

WHITEPAPER

Adverse Media Screening Best Practices

AI-Powered Discovery, PEP Monitoring & Enforcement Intelligence

*Sanctions lists tell you who is designated today.
Adverse media tells you who is about to be designated tomorrow.*

DOJ

SEC

FinCEN

FCA

PEP

6+

Sources

85%

Auto-Resolved

13

Categories

3-Tier

AI Analysis

SecurePoint USA

securepointusa.com

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01 Why Sanctions Lists Alone Are Not Enough

Sanctions lists are reactive. OFAC designates an individual or entity after sufficient evidence has been gathered, reviewed, and approved. By the time a name appears on the SDN list, the underlying behavior has often been underway for months or years.

Adverse media screening closes this gap. DOJ indictments, SEC enforcement actions, FinCEN penalties, and investigative journalism surface compliance-relevant information weeks, months, or years before formal sanctions designation.

The challenge is volume. Government enforcement databases, court filings, and global news produce thousands of data points daily. Without intelligent triage, compliance teams drown in noise. The solution is smarter screening architecture that auto-resolves low-risk findings while escalating genuine threats.

02 The 6 Enforcement Intelligence Sources

DOJ Enforcement Actions (Department of Justice)

Federal criminal prosecutions, indictments, plea agreements, and sentencing. Credibility: 1.0

SEC Enforcement (Securities & Exchange Commission)

Civil enforcement, fraud charges, insider trading, corporate penalties via EDGAR. Credibility: 0.95

FinCEN Actions (Financial Crimes Enforcement Network)

AML enforcement, BSA violations, civil money penalties. Credibility: 0.95

FCA (UK) Findings (Financial Conduct Authority)

UK regulatory enforcement including fines and prohibition orders. Credibility: 0.95

OpenSanctions Crime (Aggregated Datasets)

INTERPOL Red Notices, FBI Most Wanted, FBI Terrorism, international warrants. Credibility: 0.90

AI-Powered News (Multi-Source)

Wire services (Reuters, AP, AFP), major press (WSJ, FT, Bloomberg), regional media. Credibility: 0.60-0.90

03 AI-Powered Triage & Auto-Disposition

A tiered AI architecture is designed to auto-resolve a large share of findings while routing genuine ambiguity to human reviewers with full context. Internal benchmarks for SecurePoint USA programs commonly land in the 85–90% auto-resolved range; actual ratios depend on roster composition, source coverage, and threshold tuning.

3-Tier AI Analysis

- **Fast Tier:** Lightweight model processes bulk discoveries at scale. Entity extraction, categorization, initial confidence scoring.
- **Standard Tier:** Results with confidence 0.3-0.6 auto-escalate to more capable model for deeper analysis.
- **Deep Tier:** Most capable model used for compliance manager validation. Detailed analysis with citations and recommended actions.

Auto-Disposition Decision Matrix

- Confidence < 0.50: Auto-dismissed (likely noise)

- Confidence ≥ 0.85 : Auto-validated (high-confidence finding)
- Confidence 0.50-0.85 + Critical/High severity: Human review required
- Confidence 0.50-0.85 + Medium/Low severity: Auto-validated

Target outcome: typically 85–90% auto-resolved with the remainder routed for human review. The exact split is configuration- and roster-dependent.

04 Source Credibility & Recency Scoring

Not all adverse media is created equal. A DOJ press release carries fundamentally different weight than an unverified blog post.

Source Credibility Tiers

- Government sources (DOJ, SEC, FinCEN, FCA): 0.95-1.0
- Wire services (Reuters, AP, AFP): 0.90
- Major financial press (WSJ, FT, Bloomberg, NYT, BBC): 0.80-0.85
- Trade press (Law360, Compliance Week, GIR): 0.70-0.75
- Regional/local media: 0.60

Recency Weighting

- Under 30 days: 1.0 | 30-90 days: 0.9 | 90-180 days: 0.8
- 6-12 months: 0.7 | 1-2 years: 0.5 | 2-5 years: 0.3 | 5+ years: 0.2

Composite Scoring Formula

60% Entity Match + 20% AI Confidence + 10% Source Credibility + 10% Recency

Match threshold: 0.65 (lower than sanctions 0.80 since adverse media is informational, not blocking).

05 PEP Screening & Continuous Monitoring

Politically Exposed Persons represent elevated risk due to political connections and exposure to bribery, corruption, and illicit financial flows.

