WoWyrd

CONFIDENTIAL

WOWYRD · RULE REVIEW

Rule review: extended management report

Prepared for **Demo client with its own rule file (own-rules, synthetic)**

Client: Demo client with its own rule file (own-rules, synthetic). Data: 2026-08 to 2026-10 (monthly periods). Cut-off: 2026-10-01 (set for this run). Generated: 2026-11-20 10:02 UTC.

Demo run. The unit costs are demo values, not a client's costs. The transactions and labels are synthetic. For this demo we set the logged hits of the declining rule "Wire total from one sender in a week" to 'decline' so the log matches the rule file. Other rules that fired on the same payments now show them as declined too.

Internal report. Do not share it outside your firm.

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> This is the extended management report. The short management report is management.html; the technical report is technical.html.

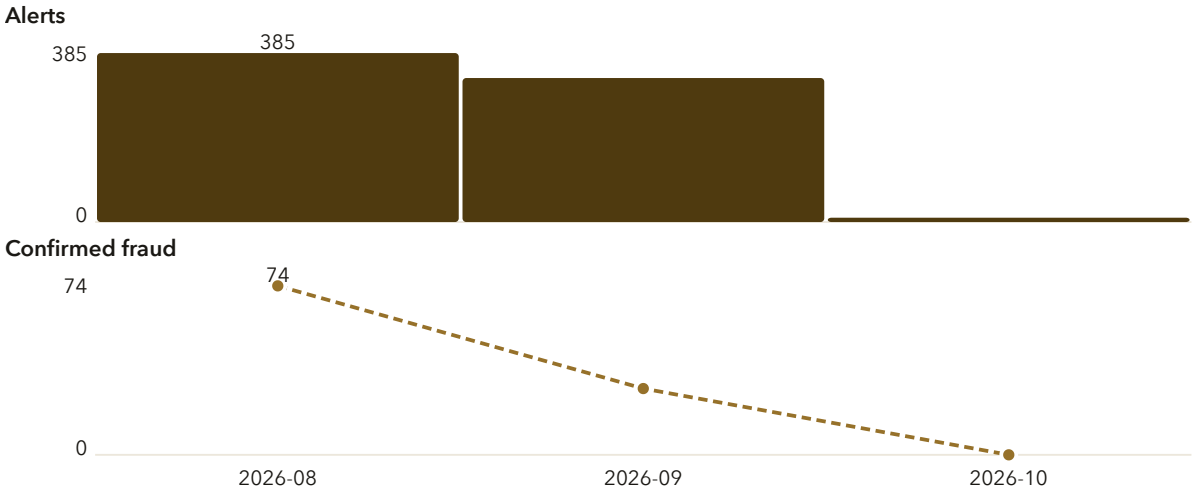
Headline numbers

1,950 **Transactions reviewed** Transactions file, 2026-08 to 2026-10	**723** **Alerts** Rule-hit log, 2026-08 to 2026-10	**103** **Confirmed fraud** Labels file, known by 2026-10-01	**450** **False alarms** Rule-hit log and labels, mature hits, 2026-08 to 2026-10
2,328.00 USD **False-alarm cost (estimate)** Your unit costs, 2026-08 to 2026-10	**79.6%** **Share of fraud with a rule hit** Labels and rule-hit log, 2026-08 to 2026-10		

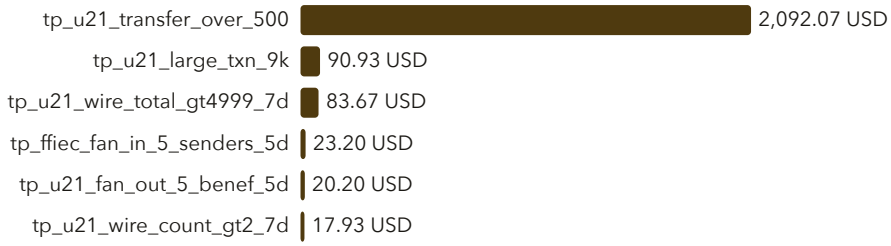
Value in your own costs

In 2026-08 to 2026-10, false alarms took 45.0 analyst hours and cost 2,328.00 USD. Source: your unit costs and the rule-hit log.

Charts



ALERTS (BARS) AND CONFIRMED FRAUD (DASHED LINE) PER PERIOD. TWO SCALES: FRAUD IS FAR SMALLER THAN ALERTS. SOURCE: RULE-HIT LOG AND LABELS, 2026-08 TO 2026-10.



FALSE-ALARM COST PER RULE IN USD. AN ALERT HIT BY SEVERAL RULES SHARES ITS COST EQUALLY. SOURCE: YOUR UNIT COSTS, 2026-08 TO 2026-10. IMPORTED RULES IN THIS CHART: TP_U21_TRANSFER_OVER_500 **TP_U21_TRANSFER_OVER_500** (AGREEMENT WITH YOUR ENGINE'S LOG: 100%); TP_U21_LARGE_TXN_9K **TP_U21_LARGE_TXN_9K** (AGREEMENT WITH YOUR ENGINE'S LOG: 88%); TP_U21_WIRE_TOTAL_GT4999_7D **TP_U21_WIRE_TOTAL_GT4999_7D** (AGREEMENT WITH YOUR ENGINE'S LOG: 100%); TP_FFIEC_FAN_IN_5_SENDERS_5D **TP_FFIEC_FAN_IN_5_SENDERS_5D** (AGREEMENT WITH YOUR ENGINE'S LOG: 100%); TP_U21_FAN_OUT_5_BENEF_5D **TP_U21_FAN_OUT_5_BENEF_5D** (AGREEMENT WITH YOUR ENGINE'S LOG: 100%); TP_U21_WIRE_COUNT_GT2_7D **TP_U21_WIRE_COUNT_GT2_7D** (AGREEMENT WITH YOUR ENGINE'S LOG: 100%).

