

Black Sea Trading Demo LLC

Registered name (KA)	შპს ბლექ სი ტრეიდიგ დემო	Identification code	999000003
Registered name (EN)	Black Sea Trading Demo LLC	Legal form	LLC
Registered address	4 Rustaveli Ave, Batumi	Registry status	active
Jurisdiction	GE	Registration date	2019-03-11

1. EXECUTIVE RISK SUMMARY

Assessment	Value	Derivation
Core risk level	CRITICAL	Highest band triggered by the rules printed below
Confidence	0.95	Direct watchlist listing on the subject node
Source coverage	4 of 6	Ingestion sources that contributed a record to this entity's 4-hop neighbourhood: acb, foreign_influence, opensanctions, spa
Findings in scope	5	Machine-generated findings citing the subject or a node within 4 hops
Graph scope	7 nodes	Breadth-first walk from the subject to depth 4

What drove this band

#	Driver
1	Subject is directly sanctioned (demo_eu_consolidated)

Banding rules, reported verbatim so the assessment can be audited rather than trusted. Graded under risk model GeoShield default (45af5890988f). A finding carries the severity of the rule that raised it and is not configurable. On top of that, this model escalates: sanction_proximity: HIGH, subject_foreign_influence: MEDIUM, subject_pep: MEDIUM, subject_sanctioned: CRITICAL. Sanction proximity is measured within 2 hops. Worst signal wins; otherwise LOW. Confidence is the confidence of the finding that set the band, and is a statement about that finding only — it is not a probability that the subject is engaged in wrongdoing. Where no finding set the band, confidence falls back to source coverage and is labelled as such. A LOW band on thin coverage means the entity was not examined, not that it is clean.

Findings in scope

ID	Severity	Conf.	Finding	Summary
DEMO-LISTED-001	CRITICAL	1.00	Black Sea Trading Demo LLC is directly sanctioned	Black Sea Trading Demo LLC is a legal entity named on a sanctions list under demo_eu_consolidated. This is a designation of the party itself, not an inference from its relationships. Demonstration record: the entity is fictional.
DEMO-PROXIMITY-001	CRITICAL	0.88	Caucasus Logistics Demo LLC is four hops from a sanctioned individual through its beneficial owner	Caucasus Logistics Demo LLC carries no designation of its own. Its ownership runs through Vake Capital Demo LLC to Anchor Holding Demo Ltd (Cyprus) to Nino Abashidze-Demo, a politically exposed person whose declared family tie reaches Temur Kldiashvili-Demo, designated under demo_ofac_sdn. A screen that stops at the first hop returns nothing on this customer.
DEMO-PEP-001	HIGH	0.95	Beneficial owner of Caucasus Logistics Demo LLC is a politically exposed person	Nino Abashidze-Demo holds the ultimate beneficial interest in Caucasus Logistics Demo LLC through a Cyprus holding, and is recorded as Deputy Minister in the asset declaration corpus. The customer has since been awarded GEL 2,450,000 in public contracts.
DEMO-OFFSHORE-001	MEDIUM	0.80	Ownership passes through a Cyprus holding company	Anchor Holding Demo Ltd is registered in Cyprus and holds Vake Capital Demo LLC. The layer is not itself an offence; it is the reason the beneficial owner is not visible from the Georgian registry extract alone.

ID	Severity	Conf.	Finding	Summary
DEMO-FOREIGN-001	MEDIUM	0.75	Open Caucasus Institute Demo is on the foreign influence register and shares a declared interest with the owner	The register records Open Caucasus Institute Demo as pursuing the interests of a foreign power. Nino Abashidze-Demo declares an interest in it. Reported because it is on the register, not because registration is evidence of wrongdoing.

2. BENEFICIAL OWNERSHIP, CONTROL AND PEP EXPOSURE

2.1 Mapped UBO chain

No ownership edges reach this subject in the loaded graph. This is an absence of ingested data, not a statement that the entity has no owners — NAPR ownership extracts are CAPTCHA-gated and are not collected automatically by this pipeline.

2.2 Corporate director history

Officer	Company	Role	Status	From	To	Conf.
Temur Kldiashvili-Demo	Black Sea Trading Demo LLC	director	Current	—	—	1.00

2.3 Linked PEP relationships

Person	Position	Agency	Hops	Conf.	Route
Nino Abashidze-Demo	Deputy Minister (demonstration record)	Demo Ministry of Regional Development	2	1.00	Black Sea Trading Demo LLC -[DIRECTOR]-> Temur Kldiashvili-Demo -[FAMILY_OF]-> Nino Abashidze-Demo

Politically exposed person status is an administrative classification that triggers enhanced due diligence under FATF Recommendation 12. It is not an allegation of wrongdoing, and neither is a family or business connection to a PEP. Route confidence is the weakest edge along the path shown.

