

## REGUSHIELD AI AUDIT REPORT

Case Reference: CASE-2026-3879

Case ID: 12

Workflow: crypto\_reserve\_monitoring

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Audit Hash: e98509148b32ec5ef938ac1451c39132427dd337a4e569bff3ee2730781ad398

### RISK MATRIX

Risk Level: high

Risk Score: 75

Status: under review

### TRANSACTION CONTEXT

Amount: EUR 2400000

Transaction Count (24h): 18

Customer Type: business

Customer Risk Level: high

Route: LT -> DE

Cross-Border: Yes

PEP Flag: No

Suspicious Pattern: No

### COMPLIANCE INPUTS

KYC Status: complete

Sanctions Screening: review\_required

Source of Funds: verified

### AI REASONING

Classified as high risk due to cross-border route, sanctions review issue, high-risk customer profile. Enhanced due diligence and structured compliance review are recommended.

### LEGAL BASIS

- AML6 - High-Risk Factors / Cross-Border Review
- AML / SAR Escalation Logic
- MiCA / Travel Rule Controls
- EU AI Act Art. 13 - Transparency & Explainability
- AVNT / KGK / ISA Audit Readiness

### NARRATIVE

A transaction of 2,400,000 EUR was flagged during the crypto reserve monitoring process due to a mismatch in reserves. The customer, categorized as high risk and operating across borders (LT to DE), has complete KYC, but the sanctions screening requires further review. The note indicates that there are gaps associated with the custody reconciliation and the necessary metadata for the Travel Rule, warranting immediate

analytical attention.

#### RECOMMENDED ACTIONS

- Implement tighter scrutiny on future transactions involving high-risk customers. [high / open]
- Initiate a comprehensive risk assessment of the customer's business activities. [high / open]
- Enhance metadata collection for cross-border transactions to comply with the Travel Rule. [high / open]
- Conduct a detailed review of the reserve discrepancy. [high / open]

#### NOTES

Reserve mismatch and custody reconciliation exception with Travel Rule metadata gap.

END OF REPORT