Top 5 actions

ACTION		TYPE	EXPECTED EFFECT (BACKTEST)	CONFIDENCE
01	`REC-16a49a98` Add a rule for: Gambling winnings arrive with no deposits, then card transfers follow	Add a missing fraud type	No effect estimate.	low
02	`REC-fc5701c9` Add a rule for: Large loans are taken and repaid again and again	Add a missing fraud type	No effect estimate.	low
03	`REC-5ff2bbff` Add a rule for: One type of operation makes up an unusual share of a user's activity	Add a missing fraud type	No effect estimate.	low
04	`REC-8078ec06` Add a rule for: Payment purposes do not fit the merchant's category code	Add a missing fraud type	No effect estimate.	medium
05	`REC-05f946b2` Add a rule for: Regular transfers to a personal account look like business activity	Add a missing fraud type	No effect estimate.	low

Effects come from a backtest on 2026-08 to 2026-10. Selective labels: a declined payment has no outcome, so fraud a rule stopped by declining is not in "caught fraud cases lost". The technical report gives the evidence and caveats for each action. A rule name links to its entry in the rule glossary. Each action has a reference (REC-…). Quote this reference in your change record.

Your imported rules

5 of 9 imported rules replayed and agreed with your engine's log; 4 did not agree, so no what-if is shown for them.

YOUR RULE	ACTION	STATUS	AGREEMENT	LOGGED HITS	REPLAY HITS
Single transfer above 9000 `tp_u21_large_txn_9k` (agreement with your engine's log: 88%)	review	Below the agreement floor	88%	80	90
Transfer above 500 `tp_u21_transfer_over_500` (agreement with your engine's log: 100%)	review	Agrees	100%	701	701
One sender pays five or more receivers in five days `tp_u21_fan_out_5_benef_5d` (agreement with your engine's log: 100%)	alert	Agrees	100%	25	25
More than two wires from one sender in a week `tp_u21_wire_count_gt2_7d` (agreement with your engine's log: 100%)	review	Agrees	100%	22	22
Wire total from one sender in a week `tp_u21_wire_total_gt4999_7d` (agreement with your engine's log: 100%)	decline	Agrees	100%	89	89
Five or more senders pay one account in five days `tp_ffiec_fan_in_5_senders_5d` (agreement with your engine's log: 100%)	review	Agrees	100%	24	24
Device risk score from the vendor `R-509` (agreement: not replayable)	review	Not replayable	–	0	–
One device used by several customers `R-610` (agreement: not replayable)	alert	Not replayable	–	0	–
Very large transfer after a quiet spell `R-900` (agreement: cannot be compared)	review	Cannot be compared	–	0	45

For a replayed rule, both counts leave out its warm-up rows. For a rule that is not replayed, the logged hits are its hits in your whole log.

What-if on past data

- Wire total from one sender in a week `tp_u21_wire_total_gt4999_7d` (agreement with your engine's log: 100%, measured at your current threshold)
  - Threshold 6000: Across all your rules, on your history this threshold would have raised the same number of alerts and caught the same fraud cases. Across all your rules, on your history this threshold would have raised the same number of false alarms, and the false-alarm cost would have been 5.60 USD higher (an estimate from your unit costs). On your history, this rule alone would have raised 19 fewer alerts; your other rules alerted on those payments anyway, so the total does not change. This rule declines the payments it hits, so a changed threshold can raise the false-alarm cost. On your history, 7 good payments that this rule declined would not have been declined at this threshold; your other rules alerted on them anyway, so each would have cost analyst time (4.80 USD) instead of your friction cost (4.00 USD).
  - Threshold 8000: Across all your rules, on your history this threshold would have raised 2 fewer alerts and caught the same fraud cases. Across all your rules, on your history this threshold would have raised the same number of false alarms, and the false-alarm cost would have been 12.00 USD higher (an estimate from your unit costs). On your history, this rule alone would have raised 52 fewer alerts; your other rules alerted on 50 of those payments anyway. This rule declines the payments it hits, so a changed threshold can raise the false-alarm cost. On your history, 20 good payments that this rule declined would not have been declined at this threshold; your other rules alerted on them anyway, so each would have cost analyst time (4.80 USD) instead of your friction cost (4.00 USD). On your history, 1 good payment that only this rule alerted on would not have been alerted on at this threshold, so it would have cost nothing instead of your friction cost (4.00 USD).
- Transfer above 500 `tp_u21_transfer_over_500` (agreement with your engine's log: 100%, measured at your current threshold)
  - Threshold 1000: Across all your rules, on your history this threshold would have raised 39 fewer alerts and caught the same fraud cases. Across all your rules, on your history this threshold would have raised 33 fewer false alarms, and the false-alarm cost would have been 158.40 USD lower (an estimate from your unit costs). On your history, this rule alone would have raised 48 fewer alerts, 33 of them false alarms, 7 of them caught fraud cases; your other rules alerted on 9 of those payments anyway.
  - Threshold 2000: Across all your rules, on your history this threshold would have raised 121 fewer alerts and caught the same fraud cases. Across all your rules, on your history this threshold would have raised 95 fewer false alarms, and the false-alarm cost would have been 456.00 USD lower (an estimate from your unit costs). On your history, this rule alone would have raised 164 fewer alerts, 99 of them false alarms, 21 of them caught fraud cases; your other rules alerted on 43 of those payments anyway.
- Single transfer above 9000 `tp_u21_large_txn_9k` (agreement with your engine's log: 88%, measured at your current threshold): What-if refused: its replay is below the agreement floor, so a what-if would carry the translation error.

