FINANCIAL INTELLIGENCE UNIT (UKFIU)

Suspicious Activity Reports (SARs) Case Studies for Training Purposes

This is a United Kingdom Financial Intelligence Unit (UKFIU) communications product, produced in line with the Serious Organised Crime Agency's (SOCA's) commitment to share perspectives on the Suspicious Activity Reports (SARs) regime.
August 2010

Suspicious Activity Reports (SARs)
Case Studies for Training Purposes

Overview

This is a United Kingdom Financial Intelligence Unit (UKFIU) communications product issued in line with SOCA’s commitment to share information which can raise awareness, increase knowledge, develop understanding, support training and underpin joint working programs.

We need your help

This report provides a summary of training case studies relating to the disclosure of financial information and intelligence submitted via Suspicious Activity Reports (SARs) to the UKFIU.

Each of the examples used in this document has been drawn from multiple case histories, which have been sanitised and amended to protect the identity of the companies and individuals involved.

In order to assist the UKFIU in improving this service we welcome any comments especially with regard to the following questions:

- Was this document useful to you or not, and why?
- As a result of reading this document are you more likely to submit a SAR in the future?
- If you are not currently registered with SAR Online, are you now likely to register within the next two months?

Please email the UKFIU Dialogue Team at fiudialogue@soca.x.gsi.gov.uk quoting the code “FF327FF”. This code can also be quoted in any SARs that are subsequently submitted to SOCA as a result of reading this document.
Information Report

National responsibility for the gathering, analysis and dissemination of the financial information submitted through the SARs Regime rests with the UKFIU, which sits within the Serious Organised Crime Agency (SOCA).

Within the UKFIU, the Dialogue Team acts as the interface between the SARs Regime and its stakeholders, which include reporters, regulators and law enforcement agencies (LEAs).

The team champions the recommendations made in Sir Stephen Lander’s Review of the SARs Regime conducted in 2006.

The following case studies have been provided in support of these recommendations. It is anticipated that they may be useful alongside a more structured course in compliance or anti-money laundering responsibilities, although they are not intended to provide a comprehensive summary of situations in which the submission of a SAR may be required.
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Case Study 1 – High value cash transaction

Mr. X, a company director and shareholder of a local sports club currently in administration, has held both personal and business accounts with the bank for a considerable number of years.

Mr. X is well known to staff and is something of a local celebrity.

On the same day that a credit of £850,000 was received in his personal account, Mr. X approached the bank to request a withdrawal of £500,000 in cash, and issued two cheques in a total sum of £350,000 to his business partner Mr. Y.

Mr. X was advised that such an amount of cash would need to be ordered, but that it could be made available in two working days.

The teller suggested to Mr. X that this sum of money could be transferred by more secure methods than cash withdrawal.

Mr. X declined this suggestion, stating that he did require the sum in cash, and advised that the money had come from his sports club.

**Issues:**

- What was the basis for suspicion, if any?
- Should a SAR have been submitted?
- If so, in what form e.g. as a Consent?
- Was the teller being asked to conduct a prohibited act?
- If a report were to have been submitted, how may this have impacted upon the bank?
- What were the risk factors?
- What action could be taken against Mr. X by law enforcement agencies?
- How could the bank/reporter have mitigated against any risks?
Case Study 2 – Sudden activity in a dormant account

A bank account which had been dormant for some years suddenly became active, with several large fund transfers taking place. The account, which was registered to Company A, was originally opened by their representative known as Mr. X.

After a sum of £150,000 was credited into the account, the funds were used to buy shares of a recently privatised company, Company B.

Three months after this purchase, Mr. X deposited a further £250,000 in cash into another company account, in the name of Company C. Having made this deposit, he immediately requested the transfer of £100,000 into a personal account at another bank.

When questioned by the bank about the source of these funds, Mr. X claimed that the money had come from his personal account. In support of this explanation he submitted documentation showing that he had sold £150,000 worth of shares in another company - Company D - for £250,000 to a further company, Company E.

Mr. X explained that the difference of £100,000 was risk compensation in the event that the initial £150,000 worth of shares, invested in Company B, became devalued.

The sum of £100,000 represented an annual interest rate of over 200 per cent, and would have been a high return in just over three months. Such a high return indicated that the shares in Company B may well have been sold knowingly at a low value to Company E, and then sold onwards for a higher price to a third party.

In effect, Mr. X had siphoned off £100,000 in profit by using his own company as a ‘hidden’ stage in the share transfer.

The UKFIU informed a local law enforcement agency that Mr. X was suspected of laundering money and fraud.

