. 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).

Money Laundering

Concerns of potential fraud were raised by a reporter when **funds were credited to a subject's account from an unknown source and then rapidly transferred to other accounts**. A further review by the reporter identified that more than £9,000 had been credited to the subject's account from a charity that provides aid to children, triggering the submission of multiple Defence Against Money Laundering (DAML) SARs by the reporter. The investigating Law Enforcement Agency (LEA) discovered that two separate groups each consisting of multiple individuals, including the subject and a member of the charity, were using false payee names and misleading references to disguise the true nature of the transfers. **While the transfers were recorded as legitimate charity expenditure, the funds were in fact being diverted for personal gain**. Both groups were responsible for stealing over £300,000. The UKFIU refused the DAML request which enabled the LEA to secure Account Freezing Orders (AFOs) totalling more than £10,000. Further updates from the investigating LEA revealed that one subject gambled over £1 million.

As a result of this intelligence and the LEA's investigation, members of the groups received custodial sentences and convictions. Enquiries are still ongoing for one subject of the group whose criminal benefit is assessed to be in excess of £1.8 million with approximately £500,000 in assets.



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



A customer's account activity showed frequent large cash deposits increasing in value over a short period of time without explanation, raising the reporter's suspicion. The funds were then transferred to the customer's other accounts or withdrawn via cash points. **This activity was indicative of circulating funds on behalf of others and money laundering.** When questioned the customer's response and evidence did not allay suspicions, but suggested illicit activity and foul play. Due to the gaps in the customer's explanation and their account activity, the reporter submitted a SAR, which was identified by an LEA investigating Chinese underground banking. The SAR intelligence highlighted new lines of enquiry for the LEA, including bank accounts and other persons of interest linked to an organised crime group (OCG) that the customer was part of. **The LEA's investigation identified account activity consistent with suspected money laundering, including the customer's secondary account credited by the customer, which had a high turnover in excess of £190,000 and transfers in excess of £90,000.** Enquiries are ongoing.



A reporter submitted a DAML SAR after transaction-monitoring alerts indicated potential muling activity on a business account trading as a building services provider. **The account received over £200,000 from a third party with no clear explanation for the source of funds.** The invoices provided, were inconsistent with the stated business activity, and despite the company being dissolved on Companies House, transactions continued to be made. The UKFIU refused the DAML SAR and disseminated intelligence to an LEA. During their investigation, the LEA identified indications of layering funds and a Production Order was issued to the reporter, enabling the LEA to further their enquiries. The LEA successfully obtained an AFO, securing the remaining balance of over £200,000 whilst enquiries continue. **The SAR enabled funds to be safeguarded and supported wider investigative activity.**



Fraud

The legitimacy of a new business was questioned by a reporter due to its limited business trade, activity and online presence. **The business received a large credit from an overseas public body, not in its name, which was quickly debited to third parties including personal accounts and unrelated businesses** and contradicted the Know Your Business (KYB) information provided to the reporter, indicating that the account was being used to receive and disperse fraudulent funds. Based on their suspicions, the reporter submitted a DAML SAR and further SARs. **The UKFIU refused the DAML, and fast-tracked it to a UK LEA who worked closely with an international LEA** to conduct an investigation. The investigation revealed that the overseas public body had been defrauded of funds linked to an online fraudulent scheme run by a UK Organised Crime Group (OCG) and that the OCG used a false address to legitimise the fraudulent business. An AFO was successfully obtained in excess of £400,000. The funds secured via the AFO will be returned to the overseas public body. LEA enquiries are ongoing.



A small hospitality business provided initial Know Your Customer (KYC) information to the reporter estimating a £60,000 turnover. **Within a year, the nature of the business changed to payroll services with a turnover in excess of £4 million.** The reporter discovered further inconsistencies, such as credits to the business account from recruitment and staffing businesses, which were immediately forwarded to hundreds of third parties. No business expenses or pension contributions were recorded, which raised further suspicions, considering the nature and turnover of the business. A DAML SAR was submitted to pay away the remaining funds in the business account, which the reporter suspected was facilitating payroll fraud and money laundering. **The UKFIU refused the DAML SAR and fast-tracked the intelligence to the relevant LEA, providing crucial intelligence which led to an investigation.** As a result, an AFO was successfully obtained by the relevant LEA for funds in excess of £600,000. Enquiries are ongoing.

After conducting an investigation, a reporter formed money laundering concerns relating to **suspected VAT fraud**, and wider concerns of a suspected shell company, believed to be associated with an OCG. Initially, the company was identified due to a shared director that had previously been disclosed due to concerns the business may have been in receipt of the proceeds of crime in relation to OCG activity and suspected shell companies. The company account was largely dormant since its opening. However, there was a large VAT credit of over £320,000 received into the account. This prompted the reporter to submit a SAR to the UKFIU, where it was allocated to the relevant LEA. Further enquiries found that the VAT return was false and the figures in the return had been inflated in order to obtain the pay-out. The intelligence was used by the relevant LEA to apply for an AFO and following this, a cash seizure was granted for the full sum.



A reporter's suspicion began after their client attempted to transfer funds from their company account to a third-party trading platform, which was declined in line with the reporter's policy and prompted further review, resulting in the reporter submitting a DAML SAR for funds over £2 million. The reporter identified strong indicators of VAT fraud, including fraudulent repayments supported by false documentation, unrelated VAT numbers, and payments from shell companies overseas with no legitimate business links. Additional concerns included structured cash withdrawals, use of money service businesses (MSBs), and inconsistencies between declared business activity and actual account behaviour. The UKFIU disseminated intelligence to the relevant LEA, who determined: the company was established solely to submit fraudulent VAT claims, had no employees despite multiple director changes, and was dissolved earlier in the same year. **The DAML SAR was refused by the UKFIU and an AFO for over £2.4 million has since been granted.**

Drugs

An LEA conducting a drugs supply investigation involving children being used to distribute drugs, completed a SAR search in support of intelligence gathering. The SAR search **uncovered a SAR where a reporter had concerns for a customer whose account had been in receipt of high volumes of third-party credits and debits within a short period of time.** Activity within the customer's account showed debits with drug references, high frequency of mobile phone top ups and excessive card purchases against taxis and ride shares, all of which were indicative of drug supply. The reporter monitored the activity and suspicions were further raised around county lines drug dealing. **The intelligence from the SAR opened up new lines of enquiry for the LEA by identifying additional bank accounts for the subject that were being used to launder funds and were previously unknown to LEA. Children were safeguarded from further exploitation by breaking the county lines connections and the suspect was arrested pending further investigation.**

A reporter's concerns were raised due to **suspicious activity on the subject's account which indicated potential money laundering.** The reporter suspected illicit funds were being mixed with legitimate income, including suspicious third-party transfers and cash deposits, followed by the rapid movement of funds to obscure their origin.

Due to these concerns, the reporter closed the subject's account and submitted a SAR to the UKFIU, which disclosed another subject linked to the money laundering activity. The LEA conducted enquiries based on intelligence from the SAR and identified that the subjects were both accessing their online banking from the same IP address, a connection not previously known to the LEA. Further investigation established that both the subjects were playing a significant role in drug-related criminal activity, linking them to a wider drugs investigation. **Arrests were made, and confiscation action was initiated.** The SAR assisted the LEA in linking the subjects and supporting wider enforcement action. The subjects remain under investigation, with sentencing proceedings ongoing.