> Backtest on past data, not a forecast. A changed threshold can change how fraudsters behave.

> A payment that was declined has no outcome. Hits on declined payments are counted as 'outcome unknown', not as caught or as false alarms. A rule that declines payments hides the fraud it stopped, so 'caught' can be lower than the real number.

> This collector changes no live rule. A threshold change goes through your own change and approval process.

Format of the rule file: Download an example rule file (JSON, with a note on every key; replace its example consent line before you use it).

Side by side with WoWyrd rules

Each of your rules next to the WoWyrd rule for the same fraud type and the requirement it relates to. A link found by the rule's name says "please check".

YOUR RULE	FRAUD TYPE AND WOWYRD RULE	REQUIREMENT IT RELATES TO
Single transfer above 9000 `tp_u21_large_txn_9k` (agreement with your engine's log: 88%) Trigger: amount is at least 9000. Action: review. Logged hits: 80. Replay: Below the agreement floor.	No fraud type in our library matches this rule. Add a typology ID to the rule file.	No requirement in our library relates to this rule.
Transfer above 500 `tp_u21_transfer_over_500` (agreement with your engine's log: 100%) Trigger: amount is more than 500. Action: review. Logged hits: 701. Replay: Agrees.	No fraud type in our library matches this rule. Add a typology ID to the rule file.	No requirement in our library relates to this rule.
One sender pays five or more receivers in five days `tp_u21_fan_out_5_benef_5d` (agreement with your engine's log: 100%) Trigger: the number of different receiver id values with the same sender id in 5 days is at least 5. Action: alert. Logged hits: 25. Replay: Agrees.	**One payer sends to far more payees than similar payers** WoWyrd rule available: One account pays many different payees; numbers: not run on your data	NBU draft, Annex 2 sign. Status: draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law); as of 2026-11-11. bank.gov.ua
More than two wires from one sender in a week `tp_u21_wire_count_gt2_7d` (agreement with your engine's log: 100%) Trigger: channel is "wire" and the number of transactions with the same sender id in 7 days is more than 2, counting only transactions where channel is "wire". Action: review. Logged hits: 22. Replay: Agrees.	**Many operations of one type in a short time, incoming or outgoing** WoWyrd rule available: Many requests from one account in an hour, then a payout; A burst of operations of one type; numbers: not run on your data	NBU draft, Annex 2 sign. Status: draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law); as of 2026-11-11. bank.gov.ua
Wire total from one sender in a week `tp_u21_wire_total_gt4999_7d` (agreement with your engine's log: 100%) Trigger: channel is "wire" and the total amount with the same sender id in 7 days is more than 4999, counting only transactions where channel is "wire". Action: decline. Logged hits: 95. Replay: Agrees.	No fraud type in our library matches this rule. Add a typology ID to the rule file.	No requirement in our library relates to this rule.

