Criminal Assets Bureau Annual Report 2025

Tuarascáil Bhliantúil 2025

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Tá an tuarascáil seo ar fáil as Gaeilge freisin.
This report is also available in the Irish language.

This report was compiled and designed by the CAB Annual Report Committee.

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Dear Minister

In accordance with the provisions of section 21 of the Criminal Assets Bureau Act 1996, I am pleased to present to you the 2025 Annual Report of the Criminal Assets Bureau.

The past year has been a busy and productive year for the Bureau which saw the Bureau achieve ten of its fifteen performance delivery targets. The Bureau continues to focus on more complex and lengthier investigations. Its work on legacy matters has also paid dividends through targets being exceeded.

The Bureau conducted 37 search operations consisting of 208 individual searches in 16 counties including search operations in Spain. The high number of search operations is evidence of ongoing excellent cooperation between the Bureau, all Garda Divisions and international partners. The Bureau also successfully progressed and sold 18 properties during the year which resulted in gross sales of €4.377m. There are 439 current Divisional Asset Profilers. These profilers are engaged in the early identification of targets for action by the Bureau.

The Bureau returned €14.926m to the Exchequer as detailed below:

Total Monies returned	
Proceeds of Crime	3,474,245
Revenue	10,796,000
Social Protection	655,543
Totals	**14,925,788**

A portion of these returns are used to finance the Community Safety Fund which allows for seized monies to be directed back into communities to fund innovative local projects aimed at building stronger, safer communities.

For local communities, the removal of criminal assets has a significance beyond the monetary value. It removes the visible rewards of crime, weakens the influence on those who use wealth to intimidate or impress. The Bureau's actions send an important message that criminality is not a legitimate route to status, power or success.

I recognise the Bureau's ongoing extensive co-operation with law enforcement agencies in Northern Ireland, including the Police Service of Northern Ireland (PSNI), His Majesty's Revenue and Customs (HMRC) and the National Crime Agency (NCA).

Internationally, the Bureau continues to liaise and conduct investigations with law enforcement and judicial authorities globally.

Finally, I wish the Criminal Assets Bureau continued success.

Yours sincerely

Justin Kelly
Commissioner
An Garda Síochána

Letter forwarding report from the Garda Commissioner to the Minister for Justice, Home Affairs and Migration

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Letter forwarding report from the Chief Bureau Officer to the Commissioner of An Garda Síochána

Dear Commissioner

It is my pleasure to deliver the 30th Annual Report of the Criminal Assets Bureau for the calendar year 2025. This report is submitted for presentation to the Minister for Justice, Home Affairs and Migration pursuant to the provisions of section 21 of the Criminal Assets Bureau Act 1996.

In compliance with its statutory obligations, the report sets out the activities of the Bureau throughout the year in targeting the proceeds of crime.

This past year has been a busy and productive year for the Bureau which saw the Bureau achieve ten of its fifteen performance delivery targets, as published. The Bureau continues to focus on more complex and lengthier investigations. Its work on legacy matters has also paid dividends through targets being exceeded.

During the year, the Bureau continued to focus on the development and upskilling of Divisional Asset Profilers. In October 2025, the Bureau delivered a two-day Advanced Divisional Asset Profiler training programme upskilling fifteen Garda Profilers and two Senior Revenue Bureau Officers.

The Bureau recognises the contribution of locally trained Divisional Asset Profilers in the early identification of suitable targets for action by the Bureau and strives to improve and enhance this course year on year.

Sixteen new applications were brought before the High Court under the Proceeds of Crime legislation. The majority of these actions are linked to the proceeds of drug trafficking. Other underlying forms of criminality includes burglary and money laundering. The Bureau will consider an investigation into any criminal conduct which involves the acquisition of wealth. The value of assets under the new proceeds of crime cases instigated by the Bureau ranged in value from €77,000 to €4.536 million.

Proceeds of crime actions, together with actions under the Revenue and Social Protection provisions, yielded in excess of €14.926 million to the benefit of the Exchequer in 2025.

Total Monies returned	
Proceeds of Crime	3,474,245
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Social Protection	655,543
Totals	**14,925,788**

A portion of these returns are used to finance the Community Safety Fund which allows for seized monies to be directed back into communities to fund innovative local projects aimed at building stronger, safer communities.

While the returns to the Exchequer are welcome and self-explanatory, they do not fully reflect the wider impact of the Bureau's actions within the community.

At its core, the value of the work by the Criminal Assets Bureau is recognised by its strategy of "denying and depriving". The duality of the "deny and deprive" strategy recognises both quantifiable success and broader societal impact. The former is evidenced through the metrics presented throughout this report. The latter is reflected in wider societal indicators reflected in protecting communities, undermining the influence of organised crime and making clear that criminal assets are not a badge of success but evidence of wrongdoing that the State can, and will, confront.

I would like to express my thanks to the members of the public who have engaged with the Bureau via good citizen reports. While their information is provided on an anonymous and confidential basis, their assistance and engagement with the Bureau is greatly appreciated. The information provided supports the Bureau in carrying out its remit and in doing so, supports their communities.

The Bureau coordinates its activities in a manner which takes cognisance of the Policing Plan of An Garda Síochána and the strategies of the Office of the Revenue Commissioners, the Department of Social Protection and the Department of Justice, Home Affairs and Migration.

Many of the Bureau's investigations have an international dimension and involve cooperation with law enforcement agencies in other jurisdictions.

The Bureau continues to develop its relationships with Interpol, Europol and the Camden Assets Recovery Inter-Agency Network (CARIN) and continues to represent Ireland on the platform of the Asset Recovery Offices (ARO).

At all times, the Bureau receives excellent support from legislators, members of the public and the media. Staff of the Bureau continue to develop a significant social media presence through Facebook, X and Instagram. The social media channels are used to tell the Bureau's story by promoting our activities and in securing important information from members of the public. I want to personally acknowledge the efforts of the Bureau staff in promoting its work through the media and the engagement of mainstream media outlets in this regard.

In addition, the support and cooperation afforded to the Bureau throughout the year by An Garda Síochána, the Office of the Revenue Commissioners, the Tax Appeals Commission, the Courts Service, the Department of Social Protection, the Department of Justice, Home Affairs and Migration, the Department of Finance, the Department of Public

Expenditure, Infrastructure, Public Service Reform and Digitalisation, the Office of the Attorney General and the Office of the Director of Public Prosecutions is greatly appreciated.

Likewise, I would also like to acknowledge the expertise and commitment of the solicitors and staff of the Criminal Assets Section (CAS) allocated by the Chief State Solicitors Office (CSSO) to the work of the Bureau. The value of co-located independent legal advice and support cannot be overstated in its contribution to the success of the Bureau.

The Bureau has greatly benefited from the increase in CAS resources. This is evident by the significant number of section 4 orders granted by the High Court. I would also like to acknowledge the significant contribution of legal counsel engaged by the CSSO on behalf of the Bureau.

I wish to acknowledge the dedication and hard work of all personnel attached to the Bureau.

During the year there were many personnel changes within the Bureau arising from promotions, transfers and retirements. I would like to welcome the new personnel who have joined the Bureau this past year and wish them well during their time in the Bureau.

As referenced in the CAB Annual Reports for the years 2022, 2023 and 2024 - a working group was established to address the Bureau's current and future accommodation requirements. The Bureau continues to liaise with the Department of Justice, Home Affairs and Migration, the Office of Public Works and relevant stakeholders to progress and secure suitable accommodation that will satisfactorily support the Bureau's remit and planned expansion for the future.

The Bureau welcomes the new provisions in the Proceeds of Crime and Related Matters Bill 2025 which will further enhance the Bureau to carry out its statutory functions.

Finally, I would like to take this opportunity to congratulate you on your promotion to Garda Commissioner. I look forward to working with you and wish you well in your new role.

Yours sincerely

Michael Gubbins

MICHAEL GUBBINS
CHIEF BUREAU OFFICER
CRIMINAL ASSETS BUREAU

Letter forwarding report from the Chief Bureau Officer to the Commissioner of An Garda Síochána

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Foreword

Section 21

This is the 30th Annual Report on the activities of the Criminal Assets Bureau (hereinafter referred to as "the Bureau") and covers the period from 1st January 2025 to 31st December 2025 inclusive.

The Criminal Assets Bureau Act 1996 and the Proceeds of Crime Act 1996 have both been amended but most substantially by way of the Proceeds of Crime (Amendment) Act, 2005.

For the purpose of this report, the Criminal Assets Bureau Act 1996 and 2005 will hereinafter be referred to as "the CAB Act" and the Proceeds of Crime Act 1996 to 2016 will hereinafter be referred to as "the PoC Act". The CAB Act provides a collective title of amendments governing the powers and functions of the Bureau.

This report is prepared pursuant to section 21 of the CAB Act which requires the Bureau to present a report, through the Commissioner of An Garda Síochána, to the Minister for Justice, Home Affairs and Migration outlining its activities during the year 2025.

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Part One
Overview of the Criminal Assets Bureau, its Officers and Staff

The Bureau

On the 15th October 1996, the Bureau was formally established by the enactment of the CAB Act. The CAB Act provides for (among other matters):

- the objectives of the Bureau;
- the functions of the Bureau;
- the Chief Bureau Officer;
- Bureau Officers;
- staff of the Bureau;
- the Bureau Legal Officer;
- anonymity of staff of the Bureau;
- offences and penalties for identifying staff of the Bureau and their families;
- offences and penalties for obstruction and intimidation;
- CAB search warrants;
- CAB production orders.

Our Mission, Vision and Values

The Bureau's Statement of Strategy 2024-2027 was published in 2024. Our Mission, Vision and Values were revisited during this process and are explained in the infographic below.

Governance

The inter-agency and multi-disciplinary structure of the Bureau, together with its multi-stranded governance and accountability pathways, means that the Bureau does not fall within the traditional definition of a State Body within the meaning of the Code of Practice for the Governance of State Bodies.

The Bureau does, however, apply the Code of Practice for the Governance of State Bodies as adapted to its structure.

As the Bureau has no Board, the Chief Bureau Officer along with the Senior Management Team undertakes the role of a Board, in addition to the performance of its executive functions. The Bureau will obtain a derogation from the Department of Justice, Home Affairs and Migration in 2026 to meet our statutory obligations.

The Bureau sets out its goals and commitments for the year in its annual Business Plan 2025. This plan took cognisance of the Statement of Strategy 2024-2027.

An Oversight Agreement between the Bureau and the Department of Justice, Home Affairs and Migration (hereinafter referred to as "the Department") has been signed and covers the period 2023 – 2025.

This Agreement sets out the broad governance and accountability framework within which the Bureau operates and defines key roles and responsibilities which underpin the relationship between the Bureau and the Department. The Bureau's Oversight Agreement is available at www.gov.ie.

A separate but related Performance Delivery Agreement has also been signed for the year 2025 and is available for viewing at www.gov.ie.

The Department's Internal Audit Unit provides support to the Bureau in monitoring and reviewing the effectiveness of the Bureau's arrangements for governance, risk management and internal controls.

The Internal Audit Unit conducts an independent audit of the Bureau's procedures and processes on an annual basis.

The Bureau held eleven (11) Senior Management Team Meetings, four (4) Audit and Risk Committee Meetings and two (2) Governance Committee Meetings during 2025.

Gender Balance

At 31st December 2025, the SMT had eight members of which 25% were female members and 75% were male members.

The SMT does not meet the Government target of a minimum of 40% representation of each gender in the membership of State Boards.

As mentioned, the Bureau has no Board. The Chief Bureau Officer along with the Senior Management Team undertakes the role of a Board. These senior positions are filled by way of competitive interviews with the parent agencies.

Environmental, Climate and Energy Issues

As set out in the requirements of the Public Sector Energy Efficiency Strategy 2017, the Chief Bureau Officer appointed a member of the senior management team as the Energy Performance Officer for the Bureau.

The Bureau will continue to participate, progress, promote and report on all initiatives in relation to environmental and energy issues by year end in accordance with S.I. 426 of 2014 (European Union (Energy Efficiency) Regulations).

Throughout 2025, the Bureau carried out a number of energy efficient initiatives which included:

- Divesting the CAB fleet of a number of older vehicles and replacing them with more modern, fuel-efficient models.
- Continued use of "Follow me Printing" for all staff.
- Recycling bins have been introduced with their use promoted within the Bureau.
- Remote Working: The Bureau implemented its Blended Working Policy in 2023 and continues to encourage Bureau Officers and staff to avail of remote working, where practicable.
- During 2025, the Chief Bureau Officer established a "green team"

within the Bureau to champion sustainability and to develop and implement initiatives to reduce environmental impact.

- In 2025, the "Green Team" developed a "Climate Action Roadmap" for the Bureau in line with our obligations.
- The Bureau implemented new VMware servers, which are significantly more energy efficient, to replace older server technology.
- The Bureau also virtualised a number of legacy physical servers, reducing the overall number of machines required and lowering energy consumption.
- The Bureau migrated away from our on-premises email system, removing the need for several physical servers.
- The introduction of automatic nightly shutdown of PCs further reduced our power usage.

Diversity & Inclusion

The Bureau is dedicated to fostering a workplace where every individual feels respected, valued and empowered to reach their full potential regardless of their background or identity.

The Bureau recognises that diversity — encompassing different experiences, cultures and perspectives — is a fundamental strength that drives innovation and is a critical component of our success. To uphold this commitment, competitions for the Bureau are held in compliance with the Code of Practice for Appointments to Positions in the Civil and Public Service. The Bureau maintain a zero-tolerance stance toward any form of discrimination or harassment.

The Bureau understands that this is a journey and is committed to continuous improvement and learning. By prioritising equity and inclusion in every aspect of our operations, the Bureau strives to build a culture of belonging that reflects and serves our diverse global community.

Human Rights

Section 42 of the Irish Human Rights and Equality Commission Act 2014 establishes a positive duty on public bodies to have regard to the need to eliminate discrimination, promote equality and protect the human rights of staff and the people to whom services are provided.

The Bureau is committed to demonstrating these values in delivering its mission and meeting those obligations in all of its interactions with individuals, organisations and stakeholders alike.

In 2025, the Bureau published an Assessment and Action Plan in line with Section 42 of the Irish Human Rights and Equality Commission Act 2014 on its website www.cab.ie.

The Bureau will continue to monitor, reassess and report on the areas identified in the Action Plan in its strategic plans and annual reports from here on in.

Finance

During the course of the year the Bureau expended monies provided to it by the Oireachtas in pursuit of its statutory objectives.

All monies provided by the Oireachtas as outlined in the following table are audited by the Comptroller and Auditor General, as is provided for under Statute.

Comparison of Budget and Expenditure for years 2024 / 2025

		Amount € M	
Year	**Description**	**Budget Provision**	**Total Spent**
2024*	Pay	10.231	9.948
	Non-pay	1.701	2.443
	Total	11.932	12.391
2025**	Pay	11,023	10,720
	Non-pay	2,251	2,868
	Total	13,274	13,588

- Following audit by the Comptroller and Auditor General, the Bureau's total 2024 spend was amended to 12.391m. This is due, in the main, to the recording of receipts.

** Awaiting audit review

Objectives and Functions

The objectives and functions of the Bureau are respectively set out in sections 4 and 5 of the CAB Act. These statutory objectives and functions are set out in full at Appendix A and may be summarised as:

1. Identifying and investigating the proceeds of criminal conduct;
2. Taking appropriate actions under the law to deny and deprive persons of the benefits of assets that are the proceeds of criminal conduct by freezing, preserving and confiscating these assets;
3. The taking of all necessary actions under the Revenue Acts to ensure that the proceeds of criminal activity are subjected to tax;
4. Investigating and determining claims under the Social Welfare Acts.

Chief Bureau Officer

The Bureau is headed by the Chief Bureau Officer, appointed by the Commissioner of An Garda Síochána from among its members of the rank of Chief Superintendent.

The current Chief Bureau Officer is Detective Chief Superintendent Michael Gubbins who was appointed on 5th May 2020.

Chief Bureau Officer Michael Gubbins

The Chief Bureau Officer has overall responsibility, under section 7 of the CAB Act, for the management, control and the general administration of the Bureau. The Chief Bureau Officer is responsible to the Commissioner of An Garda Síochána for the performance of the functions of the Bureau.

The Chief Bureau Officer is accountable to the Secretary General of the Department with regard to matters arising for the Secretary General as Accounting Officer for the Bureau.

This section also provides for the appointment of an Acting Chief Bureau Officer to fulfil the functions of the Chief Bureau Officer in the event of incapacity through illness, absence or otherwise.

Bureau Legal Officer

The Bureau Legal Officer reports directly to the Chief Bureau Officer and is appointed under section 9 of the CAB Act to assist the Bureau in the pursuit of its objectives and functions. The current Bureau Legal Officer is Mr Kevin McMeel who was appointed on 19th July 2019.

Bureau Legal Officer Kevin McMeel

A Body Corporate

The Bureau exists as an independent corporate body as provided for under section 3 of the CAB Act. The status of the Bureau was first considered in 1999 by the High Court in the case of *Murphy -v- Flood* [1999] IEHC 9.

Mr Justice McCracken delivered the judgment of the High Court on the 1st of July 1999. This judgment is pivotal to understanding the nature of the Bureau.

The court set out:

"The CAB is established as a body corporate with perpetual succession. While the Chief Bureau Officer must be appointed from members of An Garda Síochána of the rank of Chief Superintendent, nevertheless the CAB is independent of An Garda Síochána, although it has many of the powers normally given to that body.

...

The CAB is a creature of Statute, it is not a branch of An Garda Síochána. It was set up by the Oireachtas as a body corporate primary for the purpose of ensuring that persons should not benefit from any assets acquired by them from any criminal activity.

It is given power to take all necessary actions in relation to seizing and securing assets derived from criminal activity, certain powers to ensure that the proceeds of such activity are subject to tax, and also in relation to the Social Welfare Acts.

However, it is not a prosecuting body and is not a police authority. It is an investigating authority which, having investigated and used its not inconsiderable powers of investigation, then applies to the Court for assistance in enforcing its functions.

The Oireachtas, in setting up the CAB, clearly believed that it was necessary in the public interest to establish a body which was independent of An Garda Síochána, and which would act in an investigative manner.

However, I do not think it is the same as An Garda Síochána, which investigates with an aim to prosecuting persons for offences. The CAB investigates for the purpose of securing assets which have been acquired as a result of criminal activities and indeed ultimately paying those assets over [to] the State."

Structure of the Bureau

The inter-agency and multi-disciplinary structure of the Bureau, which draws together various skill sets from the personnel involved, has the benefit of enhancing investigative capabilities in pursuit of the Bureau's statutory remit. The functions of the Bureau, operating through its Bureau Officers, are outlined under section 5 of the CAB Act.

Bureau Officers and staff

Section 8 of the CAB Act provides for the appointment of officers of the Bureau. Members of staff of the Bureau are appointed under section 9 of the CAB Act.

Officers of the Bureau are:

A. Members of An Garda Síochána;
B. Officers of the Revenue Commissioners;
C. Officers of the Department of Social Protection.

Officers are on special leave from their parent agencies. Bureau Officers continue to be vested with the powers and duties of office notwithstanding their appointment as Bureau Officers.

Bureau Staff consist of:

- The Bureau Legal Officer;
- Professional and technical members;
- Administrative members.

The authorised staffing level at the Bureau, comprising Bureau Officers and other staff, remained at one hundred and one (101) for the year 2025.

Following transfers, promotions and retirements during 2025, eleven (11) staff vacancies remained at the Bureau on 31st December 2025.

These vacancies include:

- 3 x Detective Garda
- 2 x Administrative Staff
- 1 x ICT EO
- 3 x HEO Revenue
- 1 x AP Revenue
- 1 x Bureau Forensic Account

The Bureau is liaising with the relevant bodies and it is anticipated that these vacancies will be filled by Quarter 3, 2026.

