



SAMPLE COUNTERPARTY EDD MEMO

Counterparty ownership & control — evidence-readiness memo

Redacted Kazakhstan / CIS counterparty case

EXECUTIVE SUMMARY

ESCALATE BEFORE ONBOARDING

Readiness 24 / 100 · not ready

Exposure signal **Medium-high**

A name-screen cleared the counterparty, but the file is not ready to onboard. The name is clean; the structure behind it is undocumented. Three evidence gaps block a responsible decision, in order of what blocks first:

- 1. Ownership-chain evidence — not supplied.** Blocks the 50%-rule aggregation and the control test. The indirect stake behind the UAE holding company, up to the ultimate owner, is undocumented.
- 2. EU consolidated screen on the chain — not supplied.** Only the counterparty name was screened, not its owners or the nominee director.
- 3. Correspondent-bank / transit evidence — not supplied.** The file is not yet built to what the bank will ask, and the re-export facet is unevidenced.

Recommended action: escalate before onboarding. Obtain the ownership chain to the ultimate owner with an aggregate blocked-person calculation, and explain the nominee arrangement. Whether the 50% threshold is met, and whether the nominee constitutes control, is a licensed-compliance call — not made here.

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Subject	Counterparty A (Kazakhstan) · counterparty EDD, onboarding
Engine	agenda-intelligence-md, live A2A worker
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Findings reflect the file as supplied on 10 June 2026. Pre-compliance evidence triage only: this prompts for and checks whether the ownership-and-control evidence needed for an EDD decision is present and sourced — it does not resolve beneficial ownership, run sanctions screening, or verify whether any claim is true. A name match is not identity verification. Not legal, compliance, sanctions, financial, investment, insurance, or trading advice. Human review is required before any commercial action.