3. FOREIGN INFLUENCE REGISTER AND INTERNATIONAL WATCHLISTS

Entity	Signal	Detail	Source
Black Sea Trading Demo LLC	Sanctions listing	demo_eu_consolidated	https://www.opensanctions.org/search?q=demo
Temur Kldiashvili-Demo	Sanctions listing	demo_eu_consolidated, demo_ofac_sdn	https://www.opensanctions.org/search?q=demo
Nino Abashidze-Demo	Sanction proximity	Within 2 hops of a sanctioned party	https://declaration.acb.gov.ge/API/Declarations?Key=demo
Open Caucasus Institute Demo	Foreign Influence Register	Listed in the NAPR Foreign Influence Transparency Register (უცხოური ძალის რეგისტრი)	https://fitreg.napr.gov.ge/fitr/fitr-pub/srch-app
Anchor Holding Demo Ltd	Offshore jurisdiction	Connected to CY	https://www.opensanctions.org/search?q=demo

Scope of this section: entries are drawn only from the sources this pipeline ingests — the NAPR Foreign Influence Transparency Register and the consolidated OpenSanctions dataset. It is not a screen against OFAC, EU, UK OFSI, or UN lists directly, and a blank section here does not constitute a negative sanctions screening result. Registration on the foreign influence register is a filing obligation recorded by the registry; it is not a finding of wrongdoing by the registrant.

4. LITIGATION AND FINANCIAL EXPOSURE

4.1 Court records

No court record was ingested for the subject or for any node within 4 hops of it. This is the absence of a collected ruling, not a finding that none exists: the court's own decision search is disallowed to automated collection, so rulings reach this graph only when an operator uploads one.

4.2 Amounts recorded against the network

Relationship	Party	Counterparty	Amount	Stated
tender participant	Demo Roads Agency	Caucasus Logistics Demo LLC	2,450,000.00 GEL	—
tender winner	Demo Roads Agency	Caucasus Logistics Demo LLC	2,450,000.00 GEL	—

Relationship	Party	Counterparty	Amount	Stated
tender participant	Black Sea Trading Demo LLC	Demo Roads Agency	2,390,000.00 GEL	—
tender participant	Demo Roads Agency	Mtkvari Foods Demo LLC	180,000.00 GEL	—

Amounts are printed in the currency the registry recorded and are not converted here. The portal converts for reading convenience and prints the rate and its date beside the figure; a rate carried into a document without the day it was published is a number nobody can check.

5. DATA PROVENANCE AND SOURCE TIMESTAMPS

Source	Last ingested	Records staged	Used in this dossier
NAPR — National Agency of Public Registry (business register)	Not ingested	0	No
ACB — Anti-Corruption Bureau (asset declarations)	2026-08-16 15:35 UTC	4343	Yes
SPA — State Procurement Agency (tenders)	2026-08-16 15:36 UTC	275441	Yes
Common Courts of Georgia (litigation)	2026-08-16 15:36 UTC	1	No
OpenSanctions (consolidated watchlists)	2026-08-16 15:36 UTC	747	Yes
NAPR Foreign Influence Transparency Register	2026-08-16 15:40 UTC	385	Yes

Generation parameter	Value
Document identifier	7E38C8F22638
Generated at	2026-08-19 08:58 UTC
Graph backend	files (data\demo\demo_graph.json)
Graph exported at	2026-08-18 20:51 UTC
Graph loaded at	2026-08-19 08:58 UTC
Subject node id	org:ge:n:b1d7df5132a09000
Traversal depth	4
Staging store	data\georgia\staging.sqlite
Landing zone	data\georgia\landing
Document language	en
Rendering font	NotoSansGeorgian (Georgian: yes, Cyrillic: no)

"Last ingested" is the most recent fetch timestamp recorded in the staging layer for that source, not the date the underlying registry last updated the record. A source marked "Not ingested" was never collected on this host: the corresponding risk dimension is unexamined and must not be read as clear.

6. LIMITATIONS AND LIABILITY DISCLAIMER

Nature of this document. This dossier is an automated research aid compiled from public Georgian registries and open sanctions data. It is not legal advice, not a regulatory determination, not a credit or suitability opinion, and not a certification of compliance with any AML, KYC, or sanctions obligation. It does not discharge the recipient's own customer due diligence duties.

No allegation of wrongdoing. Appearance in this document is not an accusation. Politically exposed person status, registration on the Foreign Influence Transparency Register, a shared registered address, and proximity to a sanctioned party are structural observations that warrant enquiry. They are not evidence of an offence, and family members named here appear solely because a public asset declaration lists them.

Derived content. Risk levels, confidence values, effective ownership percentages, and relationship paths are computed by software from the underlying records. The derivation rules are printed in section 1 so they can be checked. Every assertion traces to a node id, edge, or finding identifier recorded in the graph and reproducible from the staging layer.

Completeness. Coverage is bounded by what the sources publish and by what was ingested at the timestamps in section 5. Georgian registry ownership extracts are gated behind a CAPTCHA and are not retrieved automatically; the pipeline records the gate and stops rather than circumventing it. Absence of a finding is therefore evidence of absent data, not of absent risk.

Identity resolution. Georgian personal and company names are matched across sources by an automated resolver. Individuals sharing a name are separated by declared date of birth or personal number where a source publishes one; where none is published, a residual risk of conflation remains.

Confirm identity against a primary document before acting on any entry.

Data protection. This dossier contains personal data, including data about named private individuals drawn from public asset declarations. Handle it under the recipient's own lawful basis for processing, restrict distribution to personnel with a compliance need, and retain it no longer than that purpose requires.

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Document 7E38C8F22638 · generated 2026-08-19 08:58 UTC · subject org:ge:n:b1d7df5132a09000 · graph source files (data\demo\demo_graph.json)