YOUR RULE	FRAUD TYPE AND WOWYRD RULE	REQUIREMENT IT RELATES TO
Five or more senders pay one account in five days `tp_ffiec_fan_in_5_senders_5d` (agreement with your engine's log: 100%) Trigger: the number of different sender id values with the same receiver id in 5 days is at least 5. Action: review. Logged hits: 24. Replay: Agrees.	**matched by name: please check** **Many operations of one type in a short time, incoming or outgoing** WoWyrd rule available: Many requests from one account in an hour, then a payout; A burst of operations of one type; numbers: not run on your data **Many payers send to one payee, far more than for similar payees** WoWyrd rule available: Many senders pay one account; One payee shared by several customers; numbers: not run on your data **Many different senders pay one account within a short time** WoWyrd rule available: Many senders pay one account; numbers: not run on your data	**matched by name: please check** NBU draft, Annex 2 sign. Status: draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law); as of 2026-11-11. bank.gov.ua Passing cards, account access or payment data to fraudsters becomes a crime. Detect and restrict accounts used as drops. Status: adopted by the Rada 28.10.2026; presidential signature not confirmed; as of 2026-11-11. itd.rada.gov.ua FinCEN advisories and alerts (money-mule red flags). Status: public red-flag references; own wording; as of 2026-11-11. No official page confirmed FFIEC BSA/AML Examination Manual, Appendix F (red flags). Status: public red-flag references; own wording; as of 2026-11-11. No official page confirmed Unit21 recommended rules (2024 public copies). Status: public red-flag references; own wording; as of 2026-11-11. No official page confirmed Monitor both outgoing and incoming payments for fraud. Status: agreed, not adopted (EU Payment Services Regulation; adoption expected by 12.2026); as of 2026-11-11. oeil.europarl.europa.eu Sending and receiving providers share APP scam refunds; a claim has a maximum level. Status: in force since 07.10.2024; as of 2026-11-11. psr.org.uk Monitor incoming as well as outgoing payments, with money-mule signs. Status: consultation; comments close 24.12.2026; as of 2026-11-11. fca.org.uk Receiving banks monitor incoming credits, including new, dormant and mule accounts. Status: in force: phase 1 20.03.2026, phase 2 22.06.2026; as of 2026-11-11. nacha.org
Device risk score from the vendor `R–509` (agreement: not replayable) Trigger: not expressible in the rule file. Action: review. Logged hits: 0. Replay: Not replayable.	**matched by name: please check** **One device fingerprint is used by unrelated users** WoWyrd rule available: One device used by several customers; numbers: not run on your data	**matched by name: please check** NBU draft, Annex 2 sign. Status: draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law); as of 2026-11-11. bank.gov.ua
One device used by several customers `R–610` (agreement: not replayable) Trigger: the number of different sender id values with the same device id in 1 day is at least 3. Action: alert. Logged hits: 0. Replay: Not replayable.	**One device fingerprint is used by unrelated users** WoWyrd rule available: One device used by several customers; numbers: not run on your data	NBU draft, Annex 2 sign. Status: draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law); as of 2026-11-11. bank.gov.ua
Very large transfer after a quiet spell `R–900` (agreement: cannot be compared) Trigger: amount is more than 20000. Action: review. Logged hits: 0. Replay: Cannot be compared.	**A dormant account suddenly moves large amounts** WoWyrd rule: planned	FFIEC BSA/AML Examination Manual, Appendix F (red flags). Status: public red-flag references; own wording; as of 2026-11-11. No official page confirmed Monitor incoming as well as outgoing payments, with money-mule signs. Status: consultation; comments close 24.12.2026; as of 2026-11-11. fca.org.uk Large amounts soon after opening; a dormant account suddenly active. Status: guidance; as of 2026-11-11. bsaaml.ffiec.gov Receiving banks monitor incoming credits, including new, dormant and mule accounts. Status: in force: phase 1 20.03.2026, phase 2 22.06.2026; as of 2026-11-11. nacha.org

Not legal advice. This report maps your rules to requirements, in our own short wording. It is not legal advice. You decide how you comply.

Threshold search on your history

For each number threshold of your rules that agree with your engine's log, the collector tried 16 values from half to double the current one. It picked the best value on the earlier 70% of the payments with a known outcome and kept it only if it also did better on the later 30%, which the pick never saw. Target: the most confirmed fraud caught by all your rules, with no more alerts than today.

Backtest on past data, not a forecast. Nothing changes until you approve it in your own engine. A changed threshold can change how fraudsters behave.

RULE	CHECK	CURRENT	PROPOSED	WHY
REC–d74333d3 tp_u21_transfer_over_500	amount is more than 500	500	**1000**	Threshold 500 → 1000: catches the same confirmed fraud with 15 fewer alerts, precision 7% → 6%, false-alarm cost 43.20 USD lower on the later 30% of your history.

Not searched

- tp_u21_large_txn_9k: not searched: the replay does not match your engine's hits (below the agreement floor).
- tp_u21_fan_out_5_benef_5d: not searched: an AML rule has no labels below its threshold, so a lower threshold would look free. Use the below-the-line sample for this rule.
- tp_u21_wire_count_gt2_7d: not searched: an AML rule has no labels below its threshold, so a lower threshold would look free. Use the below-the-line sample for this rule.
- tp_u21_wire_total_gt4999_7d, check 1: not searched: only number thresholds compared with more than or less than can be searched.
- tp_u21_wire_total_gt4999_7d, check 2: not searched: too little labelled history (0 hits with a known outcome in the search part, 0 in the check part; at least 30 and 10 are needed).
- tp_ffiec_fan_in_5_senders_5d: not searched: an AML rule has no labels below its threshold, so a lower threshold would look free. Use the below-the-line sample for this rule.
- R-509: not searched: the rule cannot be replayed on your files.
- R-610: not searched: the rule cannot be replayed on your files.
- R-900: not searched: the rule's ID is not in your hit log, so its replay cannot be checked.

Below-the-line sample (AML rules)

AML rules have no labels below the threshold: nobody reviews a payment the rule did not flag. For each number threshold of a rule marked aml, the collector picked up to 20 payments in each of 3 bands just under the line (each band 10% of the threshold). Your analysts review them in `btl_sample.csv`: write suspicious or not_suspicious in analyst_label. The next run reads the marked file and shows the share marked suspicious. The file holds transaction IDs: it stays inside your environment and is never in the summary. The order is fixed by your token key and the seed "wowyrd-btl", so a re-run gives the same list. Nothing here changes a score.