The Bureau continues to work with the Department of Justice, Home Affairs and Migration with the ambition of growing staff numbers as resources allow.

Authorised Staffing Levels

Inter-agency & multi-disciplinary authorised levels

	53
	8
	23
Revenue Cáin agus Custaim na hÉireann Irish Tax and Customs	17

Anonymity

Section 10 of the CAB Act provides certain protection in the form of anonymity for non-Garda Bureau Officers and members of staff of the Bureau. Under this section, officers and staff of the Bureau execute their duties in the name of the Bureau.

Section 11 of the CAB Act provides for criminal offences relating to the identification of certain Bureau Officers, staff and their families.

The prohibition of identification does not extend to the Chief Bureau Officer, Acting Chief Bureau Officer, the Bureau Legal Officer or Garda Bureau Officers.

Administration Office

The Bureau's Administration Office, staffed by personnel seconded from the Department of Justice, Home Affairs and Migration, provides office operations and support to all Bureau Officers.

It plays a pivotal role in supporting the Chief Bureau Officer in ensuring that all administrative aspects of the Bureau's business are handled efficiently.

This includes managing the HR, Recruitment, Governance, Audit and Risk and Financial functions for the Bureau.

Intelligence & Assessment Office

The Intelligence and Assessment Office (IAO) are an integral function of the Bureau and is serviced by Bureau Officers covering all agencies within the Bureau. Its remit is to triage all incoming referrals.

Correspondence is received by the Bureau from a variety of sources including Good Citizen Reports, Divisional Asset Profiles, information from State and semi-State agencies and both the private and non-governmental organisation sectors.

Assessment of all submissions to the Bureau takes place at the IAO. This includes the preparation of background reports to inform the

Admissions Group decision making process on whether or not, the individual / company assessed meets the criteria to be assigned as a CAB target.

The Admissions Group, serviced by the management of each agency, make decisions to either accept or decline the individual / company as a CAB target. Should they be accepted as targets, they will be assigned to a team room for multi-agency investigation.

The IAO provide ongoing intelligence and operational support to the Bureau's investigation teams by identifying any issues of relevance within the broad range of legislation under which the Bureau operates. Since the creation of the IAO, the increase in targets has grown substantially from 500 in 2016 to in excess of 1,273 in 2025.

The Bureau, through the IAO, engages with our international partners including Europol, Interpol, Camden Asset Recovery Inter Agency Network (CARIN), United Nations Office on Drugs and Crime (UNODC) and the Asset Recovery Network (ARO).

One hundred and thirty two (132) requests were received via the Asset Recovery Network in 2025 from twenty one (21) different countries and twenty three (23) requests were sent.

The Bureau, through the IAO, conducts enquiries at both national and international levels to support ongoing operations.

Good Citizen Reports

The Bureau receives information from members of the public in a variety of different ways, i.e., email, in writing or by way of phone call, whether from a self-identified author / caller or by way of a Good Citizen Report.

The Bureau is interested in any information in respect of unexplained wealth which, it is suspected, may be linked, directly or indirectly, to criminality or a person who is living beyond their means or is materially benefiting from the proceeds of crime. The information given by members of the public is dealt with in the strictest of confidence.

This information is evaluated at the IAO to establish if the information provided falls within the remit of the Bureau. Information can be provided to the Bureau via a number of different platforms listed below:

- By telephone on 00 353 1 6663266
- By email at info@cab.ie
- By post (Criminal Assets Bureau, Walter Scott House, Military Road, Dublin 8, D08 HE2P)
- Facebook: @CriminalAssetsBureau
- X: @criminalassets
- Instagram: @criminalassetsbureau

During 2025, the Bureau received three hundred and sixty six (366) Good Citizen Reports compared to four hundred and eight (408) received in 2024.

Chief State Solicitor's Office

The Criminal Assets Section (hereinafter referred to as "CAS") of the Chief State Solicitor's Office provides a dedicated legal service to the Bureau and is uniquely co-located with its clients.

CAS provides legal services on all aspects of the work of the Bureau including but not limited to:

- Applications pursuant to the PoC Act as amended and related appeals
- Legal representation for all Bureau tax and social welfare matters both before their respective appeal bodies and in the Circuit and Superior Courts
- Conveyancing and commercial property transactions
- Other civil law cases including Judicial Review and Plenary matters

The section is headed up by a Deputy Assistant Chief State Solicitor and the CAS team is comprised of legal and administrative staff all working together in its drive to support the Bureau's legal service requirements.

CAS has an authorised staffing complement of eighteen (18) consisting of one (1) Deputy Assistant Chief State Solicitor, ten (10) State Solicitors (two at State Solicitor Higher grade), one (1) Higher Legal Executive, one (1) Executive Officer and five (5) Clerical Officers.

At the end of 2025, following transfers and promotions, the actual overall staffing complement within the CSSO was fifteen (15). It is anticipated that all vacancies will be filled in 2026.

CAB acknowledges with gratitude the increase in staffing of the section by the CSSO which signals our ongoing joint prioritisation of this area of work.

Divisional Asset Profilers

Divisional Asset Profiler training is organised and conducted by the IAO in accordance with the Bureau's strategic plan. The IAO supports and liaises with the locally trained Divisional Asset Profilers to obtain profiles on persons submitted for assessment.

As referenced in the 2024 Report, a review of trained personnel was undertaken by members attached to the Intelligence and Assessment Office. The number of Divisional Asset Profilers trained by the Bureau since its inception is six hundred and twenty eight (628).

There are currently four hundred and thirty nine (439) qualified Divisional Asset Profilers. (*The variance between the trained personnel and qualified profilers is due to retirements, promotions, transfers etc).*

The Bureau continued its programme of engagement with Divisional Asset Profilers. In October 2025, the Bureau delivered a two-day Advanced Divisional Assets Profiler training course at Walter Scott House.

A total of fifteen (15) Garda Profilers and two (2) Senior Revenue Bureau Officers were in attendance. The overall feedback from this training initiative was very positive from the course participants.

To date, the Bureau have trained six hundred and twenty-eight (628) Divisional Asset Profilers of which there are four hundred and thirty-nine (439) current Divisional Asset Profilers, as outlined below:

- 425 Gardaí
- 13 Officers of the Revenue Commissioners engaged in Customs and Excise duties;
- 1 Officers of the Department of Social Protection

Ongoing contact and close cooperation were maintained both regionally and divisionally throughout 2025.

Presentations were delivered by senior Bureau Officers to regional crime teams within An Garda Síochána to promote the role of the Divisional Asset Profiler.

The Bureau continues to operate best practice in the area of non-conviction based civil forfeiture of criminal assets. The Bureau also researches best practice identifying courses and partners who increase knowledge and assist with the continuous professional development of staff directly allocated to the Bureau and those trained as Divisional Asset Profilers.

The following cases provide examples of Bureau investigations that originated from a Divisional Asset Profiler:

Case 1:
The Bureau conducted an investigation into the assets and activities of a family involved in the sale and supply of drugs following receipt of a profile from a trained Divisional Assets Profiler located in the Meath region.

The Bureau secured High Court Orders pursuant to Section 4A of the PoC Act over the following assets:

- €31,800 cash
- $94 US Dollars
- $20 CAN Dollars
- £150.40 Sterling

Case 2:
Following receipt of a referral from a trained Divisional Asset Profiler attached to the Limerick Division, the Bureau commenced an investigation into the assets and activities of a couple who were believed to be involved in criminal conduct, namely, the sale and supply of drugs and who had known links to an organised crime group.

The Bureau's investigation resulted in the successful granting of orders under

Section 4A of the PoC Act over the following assets:

- 3 properties in the Limerick area
- 3 vehicles
- €101,922 in a financial institution

Training and Development

Proceeds of Crime & Asset Investigation (POCAI)

The Bureau's multi-agency structure remains a powerful tool in the State's armoury in tackling organised crime groups and criminal activity.

As a part of its prescribed statutory function, the Bureau has provided national and international assistance and education to other law enforcement / regulatory agencies and State bodies including Interpol, Europol, National Crime Agency (NCA), Australian, Icelandic, Maltese and Zambian Law Enforcement Agencies.

The accreditation of material in this field is now regarded as critical for the delivery of an effective and professional service, both nationally and internationally.

The Bureau, together with the University of Limerick established an academically recognised qualification with the University of Limerick, at Level 9 Accreditation, launched in February 2020.

The Postgraduate Diploma in Proceeds of Crime & Asset Investigation is an accelerated programme and is delivered in five modules of learning.

This delivery of the course was supported by subject matter experts within the Bureau and external experts in areas such as proceeds of crime procedures, white-collar crime, bribery and corruption, evidence and international cooperation. During 2025, the Bureau delivered this course to fifteen (15) participants.

The Bureau wishes to extend its sincere thanks to each of the presenters on the course and in particular to the University of Limerick's President Professor Shane Kilcommins, Executive Dean, Dr. Sandra Joyce, Head of the School of Law, Professor Lucy Ann Buckley, Professor Ray Friel, Ms Angela Liddy and the staff of the University of Limerick for their support and advice.

Proceeds of Crime - MA

The Masters of Arts in Proceeds of Crime Investigation is a one-year course run by the University of Limerick for students who completed and graduated from the Proceeds of Crime and Asset Investigation (POCAI) Course.

This course allows Bureau Officers to increase their knowledge and expertise in this area. In 2025, the Bureau accommodated seven (7) Bureau Officers in completing this course.

Staff Training

During 2025, the Bureau continued to upgrade and enhance the training needs of Bureau Officers and staff. In this regard, the Bureau supported staff participation in the following courses:

- Altia: Introduction to Financial investigation Toolkit
- Proceeds of Crime and Asset Investigation (POCAI), CAB & University of Limerick
- Master of Arts in Proceeds of Crime Investigation, University of Limerick
- Certificate in Public Procurement
- Masters in Criminology
- Microsoft Office 365

In addition, a number of awareness briefings took place throughout 2025 to all staff of the Bureau on relevant topics including:

- Horse Racing Ireland
- The Dark Net and Irish Criminality
- Forensics in Criminal Cases
- Well Charging Process

CAB Presentations

Detective Training Programme

During the year, the Bureau assisted the Crime Training Faculty at the Garda College in Templemore in the provision of Detective Training.

The Bureau delivered presentations to the Detective Garda Training Programme on five (5) occasions and on a further two (2) occasions to the Detective Sergeant Training Programme.

Senior Investigators Course

The Bureau assisted the Crime Training Faculty and delivered two (2) presentations in Templemore to the Senior Investigating Officers Programme.

Asset Recovery and Management Agency (ARMA)

The Chief Bureau Officer, Michael Gubbins, participated in a panel discussion entitled *"Improving the effectiveness of finding and recovering assets derived from corruption and other crimes: the role and mission of the Legal Profession in asset tracing and recovery process"* at an event hosted by the Ukraine Asset Recovery and Management Agency (ARMA) on the 29th May 2025.

Chartered Accountants Ireland

The Chief Bureau Officer, Michael Gubbins delivered an online presentation to the Chartered Accountants of Ireland in relation to the establishment of the Bureau, its multi-agency approach, the legislation under which the Bureau operates and the objective and functions of the Bureau.

European Commission

A presentation on the CAB model was delivered by the Chief Bureau Officer, Michael Gubbins to the Minister for Justice, Home Affairs and Migration, Jim O'Callaghan, T.D. and Commissioner Brunner of the European Commission on the 24th November 2025.

Virtual Currencies

The Bureau continues to enhance its level of knowledge and investigative ability in the field of cryptocurrencies and their use in criminal conduct worldwide.

Through its investigations, the Bureau has made a number of seizures of various forms of cryptocurrencies including Bitcoin and Ethereum.

Virtual Asset Seizures training

A Garda Bureau Officer attended a 3-day Crypto-Training online course ran by Asset Reality in September 2025. Topics of discussion included virtual asset seizures.

Cryptocurrencies Presentations

The Bureau made a number of presentations to law enforcement agencies which allows the Bureau to share and enhance its knowledge in this area and generate global expert contacts in this field which will benefit future Bureau investigations.

Senior Investigating Officers Training Course

A Garda Bureau Officer delivered a presentation on virtual currencies to Detective Inspectors undergoing the Senior Investigating Officers training course at the Garda College, Templemore in April 2025.

Postgraduate Diploma in Proceeds of Crime and Asset Investigation (POCAI)

Lectures were delivered by a Garda Bureau Officer on the topic of virtual currencies to students undergoing the Postgraduate Diploma in Proceeds of Crime and Asset Investigation course (accredited by the University of Limerick) in October 2025.

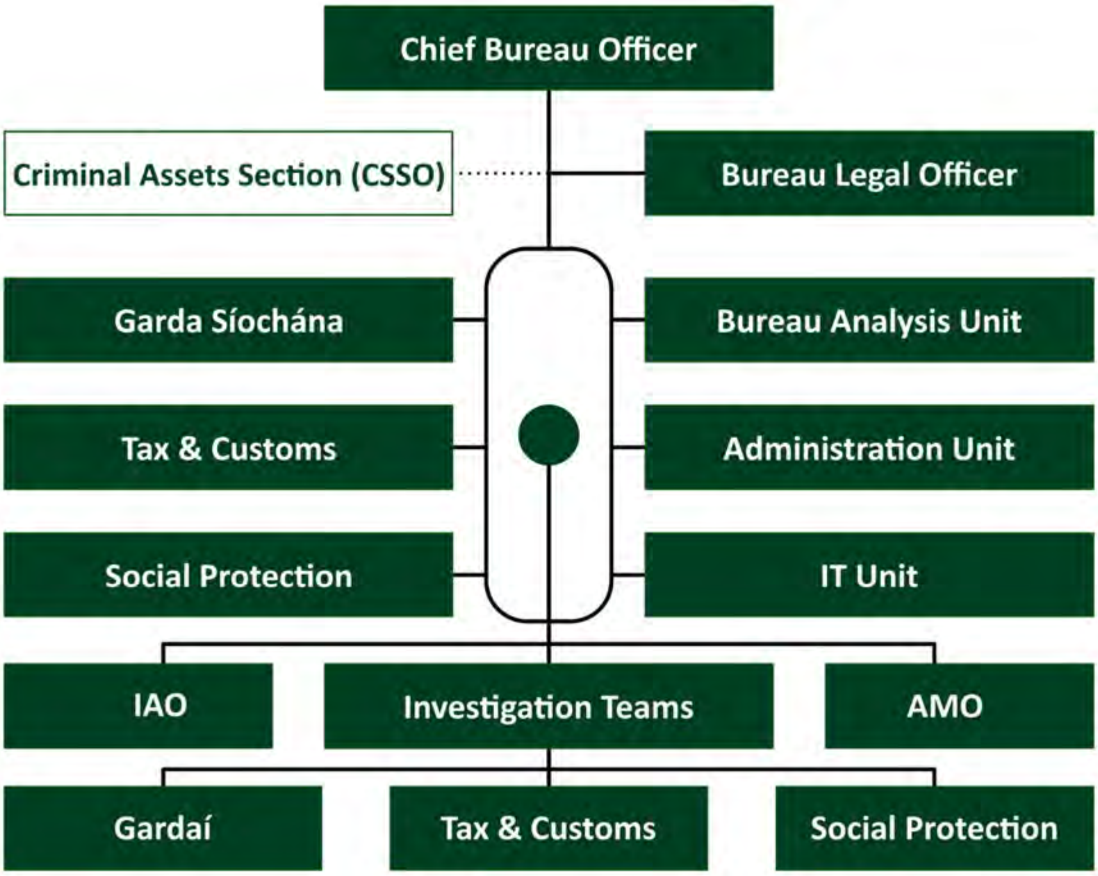
Chainalysis Training Course

A Garda Bureau Officer participated in a training course on virtual currencies hosted by Chainalysis in November 2025.

Postgraduate Certificate in Fraud & E-Crime Investigation

A Garda Bureau Officer delivered a lecture to students undergoing the Postgraduate Certificate in Fraud & E-Crime Investigation course (accredited by University College Dublin) in November 2025.

Diagram: Organisation of the Bureau



Part Two
Criminal Assets Bureau investigations

Investigations

During 2025, Bureau Officers continued to exercise the powers and duties vested in them under section 8 of the CAB Act.

It is important to note that while Bureau Officers retain the duties and powers conferred on them by their former office of their respective parent organisations, they also gain new powers particular to their role as Bureau Officers. These include the power to obtain and execute:

1. CAB search warrants pursuant to section 14 of the CAB Act.
2. Production Orders to make material available to CAB pursuant to section 14A of the CAB Act.

These powers are contained within sections 14 and 14A of the CAB Act, as amended.

The Bureau conducted its investigations throughout 2025 with the co-operation and assistance of Garda personnel from Garda Divisions and also from Garda National Units attached to Organised and Serious Crime (OSC), Special Tactics and Operations Command (STOC) and the Garda National Crime and Security Intelligence Service (GNCSIS). Investigations were also supported by the Office of the Revenue Commissioners.

The Bureau continued to co-operate with the Special Investigation Units of the Department of Social Protection in respect of their investigations in 2025. This continued assistance has been critical to the success in targeting the proceeds of criminal conduct during 2025.

The Bureau conducted thirty seven (37) search operations [exceeding the Performance Delivery Agreement target of thirty five (35)] consisting of two hundred and eight (208) individual searches across sixteen (16) counties and three (3) in a foreign jurisdiction.

Section 14

Section 14 of the CAB Act provides for CAB search warrants. Under section 14(1), an application may be made by a Bureau Officer, who is a member of An Garda Síochána, to the District Court for a warrant to search for evidence relating to assets or proceeds deriving from criminal conduct.

A section 14 search warrant operates by allowing a named Bureau Officer, who is a member of An Garda Síochána, accompanied by other such persons as the Bureau Officer deems necessary, to search, seize and retain material at the location named.

This is noteworthy in that it allows the member of An Garda Síochána to be accompanied by such other persons as the Bureau Officer deems necessary, including persons who are technically and/or professionally qualified people, to assist him/her in the search.

These warrants are seen as an important tool which greatly facilitates the Bureau to carry out investigations pursuant to its statutory remit.

The Bureau executed two hundred and thirty two (232) warrants in targeting organised crime groups.

The section 14 warrants were used to search numerous private residences as well as professional offices and other businesses. This led to the seizure of cash, vehicles, designer goods and evidence in support of Bureau investigations.

Section 14A

Section 14A was inserted by the PoC Act 2005. This section provides for applications to be made by a Bureau Officer, who is also a member of An Garda Síochána, to apply to the District Court for an order directed to a named person to make material available to the Bureau Officer.

The section 14A Production Orders have been used primarily to uplift evidence from a number of financial institutions within the State. The material obtained relates to banking details, and in many instances, the transfer of large amounts of money between accounts.

As a result of the information gleaned, the Bureau has been able to use this evidence in ongoing investigations into a number of individuals who are believed to possess assets which represent, directly or indirectly, the proceeds of crime.

During 2025, the Bureau executed four hundred and sixty one (461) orders pursuant to section 14A.