Following the police investigation, Mr. X was arrested and eventually prosecuted. A Confiscation Order was also made of £100,000.
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Case Study 3 – Unusual personal activity

Mr. P was a well-known customer of a European bank. On a number of occasions he purchased gold bullion from the bank in one kilo ingots, explaining that he was buying this to export directly to a foreign company. Mr. P would personally transport the gold out of the bank.

In one single year Mr. P purchased in excess of 800 kilos of gold, worth a total value of more than £7 million. The bank was able to see that, at regular intervals, funds were transferred into his account from another company in a neighbouring country, which appeared to support his claims that he was exporting the gold.

Mr. P’s actions in transporting the gold himself, however, seemed unusual to the bank. As a result bank officials decided to disclose their concerns to the Financial Intelligence Unit (FIU).

The UKFIU researched Mr. P and his company within various law enforcement intelligence databases. Although no obvious link to criminality could be found the scale of the gold purchases led to a formal investigation by the FIU.

Their enquiries revealed that Mr. P was not, in fact, selling the gold direct to a foreign company as he claimed. Instead, he was found to meet with a foreign citizen named Mr. D before buying the gold and then driving to the bank together. Mr. D himself would never enter the bank.

After the gold was purchased by Mr. P they would drive to Mr. D’s car and hide the gold in the boot. Mr. D would then drive to his country, crossing the border without declaring the gold to the authorities, thereby avoiding paying any import duties. Once in his overseas destination, Mr. D would give the gold to Mr. A, who delivered it on to another company for sale on the open market. Some of the profits from the sale of the gold were transferred back into Mr. D’s company.

Criminal proceedings for money laundering in conjunction with tax evasion were raised against Mr. P, Mr. D and Mr. A. The smuggling operation was estimated to have caused tax losses to the government of £1,500,000.
### Issues:

What was the basis for a suspicion, if any?  
Should a SAR have been submitted?  
What Know Your Customer (KYC) / Customer Due Diligence (CDD) checks should have been undertaken in this instance?  
What were the risk factors?
Case Study 4 – Unexpected increase in cash deposits

Mr. T worked for the government as a project manager in the finance department. Although he was able to support his family on his modest government salary, he began to develop a gambling habit which got him into debt.

Mr. T had the power to propose, and approve, schemes in a specific sector of the public works budget. He decided that offering to approve schemes in return for a small monetary gift would resolve his debt problems, and enable him to carry on gambling. He found that a number of businessmen were willing to pay him for the guarantee of government business and, as a result, he became rich very quickly.

Mr. T’s friend Ms. G, who owned an exchange and tourism company, helped him launder the bribes that he received. Ms. G used her employees as ‘straw men’ to create a number of different bank accounts through which funds could be laundered. More than £4 million was laundered through such accounts.

Cash payments and transfers risked attracting attention, so Mr. T developed a more sophisticated laundering method using a fruit delivery company. The company, owned by Ms. G’s husband, laundered £2.7 million in three months. The transactions were disguised by creating false invoices which were settled by the businessmen on Mr. T’s instructions.

This meant that there were no direct links between Mr. T and the corrupt payments. The businessmen had invoices to justify the payments if any questions were asked.

Earlier transactions had gone unnoticed by the banks involved. However, due to the increasing volume of cash deposits, the banks decided to disclose to the UKFIU on a variety of the accounts.

Enquiries showed that Mr. T had used a couple of senior members of staff within his department to assist in the approval of his schemes, one of whose signature had been counterfeited to obtain the necessary authorisation.

The total amount of money Mr. T laundered was estimated to be in the region of £1 billion.
Issues:

What was the basis for a suspicion, if any?

Should a SAR have been submitted?

What KYC / CDD checks should have been undertaken in this instance?

What were the risk factors?
Case Study 5 – Frequent deposits of cash transferred abroad

A group of several small British companies, involved in the import of goods into the UK, held accounts at several different banks within the UK. Although the business sectors in which the companies operated varied, they all had in common the way through which they moved their funds.

The companies’ representatives would deposit large amounts of cash, averaging £40-60,000 on a frequent basis, immediately after which they would order the transfer of funds abroad.

These transfers would go to a number of different accounts held by overseas companies.

The explanation given for the transfers, in each case, was that the deposits were made as advance payment for goods to be imported.

Although invoices and foreign trade documents were presented in support of this explanation, some banking staff had their suspicions about the authenticity and validity of the documents submitted.

Furthermore, there was concern that the companies almost never submitted bills of entry or original invoices that could certify goods had actually been imported.

Issues:

What was the basis for suspicion, if any?

