

COMPLIANCE WORKING RECORD

Gifts and hospitality register

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

Apply exact customer-approved item and cumulative thresholds, connection triggers, escalation and approval rules to complete supplied entries.

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

Use exact amounts per currency. Sum recipient and direction-matched entries within the declared rolling calendar-day window. Preserve included entry IDs, duplicate rejection and source gaps. Apply exact strict or inclusive thresholds and separate official, related-party and cash triggers from required prior approval evidence.

No currency conversion or automatic legality decision occurs. Rolling windows include the current date and the preceding window minus one days. Recorded approvals do not establish a statutory safe harbor.

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
Source date	October 1, 2026

Field	Value
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. Gift or hospitality source record (ITEM1)

State. Documented

Exact parties, purpose, amount and currency remain source-linked customer declarations.

Field	Value
Record	{ "reference": "ITEM1", "on": "2026-10-02", "giver": "Fictional employee", "recipient": "Fictional recipient", "direction": "Given", "purpose": "Fictional working hospitality", "amount": "60", "currency": "USD", "publicOfficialConnection": "No", "relatedParty": "No", "cash": "No", "sourceIds": ["S1"] }
Exact evidence source references	S1

5. Approved policy threshold or escalation (ITEM1/RULE1)

State. Customer rule not triggered

Apply the exact customer-approved rule. Escalation and recorded approval do not establish a lawful gift or donation.

Field	Value
Rule	Recipient cumulative amount
Operator	At least
Threshold	100
Currency	USD
Compared amount	60
Included item references	ITEM1
Escalation owner	Fictional compliance reviewer

Field	Value
Approval required	Yes
Complete supplied approvals	[{"reference":"A1","itemReference":"ITEM1","reviewer":"Fictional approver","on":"2026-10-02","decision":"Approved","rationale":"Fictional exact policy review. Requires tailoring.", "sourceIds":["S1"]}]
Exact evidence source references	S1

6. Gift or hospitality source record (ITEM2)

State. Documented

Exact parties, purpose, amount and currency remain source-linked customer declarations.

Field	Value
Record	{ "reference":"ITEM2", "on":"2026-10-03", "giver":"Fictional employee", "recipient":"Fictional recipient", "direction":"Given", "purpose":"Fictional second hospitality", "amount":"40", "currency":"USD", "publicOfficialConnection":"No", "relatedParty":"No", "cash":"No", "sourceIds":["S1"] }
Exact evidence source references	S1

7. Approved policy threshold or escalation (ITEM2/RULE1)

State. Escalation with approval gap

Apply the exact customer-approved rule. Escalation and recorded approval do not establish a lawful gift or donation.

Field	Value
Rule	Recipient cumulative amount
Operator	At least
Threshold	100
Currency	USD
Compared amount	100
Included item references	ITEM1, ITEM2
Escalation owner	Fictional compliance reviewer

Field	Value
Approval required	Yes
Complete supplied approvals	[]
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
entries 1. reference	ITEM1
entries 1. on	October 2, 2026
entries 1. giver	Fictional employee
entries 1. recipient	Fictional recipient
entries 1. direction	Given
entries 1. purpose	Fictional working hospitality
entries 1. amount	60
entries 1. currency	USD
entries 1. publicOfficialConnection	No
entries 1. relatedParty	No
entries 1. cash	No
entries 1. sourceIds	S1
entries 2. reference	ITEM2
entries 2. on	October 3, 2026
entries 2. giver	Fictional employee
entries 2. recipient	Fictional recipient

Field	Value
entries 2. direction	Given
entries 2. purpose	Fictional second hospitality
entries 2. amount	40
entries 2. currency	USD
entries 2. publicOfficialConnection	No
entries 2. relatedParty	No
entries 2. cash	No
entries 2. sourceIds	S1
rules 1. reference	RULE1
rules 1. trigger	Recipient cumulative amount
rules 1. thresholdAmount	100
rules 1. currency	USD
rules 1. operator	At least
rules 1. windowDays	30
rules 1. escalationTo	Fictional compliance reviewer
rules 1. approvalRequired	Yes
rules 1. sourceIds	S1
approvals 1. reference	A1
approvals 1. itemReference	ITEM1
approvals 1. reviewer	Fictional approver
approvals 1. on	October 2, 2026
approvals 1. decision	Approved
approvals 1. rationale	Fictional exact policy review. Requires tailoring.
approvals 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
US Department of Justice and Securities and Exchange Commission: A Resource Guide to the US Foreign Corrupt Practices Act. Second Edition	Guidance addresses gifts, hospitality, charitable contributions and third-party due diligence. Customer policy thresholds and documented approvals are not statutory safe harbors or legal clearance.	October 9, 2026	https://www.justice.gov/usdoj-media/criminal/media/1106611/dl
US Department of Justice: Evaluation of Corporate Compliance Programs. September 2024	Compliance evaluation considers risk-based design, third parties, testing and effectiveness. An assembled customer evidence pack does not certify an effective program.	October 9, 2026	https://www.justice.gov/criminal/criminal-fraud/page/file/937501/download