

## REGUSHIELD AI AUDIT REPORT

Case Reference: CASE-2026-9481

Case ID: 9

Workflow: transaction\_monitoring

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Audit Hash: 46c9bdbfac8a0e5532779f2450fd57e9b723ae022f3c8d57ca92d0090377f78e

### RISK MATRIX

Risk Level: critical

Risk Score: 82

Status: flagged

### TRANSACTION CONTEXT

Amount: EUR 15000

Transaction Count (24h): 6

Customer Type: individual

Customer Risk Level: high

Route: TR -> LT

Cross-Border: Yes

PEP Flag: No

Suspicious Pattern: Yes

### COMPLIANCE INPUTS

KYC Status: incomplete

Sanctions Screening: review\_required

Source of Funds: unknown

### AI REASONING

Escalated to critical due to cross-border route, KYC weakness, sanctions review issue, source-of-funds uncertainty, suspicious behavior pattern, high-risk customer profile. Human review and auditor-ready evidence are required before closure.

### LEGAL BASIS

- AML6 - High-Risk Factors / Cross-Border Review
- EU AI Act Art. 14 - Human Oversight
- AML6 - KYC / Due Diligence Logic
- AML / SAR Escalation Logic
- AML6 - Suspicious Pattern Detection
- EU AI Act Art. 13 - Transparency & Explainability
- AVNT / KGK / ISA Audit Readiness

### NARRATIVE

This transaction monitoring case involves a 15,000 EUR transfer from Turkey to Lithuania, characterized by incomplete KYC documentation, an unknown source of funds, and identified suspicious patterns. The high-risk status of the customer and the need

for sanctions review further complicate the risk profile, necessitating urgent compliance actions.

#### RECOMMENDED ACTIONS

- Implement stricter monitoring on cross-border transactions involving high-risk customers. [immediate / open]
- Perform sanctions screening thoroughly to confirm compliance before processing any transactions. [immediate / open]
- Conduct a comprehensive review of the source of funds for the transaction. [immediate / open]
- Investigate the suspicious patterns identified in the transaction. [immediate / open]
- Complete KYC verification for the customer immediately. [immediate / open]

#### NOTES

High risk test

END OF REPORT