RULE	CHECK	BAND	PAYMENTS IN BAND	SAMPLED	SUSPICIOUS	SUSPICIOUS SHARE
tp_u21_fan_out_5_benef_5d	the number of different receiver id values with the same sender id in 5 days is at least 5	from 4 below 5	41	20	0 of 17	0.0%
tp_u21_fan_out_5_benef_5d	the number of different receiver id values with the same sender id in 5 days is at least 5	from 3 below 4	141	20	2 of 20	10.0%
tp_u21_fan_out_5_benef_5d	the number of different receiver id values with the same sender id in 5 days is at least 5	from 2 below 3	537	20	0 of 20	0.0%
tp_u21_wire_count_gt2_7d	the number of transactions with the same sender id in 7 days is more than 2, counting only transactions where channel is "wire"	more than 1 up to 2	56	20	–	–
tp_ffiec_fan_in_5_senders_5d	the number of different sender id values with the same receiver id in 5 days is at least 5	from 4 below 5	15	15	1 of 6	16.7%
tp_ffiec_fan_in_5_senders_5d	the number of different sender id values with the same receiver id in 5 days is at least 5	from 3 below 4	96	20	4 of 20	20.0%
tp_ffiec_fan_in_5_senders_5d	the number of different sender id values with the same receiver id in 5 days is at least 5	from 2 below 3	451	20	1 of 20	5.0%

- tp_u21_wire_count_gt2_7d, check 2: band 2 would start at 0 or below.

Of the reviewed payments just under this threshold, this share was marked suspicious by your analysts. A high share means the threshold may be too high. It is not projected to all payments.

Not sampled

- tp_u21_wire_count_gt2_7d, check 1: not sampled: only number thresholds compared with more than or less than have a line to go under.

What changed since the previous report

Compared with the previous report, which covers data up to 2026-08-27 (35 days earlier). Its numbers are as measured at its own cut-off: labels that matured later are not added to it.

Per rule

Sorted by the size of the change in alerts, largest first. Precision is shown only with at least 30 hits with a known outcome in each run. Hit rate = alerts / transactions.

RULE	ALERTS THEN	ALERTS NOW	CHANGE	PRECISION THEN	PRECISION NOW	CHANGE	HIT RATE THEN	HIT RATE NOW
tp_u21_transfer_over_500	324	701	+116%	3.3%	8.5%	+5.1 points	37.6%	35.9%
tp_u21_wire_total_gt4999_7d	32	95	+197%	no data	no data	not measured	3.7%	4.9%
tp_u21_large_txn_9k	36	80	+122%	no data	34.5%	not measured	4.2%	4.1%
tp_u21_wire_count_gt2_7d	5	22	+340%	no data	no data	not measured	0.6%	1.1%
tp_u21_fan_out_5_benef_5d	15	25	+67%	no data	no data	not measured	1.7%	1.3%
tp_ffiec_fan_in_5_senders_5d	15	24	+60%	no data	no data	not measured	1.7%	1.2%
R-509	0	0	no change	no data	no data	not measured	0.0%	0.0%
R-610	0	0	no change	no data	no data	not measured	0.0%	0.0%
R-900	0	0	no change	no data	no data	not measured	0.0%	0.0%

Rules added and removed

Added: none.

Removed: none.

Threshold changes

No threshold changed.

Requirements

No requirement file was given for this run, so requirement changes are not compared.

Recommendations from the previous report

Of the previous report's 7 recommendations: 0 changed as proposed, 0 partly changed, 2 not changed, 5 where we cannot tell.

Too few dated changes for a median (0; at least 3 needed).

Open recommendations by age: 7 up to 30 days, 0 of 31–90 days, 0 over 90 days.

Days count from the first report that made each recommendation. A change dated before that report, a change with no exact date and an upper bound ("at most") are shown but not counted. This is a measurement on your own records, not a judgement of your change process.

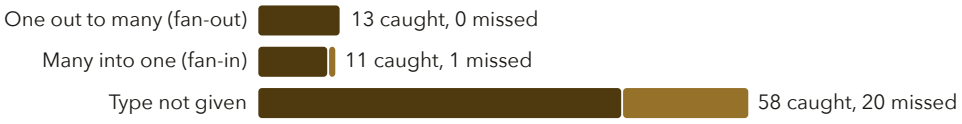
REFERENCE	NO. IN THE PREVIOUS REPORT	RECOMMENDATION	STATUS	SOURCE	CHANGE DATE	FIRST RECOMMENDED	DAYS TO CHANGE	BEFORE → AFTER	PREDICTED	AGAINST THE PREDICTION
REC–73309477	1	Turn off rule tp_u21_transfer_over_500	Not changed.	your rule file	not known	2026-11-20, in 1 report	open 0 days, in 1 report	Not measured.	Predicted: 9.5 fewer alerts per day (estimated on your data).	–

REFERENCE	NO. IN THE PREVIOUS REPORT	RECOMMENDATION	STATUS	SOURCE	CHANGE DATE	FIRST RECOMMENDED	DAYS TO CHANGE	BEFORE → AFTER	PREDICTED	AGAINST THE PREDICTION
REC-16a49a98	2	Add a rule for: Gambling winnings arrive with no deposits, then card transfers follow	Cannot tell: no change record or rule file covers it, and your data cannot show this kind of change.	none	not known	2026-11-20, in 1 report	open 0 days, in 1 report	Not measured.	No effect was estimated for this recommendation.	–
REC-fc5701c9	3	Add a rule for: Large loans are taken and repaid again and again	Cannot tell: no change record or rule file covers it, and your data cannot show this kind of change.	none	not known	2026-11-20, in 1 report	open 0 days, in 1 report	Not measured.	No effect was estimated for this recommendation.	–
REC-5ff2bbff	4	Add a rule for: One type of operation makes up an unusual share of a user's activity	Cannot tell: no change record or rule file covers it, and your data cannot show this kind of change.	none	not known	2026-11-20, in 1 report	open 0 days, in 1 report	Not measured.	No effect was estimated for this recommendation.	–
REC-8078ec06	5	Add a rule for: Payment purposes do not fit the merchant's category code	Cannot tell: no change record or rule file covers it, and your data cannot show this kind of change.	none	not known	2026-11-20, in 1 report	open 0 days, in 1 report	Not measured.	No effect was estimated for this recommendation.	–
REC-05f946b2	6	Add a rule for: Regular transfers to a personal account look like business activity	Cannot tell: no change record or rule file covers it, and your data cannot show this kind of change.	none	not known	2026-11-20, in 1 report	open 0 days, in 1 report	Not measured.	No effect was estimated for this recommendation.	–
REC-d74333d3	7	Rule tp_u21_transfer_over_500 , check 1: threshold 500 → 1000	Not changed.	your rule file	not known	2026-11-20, in 1 report	open 0 days, in 1 report	Not measured.	Predicted: 0.9 fewer alerts per day (backtest on past data).	–

