AML Public-Source Intelligence: Illustrative Evidence Brief

ILLUSTRATIVE SPECIALIST EVIDENCE BRIEF | PUBLIC-SOURCE AND SERVICE METHODOLOGY

No completed client matter is represented. This document demonstrates questions, evidence requirements, limitations and possible deliverables. It contains no verified findings about a named buyer or company. A matter, source access, fixed fee and timing require separate written acceptance.

Commissioned decision

This specialist review focuses on **AML Public-Source Intelligence**, within **Financial Crime, AML & KYC Intelligence**. The decision owner asks: **Do external identity, ownership and adverse-record signals justify further escalation?** The specific fact being tested, relevant entity, territory and historical period must be defined before any casework.

Narrow first commission

Investigate one named subject, one agreed current-versus-historical claim, the most relevant `official list entry` and one independent cross-check. Stop if original records are unavailable or the decision cannot be resolved in the agreed scope.

Original-record plan

- Source the exact original `official list entry` and capture jurisdiction, publisher and date.
- Verify identity against `company register` and document whether it is independent.
- Test `similar-name false positive` as a rival explanation.
- Check the alternative `stale beneficial-owner data` rather than treating an unreturned search result as exculpatory.
- Ask whether `unproved sanctions relationship` would require the decision owner to commission a qualified specialist.

Illustrative two-page PDF composition

Page 1: Case-neutral purpose, exact research questions, allowed source universe and decision relevance; do not name a supposed real client.

Page 2: Source-to-question matrix with no fabricated findings, a material contradiction register, a precise request for the missing original records and reliance boundaries.

Specific deliverable tables: match disposition table, ownership trace, escalation questions.

Example report table (empty until an authorised case)

Evidence question; Proposed source; What must be verified; Result

Which entity/asset is named?; official list entry; Exact identifiers and record period; Not investigated in this specimen

Does the claim survive a contrary source?; company register; Independence, timing and scope; Not investigated in this specimen

What would change the answer?; original regulator notice; similar-name false positive; Not investigated in this specimen

Applicable source portals

Ref; Primary source / comparator; Link; Evidence limitation and status

FINCEN-2026; U.S. FinCEN / Federal Register: Beneficial ownership reporting rules as amended 2026; https://www.govinfo.gov/app/details/FR-2026-08-14/2026-16576; WEB CHECKED 2026-10-12. Domestic U.S. entities exempt under final 2026 BOI revision; other verified records still matter

S02; FATF legal persons and beneficial ownership; https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Guidance-Beneficial-Ownership-Legal-Persons.html; REGISTER STARTING POINT; NOT NEWLY RECHECKED. Source candidate; subject relevance, date and access must be verified case-by-case.

S03; U.S. Treasury OFAC sanctions search; https://ofac.treasury.gov/sanctions-list-search-tool; REGISTER STARTING POINT; NOT NEWLY RECHECKED. Source candidate; subject relevance, date and access must be verified case-by-case.

Buyer action and exclusions

- Reader: Bank compliance, fintech oversight, regulated advisers and counsel.
- Commercial trigger to check: Onboarding, unusual-activity escalation, sanctions or politically exposed-person flag.
- Send the decision question and identifiers through the existing written-enquiry route; do not send restricted records by insecure email.
- **Professional boundary:** No regulated AML sign-off, screening guarantee or legal clearance; false positive risk.
- Do not imply the claimed facts are proven, that this is a completed sample case, or that named competitors have endorsed Aperture.

Release quality controls

- Confirm the appointing client, exact research question, relevant location, decision date, conflicts, privacy, sanctions and licensing.
- Check original source identity, authority, issue date, effective date, retrieval timestamp, version and lawful access.
- Reproduce important calculations and compare at least one plausible contrary explanation.
- Keep allegations, regulatory findings, historical claims and unresolved matches distinct.
- Mark each proposed finding supported, partially supported, contradicted, unresolved or outside mandate; include missing-source requests.
- Confirm that illustrations do not imply a real engagement, completed investigation, certified outcome or affiliation with named comparators.
- Obtain final human sign-off on accuracy, legal boundaries, confidentiality, claims and publication version before release.

Professional boundaries: Independent research support only. No legal, tax, investment, audit, valuation, brokerage, investigation requiring a specific professional licence or regulated opinion is implied. No confidential material should be sent before instructions.