Applications made during 2025

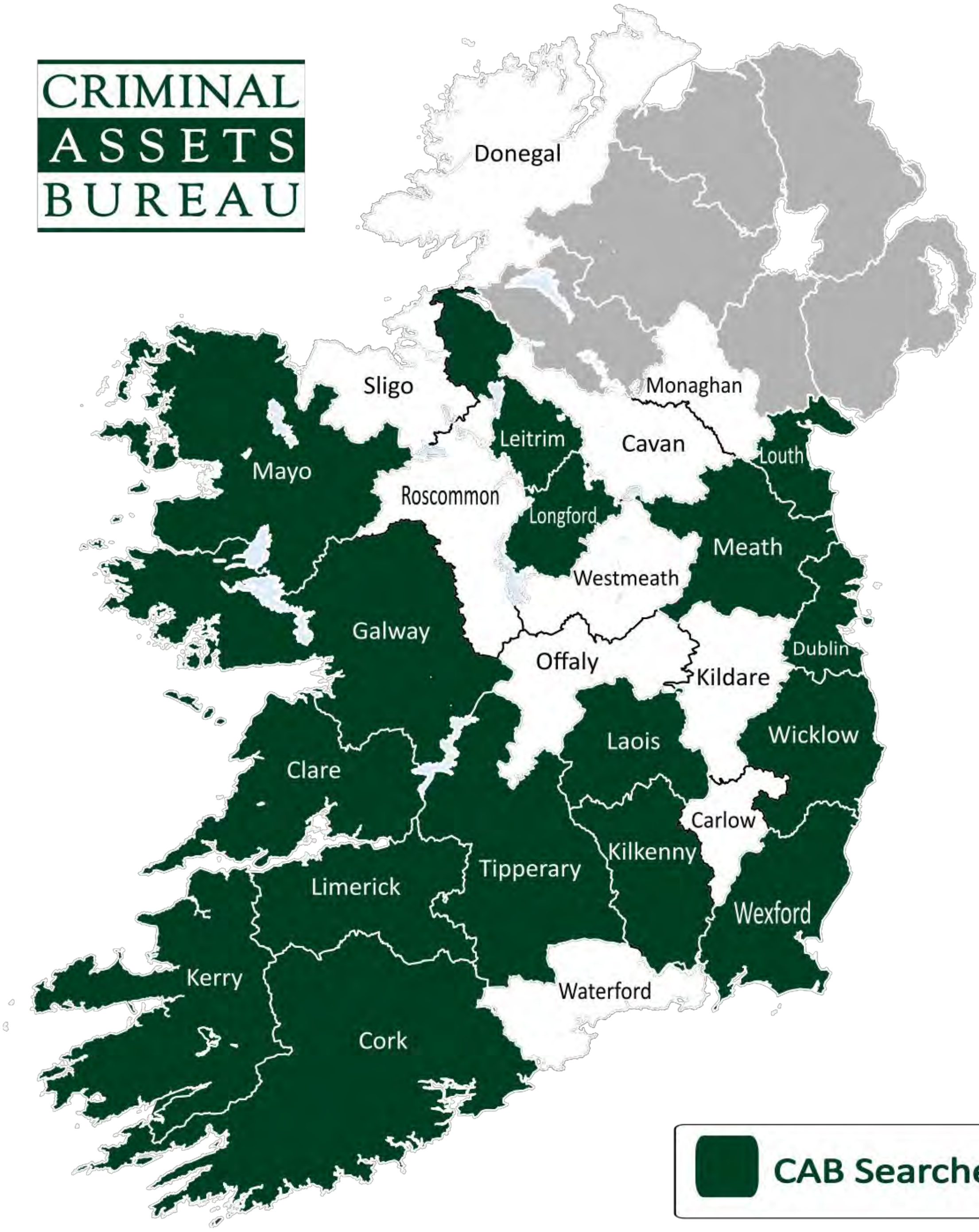
The table below outlines the number of applications made under section 14 and 14A of the CAB Act, as amended.

Applications under section 14 & 14A CAB Act, 1996 & 2005

Description	Applications	
	2024	**2025**
Search warrants under section 14 CAB Act, 1996 & 2005	227	**232**
Orders to make material available under section 14A of the CAB Act, 1996 & 2005	638	**461**

The Section 14/14A figure may fluctuate on an annual basis and is case dependent.

Search Operations Conducted, by County, in 2025



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Part Three
Actions under the Proceeds of Crime Act 1996 to 2016

Introduction

The Proceeds of Crime Act 1996 to 2016 ("PoC Act") enables the High Court to make orders for the preservation and, where appropriate, the disposal of the property concerned and to provide for related matters.

The PoC Act further allows the High Court to determine, on the civil burden of proof, whether an asset represents, directly or indirectly, the proceeds of criminal conduct.

In 2005, the PoC Act was amended to allow the proceedings to be brought in the name of the Bureau instead of its Chief Bureau Officer. Consequently, since 2005, all applications by the Bureau have been brought in the name of the Bureau.

The High Court proceedings are initiated by way of an application under section 2(1) of the PoC Act which is always grounded upon an affidavit sworn by the Chief Bureau Officer.

Other affidavits are sworn by relevant witnesses including Bureau Officers and members of staff of the Bureau, members of An Garda Síochána from outside the Bureau, including Divisional Asset Profilers and in some instances, by officers from law enforcement agencies from outside the jurisdiction.

The PoC Act provides that the originating motion may be brought ex-parte. This means that the Bureau makes its application under section 2(1) of the PoC Act without a requirement to notify the affected person (the respondent).

The section 2(1) order lasts for twenty one days unless an application under section 3 of the PoC Act is brought within that period. Section 2 of the PoC Act also provides that the affected person should be notified during this time.

Section 3 of the PoC Act provides for the long term freezing of assets. It must be noted that proceedings under the PoC Act may be initiated either by section 2(1) or by the issuing of an originating motion pursuant to section 3(1).

While section 3 cases must be initiated within twenty-one days of a section 2 order, in practice, it may take some considerable time before the section 3 hearing comes before the High Court. The affected person (the respondent) is given notice of the section 3 hearing and is entitled to attend the hearing and challenge the case in respect of the specified asset.

In cases where the respondent has insufficient means to pay for legal representation, the respondent may apply to the court for a grant of legal aid under a Legal Aid Scheme in place for this purpose. This ensures access to legal representation in cases involving the Bureau, provided the necessary criteria for the scheme, have been met.

If it is ultimately shown to the satisfaction of the High Court following a section 3 hearing that the property represents, directly or indirectly, the proceeds of criminal conduct, then the court will make an order freezing the property.

This order lasts a minimum of seven years during which the respondent or any other party claiming ownership in respect of the property can make applications to have the court order varied in respect of the property.

At the expiration of the period of seven years, the Bureau may then commence proceedings to transfer the proceeds to the Minister for Public Expenditure, Infrastructure, Public Service Reform and Digitalisation or other such persons as the court determines under section 4 of the PoC Act. During these proceedings, all relevant parties are again notified and may make applications to the court.

Prior to the expiration of the seven-year period, a consent disposal order under section 4A of the PoC Act may be granted by the court on the consent of the relevant respondent.

Section 1A Review

The PoC Act was amended by the PoC (Amendment) Act, 2016. This amendment provides that where a Bureau Officer is in a public place, or in another place where he is authorised or invited, or is carrying out a search, and finds property that he believes to be the proceeds of crime with a value not less than €5,000, then that Officer may seize the property for a period not exceeding twenty four hours.

The Chief Bureau Officer may, during the twenty four hour period, authorise the detention of the property for a period of up to twenty-one days provided he/she:

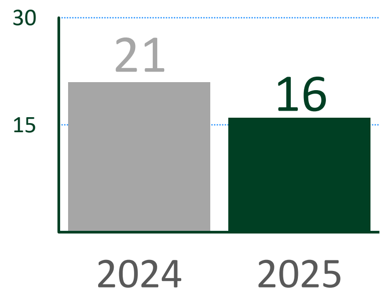
a) is satisfied that there are reasonable grounds for suspecting that the property, in whole or in part, directly or indirectly, constitutes the proceeds of crime,
b) is satisfied that there are grounds for suspecting that the total value of the property is not less than €5,000,
c) is satisfied that the Bureau is carrying out an investigation into whether or not there are sufficient grounds to make an application to the court for an interim order or an interlocutory order in respect of the property and,
d) has reasonable grounds for believing that the property, in whole or in part, may in the absence of an authorisation, be disposed of or otherwise dealt with, or have its value diminished, before such an application may be made.

The above provisions are subject to review in the Proceeds of Crime and Related Matters Bill 2025.

Cases commenced

Sixteen (16) new cases commenced by issuing proceedings by way of originating motion under section 2 of the PoC Act during 2025.

New POC cases brought before the High Court



The Bureau has been engaged in extensive work in preparing these investigations to allow it to bring these cases before the courts in 2025.

The Bureau conducted investigations and completed twenty-three (23) new PoC files.

Whilst the Bureau committed, in the Performance Delivery Agreement (PDA) 2025, to submitting twenty-five (25) proceeds of crime files, the Bureau fell short of reaching this target by two (2) files.

However, of the twenty three (23) files submitted, many were of a larger, more complex nature, thus, contributing to the reduction.

The number of files submitted can fluctuate year on year due to the complexity of the cases.

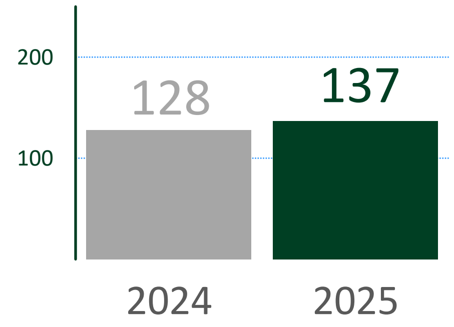
Section 2(1) Review

When analysed, the number of assets over which an order was obtained under section 2(1) increased in comparison to 2024 from one hundred and twenty-eight (128) to one hundred and thirty-seven (137) assets in 2025.

The Bureau notes the slight increase in assets.

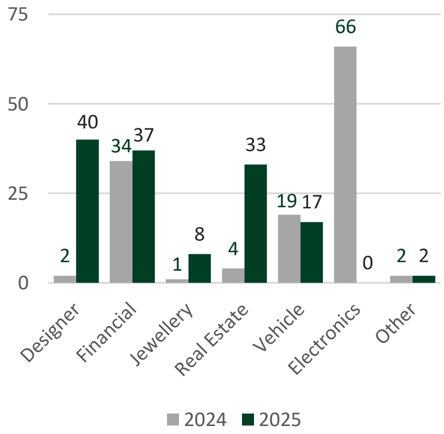
The number of assets over which section 2(1) orders are made may fluctuate on an annual basis and is case dependent.

Assets over which section 2(1) Orders made



During 2025, the Bureau took proceedings in respect of a variety of asset types. For profiling purposes, the assets are broken down into designer goods, financial, jewellery, real estate, vehicles, electronics and other.

Assets over which section 2(1) orders made
Breakdown of assets by asset type



Valuation Breakdown

While the returns to the Exchequer are welcome and self - explanatory, they do not fully reflect the broader socio-economic impact of the Bureau's actions within the wider community.

The non-measurable metrics can also be identified as:

1. Disruption to criminal entities
2. Inhibiting money laundering activities
3. Positively engaging with the wider community

The figures in respect of designer goods, financial, jewellery, real estate, vehicles, electronics and other are based on the estimated value placed by the Bureau on the asset at the time of making the application under section 2(1) of the PoC Act.

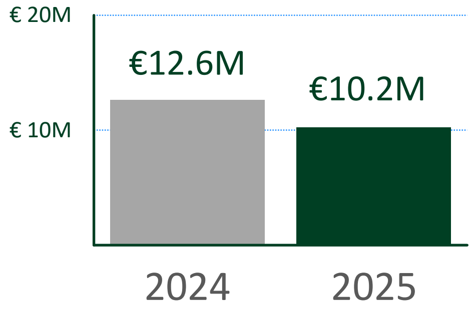
The value of the one hundred and thirty-seven (137) assets frozen under section 2 of the PoC Act during the year 2025 was €10.223 million. A breakdown of this figure is detailed in the table below.

Analysis of section 2 order by Asset Type

Description	2024 €	2025
Designer Goods	3,000	28,338
Financial	10,889,099	1,925,071
Jewellery	9,000	38,350
Real Estate	1,421,295	7,688,657
Vehicles	276,502	537,495
Electronics	6,600	-
Other	11,000	4,925
Total	**12,616,496**	**10,222,836**

The results for 2025 compared to 2024 show the value of assets frozen under section 2(1) has decreased by €2,393,660 from the previous year where the value was €12.616m. The Bureau notes the decrease in the value of assets. The value of assets fluctuates on an annual basis and is case dependent.

Value of assets frozen under section 2(1)

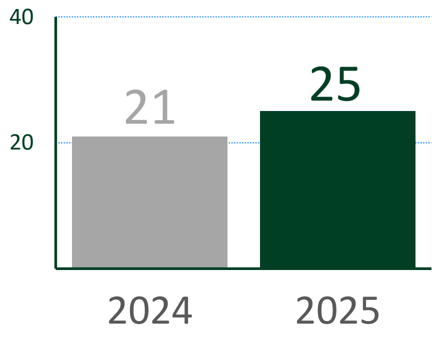


Section 3 Review

A section 3(1) order is made at the conclusion of the hearing in which the High Court has determined that a particular asset or assets represent the proceeds of criminal conduct. As such, the date and duration of the hearing is a matter for the High Court and not within the direct control of the Bureau.

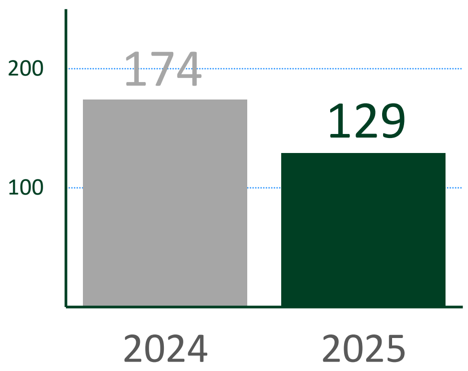
During 2025, twenty-five (25) cases before the High Court had orders made under section 3(1).

Number of cases in which section 3(1) orders made



The number of assets over which orders were made by the High Court pursuant to section 3(1) decreased from one hundred and seventy-four (174) assets in 2024 to one hundred and twenty-nine (129) assets in 2025.

Assets over which section 3(1) orders made.



The number of assets over which section 3(1) orders are made may fluctuate on an annual basis and is case dependent.

The value of the one hundred and twenty-nine (129) assets over which section 3 orders were granted during the year 2025 was €3.310 million.

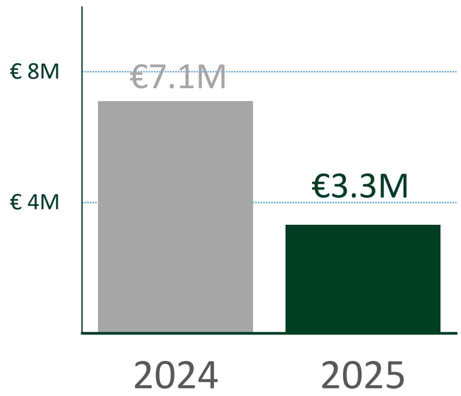
A breakdown of this figure is detailed in the below table.

Analysis of section 3 order by Asset Type

Description	2024 €	2025 €
Designer Goods	114,166	11,655
Financial	1,820,551	749,906
Jewellery	8,350	444,957
Real Estate	4,870,183	1,843,755
Vehicles	266,163	253,206
Electronic	-	3,850
Other	13,800	3,060
Total	**7,093,213**	**3,310,389**

The results for 2025 compared to 2024 show the value of assets frozen under section 3(1) has decreased by €3,782,824 from the previous year where the value was €7.093m. The Bureau notes the decrease in the value of assets. The value of assets fluctuates on an annual basis and is case dependent.

Value of assets frozen under section 3(1)



Section 3(3) Review

Section 3(3) of the PoC Act provides for the varying or discharge of an existing section 3(1) order. An application pursuant to section 3(3) can be made by the respondent in a case taken by the Bureau or by any other person claiming ownership of the property.

While section 3(3) largely contemplates the bringing of an application by a respondent in a case, it can also be made by persons claiming ownership of the subject property, thus providing an opportunity for victims of crime to make an application for the return of same.

Section 3(3) also provides an opportunity for those interested persons to vary or discharge a section 3(1) order where it can be established, to the satisfaction of the court, that the asset in question is not the proceeds of criminal conduct.

No such orders were made under section 3(3) of the PoC Act during 2025.

Geographical Breakdown

The Bureau's remit covers the investigation of proceeds of crime cases irrespective of the location of the assets.

During 2025, the Bureau obtained orders over assets in respect of proceeds of crime in all of the large urban areas and rural communities.

The Bureau remains committed to actively targeting assets which are the proceeds of criminal conduct, wherever they are situated, to the fullest extent under the PoC Act.

The Bureau is further developing its national coverage through the tasking of Divisional Asset Profilers. This will ensure that there is a focus on local criminal targets throughout the State for action by the Bureau.

Property

The statutory aims and objectives of the Bureau require that the Bureau takes appropriate action to prevent individuals, who are engaged in serious organised crime, benefiting from such crime.

In cases where it is shown that the property is the proceeds of criminal conduct, the statutory provision whereby an individual enjoying the benefit of those proceeds may be deprived or denied that benefit, includes that he/she should be divested of the property.

This policy of the Bureau may require pursuing properties, notwithstanding the fact that in some cases, the property remains in negative equity. This is to ensure that those involved in crime are not permitted to continue to benefit from the proceeds of crime.

Vehicles

The Bureau continues to note the interest in high value vehicles of those involved in serious organised crime. During 2025, the Bureau targeted a number of vehicles belonging to criminals.

Luxury Goods

The Bureau is continuing to target ill-gotten gains through the seizure of high end luxury goods such as designer handbags, designer clothing and footwear, watches and jewellery.

Section 4(1) and 4A

Section 4(1) provides for the transfer of property to the Minister for Public Expenditure, Infrastructure, Public Service Reform and Digitalisation.

This section refers to assets which have been deemed to be the proceeds of criminal conduct, for a period of not less than seven years, and over which no valid claim has been made under section 3(3) of the PoC Act.

As a result of the increased staffing levels in the Criminal Assets Section, CSSO, the Bureau saw a rise in legacy cases being finalised by way of section 4 High Court Orders.

Seventeen (17) section 4 Orders were granted by the High Court in 2025 in respect of thirty-four (34) assets with a cumulative value of €656,411.

Section 4A allows for a consent disposal order to be made by the respondent in an application pursuant to the PoC Act, thus allowing the property to be transferred to the Minister for Public Expenditure, Infrastructure, Public Service Reform and Digitalisation prior to the expiration of seven years.

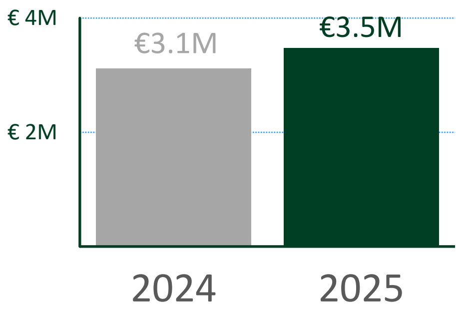
An Roinn Caiteachais Phoiblí Bonneagair
Athchóiriúcháin Seirbhíse Poiblí agus Digitiúcháin
Department of Public Expenditure Infrastructure
Public Service Reform and Digitalisation

This was introduced in the 2005 PoC Act and, in essence, the requirement for the Bureau to wait seven years before remitting funds to the Exchequer is removed.

Eighteen (18) cases were finalised and concluded under section 4A of the PoC Act in 2025 over one hundred and eleven (111) assets with a cumulative value of €2,279,535m.

During 2025, a total of €3,474,245.83 was transferred to the Minister for Public Expenditure, Infrastructure, Public Service Reform and Digitalisation under the PoC Act arising from section 4(1) and 4A disposals.

Value of assets frozen under section 4(1) and 4A



While the Bureau's activity continues to increase, the yield to the Exchequer may fluctuate in any given year.

This is due in part to the obligation to wait seven years for the conclusion of a section 4 PoC order if a consent order under section 4A is not forthcoming prior to the seven years.

The breakdown below outlines the Bureau's remittance to the Exchequer by way of section 4(1) and section 4A of the PoC Act in the current and previous year.

