

COMPLIANCE WORKING RECORD

Relevant foreign-company BOI preparation

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

Prepare current foreign-company BOI records only after an explicit customer-confirmed nonexempt foreign reporting scope.

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

Apply the August 14, 2026 domestic-company and US-person exclusions. Check company legal name, address, formation and registration jurisdictions and taxpayer identifiers. Separate selected non-US beneficial owners and required post-2023 company applicants. Check a 12-digit FinCEN ID or complete supplied identity fields and a selected local document image.

US-person beneficial owners and company applicants are excluded from the reporting draft. Unresolved eligibility, population, status or selection remain explicit. Names, addresses, identifiers, images and applicability are not authenticated, and nothing is filed.

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

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

Field	Value
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 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

Field	Value
Approver	Fictional policy owner
Approval date	October 2, 2026
Exact evidence source references	S1

4. Current foreign-company scope (CASE-FICTIONAL)

State. Customer-confirmed foreign reporting scope

The August 14, 2026 final rule exempts domestic companies and US-person beneficial owners and company applicants. A qualified customer confirms foreign formation, US registration and all exemption criteria.

Field	Value
Foreign formation	Yes
US registration	Yes
Exemption	Customer confirmed not exempt
Reviewer	Fictional qualified reviewer
Reason	Fictional current foreign registration and exemptions reviewed
Registration date	October 1, 2026
Exact evidence source references	S1

5. Foreign company report field (companyLegalName)

State. Supplied draft field

Exact required company field retained for customer review.

Field	Value
Value	Fictional foreign company
Supplied value retained in private input	Fictional foreign company
Exact evidence source references	S1

6. Foreign company report field (streetAddress)

State. Supplied draft field

Exact required company field retained for customer review.

Field	Value
Value	Fictional US business address
Supplied value retained in private input	Fictional US business address
Exact evidence source references	S1

7. Foreign company report field (formationJurisdiction)

State. Supplied draft field

Exact required company field retained for customer review.

Field	Value
Value	Fictional foreign jurisdiction
Supplied value retained in private input	Fictional foreign jurisdiction
Exact evidence source references	S1

8. Foreign company report field (registrationJurisdiction)

State. Supplied draft field

Exact required company field retained for customer review.

Field	Value
Value	Fictional US State
Supplied value retained in private input	Fictional US State
Exact evidence source references	S1

9. Foreign company report field (taxpayerId)

State. Supplied draft field

Exact required company field retained for customer review.

Field	Value
Value	FICTIONAL-TAX-ID
Supplied value retained in private input	FICTIONAL-TAX-ID
Exact evidence source references	S1

10. Foreign company report field (taxpayerIdJurisdiction)

State. Supplied draft field

Exact required company field retained for customer review.

Field	Value
Value	Fictional foreign jurisdiction
Supplied value retained in private input	Fictional foreign jurisdiction
Exact evidence source references	S1

11. Foreign person reporting preparation (P1)

State. Selected non-US draft person

US-person exclusions apply to beneficial owners and company applicants. A FinCEN ID or full required identity fields with the selected local document image is checked for preparation only, not authenticated.

Field	Value
Role	Beneficial owner
US-person status	Not US person
Customer selected	Yes
Selection reason	Fictional qualified selection

Field	Value
Draft person	{"reference":"P1","role":"Beneficial owner","usPersonStatus":"Not US person","selectedBy Customer":"Yes","selectionReason":"Fictional qualified selection","fullLegalName":"Fictional non-US person","birthDate":"1990-01-01","streetAddress":"Fictional address","fincenId":"123456789012","documentType":"","documentNumber":"","issuingJurisdiction":"","imageFileId":"","sourceIds":["S1"]}
Gaps	
Exact evidence source references	S1

12. Foreign person reporting preparation (P2)

State. Excluded from reporting draft

US-person exclusions apply to beneficial owners and company applicants. A FinCEN ID or full required identity fields with the selected local document image is checked for preparation only, not authenticated.

Field	Value
Role	Company applicant
US-person status	US person
Customer selected	Yes
Selection reason	Fictional US-person exclusion demonstration
Draft person	Withheld or excluded
Gaps	Person fields or identification image missing
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
formedUnderForeignLaw	Yes
registeredInUS	Yes

Field	Value
exemptionStatus	Customer confirmed not exempt
eligibilityReviewer	Fictional qualified reviewer
eligibilityReason	Fictional current foreign registration and exemptions reviewed
eligibilitySourceIds	S1
registrationOn	October 1, 2026
companyLegalName	Fictional foreign company
tradeNames	Fictional trade name
streetAddress	Fictional US business address
formationJurisdiction	Fictional foreign jurisdiction
registrationJurisdiction	Fictional US State
taxpayerId	FICTIONAL-TAX-ID
taxpayerIdJurisdiction	Fictional foreign jurisdiction
personsCompleteConfirmed	Yes
persons 1. reference	P1
persons 1. role	Beneficial owner
persons 1. usPersonStatus	Not US person
persons 1. selectedByCustomer	Yes
persons 1. selectionReason	Fictional qualified selection
persons 1. fullLegalName	Fictional non-US person
persons 1. birthDate	January 1, 1990
persons 1. streetAddress	Fictional address
persons 1. fincenId	123456789012
persons 1. documentType	

Field	Value
persons 1. documentNumber	
persons 1. issuingJurisdiction	
persons 1. imageFileId	
persons 1. sourceIds	S1
persons 2. reference	P2
persons 2. role	Company applicant
persons 2. usPersonStatus	US person
persons 2. selectedByCustomer	Yes
persons 2. selectionReason	Fictional US-person exclusion demonstration
persons 2. fullLegalName	Fictional excluded US person
persons 2. birthDate	
persons 2. streetAddress	
persons 2. fincenId	
persons 2. documentType	
persons 2. documentNumber	
persons 2. issuingJurisdiction	
persons 2. imageFileId	
persons 2. 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
Financial Crimes Enforcement Network, Federal Register: Beneficial Ownership Information Reporting Requirement Revision	The August 14, 2026 final rule exempts domestic entities and US-person beneficial owners and company applicants. Reporting preparation is restricted to customer-confirmed nonexempt foreign entities registered in a US State or Tribal jurisdiction. Applicability, selection and source authentication require qualified review.	October 9, 2026	https://www.federalregister.gov/documents/2026/08/14/2026-16576/beneficial-ownership-information-reporting-requirement-revision
Financial Crimes Enforcement Network: FinCEN Final Rule. Questions and Answers	Current final-rule questions describe the remaining foreign-company population, US-person exclusions and company report fields. Older domestic-company guidance must not override these exclusions.	October 9, 2026	https://www.fincen.gov/system/files/2026-08/QAs_BOIFinalRule.pdf