Observed after the change, not proven to be caused by it. Traffic, fraud patterns and other changes in the same weeks also move these numbers. A status is about your own change, not about any regulation. This is a measurement for the rule owner, not an audit of your change process.

Coverage by fraud type

Fraud types present in your labels



LABELLED FRAUD CASES PER TYPE. BLUE: A RULE FIRED ON THE PAYMENT. ORANGE: NO RULE FIRED. SOURCE: LABELS FILE AND RULE-HIT LOG, LABELS KNOWN BY THE CUT-OFF.

FRAUD TYPE	LABELLED CASES	CAUGHT	MISSED	WOWYRD
One out to many (fan-out)	13	13	0	WoWyrd rule available: One account pays many different payees
Many into one (fan-in)	12	11	1	WoWyrd rule available: Many senders pay one account; One payee shared by several customers
Type not given	78	58	20	WoWyrd rule: planned

Not in this dataset, so it cannot be measured here

Your labels hold no case of these types, so this data cannot show whether your rules catch them. This is not a gap in your rules.

- **One user holds many more accounts or cards than similar users**
  WoWyrd rule: planned.
- **One type of operation makes up an unusual share of a user's activity**
  WoWyrd rule available: One type of operation dominates an account.
- **Many operations of one type in a short time, incoming or outgoing**
  WoWyrd rule available: Many requests from one account in an hour, then a payout; A burst of operations of one type.
- **Balance stays low although large amounts pass through**
  WoWyrd rule available: Large amounts pass through an account that keeps a low balance.
- **Large loans are taken and repaid again and again**
  WoWyrd rule available: Large loans taken and repaid again and again.
- **Money comes in and leaves fast, little balance stays**
  WoWyrd rule available: Money leaves soon after it arrives.
- **Gambling winnings arrive with no deposits, then card transfers follow**
  WoWyrd rule available: Gambling winnings with no gambling deposits.
- **Regular transfers to a personal account look like business activity**
  WoWyrd rule available: A personal account paid by many payers.
- **A new merchant's volume is far above similar merchants, then the merchant closes**
  WoWyrd rule available: A merchant with little history suddenly busy.
- **Merchant account inflows mirror its outflows (transit)**
  WoWyrd rule available: A business account pays out almost all it receives.
- **Payment purposes do not fit the merchant's category code**
  WoWyrd rule available: Payment purpose does not fit the merchant's business; Card payment to a person without category or purpose.
- **Contacts, device, apps, IMEI, operating system or network address change often**
  WoWyrd rule available: Payout right after an email or phone change; One session from several network addresses; One account used from many devices.
- **One device fingerprint is used by unrelated users**
  WoWyrd rule available: One device used by several customers.
- **Two operations are too far apart to travel between in the time**
  WoWyrd rule available: Locations too far apart for the time between them.
- **Most of an incoming amount leaves again within hours**
  WoWyrd rule available: Money leaves soon after it arrives.
- **A new account gets large or many credits soon after opening**
  WoWyrd rule available: A new account receives a large credit; A new account paid by several people.
- **A dormant account suddenly moves large amounts**
  WoWyrd rule: planned.
- **Repeated amounts just under a reporting or limit threshold**
  WoWyrd rule available: Payments just under a limit; Many small payments from one account add up to a large sum; Many small payments to one payee add up to a large sum.

- **Repeated round amounts with no business reason**
  WoWyrd rule available: Several payments in large round amounts.
- **Outgoing payments per hour above the customer's usual level**
  WoWyrd rule available: More payments in an hour than the customer usually makes; Many requests from one account in an hour, then a payout.
- **A large first payment to a payee never paid before**
  WoWyrd rule available: A large payment to a payee added just before.
- **Many senders' accounts share one beneficiary**
  WoWyrd rule available: One payee shared by several customers.
- **Money goes round in a circle between accounts within days**
  WoWyrd rule: planned.
- **An amount far above the customer's own history**
  WoWyrd rule available: A payment far above the customer's usual amount.
- **Many small credits, then one large debit**
  WoWyrd rule available: Many small credits, then one large payout.
- **Credits from many different banks into one account**
  WoWyrd rule available: Credits from many different banks into one account.
- **Transfers to or from high-risk jurisdictions**
  WoWyrd rule available: A payment to or from a high-risk country.
- **Cash withdrawn right after a credit arrives**
  WoWyrd rule available: Cash taken out soon after money arrives.
- **The payee name does not match and the payment still goes**
  WoWyrd rule available: Paid although the payee name did not match.
- **The payment reference mentions investment, crypto or a 'safe account'**
  WoWyrd rule available: The payment reference uses common scam wording.
- **An older customer suddenly sends a large amount to a new payee**
  WoWyrd rule available: An older customer sends a large amount to a new payee.
- **Activity at hours unusual for the customer**
  WoWyrd rule available: Activity at an hour unusual for the customer.