If there was a basis for suspicion, at what stage should a SAR have been submitted?

What were the risk factors associated with this case?

If a report were to have been submitted how may this have impacted upon the bank?
Case Study 6 – Multiple cash deposits on the same day

Mrs. J held a bank account which had seen sporadic use throughout her five year relationship with the bank.

When in use, the pattern had been that of multiple cash deposits, on the same day, which were paid in through a number of local branches.

However in a three month period the account had received heavier use than normal, receiving deposits totalling £5,000 in cash and £6,000 in cheques, a number of which were for £200 - £250 at a time. These funds had then been withdrawn by cheque and direct debit payments.

Initial funds credited to Mrs. J’s account, in the sum of £55,000, which she had advised bank staff were the proceeds of a property sale, had been subsequently transferred to an account she had recently opened in the name of Company Y.

When asked if a cash transaction of £5,000 could be paid directly into the account of Company Y, Mrs. J was adamant that the funds should be first processed through her personal account.

Two bankers’ cheques had been debited from Company Y’s account, one in the sum of £25,000 to a solicitors firm and the other for £15,000 to a development company.

Issues:

What was the basis for suspicion?

Should a SAR have been submitted?

What were the risk factors?

What action could have been taken against the subject by law enforcement agencies?
Case Study 7 – Suspicious reason for cash payment

Mr. Y had an account with the bank from which he requested a withdrawal of £10,000 in cash by the end of the week. He advised the bank that this was to pay wages to his staff.

Mr. Y’s account is funded by a variety of electronic payments, some of which originate from Company A.

Debits from Mr. Y’s account had previously been sent to Company T.

A Miss C, who is based overseas, contacted the bank seeking to send a payment of €20,000 into Mr. Y’s account as payment for an ‘anti-terrorist certificate’.

Miss C further advised that she had received an official document from a foreign jurisdiction advising her that she was due an inheritance valued at €75,000.

However, in order to lay claim to these funds Miss C had been required to deposit €20,000 in advance into this account as specified by Mr. Y.

Issues:

What was the basis for suspicion – if any?

Should a SAR have been submitted?

If so in what form, e.g. as a Consent?

If a report were to have been submitted, how might this have impacted on the bank?

What were the risk factors?

How could these risks have been mitigated?

What action could have been taken against the subject by law enforcement agencies?
Case Study 8 – Cash withdrawals from business account

Company B held a business account with the bank from which Mr. W had requested two cash withdrawals of £50,000, to be collected later that week.

These payments had been funded by credits from Company D since the account was opened.

Mr. W subsequently visited his local branch and attempted to withdraw £25,000 in cash.

Details of his passport and verification of address by way of ID were retained, and found upon a review of branch records to indicate that they were the same forms of ID originally used to open the account.

Mr. W had also withdrawn £45,000 from this account at three other branches over the previous few days.

Mr. W also held personal and savings accounts with the bank on which the balances at that time stood at £35,000 and £30,000 respectively.

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Case Study 9 – Numerous telegraphic transfers to unrelated individuals

Mr. Y was a salesman who held an account with the bank through which transfers had been made to an account in the name of Miss W, who would then arrange for the funds to leave her account via telegraphic transfer. Miss W did not incur the transfer fee as she was a bank employee.

Mr. Y had recently received large credits, in the region of £15,000, into his account via telegraphic transfer. These appeared to have originated from Company E, trading under a different name to that in which the depositing account was held. Following on from these credits, Mr. Y would make a number of one-off fund transfers to various unrelated individuals.

Large and frequent cash deposits of £2,000 or more had been regularly followed by significant cash withdrawals.

Debits from the account had also been made to foreign financial institutions and travel providers, indicating that Mr. Y had recently spent time in the Far East.

It was believed that Mr. Y was known locally by another name, which he had used to open a separate account. Only one transaction through this account has been made to date.

Identification supplied when this separate account was opened, including a date of birth, matched that of Mr. Y.
Issues:

What was the basis for suspicion if any?

Should a SAR have been submitted?

If so in what form? – Consent request?

If a report were to have been submitted how might this have impacted upon the bank?

What were the risk factors?

How could these risks have been mitigated?

What action could have been taken against the subject by law enforcement agencies?
Case Study 10 – Substantial deposits following account inactivity

Mr. X had been a customer of the bank for the previous four years. He had recently made substantial deposits to his accounts, totalling £50,000, following a significant period of inactivity. These consisted mainly of cash deposits, one of which was for £5,000.

The deposits had been swiftly followed by several cash withdrawals, all for round amounts of £2,000 or more, and a transfer for £45,000 in favour of a solicitors firm.