Section 4(1) & 4A Breakdown

Description	No. of Cases 2024	€ 2024
Section 4(1)	2	318,843
Section 4A	30	2,798,794
Total	32	3,117,637
Description	**No. of Cases 2025**	**€ 2025**
Section 4(1)	18	611,241
Section 4A	21	2,863,004
Total	**39**	**3,474,245**

Case 1:
The Bureau commenced an investigation into a couple following a search by a local Drug Unit based in Donegal.

During the course of the investigation, significant social welfare issues were identified with an overpayment of €88,511.60 assessed.

The Bureau was successful in obtaining High Court orders, pursuant to section 3 and subsequently a section 4A consent order over approximately €63k held in a financial institution and the social welfare overpayment was paid in full.

This case shows the importance of the interagency approach used by the Bureau to achieve our statutory remit.

Proceeds of Crime and Related Matters Bill 2025

The Proceeds of Crime and Related Matters Bill 2025 comprises a substantial package of amendments intended to modernise and strengthen the State's civil non-conviction-based asset-recovery regime and the related statutory powers exercised by the Bureau.

The Bill follows an extended process of policy development and stakeholder engagement, including pre-legislative scrutiny of the General Scheme in 2024. It was approved by Cabinet for publication on the 8th July 2025 and completed Report and Final Stages in Dáil Éireann on the 17th December 2025. The Bill has proceeded to Seanad Éireann, where Second Stage will commence in 2026.

The Bill principally amends the PoC Act, while also making related amendments to the CAB Act and a number of related enactments. Its principal reforms include strengthened asset-detention and financial account restraint powers, revised provisions governing the appointment of receivers over property found by the High Court to constitute the proceeds of crime and a significant reduction in the period that must elapse before a final disposal order may be sought.

At present, an interlocutory order under the PoC Act must ordinarily have remained in force for seven years before the High Court may make a final disposal order under section 4. The Bill proposes to reduce that period to two years. It also amends section 4A to permit the making of a consent disposal order at any time while the interlocutory order remains in force, rather than only during the period before a contested disposal application becomes available under section 4.

The new powers provided for in this Bill will further enhance the Bureau in carrying out its statutory remit to deny and deprive criminals of their ill-gotten gains. These powers will strengthen the Bureau's ability to identify, preserve and recover suspected proceeds of crime and to prevent persons from continuing to enjoy or dissipate assets while investigations and proceedings are ongoing.

Section 6

Section 6 provides for the making of an order by the court during the period whilst a section 2(1) or 3(1) order is in force to vary the order for the purpose of allowing the respondent or any other party to:

1. Discharge of reasonable living or other necessary expenses; or
2. Carry on a business, trade, profession or other occupation relating to the property.

No such orders were made under section 6 of the PoC Act during 2025.

Section 7

Section 7 provides for the appointment, by the court, of a Receiver whose duties include either preserving the value of or disposing of property which is already frozen under section 2 or section 3 orders.

In 2025, the Bureau obtained receivership orders over one hundred and fifteen (115) assets. In every case the receiver appointed by the court was the Bureau Legal Officer.

These cases involved real estate, vehicles, designer goods, jewellery and watches. In some receivership cases, the High Court made orders for possession and sale by the Receiver. A receivership order cannot be made unless a section 2 or section 3 order is already in place.

In 2025, the Bureau Legal Officer continued to be appointed Receiver over rents of commercial properties to avoid the respondent from continuing to benefit from the proceeds of crime.

This provides another tool that assists the Bureau in carrying out its statutory remit.

What does success look like?

At its core, the value of the work by the Bureau is recognised by its strategy of "denying and depriving." The duality of the deny and deprive strategy recognises both quantifiable success and broader societal impact. The former is evidenced through the metrics presented throughout this report. The latter is reflected in wider societal indicators reflected in protecting communities, undermining the influence of organised crime, and making clear that criminal assets are not a badge of success but evidence of wrongdoing that the State can, and will, confront.

Statement of Receivership Accounts

	Euro€	Stg£	US$
Opening balance receivership accounts 01/01/2025	13,275,262.63	1.54	679,055.93
Amounts realised, inclusive of interest and operational advances	5,800,639.82	0.00	10,036.89
Payments out, inclusive of payments to Exchequer, operational receivership expenditure, discharge of outstanding mortgages and funds returned under Court Order	4,113,993.30	0.00	0.00
Closing balance receivership accounts 31/12/2025	14,961,909.15	1.54	689,092.82

Part Four
Asset Management within the Bureau

Asset Management Office

The Bureau established an Asset Management Office (AMO) for the specific internal management of assets under the control of the Bureau.

The diverse range of assets over which the Bureau has responsibility necessitates the deployment of considerable resources. Each asset is managed to maintain its value, to fulfil the Bureau's legal obligations and to ensure that optimum value is realised when remitted to the Exchequer.

The PoC Act requires that an asset (or its realised value) is retained for a seven-year period following the decision of the High Court (unless agreement is received from the parties involved for immediate disposal).

In practice, this period can be considerably longer due to appeals and challenges to such orders. In the case of certain assets, such as properties, this can involve ongoing resources to maintain the property, including in some instances, the Bureau acting as landlord.

In addition to tangible assets retained by the Bureau, there are also considerable assets in respect of outstanding liabilities to the Bureau under the Revenue and Social Welfare Acts.

These debts are also managed by the AMO with a view to realising their worth. This office provides a higher level of governance for assets under the control of the Bureau.

Assets managed by the Bureau

AMO is responsible for the management and control of assets seized by the Bureau pursuant to orders made under the PoC Act. The AMO assists the court appointed Receiver in carrying out his/her function under section 7 of the PoC Act.

The management, monitoring and control of an asset involves maintaining the asset from the time it is taken into the possession of the Bureau (by way of seizure or court order) and preserving the asset's value and condition until disposal.

In the case of real estate, the AMO is responsible for taking possession of, inspecting and securing the property on the date specified by the relevant court order.

The AMO arranges for the necessary works to be carried out i.e., maintenance, installation of intruder alarm, inspection of BER Certificate and valuation by an auctioneer.

AMO Disposal of Assets

In pursuit of the best value being achieved in the disposal of any asset, the Bureau utilises private sector industry experts to advise and dispose of assets by way of auction and / or private treaty sales.

It should be noted that whilst the Bureau seizes and disposes of assets that produce a net worth for the Exchequer, the Bureau's mission is to deny, deprive and disrupt criminals of their assets that were purchased from the proceeds of their criminal conduct.

The value realised in the disposal of these assets does not fully reflect the success of the Bureau in denying and depriving criminals of these assets. The Bureau's actions have a positive impact within the local communities where the assets of criminals have been targeted. The message and the positive impact on these communities, following the Bureau's actions, are equally, if not more important, than the sale of seized assets.

Online Auction

In December 2025, the Bureau held its third publicly advertised online auction which received global interest and contained one hundred and thirty-five (135) lots including luxury goods, watches, jewellery and designer goods.

All items auctioned were fully authenticated with the net proceeds being returned to the Exchequer. The Bureau realised in excess of €183k from the sale of seized assets at this auction.

Highlights from the auction included:

- A Krugerrand 1oz Gold Bullion Coin was sold and obtained a value of €3,700 at auction.

- 18 designer watches sold for €156,870 which included an Audemars Piquet 18ct Rose Gold Royal Oak watch achieving €38,020 and a Gold Gent's Rolex Watch achieving €21,060.

- 3 pieces of jewellery achieved €10,235 and included a yellow and white gold zirconia set chain selling for €7,070.

- 4 designer handbags realised a value of €4,650 with a Chanel wallet bag selling for €1,785 and a Louis Vuitton George's Bag selling for €1,010.

Property Sales

Due to the increase in staffing levels in the Criminal Assets Section, the Bureau has seen a significant increase in property sales. In 2025, the Bureau progressed and sold eighteen (18) properties nationwide which resulted in gross sales of €4.377m.

Case 1:

The Bureau commenced an investigation, following an intelligence led search operation in January 2019, conducted by the Garda National Drugs and Organised Crime Bureau at the home of a Moldovan couple living with their 3 children in Co. Louth.

The search resulted in the seizure of cannabis herb to the value of €950,000.

Information in the possession of Gardaí prior to the searches detailed how the individual had been identified as the leader of a transnational organised crime group consisting of Moldovan nationals residing in Ireland, Moldova and Spain involved in the smuggling of firearms and controlled drugs.

A report completed by a quantity surveyor on behalf of the Bureau identified that an overall spend of €1,093,775 was required to bring the property and lands to the standard it was at on the morning of the search having been originally purchased for €190,000 in 2014.

The Bureau secured High Court orders, pursuant to section 2, 7 and 4A of the POC Act over the following assets:

- Property located in Co. Louth
- Mercedez Benz E 220 CDI (valued at €65,000)
- €98,607.89 in financial institutions
- €5,000 cash

The property achieved a sale price of €649,000 at auction.

Master bathroom

Case 2:

The Bureau commenced an investigation into the assets and activities of an individual following receipt of a profile from a trained Divisional Asset Profiler attached to DMR South. The individual was known to have involvement in large-scale cannabis cultivation across the country.

Grow house

Following an extensive investigation, two properties and a parcel of land in Co. Leitrim were identified as having been purchased using proceeds derived from criminal activities.

The Bureau was successful in securing orders, pursuant to 2, 3, 7 and 4A of the PoC Act, over the properties. In 2025, the Bureau sold these properties for the sum of €257,000.

Case 3:
As a result of a referral from a trained Divisional Asset Profiler in the Dublin North region, the Bureau launched an investigation into a key member of one of two significant feuding transnational organised crime groups who had previously been arrested for armed robbery, tiger-kidnapping and murder.

The Bureau obtained orders pursuant to section 3, 7 and 4A of the PoC Act in respect of three assets namely a residential property in Dublin, a vehicle and a Rolex watch. The investigation led to the identification of a significant property in Dublin that was purchased in 2013 for €125,000.

The property was built circa 1970s and is a semi-detached two storey property. The report of the Quantity Surveyor concluded that the property was largely extended and refurbished with a new driveway, boundary walls and rear garden.

The property has three bedrooms, an ensuite and a bathroom on the first floor with stairs to a further bedroom and ensuite on the second-floor attic.

The Quantity Surveyor report also outlined that €440,894 (incl of VAT) had been spent on renovations to the property.

Following a High Court judgment, the Bureau took possession of the property in 2025.

The property was extensively damaged, which included the main staircase being removed and the kitchen units completely removed. The Bureau entered a Notice of Motion before the High Court in 2025 in respect of this damage and in November 2025, sold this property for €308,000.

An application was made pursuant to section 5 of the PoC Act for the respondents to *'make good the damage by reinstating'* (the property) *'and/or making payment'.* At the time of writing, the Bureau awaits the judgment of the High Court.

Front of house, after renovations

Case 4:
The Bureau commenced an investigation following the arrest of three key members of an organised crime group for the attempted robbery of cash being delivered to an ATM machine in the Co. Meath area. The Bureau made an application to the High Court under the PoC Act over two properties located in Dublin North.

The first property, located in Dublin North was purchased in 2005 for €360,000. Renovation work commenced in 2006 to include an extension to the rear of the property with garage, attic conversion and house extension. The property owners were involved in multiple criminal offences and their legitimate income did not support the acquisition of this property or its renovation.

The Bureau secured a High Court order over this property, pursuant to section 2 of PoC Act in 2020. The property owners appealed to the Court of Appeal and in 2024, the High Court dismissed the case. The property owners again appealed this decision to the Supreme Court in which the original judgment was upheld and a section 7 order was granted.


Rear of property

The Bureau took possession of the property and in 2025 sold the property, by way of auction, for €573,000.

Six months after the purchase of the first property, the second property was purchased for approx. €310,000. Whilst this property was part of the original proceeds of crime application, the property was subsequently removed as it was sold as part of a personal insolvency arrangement.

Case 5:
In 2006, the Bureau commenced an investigation into an individual residing in Co. Kilkenny wherein he operated a farm and haulage business. Resulting from the Bureau's investigation, this individual was subject to income tax assessments for the years 1992 through 2006 inclusive.

In 2009, the individual received a final demand from the Bureau which included tax and interest due. Due to the failure of payment by the individual, the Bureau sought and obtained judgment from the High Court in 2013 in respect of €4.9 million (tax & interest inclusive). The Bureau's investigation also identified a property in Dublin South and obtained a judgment mortgage against this property.

In the years that followed, the individual failed to pay his tax liability. To date, the Bureau has pursued the following enforcement measures to collect the tax due:

1. The Revenue Sheriff seized a herd, of 120 cattle from the individuals farm in Co. Kilkenny
2. Attachment orders were used to seize this individual's money held on account in several cattle marts in the Southeast of the country.
3. Funds in financial institutions, held in other people's names, were seized by way of Attachment orders.
4. Grants due to the individual from the Department of Agriculture, Food and Marine were seized by an attachment order.

The Bureau sold the property by auction in October 2025 to the value of €750,000. Enforcement actions are continuing against the individual in pursuance of his outstanding debt.

Front of house

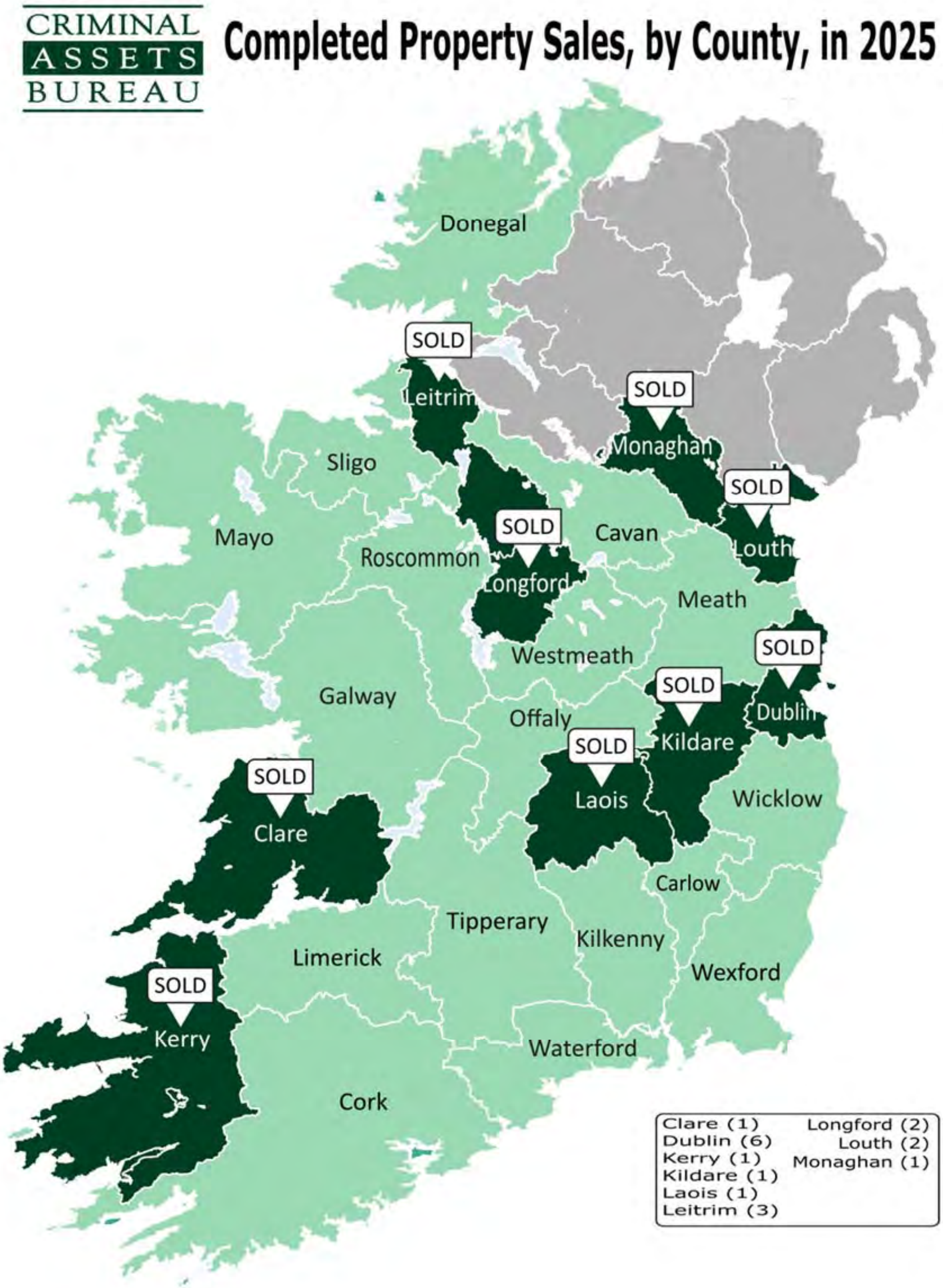
Case 6:
The Bureau commenced an investigation in August 2019, into an individual who was suspected of assisting her spouse as a driver in relation to his membership of an organised crime gang travelling the country committing burglaries.

The Bureau was successful in securing High Court orders pursuant to section 2 and section 3 of the PoC Act over the following assets:

- Property located in Portlaoise
- Volkswagen Golf
- 5 Designer Chanel Handbags valued at €13,700
- Cartier silver watch valued at €2,000
- Chanel quartz watch valued at €900
- 14 carat white gold bracelet valued at €1,900
- 14 carat white gold bracelet valued at €2,300
- 14 carat white gold bracelet valued at €2,500
- £6,900 Sterling Cash
- €700 Cash

The Bureau sold this property in 2025 and achieved a sale price of €91,000.

Front of house


CRIMINAL ASSETS BUREAU
Completed Property Sales, by County, in 2025
Donegal
SOLD
Leitrim
SOLD
Monaghan
Sligo
SOLD
Louth
Mayo
SOLD
Cavan
Roscommon
Longford
Meath
Westmeath
SOLD
SOLD
Dublin
Galway
Offaly
SOLD
Kildare
SOLD
Clare
Laois
Wicklow
Carlow
Tipperary
Kilkenny
Limerick
Wexford
SOLD
Kerry
Waterford
Cork
Clare (1)
Dublin (6)
Kerry (1)
Kildare (1)
Laois (1)
Leitrim (3)
Longford (2)
Louth (2)
Monaghan (1)

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Part Five
Revenue action by the Bureau

Overview

Revenue Bureau Officers (RBOs) are full time Revenue Officials seconded to the Bureau to carry out Revenue functions. RBOs perform duties in accordance with the Taxes Consolidation Act 1997, Value-Added Tax Consolidation Act 2010, Capital Acquisitions Tax Consolidation Act 2003, the Stamp Duties Consolidation Act 1999 and the Local Property Tax Act 2012 as amended (hereinafter referred to as the Tax Acts) to ensure that the proceeds of crime, or suspected crime, are subject to tax.

In carrying out this function, RBOs work collaboratively with our Bureau colleagues, to gather all available information to identify taxable income derived, or suspected to be derived, from unknown or unlawful sources in accordance with the Act.

RBOs raise tax assessments, issue tax demands and, with the support of the Bureau, utilise all enforcement tools available to collect on those tax assessments and deliver in line with the Bureau's strategic plan for 2024-2027.

RBOs work closely with their colleagues in the Office of the Revenue Commissioners. High risk cases of suspected tax evasion are referred to Revenue for further detailed investigation.

Tax Functions

The following is a summary of actions taken by the Bureau during 2025 and an update of the status of appeals made on foot of tax assessments and decisions made by the Bureau.

Tax Assessments

RBOs are empowered to make assessments under section 58 of the Taxes Consolidation Act 1997 (hereinafter referred to as the TCA 1997) - the charging section.

During 2025, a total of twenty five (25) individuals and corporate entities were assessed under the provisions of the Tax Acts. Total value of assessments issued amounted to €14.27 million.

Appeals to the Tax Appeals Commission

The Tax Appeals Commission (TAC) was established on 21st March 2016 as an independent statutory body, the main function of which is hearing, determining and disposing of appeals against assessments and decisions of the Bureau and the Revenue Commissioners concerning taxes and duties in accordance with relevant legislation.

