

Wire transfer thresholds

wire-transfer-thresholds-v2 - v2.0

Effective: 2026-04-25

Owner: Treasury / AML compliance

Applies to: wire_transfer, pay_invoice

Purpose

This policy is the dollar-authority schedule for wire transfer actions performed by any finance agent on the platform. It supersedes the prior v1 thresholds and adds explicit handling for customer-to-customer transfers, which v1 left under the general expense-approval rules.

Tiered approval rules

Wire transfers must follow tiered approval based on amount:

- Under \$10,000 -- auto-approve provided every required field is present in the request: amount, origin_account, recipient, transaction_type. Missing fields fail closed.
- \$10,000 to \$200,000 -- hold for manual review. The reviewer must confirm the recipient is a known counterparty before releasing.
- Over \$200,000 -- deny unless explicit pre-authorization is documented in the request context (e.g. context.preauthorization_id). Without that field, this is a hard deny -- no human-review path.

Recipient identity scrutiny

Wire transfers with a recipient whose identifier starts with C -- i.e. customer-to-customer transfers -- require enhanced scrutiny even under the \$10,000 threshold. Hold for review and surface the recipient's prior balance (recipient_balance_before) so the reviewer can spot the canonical drainage pattern.

Customer-to-customer transfers above \$50,000 are denied without review. This is the FFIEC-recommended treatment for unverified peer-to-peer high-value movement.

Why this rule exists

Adapted from the BSA \$10,000 cash-transaction reporting threshold and the FinCEN large-value-transfer guidance. The \$200,000 hard ceiling matches the canonical wire-monitoring threshold used at money-service businesses and the empirical isFlaggedFraud heuristic in the academic PaySim fraud-simulation literature.