

COMPLIANCE WORKING RECORD

Intermediary due diligence 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-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

Assemble complete intermediary ownership, business rationale, services, payments, due-diligence answers and approval evidence.

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

Join exact intermediary and service references. Check ownership totals and source verification, required answer coverage, contradictory or duplicate answers, payment-to-service currency, third-party payees and differing jurisdictions. Preserve complete controls and unassigned records for qualified review.

No registry lookup, identity verification, sanctions screening, legal eligibility, fee reasonableness or payment authorization is implied. Customer-approved requirements define the bounded dossier.

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. Intermediary dossier (ITEM1)

State. Dossier review gaps

Ownership, services, payment arrangements and original sources are organized for customer review. No entity authentication or eligibility decision.

Field	Value
Legal name	Fictional intermediary
Jurisdiction	Fictional jurisdiction
Business rationale	Fictional supported service need
Public-official connection	Unresolved
Exact listed ownership percent	100
Ownership	[{"reference":"OWNER1","intermediaryReference":"ITEM1","owner":"Fictional owner","percent":"100","verification":"Customer verified","sourceIds":["S1"]}]
Services	[{"reference":"SERVICE1","intermediaryReference":"ITEM1","description":"Fictional contracted service","contractReference":"FICTIONAL-CONTRACT","expectedValue":"100","currency":"USD","sourceIds":["S1"]}]
Payments	[{"reference":"PAY1","intermediaryReference":"ITEM1","serviceReference":"SERVICE1","on":"2026-10-03","recipientName":"Fictional third-party payee","recipientJurisdiction":"Fictional different jurisdiction","amount":"25","currency":"USD","explanation":"Fictional payee difference needs review","sourceIds":["S1"]}]

Field	Value
Approvals	[{"reference":"A1","itemReference":"ITEM1","reviewer":"Fictional approver","on":"2026-10-02","decision":"Approved","rationale":"Fictional exact policy review. Requires tailoring.","sourceIds":["S1"]}]
Gaps	Public-official connection review
Exact evidence source references	S1

5. Intermediary approved requirement (REQ1)

State. Source-linked answer

All answers and contradictions retained. Duplicate answers do not silently satisfy a requirement.

Field	Value
Question	Fictional approved service and ownership evidence
Required	Yes
Answers	[{"requirementReference":"REQ1","answer":"Fictional supplied evidence record","reviewer":"Fictional diligence reviewer","outcome":"Supported","sourceIds":["S1"]}]
Exact evidence source references	S1

6. Intermediary payment review (PAY1)

State. Payment review gaps

Exact payment-to-service and payee links remain visible. No currency conversion or payment authorization.

Field	Value
Payment	{"reference":"PAY1","intermediaryReference":"ITEM1","serviceReference":"SERVICE1","on":"2026-10-03","recipientName":"Fictional third-party payee","recipientJurisdiction":"Fictional different jurisdiction","amount":"25","currency":"USD","explanation":"Fictional payee difference needs review","sourceIds":["S1"]}

Field	Value
Service match	{"reference":"SERVICE1","intermediaryReference":"ITEM1","description":"Fictional contracted service","contractReference":"FICTIONAL-CONTRACT","expectedValue":"100","currency":"USD","sourceIds":["S1"]}
Gaps	Third-party payee; Different payee jurisdiction
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
intermediaries 1. reference	ITEM1
intermediaries 1. legalName	Fictional intermediary
intermediaries 1. jurisdiction	Fictional jurisdiction
intermediaries 1. businessRationale	Fictional supported service need
intermediaries 1. publicOfficialConnection	Unresolved
intermediaries 1. sourceIds	S1
ownership 1. reference	OWNER1
ownership 1. intermediaryReference	ITEM1
ownership 1. owner	Fictional owner
ownership 1. percent	100
ownership 1. verification	Customer verified
ownership 1. sourceIds	S1
services 1. reference	SERVICE1
services 1. intermediaryReference	ITEM1
services 1. description	Fictional contracted service

Field	Value
services 1. contractReference	FICTIONAL-CONTRACT
services 1. expectedValue	100
services 1. currency	USD
services 1. sourceIds	S1
payments 1. reference	PAY1
payments 1. intermediaryReference	ITEM1
payments 1. serviceReference	SERVICE1
payments 1. on	October 3, 2026
payments 1. recipientName	Fictional third-party payee
payments 1. recipientJurisdiction	Fictional different jurisdiction
payments 1. amount	25
payments 1. currency	USD
payments 1. explanation	Fictional payee difference needs review
payments 1. sourceIds	S1
requirements 1. reference	REQ1
requirements 1. intermediaryReference	ITEM1
requirements 1. question	Fictional approved service and ownership evidence
requirements 1. required	Yes
requirements 1. sourceIds	S1
answers 1. requirementReference	REQ1
answers 1. answer	Fictional supplied evidence record
answers 1. reviewer	Fictional diligence reviewer
answers 1. outcome	Supported
answers 1. sourceIds	S1

Field	Value
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