EDD PROFILER

Example Analysis

A worked example of an Enhanced Due Diligence review across two consecutive six-month periods, showing what the platform surfaces and how a portfolio moves between reviews.

PORTFOLIO	100 customer relationships
PERIODS	Jan–Jun 2025 and Jul–Dec 2025
PREPARED WITH	EDD Profiler

Portfolio at a glance

Every relationship is reviewed every period. The counts below are the second-half 2025 review.

100 RELATIONSHIPS REVIEWED	**8** CLASSIFIED HIGH RISK	**40** WITH INVESTIGATION FINDINGS	**61** FINDINGS RAISED

How the portfolio moved

A review is not a ratchet. Between the two periods the platform escalated relationships whose activity diverged from their stated profile, and cleared those whose activity returned to it.

MOVEMENT	RELATIONSHIPS
Newly high risk Standard monitoring in H1, high risk in H2	3
Remained high risk High risk in both periods	5
No longer high risk High risk in H1, standard monitoring in H2	5

> High-risk population moved from **10** relationships in the first half to **8** in the second — not because thresholds changed, but because customer behavior did.

What the review surfaced

Findings across the whole portfolio in the second-half review, grouped by the pattern that triggered them.

FINDING	COUNT
High transaction velocity	33
Volume anomaly	8
Potential structuring	8
High cash intensity	7
CTR activity	3
Undisclosed international activity	1
Large single transaction	1

Each finding is written into the customer's review package with the underlying transactions attached, so an analyst — and later an examiner — can trace the conclusion back to the activity that produced it.

What a full review produces

- **A package per relationship** — checklist, full transaction ledger for the period, and external research, in the folder structure your procedure already specifies.
- **A consolidated portfolio report** — the statistics above, plus every flagged relationship written up in full.
- **An audit trail** — what was reviewed, what was found, and what the analyst concluded.

> This example is deliberately partial. Risk scoring methodology, thresholds and weightings are not shown.

Three relationships in detail

One escalated, one cleared, one sustained — the three ways a relationship moves between reviews.

Alice Jenkins

NEWLY HIGH RISK

Account 1001331 · Savings · Expected $7,000/mo

Second half 2025: 101 transactions · $134,575 · 0.0% cash

FIRST HALF 2025 — STANDARD MONITORING

- CTR activity: 1 transaction ≥ $10,000

SECOND HALF 2025 — HIGH RISK

- Undisclosed international activity: 15 transactions
- High transaction velocity: 17/month
- Volume anomaly: actual avg $22,429.24/mo is 3.2x expected $7,000.00/mo

Sharon Robinson

REMAINED HIGH RISK

Account 1001341 · Demand · Expected $2,000/mo

Second half 2025: 72 transactions · $279,225 · 69.9% cash

FIRST HALF 2025 — HIGH RISK

- CTR activity: 1 transaction ≥ $10,000
- Large single transaction: $31,000.00 (15.5x monthly expected)
- Volume anomaly: actual avg $5,166.67/mo is 2.6x expected $2,000.00/mo

SECOND HALF 2025 — HIGH RISK

- Potential structuring: 21 transactions in $8,000–$9,999 range
- High cash intensity: 69.9% of volume
- Volume anomaly: actual avg $46,537.54/mo is 23.3x expected $2,000.00/mo

Bruce Wayne

NO LONGER HIGH RISK

Account 1001330 · Demand · Expected $5,000/mo

Second half 2025: 59 transactions · $21,784 · 0.0% cash

FIRST HALF 2025 — HIGH RISK

- CTR activity: 1 transaction ≥ $10,000
- Large single transaction: $49,473.85 (9.9x monthly expected)
- Volume anomaly: actual avg $12,183.00/mo is 2.4x expected $5,000.00/mo

SECOND HALF 2025 — STANDARD MONITORING

No investigation findings this period.