New in our reference set since your last report

Our reference set: version v0.7.0, published 2026-11-18 (built into this collector).

Our reference set has not changed since your last report (version v0.7.0).

Incoming payments and money-mule signs

Incoming payments not measured: your transactions file has no direction column (for example direction, with values such as in and out).

Requirements changed since the last review

Your rules are mapped to current requirements. We flag when a new requirement affects them. We follow official publications of regulators in Ukraine, the EU, the UK and the US.

> **Not legal advice. This report maps your rules to requirements, in our own short wording. It is not legal advice. You decide how you comply.**

Requirements library read on 2026-11-11. No change file was given for this run, so no changed requirement is listed here.

Requirements still open since the previous report

Your rules may not cover a requirement of NBU draft §16(10), §65-66

Review every rule at least monthly by back-testing it. (NBU draft §16(10), §65-66, status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Gap), and it is still open. Now: Partly met.

We found no implementation guidance from the regulator for this requirement.

Public cases where a regulator named the same kind of gap (monitoring rules, scenarios or thresholds not reviewed, tested or tuned):

- NBU, 2026: a public case on this kind of gap.
- NYDFS, 2025: a public case on this kind of gap.
- FCA, 2024: a public case on this kind of gap.

Your rules may not cover a requirement of NBU draft §60(1)

Metric 1: compare how often each rule fired with how many payments were actually stopped. (NBU draft §60(1), status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Partly met), and it is still open. Now: Partly met.

We found no implementation guidance from the regulator for this requirement.

Public cases where a regulator named the same kind of gap (transaction monitoring not effective or not calibrated to the firm's risks):

- NBU, 2026: a public case on this kind of gap.
- NBU, 2026: a public case on this kind of gap.
- NYDFS, 2025: a public case on this kind of gap.

Your rules may not cover a requirement of NBU draft §60(2)

Metric 2: share of fraud value that was prevented, out of all fraud value. (NBU draft §60(2), status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Partly met), and it is still open. Now: Partly met.

We found no implementation guidance from the regulator for this requirement.

Public cases where a regulator named the same kind of gap (transaction monitoring not effective or not calibrated to the firm's risks):

- NBU, 2026: a public case on this kind of gap.
- NBU, 2026: a public case on this kind of gap.
- NYDFS, 2025: a public case on this kind of gap.

Your rules may not cover a requirement of NBU draft §62-64

Set rule-effectiveness thresholds in writing. A rule under its threshold gets an immediate review. (NBU draft §62-64, status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Gap), and it is still open. Now: Gap.

We found no implementation guidance from the regulator for this requirement.

Public cases where a regulator named the same kind of gap (monitoring rules, scenarios or thresholds not reviewed, tested or tuned; transaction monitoring not effective or not calibrated to the firm's risks):

- NBU, 2026: a public case on this kind of gap.
- NBU, 2026: a public case on this kind of gap.
- NYDFS, 2025: a public case on this kind of gap.

Your rules may not cover a requirement of NBU draft §68-69

Record a review decision for every rule: keep, adjust or cancel. (NBU draft §68-69, status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Partly met), and it is still open. Now: Partly met.

We found no implementation guidance from the regulator for this requirement.

Public cases where a regulator named the same kind of gap (monitoring rules, scenarios or thresholds not reviewed, tested or tuned):

- NBU, 2026: a public case on this kind of gap.
- NYDFS, 2025: a public case on this kind of gap.

- FCA, 2024: a public case on this kind of gap.

Your rules may not cover a requirement of NBU draft §16, §18, §2

Reconcile payment operations every day. (NBU draft §16, §18, §2, status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Partly met), and it is still open. Now: Partly met.

We found no implementation guidance from the regulator for this requirement.

We found no public enforcement case for this kind of gap.

Your rules may not cover a requirement of NBU draft §19

Have evidence ready for a supervisor: documents, rules, risk markers. (NBU draft §19, status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Partly met), and it is still open. Now: Partly met.

We found no implementation guidance from the regulator for this requirement.

Public cases where a regulator named the same kind of gap (monitoring rules, scenarios or thresholds not reviewed, tested or tuned; transaction monitoring not effective or not calibrated to the firm's risks):

- NBU, 2026: a public case on this kind of gap.
- NBU, 2026: a public case on this kind of gap.
- NYDFS, 2025: a public case on this kind of gap.

Your rules may not cover a requirement of 3 NYCRR 504.3

Analyse scenarios, rules and thresholds on an ongoing basis. (3 NYCRR 504.3, status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Partly met), and it is still open. Now: Partly met.

How the regulator describes doing this:

- Final transaction monitoring and filtering program regulation (3 NYCRR 504), press release (NYDFS, 2016-06-30), dfs.ny.gov.

Public cases where a regulator named the same kind of gap (monitoring rules, scenarios or thresholds not reviewed, tested or tuned):

- NYDFS, 2025: a public case on this kind of gap.
- NBU, 2026: a public case on this kind of gap.
- FCA, 2024: a public case on this kind of gap.

