

COMPLIANCE WORKING RECORD

# Sanctions screening regression benchmark

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-control.1        |
| Status             | FICTIONAL sample. Requires tailoring. |
| Classification     | Private                               |
| Prepared by        | Fictional reviewer                    |
| Prepared on        | October 9, 2026                       |
| Sources reviewed   | October 9, 2026                       |
| Generated          | October 9, 2026                       |

Document control and frozen case

Compare supplied baseline and candidate screening observations against exact approved synthetic cases, including paired changes and missing coverage.

| Field                | Value                    |
|----------------------|--------------------------|
| Case reference       | CASE-FICTIONAL           |
| Organization         | Fictional organization   |
| Subject              | Fictional bounded review |
| Responsible reviewer | Fictional reviewer       |
| Preparation date     | October 9, 2026          |

| Field                   | Value                                                                        |
|-------------------------|------------------------------------------------------------------------------|
| Scope                   | Fictional customer-approved workflow. Replace every example before real 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

Match exact case and version identities. Count true positives, false positives, true negatives and false negatives only for one nonerror observation. Retain missing, duplicate, error and unassigned results separately. Compare each complete baseline and candidate pair against the synthetic expectation.

No screening API runs here. Synthetic expected labels are customer-approved fixtures. Confusion counts and alert changes do not clear real parties or establish provider semantic quality.

All original evidence, customer rules and factual verification are customer declarations. File hashes establish retained byte identity only.

The tool does not perform live screening, authenticate identities, decide legal applicability, approve transactions, file reports or certify effective controls.

Prepared results preserve complete accepted records. Recovery does not restore payment, source authentication or fresh approval authority.

Complete result counts

| Measure                       | Value |
|-------------------------------|-------|
| fictional-baseline-v1 tp      | 1     |
| fictional-baseline-v1 fp      | 0     |
| fictional-baseline-v1 tn      | 1     |
| fictional-baseline-v1 fn      | 0     |
| fictional-baseline-v1 missing | 0     |
| fictional-baseline-v1 errors  | 0     |

| Measure                        | Value |
|--------------------------------|-------|
| fictional-candidate-v2 tp      | 0     |
| fictional-candidate-v2 fp      | 0     |
| fictional-candidate-v2 tn      | 0     |
| fictional-candidate-v2 fn      | 1     |
| fictional-candidate-v2 missing | 1     |
| fictional-candidate-v2 errors  | 0     |

## 1. Original evidence source (S1)

State. Customer verification linked

Customer-declared source identity and verification. Original contents are not extracted or independently authenticated.

| Field                            | Value                                                                  |
|----------------------------------|------------------------------------------------------------------------|
| Original file ID                 | F1                                                                     |
| Locator                          | Fictional section one                                                  |
| Source date                      | October 1, 2026                                                        |
| Custodian                        | Fictional customer custodian                                           |
| Description                      | Fictional source declaration. Does not establish real source evidence. |
| Customer verification            | Customer verified                                                      |
| Verified by                      | Fictional customer reviewer                                            |
| Verified on                      | October 2, 2026                                                        |
| Exact evidence source references | S1                                                                     |

## 2. Original byte manifest (F1)

State. Indexed

The complete archive requires these exact original bytes.

| Field                            | Value                                                                |
|----------------------------------|----------------------------------------------------------------------|
| Filename                         | FICTIONAL-control-evidence.txt                                       |
| Media type                       | text/plain                                                           |
| Bytes                            | 208                                                                  |
| SHA-256                          | 158b727cc608104a93cc176d0e3cd7b62a9d775a674e30<br>837ae8f7fb5bc5ceff |
| Exact evidence source references | S1                                                                   |

## 3. Frozen customer policy (POLICY-FICTIONAL)

State. Documented

Exact customer-approved policy retained. Applicability and authority remain customer declarations.

| Field                            | Value                  |
|----------------------------------|------------------------|
| Version                          | fictional-v1           |
| Approver                         | Fictional policy owner |
| Approval date                    | October 2, 2026        |
| Exact evidence source references | S1                     |

## 4. Synthetic benchmark case (CASE1/fictional-baseline-v1)

State. Expected synthetic outcome

Compare one exact supplied version observation with the approved synthetic expectation. This does not screen or clear real parties.

| Field    | Value                    |
|----------|--------------------------|
| Scenario | Fictional expected alert |
| Expected | Alert                    |

| Field                            | Value                                                                                                                                                                                                  |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Version                          | fictional-baseline-v1                                                                                                                                                                                  |
| Complete observations            | [{"caseReference":"CASE1","version":"fictional-baseline-v1","observed":"Alert","provider":"Fictional supplied provider","listVersion":"fictional-list-v1","testedOn":"2026-10-02","sourceIds":["S1"]}] |
| Exact evidence source references | S1                                                                                                                                                                                                     |

5. Synthetic benchmark case (CASE1/fictional-candidate-v2)

State. Synthetic regression mismatch

Compare one exact supplied version observation with the approved synthetic expectation. This does not screen or clear real parties.