During 2025, there was continued and ongoing engagement between the TAC and the Bureau on foot of tax assessments served.

The engagement resulted in the progression of a number of appeals, including legacy cases, which required the legal support of the Criminal Assets Section of the Chief State Solicitor's Office.

The Bureau continues to positively engage with the TAC with a view to progressing all open tax appeals.

During the course of 2025, one (1) appeal was dismissed by the TAC and a further two (2) were withdrawn by the appellants.

One (1) determination issued in favour of the Bureau. In this determination, the Appeals Commissioner, bound by prevailing legislation and guiding case law from the Superior courts, found that

- the burden of proof rests on the Appellant
- it is the Appellant who must satisfy the Commission at the threshold of the balance of probabilities,
- the assessment to tax made against them is incorrect.

The Commissioner, in her determination, cited the binding legal principal as that stated in the High Court case of *Menolly Homes Ltd v Appeal Commissioners and Anor. [2010] IEHC 49*.

Ultimately the Commissioner determined that the respondent was entitled to raise the Notices of Assessment and that the amounts raised, under the provisions of Section 949AK(1)(c) of the TCA 1997, in the Notice of Assessment shall stand.

As of 31st December 2025, there were fourteen (14) open appeals.

Update on 2024 Case:

2024 saw the Bureau contest a Judicial Review to its processes and the processes of the TAC in relation to the Burden of Proof.

The decision of the High Court was delivered on 30th July 2024 by Judge Alexander Owens and supported the Bureau's position that the burden of proof remained with the appellant in relation to an appeal to the TAC. This decision was subsequently appealed by the Plaintiffs to the Court of Appeal where, during 2025, the matter was heard and a ruling was made.

The ruling reinforced the position that the burden of proof does not shift from the Plaintiff in relation to the issue of residency. The determination in this case was ultimately in favour of the Bureau. The decision has been appealed by the plaintiffs to the Court of Appeal. The case was heard by the Court of Appeal and a ruling delivered in favour of the Bureau in 2025.

Collections

RBOs encourage compliance with tax debt, however, where no meaningful engagement is forthcoming, RBOs are empowered to take all necessary actions for the purpose of collecting tax liabilities when they become final and conclusive.

Throughout the year enforcement actions were undertaken with due regard to fairness, proportionality and taxpayers' rights ensuring adherence to statutory obligations and in line with the Bureau's Mission and Vision.

Enforcement actions include Notice of Attachment, appointment of sheriff and multiple legal recovery proceedings which resulted in the sale of assets and properties at auction.

Enforcement activity continued to be delivered in accordance with professional standards, underpinned by the TCA 1997 and established governance procedures.

Revenue Bureau Officers hold the powers of collection in the TCA 1997 as follows:

- The issue of demands – Section 960E TCA 1997
- Power of attachment – Section 1002 TCA 1997
- Sheriff action – Section 960L TCA 1997
- Civil proceedings – Section 960I TCA 1997

Recoveries

In 2025, the Bureau recovered tax from two hundred and seventy (270) individuals and corporate entities, through agreements, enforcement, court proceedings and other payments. The total amount collected is €10.796 million.

Demands

During 2025, tax demands (inclusive of interest) served in accordance with section 960E TCA 1997 in respect of forty (40) individuals and corporate entities amounted to €16.002 million.

Settlements

During the course of 2025, sixteen (16) individuals settled outstanding tax liabilities with the Bureau by way of agreement in the total sum of €2.941 million.

Investigations

Revenue continues to work with all the agencies in the Bureau to deny and deprive individuals the benefits of criminal conduct by using Revenue powers as prescribed in Section 5(1)(b) of the CAB Act.

Extensive efforts are made to collect all amounts assessed on the individuals subsequent to the individual having exhausted all lawful challenges to the assessments or assessing procedures.

During 2025, larger investigations into more complex case structures were conducted, the results of which will be seen during 2026.

RBOs apply the multi-disciplinary synergy central to the Bureau's methodology to support proceeds of crime actions by outlining the facts held on Revenue systems, disclosed correctly, as to the declared income, assets acquired or disposed of amongst other information.

Individuals subject to assessment to tax, under any tax type, are assessed based on the information available to the Bureau at the time the assessments are computed.

The assessed individuals have a right of appeal to pursue all lawful avenues open to challenge the assessments. This includes appealing to the TAC, subsequent appeal to the High Court on a point of law and further appeals to the Higher Courts.

It should also be noted that assessed individuals have the right to seek a judicial review through the High Court if they are of the opinion the correct process or procedure has not been applied.

The collection of amounts assessed may only commence when the appeal and review process are concluded and the tax is deemed final and conclusive.

To settle tax liabilities RBOs, in the first instance, negotiate settlements with targets of the Bureau throughout appeal and review process. If ultimately, the liability is not satisfied, the Bureau pursue tax debts using all available collection mechanisms, including Notice of Attachment, referral to the sheriff or solicitor enforcement through the courts. Solicitors initially secure the debt by obtaining a court judgment which opens a number of enforcement options. Post-judgment enforcement options include, but not limited to, registration of judgment mortgages against the debtor's interest in assets and forced sale of property without the individual's consent.

As mentioned in previous reports, there are many types of criminal conduct which include: Theft and Fraud, Money Laundering via the Used Car Trade and the Sale and Supply of Illegal Drugs. Revenue's authority to assess the ill-gotten gains of individuals to tax is provided for under section 58 TCA 1997:

*"**58.**-(1) Profits or gains shall be chargeable to tax notwithstanding that at the time an assessment to tax in respect of those profits or gains was made*

- *(a) The source from which those profits or gains arose was not known to the inspector,*
- *(b) The profits or gains were not known to the inspector to have arisen wholly or partly from a lawful source or activity, or*
- *(c) The profits or gains arose and were known to the inspector to have arisen from an unlawful source or activity.*

And any question whether those profits or gains arose wholly or partly from an unknown or unlawful source or activity shall be disregarded in determining the chargeability to tax of those profits or gains."

This legislation is applied prudently in computing assessments based on available facts and information.

Case 1:

An example of the ongoing professionalism and collaboration displayed by Bureau Officers arose in a case where tax assessments of €2.5m issued and final demands were served on an individual being investigated by the Bureau. This individual, accepted to the Bureau for suspected money laundering, was assessed over nine years and a tax liability raised for €2.5m.

The individual sought to enter agreements with the Bureau over the tax debt however they subsequently failed. RBOs used all enforcement mechanisms available to the Bureau including Sheriff enforcement under section 960L TCA 1997, Notice of Attachment under s1002 TCA 1997 and pursuit through the court under section 987 TCA 1997.

There are various possibilities for pursuit action through the courts, initiated first by securing a Court Judgment. In this case, Court Judgments were secured and registered over three folios which had a life span of 30 years. The court's permission was sought and granted to collect the debt by way of a "well charging order" or force sale.

A '*Notice to Quit*' was served in person by Garda Bureau Officers who exhibited the highest standards of security, professionalism, confidentiality and safety for all involved.

All proceeds received by the Bureau are deposited to the Bureau's Tax Receipts bank account and transferred to the Collector General's account of the Revenue Commissioners in the Central Bank for the benefit of the Exchequer. All collections received generally, and specific to this individual, have been brought to account in this manner.

Customs & Excise Functions

The Customs and Excise functions of the Bureau support all investigations by identifying any issues of relevance within the broad range of Customs related legislation, intelligence and operational support.

The Bureau exercises a variety of Customs powers and functions including passenger interceptions, import / export control and examination of goods, VRT enforcement, excise licence control and all associated detention and seizure provisions.

Serious and organised crime groups in every jurisdiction attempt to violate Customs regulations in their efforts to make substantial profits and evade EU and national controls.

These activities have a negative impact on society by depriving the Exchequer of funds and diverting those funds towards enrichment of criminal lifestyles.

Points of Entry / Exit in the State

Customs functions at ports and airports, in particular, support the Bureau's investigations into the cross – jurisdictional aspects of crime and criminal profits.

The Bureau uses all available powers to prevent the proceeds of crime, in any form, being moved by criminals through ports and airports.

Once again throughout 2025, a growing number of criminals and their associates were monitored and intercepted by, or on behalf of, the Bureau as they travelled through ports and airports.

Motor Trade

The Bureau continues to investigate the infiltration of the used-car trade by organised crime groups.

Throughout 2025, the Bureau conducted investigations into second hand car dealers operated by, or on behalf of, criminal groups. These interventions included conducting a number of inspections of specific outlets to enforce the provisions of both VRT and VAT legislation.

A number of breaches of VRT Regulations and abuse of VAT schemes pertaining to second hand vehicles have been identified and are being robustly addressed.

The used-car trade remains the subject of close cooperation between the Bureau, the Police Service of Northern Ireland (PSNI), His Majesty's Revenue & Customs (HMRC), the UK National Crime Agency (NCA), An Garda Síochána and the Revenue Commissioners.

Excise Duty

During 2025, an individual pleaded guilty to excise offences relating to a commercial consignment of tobacco seized during a Bureau search operation. A sentencing date will be set by the courts in Q1 2026.

Operational Support

The Bureau welcomed the operational assistance provided by specialist areas within Revenue's Customs Service throughout the year.

The Bureau would like to acknowledge, in particular, the support given by the Customs Dog Units throughout the year on thirteen (13) separate large search operations, each involving multiple search sites nationwide.

The expert service provided to the Bureau by the Disclosure Office of Revenue Customs Service is greatly appreciated.

His Majesty's Revenue & Customs (HMRC)

Fighting organised crime groups operating across jurisdictions requires close cooperation among competent authorities on both sides of the border.

The Bureau has a traditionally strong liaison with HMRC and, in particular, the HMRC Fiscal Crime Liaison Officer based at the British Embassy in Dublin. Regular and important exchange of criminal intelligence between the Bureau and HMRC continued during 2025 on a number of live investigations.

A number of meetings were held during the year between the Bureau and senior HMRC officials to discuss emerging cross border risks and to agree continued collaboration going forward. Every aspect of mutual assistance legislation, whether it be Customs to Customs or Police to Police, is utilised by the Bureau.

A revised Memorandum of Understanding between the Bureau and the HMRC has been fully agreed and signed by both agencies in 2025. This MoU will remain in place until 5th August 2028.

Signed copies of the memorandum of Understanding between the Bureau and HMRC

Revenue Tables

Table 1: Tax Summary Table

Tax Headings	2024 €M	2025 €M
Tax Assessed	7.2	14.27
Tax Demanded (Inclusive of Interest)	14	16.00
Tax Collected	13.4	10.80

Table 2: Tax Assessments

Tax Type	Tax €M 2024	Tax €M 2025	No. of Assessments 2024	No. of Assessments 2025
Income Tax	6.568	13.400	194	162
Capital Gains Tax (CGT)	0.045	0.113	1	6
Corporation Tax (CT)	0.012	0.010	1	5
PAYE/PRSI	0.034	0.000	2	0
Value Added Tax (VAT)	0.477	0.467	14	5
Capital Acquisition Tax (CAT)	0.112	0.246	10	9
Local Property Tax (LPT)	0	0.000	-	-
Relevant Contracts Tax	0.013	0.000	1	-
TWSS	0.008	0.000	1	-
Stamp Duty		0.034		7
Totals	**7.269**	**14.270**	**224**	**194**

Table 3: Tax, Interest and Penalties Collected

Tax Type	Tax €M 2024	Tax €M 2025
Income Tax	4.949	5.491
Capital Gains Tax (CGT)	0.075	0.214
Corporation Tax (CT)	0.376	0.323
PAYE / PRSI	0.414	0.426
Value Added Tax (VAT)	6.707	2.115
Capital Acquisition Tax (CAT)	0	1.424
Local Property Tax (LPT)	0.079	0.118
Customs & Excise	0.103	0.085
Vehicle Registration Tax (VRT)	0.344	0.340
Relevant Contract Tax (RCT)	0.301	0.260
Other	0.02	0.000
Totals	**13.368**	**10.796**

*In some cases, one receipt was receipted to cover multiple tax types.

Table 4: Tax and Interest Demanded

Tax Type	Tax €M		Interest €M		Total €M	
	2024	2025	2024	2025	2024	2025
Income Tax	6.7	6.478	6.434	6.115	13.134	12.59
CGT	-	0.01	-	0.024	-	0.034
CT	0.036	-	0.005	-	0.041	-
PAYE/PRSI	0.180	0.021	0.151	0.008	0.331	0.03
VAT	0.183	1.768	0.129	1.238	0.312	3.06
CAT	0.089	0.161	0.077	0.065	0.166	0.22
RCT	0.013	0.080	0.004	0.034	0.017	0.11
Stamp Duty	-	0	-	-	-	-
TWSS	0.008	-	-	-	-	-
Totals	**7.209**	**8.518**	**6.8**	**7.484**	**14.001**	**16.002**

*Some cases were assessed for multiple tax types.

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Part Six
Social Welfare actions by the Bureau

Overview
The role of Social Welfare Bureau Officers (SWBOs) is to take all necessary actions under the Social Welfare Consolidation Act 2005, pursuant to its functions as set out in section 5(1)(c) of the CAB Act.

In carrying out these functions, SWBOs investigate and determine entitlement to social welfare payments by those engaged in criminal activity. SWBOs are also empowered to recover monies as appropriate.

In 2025, SWBOs engaged in a number of investigations and actions that lead to Savings, Overpayment Assessments and Direct Recoveries with a total monetary value of €4,679,828.

Recoveries
SWBOs are empowered to recover overpayments from individuals. An overpayment is regarded as a debt to the Exchequer. The Bureau utilises a number of means by which to recover debts which include payments by way of lump sum and or instalment arrangement. SWBOs utilised a number of measures including the attachment powers granted to SWBOs by way of the Social Welfare (Miscellaneous Provisions) Act 2024.

As a result of actions by SWBOs, a total sum of €655,543 was returned to the Exchequer in 2025, exceeding the Performance Delivery Agreement target of €550,000.

Overpayments
The investigations conducted also resulted in the identification and assessment of overpayments against individuals as a result of fraudulent activity.

An overpayment is described as any payment being received by an individual over a period of time to which they had no entitlement or reduced entitlement and accordingly, any payments received in respect of those periods result in a debt to the Department of Social Protection.

During 2025, overpayments assessed and demanded amounted to €3,311,833 exceeding the Performance Delivery Agreement target of €3,000,000.

Savings
Following investigations conducted by SWBOs in 2025, total savings as a result of termination, cessation or reduction of payments to individuals, who were not entitled to payment, amounted to €712,452 exceeding the Performance Delivery Agreement target of €675,000.

Summary Table	2024 €	**2025 €**
Recoveries	566,219	655,543
Overpayments	3,708,809	3,311,833
Savings	776,549	712,452
Totals	5,051,577	**4,679,828**

Section 5(1)(c) & 5(1)(d) of the CAB Act 1996

Case 1:
Following a comprehensive review conducted by an SWBO, it was determined that an individual had fraudulently claimed social welfare benefits over an extended period.

The investigation found that the individual knowingly failed to declare multiple sources of income and assets while continuing to receive weekly payments to which they were not entitled and a Deciding Officer issued revised decisions.

As a result of the review, an overpayment in excess of €120,000 was formally assessed.

During the execution of a lawful search warrant at the individual's residence, authorities seized cash and vehicles obtained during the period of undeclared income.

Agreement was reached whereby the vehicles were sold at a Bureau auction and the proceeds of same were applied against the overpayment assessed.

In total over €100,000 was returned to the Exchequer by way of this agreement.

Case 2:
An individual had various means assessed payments dating back a significant period.

Searches conducted by local Gardaí resulted in cash and illegal drugs being found. A subsequent Bureau investigation discovered several undeclared bank accounts totalling amounts over six figures.

Following investigation and the lack of a credible explanation, a retrospective analysis of their now known income and circumstances for periods from 2018 to 2025 was examined. This analysis has resulted in overpayments in excess of €40,000 being assessed against this individual. Repayments have now begun with a view to recouping the monies.

Case 3:
The Bureau identified an individual as having been in receipt of means tested payments for a period of over 10 years. A Social Welfare investigation commenced and undeclared accounts with significant lodgements were discovered.

No explanation was provided regarding the accounts or the lodgements to them and following consideration, a Deciding Officer revised the decisions and disallowed the payments. An overpayment was assessed in excess of €280,000.

A further investigation was carried out by a Garda Bureau Officer and charges were brought under section 6 of the Criminal Justice (Theft and Fraud Offences) Act against this individual. A guilty plea was entered and a prison sentence totalling 6 years was imposed by the Judge with a period suspended.

Part Seven
Notable investigations of the Bureau

Introduction
The following cases provide an overview of the successful applications brought by the Bureau in 2025.

These cases demonstrate the variety of assets seized, the geographical spread of the targets and the crime types engaged in by these individuals.

2025 Investigations
Case 1:
The Bureau successfully targeted an individual who utilised the services of a Chinese organised crime group to launder money obtained from the sale and supply of encrypted phones known as *EncroChat* devices to various criminal factions within Ireland and via his involvement in drug trafficking.

The Bureau obtained orders pursuant to section 3 of the PoC Act over the following assets:

- Gent's Rolex Oyster Perpetual Datejust watch, valued at €9,100
- €3,060 cash
- 1oz Gold Krugerrand coin (valued at €2,000)
- Louis Vuitton Briefcase (valued at €2,000)
- 46 Electronic mobile devices

The Bureau also investigated this individual for tax and as a result, he was found to have a tax liability of €357,478.

The above demonstrates how the Bureau's multi-agency approach can successfully target and achieve its statutory remit to deny and deprive criminals of the proceeds of crime.

Case 2:
The Bureau, assisted by members attached to Ronanstown, Lucan and Newbridge Garda Stations, conducted an investigation into the assets and affairs of an individual and his family known to be connected to an organised crime group operating in West Dublin and Kildare.

The individual and another associate were involved in the sale and distribution of drugs in this area.

The Bureau successfully obtained High Court Orders pursuant to section 2, 3 and 7 of the PoC Act over the following assets:

- 3 high end vehicles
- 2 rings and a Rolex Jubilee Bracelet
- 3 Rolex Watches
- Modular home
- €6,885 Cash
- Bank Draft to the value of €11,900
- Assorted designer clothing and footwear (valued at €11,085)

In addition, further investigations carried out by Social Welfare Bureau Officers found that three individuals associated with this group had overpayments totalling €322,769. Since these assessments, all three individuals have had their social welfare payments terminated.

Case 3:

The Bureau launched an investigation into an organised crime group following contact with Gardaí attached to Killarney Garda Station targeting alleged money laundering activities.

Two members of this group were arrested in Australia for the offence of deceiving victims of over $1.1m Australian Dollars.

Previous investigations, carried out by Gardaí attached to Henry Street Garda Station, into an alleged “romance fraud” resulted in the detection of an elaborate fraud which deceived the victim of over €260k.

Following the Bureau’s investigation, High Court orders were obtained pursuant to Section 2 of the PoC Act over a property located in the South of Ireland

Case 4:

The Bureau previously carried out investigations into an individual in 2014 who was involved in cryptocurrency trading on the DarkNet.

At that time, the Bureau successfully obtained court orders over a number of assets which included a quantity of cryptocurrencies.

This case was reviewed by the Bureau in 2025 following developments in crypto asset tracing technology and the enhancement of skillsets within the Bureau.

The review resulted in further cryptocurrencies being identified as having been used in the purchase of a specific property.

The Bureau investigation was successful in securing further court orders over €235k in assets.

Case 5:
The Bureau commenced an investigation into a known criminal following a referral from Gardaí in Limerick who had, during a search operation, found €32,960 in cash concealed within a sock in a bedroom drawer. As a result of this investigation, the Bureau successfully obtained Orders under section 2 & 3 of the PoC Act over the €32,960 cash.