A Chaps credit originating from a Mr. S for £25,000 was received into one of Mr. X’s accounts earlier in the current year and may have been significant.

Direct debits from Mr. X’s accounts seemed to suggest some recent property activity.

Mr. X maintained that he bought and sold property, but had stated that a number of recent property transactions had fallen through.

Issues:

What was the basis for suspicion if any?

Should a SAR have been submitted?

If so in what form? – Consent request?

If a report were to have been submitted how might this impact on the bank?

What were the risk factors?

How could these risks have been mitigated?

What action could have been taken against the subject by law enforcement agencies?
Case Study 11 - Loan settled by third party

Loan Company X received a payment in settlement of a £25,000 loan in the form of a third party cheque, in the name of a female not associated with the loan. The cheque came in the form of a banker’s draft from ABC bank.

The bank account at ABC from which the banker’s draft was drawn was a business account, held by Miss A, who attended the bank regularly to organise payment of employees’ wages.

The manager at ABC bank dealt with Miss A’s business personally. He had previously arranged loans for Miss A to assist her business and had also asked her on occasion to write additional cheques for cash. These requests were made on the basis that these sums were needed to cover the interest on her loans.

The manager had also asked Miss A to sign authority for the banker’s draft which was subsequently used to repay the loan £25,000 to Loan Company X.

This loan which was thereby paid off had been obtained by the manager’s sister on his behalf, and she was unaware that the loan had been repaid from a third party account.

After a subsequent police investigation, the manager was charged with the theft of monies amounting to £100,000. Enquiries revealed that he had built up a number of personal debts. The manager was found guilty and subsequently sentenced to a lengthy prison term.

Issues:

Was there a basis for suspicion?

If there was a basis for suspicion, at what stage should a SAR have been submitted?

What are the risk factors associated with this case?
Case Study 12 - Frequent loans for similar amounts

A newly appointed credit manager at a car loan company had responsibility for Mr. R, a customer who had used the company’s loan facilities on a number of occasions to finance the purchase of high value cars.

Mr. R was interested in purchasing a luxury sports car worth approximately £55,000.

He applied for a five year loan of £40,000 through the credit company, and stated that he would pay the balance in cash.

The credit manager undertook checks against historical records, and discovered that Mr. R had had several loans over the previous six years.

All of these loans had been for the same amount of money, and all had been raised in conjunction with a large proportion of cash as a deposit.

More significantly, in a number of these cases, the loan had been repaid early and in cash.

Issues:

What was the basis for suspicion, if any?

Should a SAR have been submitted?

If so, in what form e.g. as a consent?

Was the credit manager being asked to conduct a prohibited act?

What were the issues concerning the credit manager in dealing with this application?

What KYC / CDD checks should have been undertaken in this instance?

If a report was submitted how may this have impacted upon the loan company?

What were the risk factors?
Case Study 13 - Cash deposits and withdrawals

A bureau de change at a bank attracted a new customer Mr. K, who exchanged €5,000 into UK Sterling.

Mr. K then opened a personal bank account at the same branch, and immediately deposited funds into this new account.

Whilst completing the documentation for the account opening, no explanation was given for the funds.

A few days later, a proportion of the money was withdrawn, again in cash.

As both the beginning and end of the financial activity were in cash, the bank could draw no conclusion about the origins of the funds.

**Issues:**

What was the basis for suspicion, if any?

Should a SAR have been submitted?

What KYC / CDD checks should have been undertaken in this instance?

If a report were to have been submitted how may this have impacted upon the bank?

What were the risk factors?
Case Study 14 - Property sale

Mr. & Mrs. A, a married couple aged 45 and 43 respectively, approached Mrs. C (sole trader solicitor) for her to conduct a conveyance on the sale of their marital home. This was an end terraced Victorian style town house valued at £275,000. Upon sale Mr. & Mrs. A would be due an equity payment of £160,000.

Mrs. C was instructed only in relation to the sale of the property.

Mr. & Mrs. A advised that they had recently sold their business, a fast food outlet, and now intended to emigrate to Spain.

The property had been marketed through a local estate agent at value.

Five days prior to the completion date the clerk employed to deal with the conveyance informed Mrs. C that she was aware of Mr. & Mrs. A. She recalled having read an article in a paper, which indicated that Mr. & Mrs. A had been involved in drug smuggling and that they might have recently appeared in court.

Did this revelation place any imposition upon the solicitor and what factors would affect her in conducting further business upon these instructions?
**Issues:**

What was the basis for suspicion, if any? (Was information received in the course of business?)

