

# The Fiduciary Intelligence Hub

Q2 2026 Market Analysis  
of Retirement Provider  
Vulnerability

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# The Breaking Point

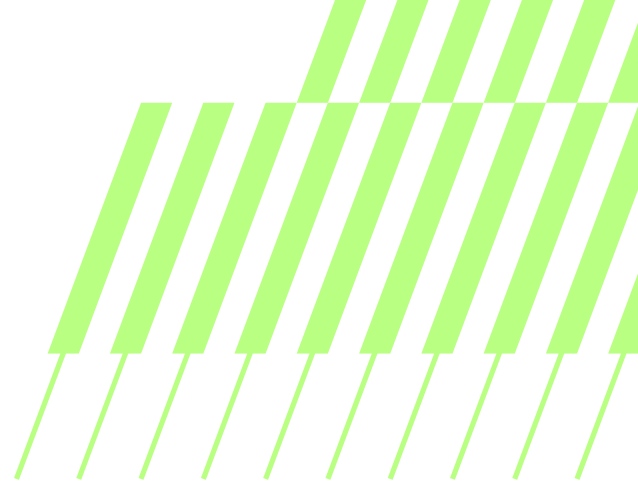
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## Financial crime has entered a high-velocity, industrialized era.

The retirement and pension sector faces systemic instability as attacks transition from bespoke, high-value targets to an industrialized era of financial crime. This shift is defined by the deployment of high-volume, automated botnets capable of conducting thousands of concurrent, low-value probes against institutional money-out workflows<sup>1</sup>.

While previous cycles involved threat actors targeting high-net-worth individuals through labor-intensive social engineering, the math has changed. By Q2 2026, agentic artificial intelligence has permanently altered the cost-benefit analysis for criminals. Fraud is now executed at a scale and velocity that legacy defensive infrastructures were never designed to handle.

# The Breaking Point



## Criminals use micro-targeting to evade internal alert thresholds.

The most prominent evidence of this tactical shift is the micro-targeting of disbursements at specific values designed to evade internal alert floors. Fraudulent requests are increasingly clustering at the \$79,700 mark.

This specific figure is a calculated response to the \$80,000 manual review threshold common among Tier 1 retirement providers.

By requesting funds just below this ceiling, automated systems extract assets without triggering the enhanced due diligence or manual oversight required for larger distributions.

This "industrialized probing" leverages computational endurance (the ability of AI agents to persist indefinitely until a vulnerability is found) to bypass static rules that rely on human intervention.

# The Regulatory Catalyst

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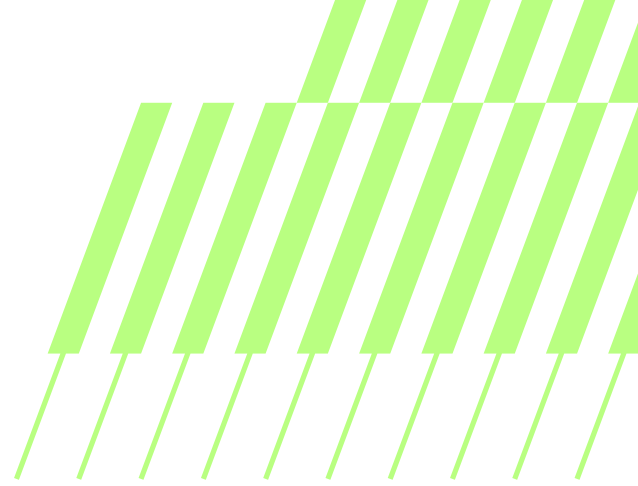
## Introducing The FIFC: FINRA'S Real-Time Threat Intelligence Hub

On March 31, 2026, the Financial Industry Regulatory Authority (FINRA) launched the Financial Intelligence Fusion Center (FIFC), which is a regulator-led intelligence hub providing a centralized portal for real-time threat intelligence sharing.

The launch of the FIFC is a direct response to the escalating computational endurance race between adversarial AI and legacy defense systems.

Historically, firms operated in isolation and treated fraud as an internal operational risk. The FIFC formalizes the transition to a collective defense posture, acknowledging that modern attacks rarely target a single institution in isolation.

# The Regulatory Catalyst



Complementing the FIFC is FINRA Regulatory Notice 26-02, which proposes critical amendments to Rules 4512 and 2165 to protect senior and vulnerable investors from financial exploitation<sup>2</sup>. A

key proposal includes extending the maximum hold period for suspicious disbursements from 55 business days to 145 business days.

This extension is necessary because AI-driven frauds often require significant time to investigate, escalate, and remediate.

Furthermore, the industry is moving toward adopting the term "emergency contact" in place of "trusted contact person" to increase participant comfort with account-level protection measures.

# The Business Case For Modernization

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To quantify the risk and opportunity cost associated with legacy processes, this analysis examines the metrics of two industry leaders: a Top 5 U.S. Retirement Provider managing \$1.5 trillion in assets and a Top 10 Global Actuarial and Retirement Firm that recently transitioned to automated high-stakes workflows<sup>2</sup>.

For institutions of this scale, manual, paper-based workflows represent a critical security vulnerability. Before implementing modernized identity attestation, these institutions faced manual "wet signature" error (NIGO) rates of 33%<sup>5</sup>. Updated March 2026 data indicates that manual form processing and mailing costs have risen to \$34.70 per form, driven by persistent inflation and increased labor costs.