Case 6:
The Bureau targeted a principal member of an Eastern European organised crime group involved the theft of high end motor vehicles.

Resulting from this investigation, orders, pursuant to section 3 and 7 of the PoC Act, were obtained at the High Court over an industrial unit in West Dublin.

Case 7:
The Bureau undertook targeted actions against members of a family operating on behalf of a significant Midlands organised crime group. These individuals were involved in facilitating criminal activities, including the distribution of controlled drugs, money laundering and extortion.

The Bureau obtained orders, pursuant to section 2 and 3 of the PoC Act, over €101,100 in cash and the proceeds from the sale of two high end motor vehicles.

Case 8:
The Bureau targeted a group that had come under prior investigation by the Swedish authorities for fraud and money laundering offences.

The Bureau obtained High Court orders pursuant to section 4A of the PoC Act over the following assets:

- 3 properties
- €110,750.69 held in financial institutions
- The sum of €125,000

Case 9:
The Bureau commenced an investigation into an individual who resided in Co. Waterford.

This referral was made, by a Divisional Asset Profiler attached to the Limerick Division, following the discovery of a cannabis grow house in a business premises run by the individual in that area.

Following a lengthy investigation, the Bureau obtained High Court orders pursuant to section 2, 3, 7 and 4A over the below listed assets:

- Property located in Co. Waterford
- Cash totalling €4,230

The individual in this case was granted a stay on the execution of these orders for a period of 12 months. The Bureau took possession of the property in March 2026 and it is currently awaiting auction.

Case 10:
The Bureau conducted an investigation targeting a family based organised crime group who have significant involvement in the sale and supply of controlled drugs in Galway and surrounding counties.

Following a successful application to the High Court, the Bureau obtained orders pursuant to section 3 and 7 of the PoC Act over the following assets:

- €12,040 in cash
- Three motor vehicles
- Rolex watch

Part Eight
Significant Court Judgments during 2025

During 2025, written judgments were delivered by the courts in the following cases of note:

1. Criminal Assets Bureau –v- Cash
2. Criminal Assets Bureau –v- Nida Investments Limited
3. Criminal Assets Bureau –v- Routeback Media
4. Criminal Assets Bureau –v- Calvert & Ors

Criminal Assets Bureau –v- Mary Cash (Née Kiely)

Court of Appeal Record No. 2024/154

Court of Appeal– Delivered by Ms. Justice Butler on the 18th February 2025.

Neutral Citation: [2025] IECA 36

Summary

This judgment looks at the exercise of discretion by the High Court in making an order under section 7 of the Proceeds of Crime Act 1996, as amended ("the Act") appointing a receiver with full power of sale over the dwelling house - previously determined to be the proceeds of crime - in which the appellant and her three infant children resided at the time the order was made.

The decision of the High Court determining that the dwelling house constituted the proceeds of crime was previously upheld on appeal *(Noonan J. [2024] IECA 13*). The issues raised on this appeal are very net insofar as the appellant focuses on the High Court's treatment of two aspects of the case made on her behalf, namely

a. the likelihood her family would be rendered homeless if the dwelling house were sold, and;
b. an undertaking she offered to insure the property if orders were not made.

She contends that in considering these matters, the High Court failed to engage appropriately with the equitable principles originally set out by Feeney J. in *Murphy v. J. G [2008] IEHC 33* and adopted by Baker J. on behalf of the Court of Appeal in *CAB v. Dean Russell [2020] IECA 61* ("Dean Russell principles").

In addition, the Criminal Asset Bureau (the Bureau) argued that the appeal is moot because, in circumstances where the appellant was unable to secure a stay on the High Court order, she had vacated the dwelling house pursuant to that order by the time the appeal was heard.

Held:

Dealing with the last issue first, the Court of Appeal did not find favour with the Bureau's argument regarding the issue of mootness. The appellant in this case acted in compliance with a High Court order in respect of which she was unable to secure a stay notwithstanding that she had appealed the order within time.

The court held that an appellant cannot lose the right to prosecute an appeal because of a change in her circumstances brought about by compliance with the order the subject of the appeal. To so hold would be to unfairly deprive the appellant of the practical benefit of the right to appeal to this court conferred on her by Article 34.4.1 of the Constitution.

The court held that the principles underpinning the making of receivership order are equitable in nature citing the aforementioned case of *Dean Russell* which in turn relied on the statement of Feeney J. at page 13 of his judgement in Murphy v. J.G:-

> *"Firstly, it is the case that a receiver under Section 7 can only be appointed in circumstances where an Interim or Interlocutory Order under the Proceeds of Crime Act 1996 has been made.*
>
> *Therefore, at the time that the Court comes to consider the appointment of a receiver, there will be in existence an Interim or Interlocutory Order whereby the High Court will have come to an earlier conclusion that the specified property constitutes directly or indirectly the proceeds of crime.*
>
> *That earlier conclusion is a necessary prerequisite to the application of Section 7 and is the context within which the appointment of a receiver must be considered.*
>
> *Secondly, it is clear that an application to appoint a receiver under Section 7 requires to be considered on equitable principles.*
>
> *Thirdly, the purpose of a receivership is to preserve the property over which the receiver is appointed for the benefit of the party ultimately found to be entitled to it. The appointment of a receiver is not a penalty but rather a mechanism to endeavour to ensure that property is preserved.*
>
> *Fourthly, the use of the word 'preservation' is not the use of a precise term but covers a number of different and varying circumstances but unquestionably covers the necessity to ensure that property is properly and validly insured.*
>
> *Fifthly, in considering the application of equitable principles, the issue of delay, if any, inconvenience and occupation by a family or a family member are factors to take into account.*
>
> *Sixthly, a further factor a [sic] take into account in applying the equitable principles is the existence of pending proceedings seeking to discharge or vary a section 3 Order and the timing and circumstances of such application.*
>
> *Seventhly, the handing up of possession or use of lands and/or houses after the making of a Section 3 Order or when a Section 4 Order is pending is relevant.*
>
> *Finally, a factor to take into account is consideration as to whether the appointment of a receiver is appropriate or inappropriate."*

In holding that the High Court had not erred in law in its applications of the Dean Russell Principles, the court emphasized the equitable nature of those principles but stated that they do not constitute a check-list which a trial judge must reference in order to demonstrate that he has considered them. The court went on to say at para 41.

> *The existence of these factors alone is unlikely to be sufficiently persuasive in most cases to justify refusal of relief under section 7 once it has been determined that the assets in question are the proceeds of crime*

The court noted that the trial judge had in fact, expressed considerable sympathy for the Appellant's plight on account of her family circumstances.

Regarding the issue of the trial court's disregard of the Appellant's proposed undertaking to insure the property, the court stated that the absence of insurance may be a decisive factor leading to the making of the order, however, the presence of valid insurance does not necessarily prevent an order for possession from being granted.

While noting the proposed undertaking the court noted that there was credible evidence before the trial court that such insurance was unlikely to be secured since the section 3 order was granted.

The court further noted that it was for the appellant to adduce evidence both of the difficulties that she has encountered in sourcing alternative accommodation and to provide substance to the undertaking to secure a policy of insurance over the property.

Accordingly, in an unanimous judgment, the court held that there was no error on the part of the trial judge and dismissed the appeal.

Criminal Assets Bureau v. Nida Investments Limited

Appeal No. 2025/21

Court of Appeal (ex tempore) judgment delivered by Ms. Justice Butler on 29th May 2025.

Neutral Citation: [2025] IECA 132

Summary
The Bureau took High Court proceedings seeking, *inter alia*, orders pursuant to section 3 of the PoC Act against the commercial property and balance in the bank account of the Respondent Company and judgement was delivered in the Bureau's favour on the 18th December 2024.

In the High Court proceedings, the Respondent Company was successively represented by two firms of solicitors. The first applied to come off record due to a breakdown in the relationship of trust and confidence due to the request by the Respondent to file an affidavit which the solicitor believed would amount to an abuse of process. In hearing the motion to come off record the High Court in insisting that company could only be represented by a solicitor stated:

"If the company wants to be represented it's the company's problem and the shareholders of the company are simply going to have to put money into the company to engage a solicitor, that's their option. If they don't put in money to engage a solicitor that's tough luck."

The Respondent then engaged a second firm of solicitors. However relations subsequently also broke down and on the 27th November 2024, the second solicitor indicated that he was going to move to come off record.

The High Court permitted that application to be made on the 18th December but indicated that the substantive matter was to be heard on the same date. On that date, the court was informed by counsel for the Bureau that an email had been received that morning from the second solicitor which was received by Ms. Agnes Kahn, the sole director and shareholder of the Respondent company stating:

> "*We write to confirm despite the greatest efforts of the legal advisers presently involved for Nida Investments Ltd, there has been an irretrievable breakdown in their professional relationship for a varied [sic] of reasons which would be prejudicial to elaborate upon. This has been flagged with the Respondents whom we are instructed will proceed as lay litigants in the ongoing proceedings.*"

It was not disputed that the company director received this email but she did not attend on that date whereupon the high court permitted the second solicitor to come off record and, as previously indicated, proceeded with the substantive hearing and ultimately determined that the subject property was the proceeds of crime pursuant to section 3 of the POC Acts. Ms. Kahn indicated that she wished to appeal this determination.

In the unanimous *ex tempore* Judgment, the Appeal Court held:

i. In accordance with the principles set out by the Supreme Court in *AIB v. Aqua Fresh Fish [2019] 1 IR 517,* there are only limited exceptions to the rule that a company must be represented by a solicitor and the current appellant does not come within those exceptions.
ii. A lack of funds on the part of the Respondent Company does not constitute a valid exception.
iii. There was no manifest injustice in applying the general rule.
iv. It follows that there is nobody in court to advance the appeal even if it were accepted to be validly before the court.

In line with the foregoing, the court dismissed the appeal and the motion to admit new evidence was struck out with costs awarded against the Respondents.

The Criminal Assets Bureau – v- Routeback Media, trading as Local Mart, and Harry Zeman

Supreme Court Record No. S:AP:IE:2024:000089

Supreme Court written judgment delivered by Mr. Justice Charleton on 15th July 2025.

Neutral Citation: [2025] IESC 34

Summary

The background to the appeal involves proceedings initiated by the Bureau in January 2009 under the POC Act against Routeback Media AB - a Swedish company and its director Harry Zeman, alleging that over $651,000 held in an Irish bank account represented the proceeds of a fraudulent online email account scheme.

A section 2 interim freezing order under the said Act was made in 2006, followed by a section 3(1) interlocutory freezing order in 2011. The Respondents were absent from the section 3 hearing. The High Court accepted the Bureau's evidence linking Routeback to a high-volume of unverifiable transactions and fraudulent activity. No appeal was lodged to the section 3 order at the time.

In 2018, seven years having passed, the Bureau sought a final section 4 disposal order, leading to renewed opposition from Harry Zeman, including claims of procedural unfairness and new affidavit evidence.

In May 2019, the High Court allowed the section 4 process to continue but rejected attempts to revisit the section 3(1) decision which had not been appealed.

Ultimately, a final disposal order was made in May 2022. Harry Zeman's appeal to the Court of Appeal was struck out in 2022 but leave to appeal to the Supreme Court was granted.

Issues in contention
The issues which arose on this appeal include:

i. the interaction between a freezing order section 3(1) and a review application under section 3(3) particularly where a threshold must be met to challenge or vary the existing order;
ii. the relationship between the section 3 orders and the final disposal order in the section 4 including whether grounds not raised under section 3(1) or section 3(3) can be raised at the section 4 disposal stage;
iii. the Respondent's entitlement, if any, to cross-examine evidence presented in support of the section 3(1) order and section 4 applications;
iv. where the right to cross-examine is a general procedural right under the Rules of the Superior Courts or a more limited right;
v. the extent to which a judge is obliged to assist or advise an unrepresented Respondent in navigating such proceedings.

Held:
In granting the appeal, Charlton J. sets out that the POC Act establishes two distinct but interdependent phases for the disposal of criminal acquired property. These are that the initial section 3 application to freeze property for seven years and a subsequent section 4 application of the disposal or vesting of the assets.

The standard principles of bringing all actions and relevant evidence forward for decision in judicial proceedings exemplified by *Henderson v Henderson (1843) 3 Hare 100*, or the rules regarding the admission of new evidence on appeal as set out in *Murphy v. Minister for Defence [1991] 2 IR 161*, cannot be directly applied to the second section 4 hearing.

However, the POC Act must be interpreted in a way which ensures efficiency and avoids repetition of issues, avoiding relitigating matters which have already been decided at the section 3 stage during the section 4 disposal hearing. Section 3 is the appropriate time for a Respondent to contest the freezing of their property, since this is the final order.

Whilst section 2 and section 3 orders resemble interim and interlocutory relief in chancery proceedings, a section 3 order, despite being labelled as interlocutory, is a final determination that the property is the proceeds of crime. Therefore, the Respondents must raise all relevant arguments and evidence at the section 3 hearing, as they are not permitted to revisit those issues at the section 4 stage.

In addition, Charleton J outlines that belief evidence is central to section 3(1), but that under the statutory scheme, it is only admissible under section 2 and section 3, but not at the final disposal stage under section 4. In the latter case, the court need only be satisfied that a valid s 3(1) order has been made at least seven years prior, and that no serious risk of injustice arises.

Belief evidence which can be admitted under the section 3 stage, if determined to be reasonably grounded, has the effect of reversing the burden of proof on the Respondent. The Respondent must then demonstrate, on the balance of probabilities, that the property is not the proceeds of crime. If this burden is not discharged, then the only task of the court is to determine whether a serious risk of injustice will arise if the order is made.

Section 3(3) permits a person affected by a section 3(1) order to apply to vary or discharge it. This application can be made at any time up until the final disposal order is granted and is another opportunity – outside of appeal - for a person to produce evidence that indicates that the property is not the proceeds of crime, that may convince a judge that the section 3 order should not have been made.

The appropriate threshold for contest is that evidence should be credible and bring new factual focus to the section 3 order, or that the section 4 order should not be made because the property is demonstrated not be the proceeds of crime, or because it is unjust to make the order.

In either a section 3 or section 4 application, an unjust order should not be made.

Regarding the issue of cross-examination, Charleton J highlights that there is no automatic right to examine deponents save for the Chief Bureau Officer or ‘member’ as set out under the Act in respect of their belief evidence pursuant to section 8. Given that belief evidence is not admissible at section 4 stage, no automatic entitlement to cross examine is permissible at that stage.

With regard to all other deponents, leave of the court must be obtained and it is limited to instances where there is new evidence (in the case of section 3(3) and a contest of fact arises which necessitates it.

With regard to the final issue, Charleton J clarifies that it is not the task of the trial judge dealing with lay litigants to guide them through every procedure; much less to advise them as to the prudent course. However, it is the duty of a judge to ensure that an unrepresented litigant is not taken advantage of.

Criminal Assets Bureau –v- Dermot Calvert, Martina Harty and Stacey Calvert

Court of Appeal Record No. 2025/64

Court of Appeal– Delivered by Mr. Justice Allen on the 15th September 2025.

Neutral Citation: [2025] IECA 188

Summary

This judgment deals with two appeals against section 3 (interlocutory) and section 7 (receivership) orders consequential upon the judgment of High Court (Owens J.) dated the 15th January 2025 [2025] IEHC 73. The orders relate to five items of property, a house and apartment on a corner site at Singland Crescent, Garryowen, Limerick (Singland Crescent). The second is a former shop at Cloughan Court, Garryowen (Cloughan Court) which is in the course of being converted into a residence. Two separate cash seizures, and a 171 D VW Passat motor car.

The High Court had determined that all of the property was, in whole or in part, the proceeds of crime. However, noting the special circumstances of the case, the Bureau was allowing Ms. Calvert and her children to continue to reside at the Singland Crescent property rent free for seven years; and declared that Ms. Calvert should have an equitable lien over that property for 20% of the proceeds of the eventual sale of that property. The effect of the order is that Mr. Calvert and Ms. Harty will be able to continue to live in the apartment until the entire property is sold.

By a second ex tempore judgment, the High Court appointed the Bureau Legal Officer as receiver over the Cloughan Court property, with power to sell it. Given that this order was also the subject of an appeal, the receiver undertook not to sell it pending its determination.

The first appeal was by Mr. Calvert and Ms. Harty in relation to Cloughan Court only on the sole ground that the Bureau had not satisfied the standard of proof required by section 8(2) of the POC Act in determining the property the proceeds of crime.

By the second notice of appeal filed on 11th April 2025 (2025/93) Mr. Calvert and Ms. Harty appealed against the judgment and order of 19th February 2025.

Again there is a single ground of appeal, which is that in acceding to the Bureau's application for the appointment of a receiver over the Cloughan Court property, the High Court judge erred in failing to consider the equitable principles set out in *Criminal Assets Bureau v. Russell [2020] IECA 61*.

Held:
Dealing with the substantive appeal first, the Appeal Court held from para 47

47. *The appellants simply did not engage with the judge's finding (para. 43) that they had no track record of legitimate earnings which could have accounted for the accumulation of cash and (para. 56) that the circumstances in which the bundles of cash had been found – wrapped in plastic and concealed behind the kickboard in the kitchen of the apartment – strongly indicated that the cash came from the proceeds of illicit drug sales.*

The judge had addressed (paras. 57 to 59) the explanations which Ms. Harty had offered at the time of the seizure and rejected them as vague, unsupported by any credible evidence, and inconsistent with the pattern of lodgements and withdrawals on Ms. Harty's bank account. Part of that explanation was that in 2015 Ms. Harty had received a sum of €20,000 inclusive of legal costs in settlement of a compensation case.

That was rejected by the judge for the reason that her bank account showed that by the time the cash was found in 2019, any compensation which she received in 2015 was long spent. There was no suggestion that the judge erred in that conclusion.

48. *As to the €5,860 seized on 4th June, 2021, the appellants' written submissions recalled that Ms. Harty had sworn that in November, 2019 she and Mr. Calvert had each received €5,500 from AXA insurance company following a road traffic accident. So she had, and the judge had addressed this explanation at paras. 66 to 69.*

The evidence was that the three compensation cheques – one each for Mr. Calvert, Ms. Harty and Ms. Calvert – had been lodged to Ms. Calvert's bank account on 8th November, 2019 and that on 13th November, 2019 she had withdrawn sums of €5,000 and €10,000. The apartment at Singland Crescent was searched five times between November, 2019 and June, 2020 and no cash was found. It was searched again on 2nd July, 2020 when a sum of €5,370 was found, but returned to Ms. Harty when she produced a letter from AXA in respect of her claim.

When the apartment was searched again on 21st April, 2021, no cash was found. The judge found that it was inherently improbable that Ms. Harty had kept €5,500 in cash in her apartment from 13th November, 2019 until 4th June, 2021. At para. 13, the appellants' written submissions noted that the judge, at para. 57, found that the explanations offered by Ms. Harty for the provenance of the cash lacked reality. It was not suggested that he was wrong.

49. *At para. 16 the appellants' submissions moved on to the affidavits of Mr. Calvert which were filed in response to the application. The focus of the submissions – such as it was – was on what Mr. Calvert had said, rather than on the evidence tendered on behalf of the Bureau and the judge's analysis of all of the evidence, including his analysis and rejection of Mr. Calvert's assertions as to the provenance of the money.*

50. *Mr. Calvert, in his affidavit filed on 26th February, 2024, deposed that he had received personal injury awards of €12,545 in November, 2014; €8,202 in February, 2017; and €5,500 in November, 2019. The Bureau had already established this. He said that he paid a booking deposit of €3,000 to purchase the Cloughan Court property and the balance of €10,000 with a credit union loan. The Bureau had already established this: and that the credit union loan was back-to-back with his share account, from which it was evident that he did not need the loan to complete the purchase.*

51. *The submissions recalled that Detective Garda Davis had deposed that much of the repayment of the loan was by cash from an unknown source and that Mr. Calvert had sworn that the repayments were funded by savings from his social welfare payments and the children's allowances in respect of his fifteen children. At para. 21 it was recalled that the judge found that his various awards had been dissipated through point-of-sale transactions and various withdrawals that were gradual in nature, and it was said that this finding was the subject of the appeal.*

52. *As the High Court judgment shows, Detective Garda Davis, besides establishing the fact of the compensation payments, had traced them into an AIB account in the name of Mr. Calvert; a credit union account in the name of Mr. Calvert; and an AIB account in the name of Ms. Calvert.*

He had exhibited a print out of Mr. Calvert's credit union loan account and shares account from 1st June, 1998 to 19th March, 2021 and a print out of his AIB account from 8th April, 2013 to 21st June, 2021; as well as a print out of Ms. Calvert's account, which showed the lodgement of the AXA compensation cheques and the immediate withdrawal of the proceeds. The appellants' submissions did not address the statements of account nor – save to baldly contest it – the judge's finding.