Should a SAR have been submitted?

If so, in what form e.g. as a consent?

Was the Solicitor being asked to conduct a prohibited act?

What KYC / CDD checks should have been undertaken in this instance?

If a report were to have been submitted how may this have impacted upon the ability of the Solicitor to complete?

Did the Solicitor have a duty of care to any third parties?

What were the risk factors?

How could the concerned parties mitigate against any risks?

What action could have been taken against Mr. & Mrs. A by law enforcement agencies?
Case Study 15 - High value transfer to foreign bank

A police team initiated an investigation into a family suspected of being involved in drugs trafficking and money laundering using a bureau de change company called FH to facilitate the laundering process.

Mr. M and Mr. L were local managers of FH, who undertook foreign currency exchange activity with ‘profits’ from the business being deposited in cash into the company accounts.

Within two months, large movements of funds occurred within the accounts of Company FH. Approximately £425,000 was credited into the account and nearly £213,000 transferred to a personal account at a foreign bank.

The UK bank was suspicious of the fund movement and accordingly decided to disclose the transactions to the UKFIU.

Another bank made separate disclosures reporting new transactions involving another Company FH account.

A search of intelligence databases showed that Mr. L was a director of FH and was linked with organised crime. Mr. M was also found to have deposited significant sums into his own personal account, from where he transferred the whole amount to the FH account.

The FIU passed all this intelligence relating to transactions involving FH, Mr. L and Mr. M to the police investigation team in a report which assisted in determining the scale of the drug dealing, the volume of laundering undertaken, and which also identified that the profits were being used to purchase property abroad.

As a result Mr. L and Mr. M were arrested and convicted of offences relating to drugs trafficking and money laundering. They received sentences of fourteen and twelve years imprisonment respectively. Approximately £43 million worth of property was seized abroad and fines imposed totalling £425,000.
Issues:

What was the basis of suspicion for the banks?

What KYC / CDD checks should have been undertaken in this instance?

What were the risk factors?
Disclaimer

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UKFIU Dialogue Team

The aim of the Dialogue Team is to drive the UK Financial Intelligence Unit (UKFIU) agenda on interfacing with stakeholders on Suspicious Activity Reports (SARs) activity. The team strives to improve communication and understanding between the SARs Regime participants, to increase the value extracted from the SARs Regime, to provide, facilitate and contribute to various forums to share perspectives on the operation of the Regime as a whole. In essence the Dialogue Team seeks to improve the quality of SARs intelligence, and promote the value and greater use of this intelligence in mainstream law enforcement activity.

For further information, please contact SOCA UKFIU Dialogue Team by email fiudialogue@soca.x.gsi.gov.uk or by telephoning 0207 238 8282. For more information about the Serious Organised Crime Agency go to www.soca.gov.uk.

Reducing harm – Providing information back to SOCA

We would like to remind you of the provisions contained in Section 34 Serious Organised Crime and Police Act 2005. These provisions say that any information provided by you to SOCA, in order to assist SOCA to discharge its functions which include the prevention and detection of crime, will not breach any obligation of confidence which you may owe to any third party or any other restriction on the disclosure of information. S34 requires that disclosures of personal information about living individuals by you to SOCA must still comply with the provisions of the Data Protection Act 1998 (DPA), but you may be satisfied that disclosure by you of such personal information to SOCA in order to assist SOCA to prevent and detect crime is permitted by the DPA. Please, therefore, submit all S34 information to fiudialogue@soca.x.gsi.gov.uk.

Handling advice – Legal information

This information is supplied by SOCA under Section 33 of the Serious Organised Crime and Police Act 2005. It is exempt from disclosure under the Freedom of Information Act 2000. It may also be subject to exemption under other UK legislation. Except where permitted by any accompanying handling instructions, this information must not be further disclosed without reference to SOCA in accordance with Section 35(1) of the Serious Organised Crime and Police Act 2005.

This report may contain ‘Sensitive Material’ as defined in the Attorney General’s guidelines for the disclosure of ‘Unused Material’ to the defence. Any sensitive material contained in this report may be subject to the concept of Public Interest Immunity. No part of this report should be disclosed to the defence without prior consultation with the originator.

Requests for further disclosure which are not permitted by any handling instructions or handling code must be referred to the SOCA originator from whom you received this information, save that requests for disclosure to third parties under the provisions of the Data Protection Act 1998 or the Freedom of Information Act 2000 and equivalent legislation must be referred to SOCA’s Public Information Compliance Unit by e-mail on picuenquiries@soca.x.gsi.gov.uk.