- Global PEP database aggregated from multiple authoritative datasets covering all jurisdictions
- Each PEP record includes position, country, term dates, and alternative name spellings
- Continuous monitoring detects PEP status changes over time
- PEP screening runs alongside sanctions and adverse media in a single call
- Watchlist integration: entities under surveillance checked against new PEP and adverse media matches

06 The Adverse Media Risk Categories

Every discovery is classified into one or more categories:

- Fraud
- Sanctions Evasion
- Money Laundering
- Bribery & Corruption

- Export Violations
- Terrorism Financing
- Tax Evasion
- Insider Trading
- Regulatory Action
- Environmental Crime
- Human Trafficking
- Cybercrime
- Organized Crime

Severity Levels

- Critical: Confirmed conviction, active sanctions, terrorism, major enforcement (>\$1M penalties)
- High: Formal indictment, criminal charges, significant regulatory action, debarment
- Medium: Active investigation, settlement, minor violations, civil penalty (<\$500K)
- Low: Allegations only, minor issues, unverified reports, resolved historical matters

07 Building an Operational Monitoring Program

1. Load Your Roster Once

Import counterparties, vendors, visitors, or third parties via CSV or API. Each entity gets a risk tier and review cadence (monthly, quarterly, semi-annual, annual).

2. Monitor Continuously

Daily automated scans check your entire roster against enforcement databases, sanctions updates, PEP changes, and news monitoring. Incremental mode fetches only new results.

3. Let AI Triage Noise

Auto-disposition resolves the bulk of low-confidence and clearly-serious results so that ambiguous-but-serious findings reach compliance teams with full AI context and recommended actions.

4. Generate Defensible Evidence

Quarterly certifications, annual reviews, and event-triggered assessments with dual-signature signoff (reviewer + approver). Evidence packs in PDF, CSV, JSON formats.

08 SecurePoint USA Screening Architecture

6 Enforcement Sources, Daily Scans

DOJ, SEC, FinCEN, FCA, OpenSanctions crime datasets, and AI-powered news aggregation. Incremental sync processes only new results.

3-Tier AI with Multi-Entity Extraction

AI extracts all named entities from a single article (up to 10) with independent confidence scores. Ambiguous results auto-escalate to more capable models.

Unified Sanctions + Media + PEP Screening

Single screening call checks 19+ sanctions lists, adverse media, and global PEP databases simultaneously. Combined risk scoring for holistic assessment.

Review Lifecycle & Dual-Signature Signoff

Structured review lifecycle (draft, in-progress, pending adjudication, completed). Individual finding adjudication with compliance notes. Dual-signature signoff.

Roster-Based Continuous Monitoring

Assign risk tiers and review cadences. Daily scans with AI triage. Digest reporting for routine, immediate alerts for critical findings.

SRC Sources & Notes

The references below are the primary sources used in this paper. They are listed for traceability and verification — they are not endorsements, and SecurePoint USA does not represent any source as exhaustive. Confirm current text and guidance with the source itself before relying on any citation.

[1] FATF Recommendations — Politically Exposed Persons (Recommendation 12)

<https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatf-recommendations.html>
International framework that underpins PEP screening expectations.

[2] FinCEN — Customer Due Diligence and Beneficial Ownership

<https://www.fincen.gov/resources/statutes-and-regulations/cdd-final-rule>
US regulatory anchor for the adverse-media-as-CDD-input discussion.

[3] DOJ — Justice Manual and Enforcement Press Releases

<https://www.justice.gov/jm/justice-manual>
Source category for the "DOJ enforcement intelligence" tier described in the paper.

[4] SEC — EDGAR Enforcement Actions

<https://www.sec.gov/litigation.shtml>
Source category for SEC civil enforcement findings referenced.

[5] OFAC — A Framework for OFAC Compliance Commitments (May 2019)

<https://ofac.treasury.gov/media/16331/download>
Used to frame why adverse media is part of a "risk-based, documented" program.

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Beyond Sanctions Lists, Toward Programmatic Diligence

Sanctions lists describe yesterday. Adverse media often surfaces tomorrow. SecurePoint USA screens government enforcement sources, runs AI-powered triage, supports PEP monitoring, and supports roster-based continuous surveillance.

Auto-resolution rates depend on configuration and roster; the goal is to focus your compliance team on the findings that actually matter.

Schedule a Demo

securepointusa.com/request-demo

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