53. *The judge found (at para. 106) – and the AIB statement clearly showed – that the €12,545 was lodged to Mr. Calvert's AIB account on 31st March, 2014 and that €12,400 was withdrawn two days later. As the judge found, there was no evidence of what Mr. Calvert did*

with this money but whatever he did with it, he did not lodge into his credit union account. Garda Davis's evidence was – and Mr. Calvert did not contest it – that the deposit on Cloughan Court had been paid by a bank draft bought for cash in July, 2015 and it was common case that the balance of €10,000 was paid using a credit union loan.

The judge found (para. 108) that there was no evidence that the compensation payments of €8,202 which Mr. Calvert received in 2017 or the €5,500 he received in 2019 were used to pay for the work at Cloughan Court. It was not said that the judge was wrong in so finding. Even if – for the sake of argument – those payments had been so used, the total of €15,702 was well short of what the judge found was the likely cost of the work at Cloughan Court alone: never mind the work at Singland Crescent.

54. The appellants' submissions (para. 19) recalled that the Bureau had estimated the cost of the refurbishment works at Cloughan Court at €48,305; that Mr. Calvert had deposed that the cost was in the region of €12,000; and that the judge had found that the likely cost was somewhere in the middle: something, he said, in the order of €25,000. There was no suggestion of error in this finding. It was recalled that the judge found that there were no legitimate sources of income to fund the renovation of the house at Singland Crescent or the construction of the apartment, or the conversion of the Cloughan Court property into a residence. Again, there was no suggestion of error in this finding.

55. At para. 20 it was recalled that the Bureau had submitted to the High Court – and at para. 21 that the High Court had found – that the personal injury awards received by Mr. Calvert and Ms. Harty had been dissipated through point-of-sale transactions and various withdrawals which were gradual in nature.

It was not suggested that either the Bureau's submission or the judge's findings were wrong. All that was said was that "At no time did either respondent aver that the monies seized were the exact monies received in the said awards but that these sums had allowed them, along with social welfare and odd jobs to save the said sums and to purchase Cloughan Court. These sums came from legitimate sources."

56. This does not accurately reflect the evidence.

57. The evidence was that in interview on 22nd June, 2019 Mr. Calvert and Ms. Harty both told Garda O'Grady that the €17,145 and stg.£30 was Ms. Harty's money. Specifically, Mr. Calvert told Garda O'Grady that none of the money was his. That was the case made by Ms.

Harty in her replying affidavit in which she attempted to account for it in part as the proceeds of an insurance payout in 2015.

58. *In interview on 4th June, 2021 Ms. Harty told the Gardaí that the €5,860 then seized had come from money which she had received from AXA insurance in November, 2019. That was what she swore to in her replying affidavit filed on 3rd April, 2024 in which she deposed – as the Bureau had already established – that the AXA monies had been lodged to the AIB account and almost immediately withdrawn in cash. Ms. Harty's evidence was that "… the said cash was held by us at our residence."*

About five weeks previously, in his affidavit filed on 26th February, 2024 Mr. Calvert had sworn that the €5,860 which was seized on 4th June, 2021 "… was surplus funds from <u>my</u> insurance claims received previously." (Emphasis added.) Ms. Harty's evidence that the €5,860 could be accounted for as the proceeds of <u>her</u> AXA payment was obviously inconsistent with Mr. Calvert's evidence that it was the proceeds of his AXA payout but the point, for present purposes, is that they both sought to make the case that the money had been derived directly from AXA. Separately, in affidavits filed in this Court in connection with their legal aid application, Mr. Calvert and Ms. Harty both referred to the money which was seized on 4th June, 2021 as money which <u>they</u> had saved and from personal injury payouts which <u>they</u> had received.

59. *The appellants did not attempt to engage with any of this. There is no challenge to the judge's finding that Mr. Calvert was an established drug dealer who was in receipt of substantial cash from that activity for a number of years. The appellants' submissions merely recall their explanations and evidence without attempting to engage with the reasons for which the judge rejected them. Contrary to their submissions on the appeal, the appellants did make the case that the money seized was the proceeds of their insurance claims.*

60. *Counsel for the appellants sought to make much of the absence of any evidence of a lavish lifestyle. It is true that in this case there was no evidence of very expensive cars or watches or the like; and, by the way, that the judge was sceptical of the figures used in Bureau's forensic accountant's lifestyle analysis. However, the evidence clearly demonstrated the acquisition of assets which could not be accounted for by legitimate sources.*

61. *As to the acquisition and refurbishment of the properties, there was never any suggestion that Ms. Harty had made any contribution to the cost. The issue as to the true cost of the acquisition of those properties was resolved in*

> *favour of the appellants. There was no challenge to the judge's assessment of the likely cost of the refurbishment. Leaving aside Ms. Calvert's money, the total expenditure in connection with Singland Crescent was significantly in excess of €100,000 and the total expenditure in connection with Cloughan Court was something in the order of €38,000 plus costs of acquisition.*
>
> *This expenditure was all in cash – airgead tirim – and was all borne by Mr. Calvert. The judge carefully examined Mr. Calvert's assertions that the wherewithal came from insurance payouts, odd jobs, Tommo jobs, scams and from skimming the children's allowances and – for the reasons given – rejected them. The appellants' bald assertion that "these sums came from legitimate sources" does not even put a dent in the judgment.*

In respect of the appeal of the receivership order over Cloughan Court, the court noted that the evidence – by reference to the current living arrangements, its dimensions and how many bedrooms it may have, - does not support the submission that the Cloughan Court property was the intended family home of the appellants and Ms. Harty's children. Indeed the court found that the objective fact of the matter is that the property is incomplete and unfit for occupation as a residence. There is no evidence as to how much it would likely cost to finish it but also noted the lack of any legitimate income that the Appellants had to so do.

The court in noting that the burden lay on the appellants in establishing an error in the findings of the High Court, determined that they had not so met that burden.

Accordingly, in an unanimous judgment, the court held that there was no error on the part of the trial judge and dismissed the appeal.

Part Nine
National and International developments

The International Perspective
As a front line agency in the fight against criminality, the Bureau's capacity to carry out this function is, to a large degree, based on its inter-agency and multi-disciplinary approach, supported by a unique set of legal principles. The Bureau continues to play an important role in the context of law enforcement at an international level.

Asset Recovery Office (ARO)
The Bureau is the designated Asset Recovery Office (ARO) in Ireland. Following a European Council Decision in 2007, Asset Recovery Offices were established throughout the European Union to allow for the exchange of intelligence between law enforcement agencies involved in the investigation, identification and confiscation of assets deemed to be the proceeds of criminal conduct.

As part of its commitment as an Asset Recovery Office, the Bureau actively participated in the ARO Network in 2025. The Bureau Legal Officer Kevin McMeel and Detective Inspector Barry Butler attended two (2) ARO meetings in Brussels in March and remotely in December 2025.

During 2025, the Bureau received one hundred and thirty two (132) requests for assistance. The Bureau was able to provide information in respect of all these requests. The requests were received from twenty one (21) countries worldwide.

During 2025, the Bureau further utilised this network and sent twenty three (23) requests to seven (7) different countries worldwide compared to thirty three (33) requests to seventeen (17) countries during 2024.

International Operations
From an operational perspective, the Bureau continues to be involved in a number of international operations. The Bureau’s engagement in such operations can vary depending on the circumstances of the case. It may include providing ongoing intelligence in order to assist an investigation in another jurisdiction.

More frequently, it will entail taking an active role in tracking and tracing individual criminal targets and their assets in conjunction with similar agencies in other jurisdictions.

Europol
Europol acts to support its Member States in preventing and combating all forms of serious, international and organised crime. During 2025, the Bureau continued to work with Europol on a number of live investigations.

Interpol

Interpol is an agency comprised of the membership of police organisations in one hundred and ninety six (196) countries worldwide. The agency's primary function is to facilitate domestic investigations which transcend national and international borders. The Bureau has utilised this agency in a number of investigations conducted in 2025.

CARIN

In 2002, the Bureau and Europol co-hosted a conference in Dublin at the Camden Court Hotel. The participants were drawn from law enforcement and judicial practitioners.

The objective of the conference was to present recommendations dealing with the subject of identifying, tracing and seizing the profits of crime.

One of the recommendations arising in the workshops was to look at the establishment of an informal network of contacts and a co-operative group in the area of criminal asset identification and recovery. The Camden Assets Recovery Inter-Agency Network (CARIN) was established as a result.

The aim of CARIN is to enhance the effectiveness of efforts in depriving criminals of their illicit profits.

The official launch of the CARIN Network of Asset Recovery agencies took place during the CARIN Establishment Congress in The Hague, in September 2004.

The CARIN permanent secretariat is based in Europol headquarters at The Hague. The organisation is governed by a Steering Committee of nine members and a rotating Presidency.

During 2025, the Bureau actively participated in the CARIN Network.

The Bureau Legal Officer, Mr Kevin McMeel, attended the CARIN Steering Group Meeting in the Camden Court Hotel on the 18th June 2025 wherein he met representatives from the Steering Committee countries.

The Annual General Meeting was hosted by the United Kingdom and took place at Europol in The Hague, The Netherlands from 29th – 31st October 2025 and was attended by the Chief Bureau Officer Michael Gubbins and Detective Inspector Barry Butler.

Anti-Money Laundering Steering Committee (AMLSC)

During the course of 2025, the Bureau participated in the Anti-Money Laundering Steering Committee on six (6) occasions. The purpose of the AMLSC is to provide a national cross sectoral forum for the oversight and active review of Ireland's AML/CFT framework.

European Anti-Financial Crime Summit

The Chief Bureau Officer, Michael Gubbins, was delighted to attend the European Anti-Financial Crime Summit 2025 at the RDS Dublin on the 7th May 2025. The 2025 Summit brought together senior decision makers and law enforcement for focused conversation on how challenges are addressed.

The Institute of International and European Affairs (IIEA)

Michael Gubbins, Chief Bureau Officer was delighted to accept an invitation to attend a private lunch at the Institute of International and European Affairs (IIEA) on the 12th June 2025.

Keynote speakers, including the Attorney General Rossa Fanning, gave presentations that offered valuable insights and led key discussions on key developments within the justice system.

Relationship with External Law Enforcement Agencies

The Bureau continues to enjoy strong co-operation with its international law enforcement partners.

The UK being the only country with which Ireland shares a land frontier is of particular significance. The Bureau therefore continues to develop and strengthen the relationship between it and UK law enforcement agencies.

Cross Border Joint Agency Task Force (JATF)

The establishment of the Cross Border Joint Agency Task Force was a commitment of the Irish and British Governments in the 2015 Fresh Start Agreement and the Task Force has been operational since early 2016.

This Joint Agency Task Force consists of a Strategic Oversight Group which identifies and manages the strategic priorities for combatting cross-jurisdictional organised crime and an Operations Coordination Group which coordinates joint operations and directs the necessary multi-agency resources for those operations.

The Cross Border Joint Agency Task Force brings together the relevant law enforcement agencies in both jurisdictions to better coordinate strategic and operational actions against cross border organised crime groups.

The Task Force comprises Senior Officers from An Garda Síochána, Police Service of Northern Ireland, Revenue Customs, His Majesty's Revenue and Customs, the Bureau and the National Crime Agency (who have the primary role in criminal assets recovery in the United Kingdom).

CROSS BORDER
JOINT AGENCY
TASK FORCE

On occasion, other appropriate law enforcement services are included, (such as environmental protection agencies and immigration services) when required by the operations of the Task Force.

The Bureau participated in two (2) operational meetings in April and October 2025 in relation to the Joint Agency Task Force.

The Bureau provided reports to the Operations Coordination Group on the status of the relevant investigations in advance of both meetings and is involved in a number of investigations being conducted under the Joint Agency Task Force.

Memo of Understanding (MoU)

MoU between His Majesty's Revenue & Customs (HMRC) and the Bureau

On the 5th August 2025, the Chief Bureau Officer, Michael Gubbins, co-signed a Memorandum of Understanding (MoU) between His Majesty's Revenue & Customs (HMRC) and the Criminal Assets Bureau which outlines the procedures governing an information sharing agreement.

HMRC and the Bureau have a long-standing relationship in collaborating to tackle serious and organised crime and removing the proceeds of such activity.

To continue and develop the ongoing co-operation between the two agencies, this MoU outlines the agreement for the exchange of information and material between the Bureau and the HMRC.

Pictured above are the Chief Bureau Officer, Michael Gubbins and Mr. Peter Thorpe, HMRC

MoU with the Asset Recovery Committee of the General Prosecutor's Office of the Republic of Kazakhstan

On the 30th October 2025, the Chief Bureau Officer, Michael Gubbins, whilst in attendance at the CARIN Conference in the Hague, co-signed a Memorandum of Understanding with colleagues in the Asset Recovery Committee of the General Prosecutor's Office of the Republic of Kazakhstan.

MoU with the Asset Recovery and Management Agency (ARMA), Ukraine

On the 30th October 2025, the Chief Bureau Officer, Michael Gubbins, whilst in attendance at the CARIN Conference in the Hague, co-signed a Memorandum of Understanding with colleagues in the Asset Recovery and Management Agency (ARMA), Ukraine.

Pictured above is the Chief Bureau Officer, Michael Gubbins co-signing MoU's with colleagues from the Asset Recovery Committee of the General Prosecutors Office of the Republic of Kazakhstan and the Asset Recovery and Management Agency (ARMA), Ukraine

The Bureau is committed to working with the Asset Recovery and Management Agency (ARMA), Ukraine and the Asset Recovery of the General Prosecutor's Office of the Republic of Kazakhstan in an effort to carry out our respective remits.

Visits to the Bureau

The success of the Bureau model continues to attract international attention. During 2025, the Bureau welcomed national and international delegations and agencies, both in person and online, covering a range of disciplines.

The Bureau's continued involvement in investigations having an international dimension presents an opportunity to both contribute to and inform the international law enforcement response to the ongoing threat from transnational organised criminal activity. In addition, this engagement provides an opportunity for the Bureau to share its experience with its international partner agencies.

The Bureau also gave a number of presentations to various agencies, details of which are outlined as follows:

Corporate Enforcement Authority

The Chief Bureau Officer, Michael Gubbins and a member of the Bureau Analysis Unit met with officers from the Corporate Enforcement Authority (CEA) at the Bureau's offices on the 30th April 2025. Matters discussed included software tools used by the Bureau for various types of cases.

CEA
Údarás um Fhorfheidhmiú Corparáideach
Corporate Enforcement Authority

High Level Meetings

A number of high level meetings took place in 2025, included as follows:

Jim O'Callaghan, Minister for Justice, Home Affairs and Migration

The Chief Bureau Officer, Michael Gubbins, was delighted to welcome the newly appointed Minister for Justice, Home Affairs and Migration, Jim O'Callaghan, T.D., and our colleagues from the Department of Justice, Home Affairs and Migration to the Bureau's offices on 7th April 2025.

Minister O'Callaghan met with members of the Bureau's senior management team and discussed the workings of the Bureau and the challenges the Bureau are facing into the future.

The Bureau appreciates the ongoing support of the Department of Justice, Home Affairs and Migration which greatly enables us to successfully carry out our statutory remit to deny and deprive.

Pictured above is the Chief Bureau Officer, Michael Gubbins and the Minister for Justice, Home Affairs and Migration, Jim O'Callaghan, T.D.

Meeting with Office of the Director of Public Prosecutions (ODPP)

The Chief Bureau Officer, Michael Gubbins and the Bureau Legal Officer, Kevin McMeel met officers from the ODPP, Mr. Ray Briscoe, Ms. Helena Kiely and Mr. Henry Matthews on the 17th April 2025.

This meeting showcases the Bureau's continued engagement to further strengthen both agencies capacity to seize illicit wealth.

Visit of Revenue Commissioners

The Bureau welcomed a visit from senior officers from the Office of the Revenue Commissioners on the 24th April 2025. Chairperson Mr Niall Cody and Commissioners Ms Ruth Kennedy and Ms Maura Kiely, met with the Chief Bureau Officer, Michael Gubbins and the Bureau's senior management team and Revenue staff seconded to the Bureau.

The delegation was briefed on the operation of the Bureau and engaged in a walk-through of the offices.

L-R: Michael Gubbins (Chief Bureau Officer), Ms. Ruth Kennedy (Commissioner), Ms. Maura Kiely (Commissioner) and Mr. Niall Cody (Chairman)

Netherlands Liaison Magistrate

On the 28th April 2025, the Bureau Legal Officer Kevin McMeel and members of the Bureau hosted Ms Wendela Mulder, Netherlands Liaison Magistrate for the United Kingdom and Ireland together with a small delegation from her Office.

The purpose of the visit was to focus on improving the bilateral relations between Ireland and the Netherlands in the fight against organised crime and to share information and experience on best practices in this area.

The Bureau provided a presentation on its unique role in Ireland's law enforcement community which was followed by very robust and positive discussions regarding the roles of and future cooperation between both agencies.

Swedish National Police

In conjunction with our Europol colleagues, the Bureau was delighted to welcome a delegation from the Swedish National Police on 6th May 2025 who were establishing a specialised Police Unit aimed at combatting organised crime. The aim of the delegation's visit was to learn from the Bureau's experience and lessons learned in the area of asset forfeiture.

Senior Bureau Officers delivered presentations to the delegation and covered topics such as the establishment of the Bureau, relevant legislation, our multi-agency, multi-disciplinary approach and how the Bureau performs its statutory remit to deny and deprive criminals of the ill-gotten gains.

Zambian Justice Section Study Visit to Ireland

The Bureau welcomed the visit of the Zambian delegates, representatives from the Irish Embassy and the Irish Rule of Law International (IRLI) to the Bureau offices on the 12th May 2025.

The visit allowed the opportunity for the Zambian delegation to present on the economic and financial crimes position in Zambia, the National Prosecution Authorities work, the work of the Interagency Framework and Secretariat and a summary of the work completed since their last visit to the Bureau.

Bureau Officers delivered a presentation to the delegates in relation to the original set up of the Bureau, how the Bureau currently works, our successes and challenges and lessons learnt. Bureau Officers also provided a tour of the Bureau offices focusing on how the representatives of each agency work together.

National Anti-Corruption Commission (NACC)

In October 2025, the Bureau welcomed a delegation from the Office of the National Anti-Corruption Commission (NACC). The delegation met with the

Chief Bureau Officer, Michael Gubbins, the Bureau Legal Officer, Kevin McMeel and solicitors from the Criminal Assets Section of the Chief State Solicitors Office.

The Bureau assisted the NACC in their mission to co-ordinate efforts in recovering assets linked to a foreign bribery case back to Thailand from Ireland.

Pictured above are the Chief Bureau Officer, Michael Gubbins, Bureau Legal Officer, Kevin McMeel, State Solicitor Simone Walsh and members of the National Anti-Corruption Commission

Japan Tobacco International (JTI)

On the 1st December 2025, the Chief Bureau Officer, Michael Gubbins and Detective Superintendent Seamus Dalton met with the Global Head of illicit trade operations for Japan Tobacco International (JTI).