WORKED EXAMPLE

STANDARD MONITORING

Alice Jenkins

Account 1001331 · Savings · Expected monthly volume $7,000 · Review period January–June 2025

TRANSACTIONS	TOTAL VOLUME	CASH SHARE	FINDINGS
1	$30,000	0.0%	1

1 INVESTIGATION FINDINGS

- CTR activity: 1 transaction ≥ $10,000

2 TRANSACTION ACTIVITY NARRATIVE

Single transaction: $30,000 ACH debit via "OTHER" channel in May 2025. Zero credits during review period. The $30,000 exceeds CTR threshold and is more than four times the $7,000 expected for an entire month.

Critical observation: Customer stated account purpose is payroll. Payroll involves recurring, periodic disbursements to multiple payees in relatively uniform amounts. A single $30,000 ACH debit bears no resemblance to legitimate payroll. No evidence of multiple payees, recurring cadence, or employee-wage-level amounts.

Zero credits in the period — a payroll account would need funding from business revenue or owner contributions. Absence suggests pass-through or single-purpose disbursement rather than active business payroll.

3 NEGATIVE NEWS & RESEARCH FINDINGS

No adverse media. Address and business registration verification PENDING — material gap for a customer claiming business purpose and business income. Must confirm legitimate business entity exists.

4 CDD PROFILE CONSISTENCY ANALYSIS

ELEMENT	DECLARED	OBSERVED	CONSISTENT?
Purpose	Business (payroll)	Single $30K ACH debit	**NO**
Monthly Volume	$7,000	$5,000 avg	Yes
Txn Types	Payroll	Single lump-sum debit	**NO**
International	None expected	None observed	Yes
Income Source	Business	No credits observed	Unverifiable
Product	Savings	Used for business payroll	Anomalous

Payroll would present as multiple disbursements, recurring cadence, employee-compensation-level amounts, recognized payroll processor origination. None present.

5 ALERT & CTR SUMMARY

One CTR-threshold transaction ($30,000 ACH — electronic, CTR not required). No structuring. No prior SARs. SAR not recommended at this time but reassess within 30 days pending follow-up.

6 PRODUCT USAGE ANALYSIS

Savings account for business payroll is atypical. Subject to transaction limitations. Not designed for recurring disbursement patterns.

7 OVERALL ASSESSMENT

Borderline profile that tilts toward elevated risk upon qualitative analysis. No single factor is dispositive; collectively they exceed appropriate residual risk for non-high-risk classification.

8 RECOMMENDATION

Qualitative factors support reclassification:

- Material CDD inconsistencies (payroll declared vs single lump-sum observed)
- Product-purpose mismatch (savings for payroll)
- New customer, no baseline
- Incomplete verifications

REQUIRED FOLLOW-UP:

1. Contact relationship manager — explain $30,000 ACH and payroll inconsistency
2. Complete business registration verification
3. Verify address
4. Request business documentation (license, articles, EIN)
5. Determine source of funds for $30K debit
6. Identify payee/beneficiary
7. Reassess SAR filing upon completion

9 NEXT REVIEW DATE

December 28, 2025 (6-month enhanced cycle) Return to 12-month once CDD updated and validated. Interim review triggered by: additional CTR transactions, adverse media, failure to respond to documentation requests.

THE FOLLOWING REVIEW — JULY TO DECEMBER 2025

On the next review this relationship **escalated to high risk**, with 101 transactions totaling $134,575.

- Undisclosed international activity: 15 transactions
- High transaction velocity: 17/month
- Volume anomaly: actual avg $22,429.24/mo is 3.2x expected $7,000.00/mo

WORKED EXAMPLE

HIGH RISK

Bruce Wayne

Account 1001330 · Demand · Expected monthly volume $5,000 · Review period January–June 2025

TRANSACTIONS	TOTAL VOLUME	CASH SHARE	FINDINGS
47	$73,098	0.5%	3

1 INVESTIGATION FINDINGS

- CTR activity: 1 transaction ≥ $10,000
- Large single transaction: $49,473.85 (9.9x monthly expected)
- Volume anomaly: actual avg $12,183.00/mo is 2.4x expected $5,000.00/mo

2 TRANSACTION ACTIVITY NARRATIVE

During the six-month review period, account 1001330 generated 47 transactions with aggregate volume of $73,097.99. Credits totaled $61,125.64 while debits totaled $11,972.35, indicating the account is receiving substantially more funds than disbursing. The average transaction size was $1,555.28, heavily skewed by one anomalous transaction of $49,473.85.