Resolved since the previous report

- The requirement “Test and review rules; a poorly calibrated rule set the firm cannot explain is poor practice”: No gap found in your data in this report (was Partly met in the report with data up to 2026-08-27).
- The requirement “Tune and validate monitoring; justify each threshold”: No gap found in your data in this report (was Partly met in the report with data up to 2026-08-27).

Not legal advice. Your compliance team decides how a requirement applies to you. Public cases show how regulators have treated the same kind of gap; they do not predict an outcome for you.

Regulatory checks by regulator

> **Not legal advice. This report maps your rules to requirements, in our own short wording. It is not legal advice. You decide how you comply.**

Regulatory statuses as of 2026-11-11 (library date). Check them again before you rely on this report.

Grouped by regulator. Our own short wording, not the regulator's text. The technical report gives each finding and its evidence.

Checks per NBU requirements

Rows citing the NBU draft of 17.07.2026 — draft, not in force: its text can change before adoption. Resolutions 51, 54 and 116 are in force. Bill 16013 is a Ukrainian bill, shown here with its status.

REQUIREMENT (OUR WORDING)	RESULT	SOURCE STATUS	AS OF	OFFICIAL SOURCE
The acquirer passes payee (merchant) name and category code to the issuer. Check that these fields are filled in your data. Most time-relevant item: the deadline is about 20.11.2026.	Not measurable from these files	in force since 20.05.2026; 6 months to comply (about 20.11.2026)	2026-11-11	bank.gov.ua
Review every rule at least monthly by back-testing it.	Partly met	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Metric 1: compare how often each rule fired with how many payments were actually stopped.	Partly met	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Metric 2: share of fraud value that was prevented, out of all fraud value.	Partly met	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Set rule-effectiveness thresholds in writing. A rule under its threshold gets an immediate review.	Gap	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Record a review decision for every rule: keep, adjust or cancel.	Partly met	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Have evidence ready for a supervisor: documents, rules, risk markers.	Partly met	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Show the acquirer's full name before an online payment; receipts show payee, commission, purpose and category code.	Not measurable from these files	in force since 20.05.2026; 6 months to comply (about 20.11.2026)	2026-11-11	bank.gov.ua
Reconcile payment operations every day.	Partly met	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Acquiring for natural persons only for allowed categories, with the required data passed to the issuer.	Not measurable from these files	in force since 20.05.2026; 6 months to comply (about 20.11.2026)	2026-11-11	bank.gov.ua
Non-bank providers that acquire payments need an authorisation; the sanctions pause has ended.	Not measurable from these files	in force; grace period ended 02.09.2026	2026-11-11	bank.gov.ua
Remote verification of natural persons uses the updated procedure with credit-bureau data.	Not measurable from these files	in force since 10.10.2026; 3 months to align internal procedures (about 10.01.2027)	2026-11-11	bank.gov.ua
Reports to the State Financial Monitoring Service go only through the e-cabinet, with numbered registers.	Not measurable from these files	in force since 10.10.2026; 3 months to align internal procedures (about 10.01.2027)	2026-11-11	bank.gov.ua
Passing cards, account access or payment data to fraudsters becomes a crime. Detect and restrict accounts used as drops.	Not measurable from these files	adopted by the Rada 28.10.2026; presidential signature not confirmed	2026-11-11	itd.rada.gov.ua

Checks per EU requirements

REQUIREMENT (OUR WORDING)	RESULT	SOURCE STATUS	AS OF	OFFICIAL SOURCE
When a payee name check fails because of the payee's provider, that provider compensates the payer's provider. Keep evidence of the name check on received transfers.	Not measurable from these files	agreed, not adopted (EU Payment Services Regulation; adoption expected by 12.2026)	2026-11-11	oeil.europarl.europa.eu

Checks per UK requirements

REQUIREMENT (OUR WORDING)	RESULT	SOURCE STATUS	AS OF	OFFICIAL SOURCE
A claim may carry an excess of up to 100 GBP, never for vulnerable customers.	Not measurable from these files	in force	2026-11-11	psr.org.uk
Test and review rules; a poorly calibrated rule set the firm cannot explain is poor practice.	No gap found in your data	guidance in force	2026-11-11	fca.org.uk

Checks per US requirements (FinCEN, NYDFS, FFIEC, Nacha, Federal Reserve)

FinCEN and Nacha items are not checked from your files in this run; the rows below are NYDFS and FFIEC items.

REQUIREMENT (OUR WORDING)	RESULT	SOURCE STATUS	AS OF	OFFICIAL SOURCE
Analyse scenarios, rules and thresholds on an ongoing basis.	Partly met	in force	2026-11-11	dfs.ny.gov
Test rules before and after they go live.	Not measurable from these files	in force	2026-11-11	dfs.ny.gov
Tune and validate monitoring; justify each threshold.	No gap found in your data	guidance	2026-11-11	bsaaml.ffiec.gov

Fraud types in plain words

Each fraud type named in your labels, in one sentence. The word in small grey text is the label as your file gives it.

Many into one (fan-in) `FAN-IN`	Many accounts send money into one account, which collects it.
One out to many (fan-out) `FAN-OUT`	One account sends money out to many accounts, so it spreads thin.
Type not given `no type`	Fraud labels in your file that do not say which kind of fraud it was.