The presentation was delivered to the Bureau by the Global Head of their illicit trade operations as part of their commitment to collaborating with Law Enforcement Agencies to tackle the problem of Tobacco smuggling.

The presentation highlighted the risks posed by tobacco smuggling to the industry, to jobs and to tax revenues. The presentation was welcomed as it lent to raising awareness about the dangers posed by the illicit trade in illicit tobacco products.

Media Interviews

To further raise the profile of the Bureau, the Chief Bureau Officer gave a number of interviews to media organisations, samples of which are outlined below:

- 01/02/2025 – Garreth MacNamee online article entitled "*Gardai snare criminals 'outing themselves' on Instagram*."
- 04/02/2025 – Irish Daily Mail newspaper article entitled *"Criminals now turning to crypto to conceal their wealth, says CAB".*
- 04/08/2025: Irish Independent Newspaper article entitled '*It's the ultimate example of depriving the criminal' - CAB Chief vows to target crime bosses through trophy homes*".
- 05/08/2025: Irish Independent Newspaper article entitled *"'Good Citizen reports are a really important source of intelligence' says CAB Chief Michael Gubbins"*.
- 09/11/2025: Chief Bureau Officer, Michael Gubbins, was interviewed by Maeve Sheehan of the Irish Independent for a newspaper article entitled "*Gucci, Chanel and Rolex – the ill-gotten bling for sale in CAB's online auction*".

- 29/11/2025: Irish Daily Mail Newspaper article entitled *"Cars, houses, holidays and cosmetic surgery - we hit criminals where it really hurts"*.

RTE Interview on CAB's 3rd Online Auction

The Chief Bureau Officer, Michael Gubbins, was interviewed by Sarah Magliocco for RTE on the 27th November 2025 in an article entitled "*Criminal Assets Bureau Black Friday Auction includes Rolex watches, designer shoes and bags*". The article highlighted the Bureau's upcoming auction and showcased some of the items listed for sale.

Podcasts, Radio & TV Programmes

Cork's 96fm Opinion Line Podcast

The Chief Bureau Officer participated in a podcast with Paul Byrne on 7th February 2025 entitled "*What has the Criminal Assets Bureau got its sights on in Cork?*". This podcast can be listened to at the following link: https://sphinx.acast.com/p/acast/s/corks-96-fm-opinion-line/e/67a60c96340a5590cda0145f/media.mp3

Book Launch

The Chief Bureau Officer, Michael Gubbins, was delighted to attend the book launch of "*What We're Made of*" on the 27th May 2025 at the Museum of Literature Ireland. The book was inspired by the Theatre of the Oppressed and facilitated by Senator Lynn Ruane and theatre maker Grace Dyas. This book was written by the men incarcerated at Mountjoy Prison.

"Hidden Assets"

Following the successful broadcast of "*Hidden Assets*", the Chief Bureau Officer, Michael Gubbins welcomed cast members and the production team to the Bureau as part of their research for future episodes.

Drivetime, RTE Radio 1

The Chief Bureau Officer participated in an interview on Drivetime for RTE Radio 1 on the 4th November 2025 wherein he spoke about the record number of properties sold by the Bureau in 2024. This interview can be listened to on the following link: https://www.rte.ie/radio/radio1/clips/22556875/

In the News by the Irish Times Podcast

The Chief Bureau Officer participated in a podcast with Berenice Harrison on 21st November 2025 entitled *"Good year for the Criminal Assets Bureau, bad year for blinged-up criminals*".

The Chief Bureau Officer discussed, among other topics, the Bureau's seizures, disposal of assets, the returns made to the Exchequer under the Bureau's three disciplines (Proceeds of Crime, Revenue and Social Protection), Good Citizen's Reports and the Divisional Asset Profiler Network. This podcast can be listened to at the following link: https://www.irishtimes.com/podcasts/in-the-news/good-year-for-the-criminal-assets-bureau-bad-year-for-blinged-up-criminals/

Social Media Activities

The Criminal Assets Bureau oversees three official social media channels: Facebook, Instagram, and X (formerly Twitter).

@criminalassetsbureau

@criminalassetsbureau

@criminalassets

www.cab.ie

The social media channels are used to tell the Bureau's story by promoting our activities.

Part Ten
Protected Disclosures Annual Report

Protected Disclosures Act 2014

Section 22 of the Protected Disclosures Act 2014 requires every public body to prepare and publish a report, not later than the 30th June, in relation to the preceding year's information, relating to protected disclosures.

No protected disclosures were received by the Bureau in the reporting period up to the 31st December 2025.

Integrity at Work Pledge

The Bureau signed the 'Integrity at Work' pledge in June 2021. This pledge is a public statement of the Bureau's commitment to fostering a workplace that supports concerns raised of any wrongdoing.

In this regard, one Bureau Officer attended the Integrity at Work (IAW) Forum hosted by Transparency International (Ireland) Limited.

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Conclusions

The Bureau exercised its statutory remit to pursue the proceeds of criminal conduct. In order to do this, the Bureau utilised the provisions of the Proceeds of Crime Act 1996 as amended, together with Revenue and Social Welfare legislation.

The Bureau continued to target assets deriving from a variety of suspected criminal conduct including drug trafficking, fraud, theft, burglary and money laundering.

The Bureau monitors and targets emerging trends such as the use of the motor trade to conceal criminal assets as well as the use of cryptocurrency for asset transfer and international fraud.

Throughout 2025, the Bureau placed particular emphasis on targeting the criminal groups engaged in serious and organised crime, as well as property crime, such as burglaries and robberies.

A particular focus of the Bureau's activities centres upon rural crime and a number of the Bureau's actions were in support of law enforcement in Regional locations.

The investigations conducted by the Bureau and the consequential proceedings and actions resulted in sums in excess of €14.926m being forwarded to the Central Fund, which can be broken down as follows:

- €3.474m remitted to the Exchequer under the Proceeds of Crime legislation
- €0.656m remitted in Social Welfare recoveries
- €10.796m collected as a result of Revenue enforcement procedures and tax agreements

Total Monies returned by CAB in 2025	
Returned under CAB remit i.e., Proceeds of Crime, Revenue and Social Welfare legislation	14,925,788
Totals	14,925,788

At an international level, the Bureau has maintained strong links and has continued to liaise with law enforcement and judicial authorities throughout Europe and worldwide.

The Bureau was involved in a number of investigations relating to criminal conduct by organised crime groups in the border region.

The Bureau continues to develop its relationship with a number of law enforcement agencies with cross-jurisdictional links, most notably, Interpol, Europol, His Majesty's Revenue & Customs, the National Crime Agency in the UK, the CARIN Network, the Australian Federal Police, Homeland Security Investigations, the US Attorney's Office and the Spanish Authorities.

As the designated Asset Recovery Office (ARO) in Ireland, the Bureau continues to develop law enforcement links with other EU Member States.

Conclusions

The Bureau seeks input from representatives of the various agencies attached to CAB in developing its Strategic Plan. These include representatives from An Garda Siochana, Office of the Revenue Commissioners, Department of Social Protection and the Department of Justice, Home Affairs and Migration. The development of the Strategic Plan has been guided and informed by the Mission of each of the partner agencies.

The Plan is reviewed/challenged by the Department of Justice, Home Affairs and Migration prior to being signed off. The Bureau's Performance Delivery Agreement is informed by our Strategic document.

The formal Admissions Group, established in 2018, continues to support the work of the Intelligence and Assessment Office (IAO) in advising the Chief Bureau Officer on the selection of targets for full investigation. The heart of the CAB model continues to be the multi-disciplinary team where professionals work together for the common purpose of denying and depriving criminals of their ill-gotten gains.

One of the key strengths of the Bureau is its collaboration with other organisations to support its activities. The Bureau could not undertake its activities without the support of many sections of An Garda Síochána, including units under the Organised and Serious Crime, the Emergency Response Unit, Regional Armed Support Unit, local Divisional personnel and the Garda Press Office.

In addition, the Bureau receives excellent assistance from many sections of the Office of the Revenue Commissioners and in particular, the Revenue Solicitor and the Investigation, Prosecution, Frontier Management Division and the Customs Dog Units.

Officers from various sections of the Department of Social Protection have assisted the Bureau in matters of mutual interest.

Our colleagues in the Department of Justice, Home Affairs and Migration provide excellent advice and support to the Bureau with particular emphasis on human resources, finance, governance, audit and risk. We continue to work with the Department in the areas of legislative and policy changes and in the securing of new suitable accommodation that will enable the Bureau to carry out its statutory remit.

At its core, the work of the Criminal Assets Bureau is not just about "*denying and depriving*". It is about something wider: protecting communities, undermining the influence of organised crime, and making clear that criminal assets are not a badge of success but evidence of wrongdoing that the State can and will confront.

Appendix A

Objectives & functions of the Bureau

Objectives of the Bureau: Section 4 of the Criminal Assets Bureau Act 1996 & 2005

4.—Subject to the provisions of this Act, the objectives of the Bureau shall be—

(a) the identification of the assets, wherever situated, of persons which derive or are suspected to derive, directly or indirectly, from criminal conduct,

(b) the taking of appropriate action under the law to deprive or to deny those persons of the assets or the benefit of such assets, in whole or in part, as may be appropriate, and

(c) the pursuit of any investigation or the doing of any other preparatory work in relation to any proceedings arising from the objectives mentioned in paragraphs (a) and (b).

Functions of the Bureau: Section 5 of the Criminal Assets Bureau Act 1996 & 2005

5.—(1) Without prejudice to the generality of Section 4, the functions of the Bureau, operating through its Bureau Officers, shall be the taking of all necessary actions—

(a) in accordance with Garda functions, for the purposes of the confiscation, restraint of use, freezing, preservation or seizure of assets identified as deriving, or suspected to derive, directly or indirectly, from criminal conduct

(b) under the Revenue Acts or any provision of any other enactment, whether passed before or after the passing of this Act, which relates to revenue, to ensure that the proceeds of criminal conduct or suspected criminal conduct are subjected to tax and that the Revenue Acts, where appropriate, are fully applied in relation to such proceeds or conduct, as the case may be,

(c) under the Social Welfare Acts for the investigation and determination, as appropriate, of any claim for or in respect of benefit (within the meaning of Section 204 of the Social Welfare (Consolidation) Act, 1993) by any person engaged in criminal conduct, and

(d) at the request of the Minister for Social Welfare, to investigate and determine, as appropriate, any claim for or in respect of a benefit, within the meaning of Section 204 of the Social Welfare (Consolidation) Act, 1993, where the Minister for Social Welfare certifies that there are reasonable grounds for believing that, in the case of a particular investigation, Officers of the Minister for Social Welfare may be subject to threats or other forms of intimidation,

and such actions include, where appropriate, subject to any international agreement, co-operation with any police force, or any authority, being an authority with functions related to the recovery of proceeds of crime, a tax authority or social security authority, of a territory or state other than the State.

(2) In relation to the matters referred to in subsection (1), nothing in this Act shall be construed as affecting or restricting in any way—

(a) the powers or duties of the Garda Síochána, the Revenue Commissioners or the Minister for Social Welfare, or

(b) the functions of the Attorney General, the Director of Public Prosecutions or the Chief State Solicitor.

Appendix B
Statement of Internal Controls

Scope of Responsibility
On behalf of the Criminal Assets Bureau I, as Chief Bureau Officer, acknowledge responsibility for ensuring that an effective system of internal control is maintained and operated. This responsibility takes account of the requirements of the Code of Practice for the Governance of State Bodies (2016).

I confirm that a business plan is agreed annually by the Senior Management Team (SMT) and is submitted to the Assistant Secretary, Department of Justice, Home Affairs and Migration.

I confirm that an Oversight Agreement between the Bureau and the Department of Justice, Home Affairs and Migration covering the years 2023 – 2025 is in place and is subject to ongoing review.

I confirm, that the Annual Report and Compliance Statement have been submitted to the Minister for Justice, Home Affairs and Migration.

Purpose of the System of Internal Control
The system of internal control is designed to manage risk to a tolerable level rather than to eliminate it. The system can therefore only provide reasonable and not absolute assurance that assets are safeguarded, transactions are authorised and properly recorded and that material errors or irregularities are either prevented or detected in a timely manner.

The system of internal control, which accords with guidance issued by the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation has been in place in the Criminal Assets Bureau for the year ended 31st December 2025 and up to the date of approval of the financial statements.

Capacity to Handle Risk
The Criminal Assets Bureau reports on all audit matters to the Internal Audit Unit in the Department of Justice, Home Affairs and Migration and has in place a Bureau Audit and Risk Committee (ARC). The ARC of the Bureau met on four occasions during the year 2025.

The ARC has developed a risk management policy which sets out its risk appetite, the risk management processes in place and details the roles and responsibilities of staff in relation to risk.

The policy was issued to all Managers within the Bureau who were advised of the necessity to alert senior management of emerging risks and control weaknesses and to assume responsibility for risk and controls within their own area of work.

Risk and Control Framework
The Criminal Assets Bureau implemented a Risk Management System which identified and reported key risks and the management actions taken, as far as possible, to mitigate those risks.

A Risk Register is in place in the Criminal Assets Bureau which identifies the key risks facing the Bureau and these are identified, evaluated and graded according to their significance. The register is reviewed and updated by the ARC on a quarterly basis. The outcome of these assessments is used to plan and allocate resources to ensure risks are managed to an acceptable level. The Risk Register details the controls and actions needed to mitigate risks and responsibility for operational controls assigned to specific staff.

In respect of the Bureau, I confirm that a control environment containing the following elements is in place:

- Procedures for all key business processes are documented
- Financial responsibilities are assigned at management level with corresponding accountability
- An appropriate budgeting system is in place, with an annual budget which is kept under review by senior management
- Systems aimed at ensuring the security of the information and communication equipment systems;
- Systems to safeguard the Bureau's assets
- The National Shared Services Office provide Payroll Shared Services to the Bureau

Ongoing Monitoring and Review

During the period covered by the 2025 Financial Statements, formal procedures were implemented for monitoring key controls. Control deficiencies were communicated to those responsible for taking corrective action and to management, where relevant, in a timely way.

I confirm that the following monitoring systems were in place in respect of the Criminal Assets Bureau for 2025:

- Key risks and related controls have been identified and processes have been put in place to monitor the operation of those key controls and report any identified deficiencies
- An annual audit of financial and other controls has been carried out by the Department of Justice, Home Affairs and Migration's Internal Audit Unit
- Reporting arrangements have been established at all levels where responsibility for financial management has been assigned
- Regular reviews by senior management of periodic and annual performance and financial reports take place, which indicate performance against budgets/ forecast

Procurement

I confirm that the Criminal Assets Bureau has procedures in place to ensure compliance with current procurement rules and guidelines and that during the year 2025 the Criminal Assets Bureau complied with those procedures.

Review of Effectiveness

I confirm that the Criminal Assets Bureau has procedures in place to monitor the effectiveness of its risk management and control procedures. The Bureau's monitoring and review of the effectiveness of the system of internal control was informed by the work of the internal ARC, the Internal Audit Unit of the Department of Justice, Home Affairs and Migration and the Comptroller and Auditor General. The ARC, within the Criminal Assets Bureau, is responsible for overseeing the internal control framework.

During 2025 the Internal Audit Unit of the Department of Justice, Home Affairs and Migration conducted an audit at the Criminal Assets Bureau on financial and other controls, in line with their annual programme of audits, to provide assurance to the Audit Committee of Vote 24 (Justice). The next internal audit of the Bureau's financial and other controls is due to take place in Q1, 2026.

During 2025 the Comptroller and Auditor General carried out an audit on the 2024 Financial Statements. No material issues were reported. During 2026, the Comptroller and Auditor General will conduct an audit on the 2025 Financial Statements.

Internal Control Issues

No weaknesses in internal control were identified in relation to 2025 that require disclosure in the Financial Statements.

Michael Gubbins

Michael Gubbins
Chief Bureau Officer
June 2026

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Appendix C

2025 Year in Review

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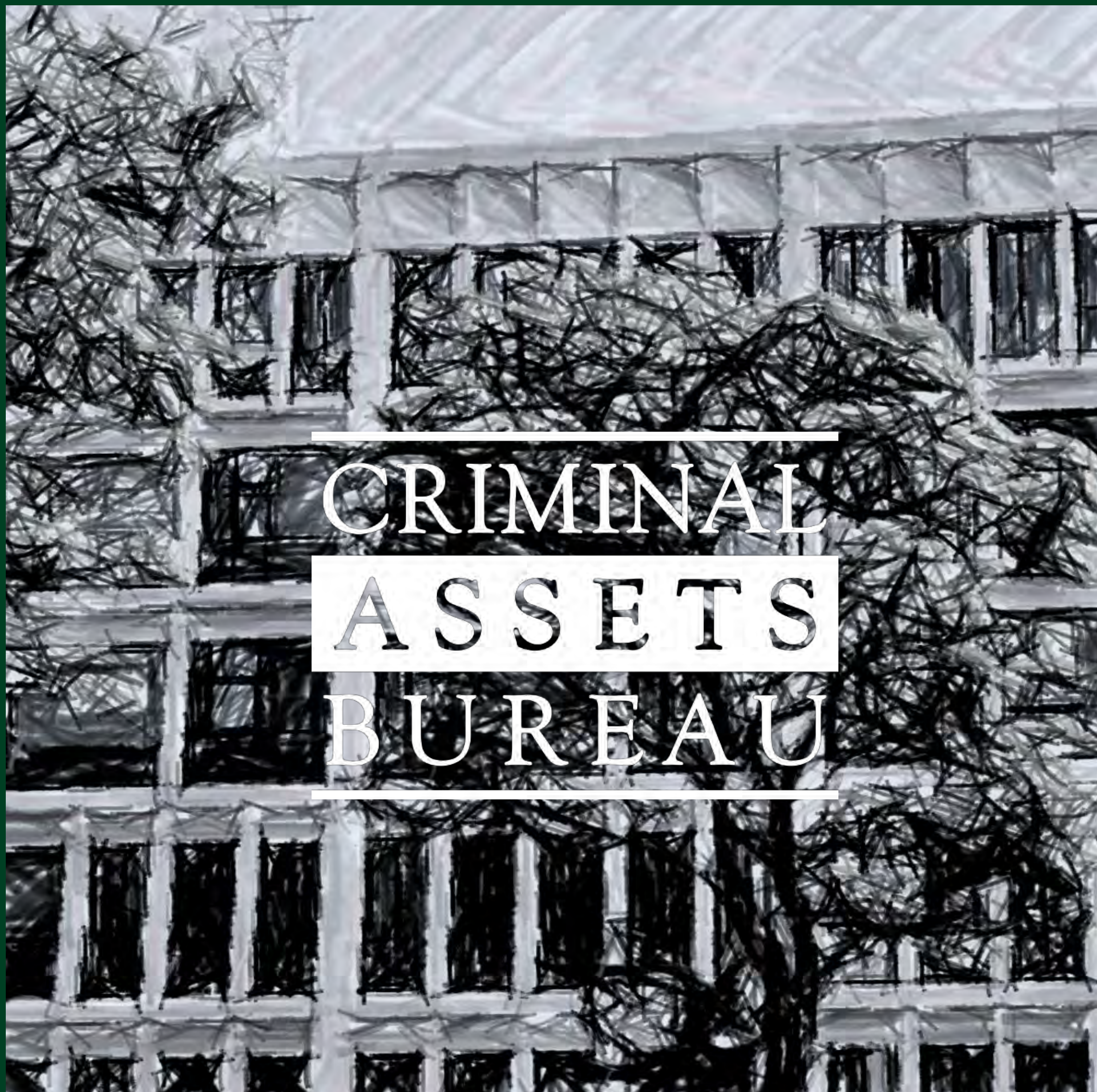
Notes



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