Transaction Composition: 46 of 47 transactions were debit card ($72,707.99). A single cash transaction of $390.00 was recorded. No wire transfers were executed despite CDD indicating international wires expected. No structuring-range transactions ($8,000–$9,999) observed.

Channel Distribution: 15 transactions totaling $58,126.85 processed through "OTHER" channel (79.5% of dollar volume but 31.9% of count). In-branch: 13 transactions ($8,485.14). Online: 7 ($2,506.00). ATM: 6 ($2,035.00). POS: 6 ($1,945.00).

Monthly Pattern: March 2025: $6,699 (within expected range). April 2025: $63,341 (12.7x expected — 86.7% of total volume in one month). May 2025: $3,058 (below expected). Extreme spike-and-drop pattern.

CTR Activity: One incoming transaction of $49,473.85 exceeded the $10,000 threshold. This is 9.9x expected monthly volume and 67.7% of total period volume.

3 NEGATIVE NEWS & RESEARCH FINDINGS

No adverse media found. Address verification PENDING (224 Park Drive, Gotham City, IL 60565 — ZIP 60565 corresponds to Naperville area; city name requires validation). CLEAR report PENDING. OFAC/sanctions screening: no matches.

4 CDD PROFILE CONSISTENCY ANALYSIS

ELEMENT	EXPECTED	ACTUAL	CONSISTENT?
Purpose	Personal use	Personal use	Yes
Monthly Volume	$5,000	$12,183 avg	**NO — 2.4x**
International Wires	Expected	$0 / 0 transactions	**NO**
Transaction Types	Day-to-day	46 debit card (incl. $49K anomaly) + 1 cash	**NO**

Key finding: Excluding April spike, the two other months with activity average ~$4,879 each. Deviation attributable to single event rather than sustained pattern. However, the $49,473.85 transaction is categorically inconsistent with "day to day" personal use and employment income.

5 ALERT & CTR SUMMARY

One CTR-threshold transaction: a $49,473.85 credit (inflow) on the debit-card product via the "OTHER" channel. As an electronic transaction, CTR filing not required, but enhanced review triggered. No structuring indicators. No prior SARs. SAR not recommended at this time pending RFI response.

6 PRODUCT USAGE ANALYSIS

Primary transaction type: debit card (97.9% of count, 99.5% of volume). Online banking used modestly. "OTHER" channel accounts for 79.5% of dollar volume — requires clarification. International wire capability unused — CDD update recommended. No RDC activity observed.

7 OVERALL ASSESSMENT

Mixed profile. Day-to-day debit card activity is unremarkable and consistent with personal banking. However, the $49,473.85 transaction is a significant outlier requiring explanation. Incomplete CLEAR report and address verification prevent fully informed determination.

Mitigating: No adverse media, no structuring, low cash activity (0.5%), no international transactions, US citizen. Excluding anomalous month, volume is consistent. Aggravating: $49K unexplained transaction, 2.4x volume deviation, new customer, "OTHER" channel concentration, incomplete verifications, CDD discrepancy on international wires.

8 RECOMMENDATION

REQUEST FOR INFORMATION (RFI) with Enhanced Monitoring

1. Obtain explanation and documentation for $49,473.85 transaction (nature, source, counterparty)
2. Update CDD monthly volume expectation
3. Confirm international wire capability still needed
4. Complete CLEAR report within 10 business days
5. Verify address

Enhanced monitoring: flag any transaction >$10K, monthly aggregate >$15K, any international wires, cash >$3K/month.

If RFI not resolved within 30 days, escalate for SAR consideration.

9 NEXT REVIEW DATE

December 28, 2025 (6-month enhanced cycle) If SAR filed, accelerate to 90-day cycle.

THE FOLLOWING REVIEW — JULY TO DECEMBER 2025

On the next review this relationship **returned to standard monitoring**, with 59 transactions totaling $21,784.

No investigation findings this period.