| Field                            | Value                                                                                                                                                                                                      |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Scenario                         | Fictional expected alert                                                                                                                                                                                   |
| Expected                         | Alert                                                                                                                                                                                                      |
| Version                          | fictional-candidate-v2                                                                                                                                                                                     |
| Complete observations            | [{"caseReference":"CASE1","version":"fictional-candidate-v2","observed":"No alert","provider":"Fictional supplied provider","listVersion":"fictional-list-v2","testedOn":"2026-10-02","sourceIds":["S1"]}] |
| Exact evidence source references | S1                                                                                                                                                                                                         |

6. Paired coverage change (CASE1)

State. Changed

Paired literal alert outcomes. Error, missing and duplicate observations are excluded from confusion counts and included as coverage gaps.

| Field    | Value |
|----------|-------|
| Baseline | Alert |

| Field                            | Value    |
|----------------------------------|----------|
| Candidate                        | No alert |
| Expected                         | Alert    |
| Exact evidence source references | S1       |

7. Synthetic benchmark case (CASE2/fictional-baseline-v1)

State. Expected synthetic outcome

Compare one exact supplied version observation with the approved synthetic expectation. This does not screen or clear real parties.

| Field                            | Value                                                                                                                                                                                                     |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Scenario                         | Fictional expected no alert                                                                                                                                                                               |
| Expected                         | No alert                                                                                                                                                                                                  |
| Version                          | fictional-baseline-v1                                                                                                                                                                                     |
| Complete observations            | [{"caseReference":"CASE2","version":"fictional-baseline-v1","observed":"No alert","provider":"Fictional supplied provider","listVersion":"fictional-list-v1","testedOn":"2026-10-02","sourceIds":["S1"]}] |
| Exact evidence source references | S1                                                                                                                                                                                                        |

8. Synthetic benchmark case (CASE2/fictional-candidate-v2)

State. Missing observation

Compare one exact supplied version observation with the approved synthetic expectation. This does not screen or clear real parties.

| Field    | Value                       |
|----------|-----------------------------|
| Scenario | Fictional expected no alert |
| Expected | No alert                    |

| Field                            | Value                  |
|----------------------------------|------------------------|
| Version                          | fictional-candidate-v2 |
| Complete observations            | []                     |
| Exact evidence source references | S1                     |

## 9. Paired coverage change (CASE2)

State. Pair incomplete

Paired literal alert outcomes. Error, missing and duplicate observations are excluded from confusion counts and included as coverage gaps.

| Field                            | Value    |
|----------------------------------|----------|
| Baseline                         | No alert |
| Candidate                        | Unusable |
| Expected                         | No alert |
| 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                    |
|-------------------------|--------------------------|
| baselineVersion         | fictional-baseline-v1    |
| candidateVersion        | fictional-candidate-v2   |
| cases 1. reference      | CASE1                    |
| cases 1. syntheticLabel | SYNTHETIC                |
| cases 1. scenario       | Fictional expected alert |
| cases 1. expected       | Alert                    |
| cases 1. sourceIds      | S1                       |

| Field                         | Value                       |
|-------------------------------|-----------------------------|
| cases 2. reference            | CASE2                       |
| cases 2. syntheticLabel       | SYNTHETIC                   |
| cases 2. scenario             | Fictional expected no alert |
| cases 2. expected             | No alert                    |
| cases 2. sourceIds            | S1                          |
| observations 1. caseReference | CASE1                       |
| observations 1. version       | fictional-baseline-v1       |
| observations 1. observed      | Alert                       |
| observations 1. provider      | Fictional supplied provider |
| observations 1. listVersion   | fictional-list-v1           |
| observations 1. testedOn      | October 2, 2026             |
| observations 1. sourceIds     | S1                          |
| observations 2. caseReference | CASE1                       |
| observations 2. version       | fictional-candidate-v2      |
| observations 2. observed      | No alert                    |
| observations 2. provider      | Fictional supplied provider |
| observations 2. listVersion   | fictional-list-v2           |
| observations 2. testedOn      | October 2, 2026             |
| observations 2. sourceIds     | S1                          |
| observations 3. caseReference | CASE2                       |
| observations 3. version       | fictional-baseline-v1       |
| observations 3. observed      | No alert                    |
| observations 3. provider      | Fictional supplied provider |

| Field                       | Value             |
|-----------------------------|-------------------|
| observations 3. listVersion | fictional-list-v1 |
| observations 3. testedOn    | October 2, 2026   |
| observations 3. 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                                                                                                                                                        |
|---------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Office of Foreign Assets Control: A Framework for OFAC Compliance Commitments   | Testing, auditing, internal controls and records support sanctions compliance programs. Customer-supplied synthetic results do not screen real parties or prove provider execution. | October 9, 2026 | <a href="https://ofac.treasury.gov/system/files/126/framework_ofac_cc.pdf">https://ofac.treasury.gov/system/files/126/framework_ofac_cc.pdf</a>             |
| Federal Financial Institutions Examination Council: BSA/AML Independent Testing | Risk-based testing and workpapers support documented program review. An isolated synthetic fixture or change record does not establish monitoring effectiveness.                    | October 9, 2026 | <a href="https://bsaaml.ffiec.gov/manual/AssessingTheBSAAMLComplianceProgram/03">https://bsaaml.ffiec.gov/manual/AssessingTheBSAAMLComplianceProgram/03</a> |