Additionally, spousal consent requirements impact approximately 20% of withdrawal requests, which is roughly 168,000 transactions annually for a Top 5 provider, creating significant operational friction<sup>7</sup>.

## Proof Implementation Results

The implementation of Proof’s multi-signal identity infrastructure has fundamentally reset these operational benchmarks. Since late January, a Top 10 global firm utilizing the platform has secured over \$4.2 billion in transactions and eliminated more than 2,500 processing days<sup>4</sup>.

By achieving a 70% digital adoption rate, these institutions have realized a projected ROI of \$7.5 million in annual recurring net savings<sup>7</sup>.

Metric	Legacy State	Proof State	Impact
<b>NIGO Error Rate</b>	33%	<1%	97% reduction in rework
<b>Cost Per Form</b>	\$34.70	Optimized digital overhead	Substantial overhead reduction
<b>Time to Detect</b>	18 days	Real-time	Near-instant threat mitigation
<b>Fraud Loss Rate</b>	12.5 bps	<1 bps	>90% loss reduction



**<1%**

NIGO error rate



**Real-time**

Threat mitigation



**<1bps**

Fraud loss rate

# The "Money Out" Identity Gap

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The "Money Out" phase remains the primary point of failure for identity verification. Vulnerabilities in 401(k) rollovers and hardship withdrawals have intensified following SECURE 2.0 Act self-certification provisions. While intended to streamline access, these provisions have inadvertently caused a 6% surge in account leakage. Fraudsters exploit the reduced evidentiary requirements to initiate illegitimate withdrawals under the guise of financial hardship<sup>1</sup>.

Simultaneously, the industry is observing a 40% increase in video injection attacks targeting participant distributions<sup>11</sup>. These attacks represent an escalation of deepfake technology, where an unauthorized party injects an AI-generated video stream into a live identity verification interview.

These tools can simulate micro-expressions and lip-syncing, making it difficult for human agents to distinguish between a legitimate participant and a high-resolution deepfake. This surge highlights the inadequacy of visual-only "Know Your Customer" (KYC) protocols<sup>13</sup>.

# Calibrated Strategic Metrics (2022-2026)

Metric	2022 (Actual)	2024 (Actual)	2025 (Year End)	2026 (Projected)
Incident Volume	~900/yr	4,200/yr	8,800/yr	12,600/yr
Average Disbursement	~\$182k	\$124k	\$92k	\$79.7k
Average Account Target	~\$348k	\$265k	\$210k	\$168k
Time To Detect (ATO)	18 days	9.5 days	5 days	2.5 days

## Trends



**Industrialized probing:**  
High-volume automation



**Micro targeting:**  
Evading \$80k alert floors



**Mid-market saturation:**  
Bulk asset targeting



**Real-time convergence:**  
Driven by the FIFC

# The Technical Solution

## Address the identity gap through multi-signal attestation.

The Proof platform secures the "money out" identity gap by moving beyond binary document checks. The platform employs a multi-signal attestation model evaluating risk across identity, device, network, and behavioral vectors<sup>15</sup>.

Plus, the integration of Visa's global transaction intelligence (Q4 2025) has significantly enhanced the Proof risk model. By leveraging network-level visibility across Visa Direct and Risk Insights, the platform correlates signals invisible to a single institution<sup>17</sup>:

- **Device fingerprinting:** Identifying unique hardware signatures to detect if the same device is accessing multiple unrelated accounts<sup>19</sup>.
- **Email age:** Analyzing the history of the associated email. Requests from accounts created less than 24 hours ago are automatically escalated<sup>15</sup>.
- **Location correlation:** Comparing IP locations against historical data and piercing VPN or proxy masking<sup>15</sup>.

# Bridging the Literacy Gap with Explainable AI (XAI)

A significant challenge is the cybersecurity literacy gap, where approximately 1 in 4 business leaders lack the technical familiarity to interpret complex AI-driven fraud attempts.

Proof's Explainable AI (XAI) interface translates sophisticated risk scores into clear insights, such as "Unusual IP location following recent password reset"<sup>15</sup>.

This transparency empowers staff to make informed decisions without deep forensic training, reducing the likelihood of human error<sup>22</sup>.

[Calculate your ROI](#)

[Talk to Proof](#)

## Proof Performance Data

# 630%

Outperformance over traditional industry benchmarks for fraud detection at a high risk threshold<sup>15</sup>

# 13x

Proof Defend Risk Engine efficiency compared to an industry-leading passive-signal fraud model<sup>15</sup>

# 6x

Amount of fraud Proof can identify compared to benchmarks at equivalent intervention rates<sup>15</sup>.

# <1 bps

Fraud loss reduction for institutions fully integrated into Proof's multi-signal model<sup>24</sup>

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## About Us

Proof provides the high-assurance digital identity infrastructure for the internet's most important transactions. As a digital identity issuer, Proof verifies who is behind a critical action and ensures every interaction is continuously secured through our Identity Authorization Network. Our platform empowers organizations to authorize high-stakes actions and preserve verifiable records that are both defensible and authentic. To date, Proof has secured over \$640B in transactions across critical workflows including account recovery, financial approvals, and the Notarize Network, the world's largest on-demand notary platform. Learn more at [proof.com](https://proof.com).