COMPLIANCE WORKING RECORD

Beneficial ownership evidence pack

FICTIONAL evidence sample. Requires tailoring.

Document control

Field	Value
Document type	Evidence workpaper
Document reference	CASE-FICTIONAL
Jurisdiction	United States
Version	2026-10-09.financial-evidence.1
Status	FICTIONAL sample. Requires tailoring.
Classification	Private
Prepared by	Fictional responsible reviewer
Prepared on	October 9, 2026
Sources reviewed	October 9, 2026
Generated	October 9, 2026

Document control and frozen case

Assemble an original-source ownership and control workpaper, exact supplied-graph natural-person shares and missing-information questions.

Field	Value
Case reference	CASE-FICTIONAL
Organization	Fictional organization
Subject	Fictional customer or subject
Responsible reviewer	Fictional responsible reviewer
Preparation date	October 9, 2026

Field	Value
Scope	Fictional bounded evidence case. Replace every source, policy and fact before use.
Customer policy	POLICY-FICTIONAL
Customer policy version	fictional-v1
Declared approver	Fictional policy owner
Declared approval date	October 2, 2026
Decision boundary	No substantive decision or external filing made.

Named method and supported scope

Validate distinct entities, one direct relationship per owner and entity, totals at most 100 percent and an acyclic graph. Sum exact rational natural-person paths, retain exact fractions and compare the customer-approved threshold without rounding the comparison. Separate declared control roles. Incomplete or unverified ancestry prevents a complete ownership finding.

Up to 100 entities and relationships per table. Cycles, trust look-through, nominee or disputed ownership are unresolved. The customer selects applicability, ownership threshold and control rules.

Original evidence bytes, annotations and customer rules remain in this browser unless explicitly approved for paid cloud saving. Customer verification and approval are declarations. Mechanical results do not authenticate source facts, decide legal applicability, clear screening hits, authorize transactions, classify exports, file reports or establish total wealth.

Only the supplied population is evaluated. Source annotations do not prove completeness, authenticity, reviewer authority or external screening. Missing and conflicting evidence remains visible.

Every accepted finding and original source reference is retained. Supplied text is not silently shortened. Original files are copied only into a local full backup or an explicitly approved artifact operation.

Complete result counts

Measure	Value
Original file descriptors	1
Evidence source references	1
Complete findings	6
Findings needing review	0

1. Original evidence index (S1)

State. Customer evidence linked

Exact source descriptor and customer-declared locator retained. No content authentication.

Field	Value
File	F1
Locator	Fictional document paragraphs 1 to 3
Description	Fictional policy and evidence source only.
Custodian	Fictional custodian
Source date	October 1, 2026
Customer verification	Customer verified
Verified by	Fictional reviewer
Verified on	October 2, 2026
Exact evidence source references	S1

2. Original byte manifest (F1)

State. Indexed

Exact local SHA-256 descriptor. Recovered descriptors require matching original bytes for a complete attachment export.

Field	Value
Filename	FICTIONAL-evidence.txt
Media type	text/plain
Bytes	255
SHA-256	f915adc44353033ee611dbc67d8e24d6d2fcfa10da40688 f5b9d0a3cb2e20a4a
Exact evidence source references	None supplied

3. Frozen customer policy (POLICY-FICTIONAL)

State. Policy linked

Customer-selected policy, version and approval are retained. Applicability and authority require human review.

Field	Value
Version	fictional-v1
Approved by	Fictional policy owner
Approved on	October 2, 2026
Exact evidence source references	S1

4. Exact ownership relationship (P1 -> E1)

State. Relationship documented

Customer-verified direct ownership percentage retained.

Field	Value
Percent	100
Verification	Customer verified
Exact evidence source references	S1

5. Beneficial ownership working calculation (P1)

State. Customer threshold reached

Exact acyclic supplied-graph share compared with the customer-approved threshold. No statutory ownership or control classification.

Field	Value
Target	E1
Supplied graph share	100%
Exact share fraction	1/1
Customer threshold percent	25
Exact evidence source references	S1

6. Control evidence (P1)

State. Control declaration linked

Customer-declared role retained independently of ownership. This does not establish legally defined control.

Field	Value
Role	Fictional director. Customer must verify actual control.
Exact evidence source references	S1

Complete accepted task inputs

The following exact accepted fields preserve every supplied task record, including orphan records and contradictions. They are customer annotations, not independently extracted or authenticated evidence.

Field	Value
target	E1
ownershipThresholdPercent	25
entities 1. id	P1
entities 1. name	Fictional person one
entities 1. kind	Person
entities 1. ownershipComplete	Yes
entities 1. sourceIds	S1
entities 2. id	E1
entities 2. name	Fictional entity one
entities 2. kind	Entity
entities 2. ownershipComplete	Yes
entities 2. sourceIds	S1
relationships 1. ownerId	P1
relationships 1. entityId	E1
relationships 1. percent	100

Field	Value
relationships 1. verification	Customer verified
relationships 1. sourceIds	S1
controllers 1. personId	P1
controllers 1. role	Fictional director. Customer must verify actual control.
controllers 1. sourceIds	S1

Recovery and original attachment boundary

The complete local ZIP includes every original file listed in the retained manifest. A structured JSON or cloud record alone preserves the descriptor and annotation, not the original file bytes. Attach matching bytes before producing a complete original-attachment pack.

Customer recovery restores neither source authentication, approval authority nor paid export access. Payment ownership is checked before each commercial export.

Official sources

Source	Provision	Date	Link
Federal Financial Institutions Examination Council: Beneficial Ownership Requirements for Legal Entity Customers	Bank examination guidance distinguishes ownership and control information and source verification. The customer determines applicable requirements and supplied ownership rules. This workpaper does not authenticate a legal entity or beneficial owner.	October 9, 2026	https://bsaaml.ffiec.gov/manual/AssessingComplianceWithBSARegulatoryRequirements/03

Source	Provision	Date	Link
Federal Financial Institutions Examination Council: Customer Due Diligence	Bank examination guidance describes risk-based customer information, source-of-funds and wealth review, documentation and unresolved information. It does not establish applicability to every customer or organization.	October 9, 2026	https://bsaaml.ffiec.gov/manual/AssessingComplianceWithBSARegulatoryRequirements/02