

09.10

DECISION DOSSIER · HELD PAYMENTS

The list changed at 11:00. The agent's copy changed at 11:30.

A bank lets an agent clear sanctions-screening hits in approved false-positive categories up to €25,000 under mandate FC-11.3. On 9 October an act designating a new party is published at 11:00, in force from the start of the day; it reaches the bank's list service at 11:15. Between 11:00 and 11:15 the agent clears fourteen hits on the list of two days before, which the list service still holds too, and the payments join the 11:30 batch to the correspondent bank. At 11:22 the check refers payment 7738, and the match is confirmed. The room decides what happens next.

Before the session, ten minutes: read pages 1 to 4; pages 7 and 8 are the record of the two acts, field by field, for the seats that read records. **In the session:** pages 5 and 6, the questions, in pairs, then together. Write down what you would do, who decides, and which evidence you would ask for. Where the dossier does not say, say what you would need to know.

In the dossier

- the morning of 9 October, minute by minute
- payment 7738, the list entry, and the mandate
- release v3.1 and the record as at 11:31
- a message from the client
- the questions
- the record of the two acts, field by field

Where it comes from

The payments case of the control plane map: payment 7730 and the referral of payment 7738, the list of 7 October against the act of 9 October, mandate FC-11, rules R-07 and R-07S, and the loop that narrows at once on a serious defect. The dossier adds the fifteen minutes between the act and the list service, and the batch that follows.

THE SITUATION

Fifteen minutes, fourteen clearances, one true match

The bank screens 8 million outgoing payments a year; about 240,000 stop on a possible match, and most are false positives. Under FC-11.3 the agent clears hits in approved category FP-2 up to €25,000 and asks the payment engine to send; the engine releases cleared payments to the correspondent in batches every thirty minutes, the last at 15:00. Rule R-07 narrows the mandate after three referrals for one reason in a day; R-07S narrows it at once when a match is confirmed on a stale list. The agent's screening copy of the list refreshes every six hours, at 05:30, 11:30, 17:30, and 23:30.

- 07.10 17:30 The consolidated list is published. B-311 is not on it.
- 09.10 11:00 The authority publishes an act designating B-311, a ship-supply company, as entry EU-2318, in force from the start of the day.
- 09.10 11:00 to 11:15 The agent clears fourteen hits in category FP-2 on the list of 07.10, which the list service still holds as well, among them payment 7718, €9,200 to a company whose name partly matches EU-2291. All fourteen pass six of six and join the 11:30 batch.
- 09.10 11:15 The act enters the bank's list service. The agent's screening copy, refreshed at 05:30, holds the list of 07.10 until 11:30.
- 09.10 11:22 Payment 7738, €21,300 to B-311: the agent declares the list of 07.10 and proposes clearance. The check reads the list service, finds EU-2318, and refers the payment. Referral 1.
- 09.10 11:30 The batch to the correspondent is due. The fourteen clearances of 11:00 to 11:15 are in it, each permitted on the list of 07.10.
- 09.10 11:31 Analyst A-204 at level two confirms the match. The funds are frozen. R-07S narrows FC-11.3 to FC-11.4, recommend only, at once. The Head of Financial Crime Operations and the Head of Financial Crime Compliance are alerted.
- 09.10 12:05 The freeze is reported to the national sanctions authority.
- 09.10 12:30 The look-back re-screens every payment the agent cleared since 00:00 against the act of 09.10. None of the fourteen names B-311; one of them, payment 7721, hits entry EU-2318 on the name alone, as the re-screen of 11:30 had found, and the analyst's ruling on two identifiers stands.
- 09.10 14:10 Review FR-031 finds the cause: a six-hour refresh, and no trigger when the list service takes in an act. The screening data team moves the refresh to the moment an act arrives and verifies 15 lookups.
- 09.10 14:40 The Head of Financial Crime Operations asks for FC-11 to be restored before the 15:00 cut-off: 310 held payments are waiting, and the clients have value dates today.
- 10.10 After 30 clean clearances, restoration to FC-11.5 is proposed for two signatures.

The capacity, from the case pack. While FC-11.4 is in force, every hit the agent would have cleared needs an analyst's decision: about 540 held payments a day pass through the agent, at 6 minutes each, about 54 analyst-hours, seven analysts. On the day a list changes, the hits triple: about 160 hours and twenty-one analysts. On a normal day the check refers about 80 hits to level one, eight hours of work.

EXHIBIT A · PAYMENT 7738

PAYMENT	P7738, €21,300, ordered by client C-2270, an importer, to B-311, a ship-supply company banking outside the EU
HELD	11:20, partial name match to list entry EU-2291, a different company
COMPARED	11:21, registration number, address, and country rule EU-2291 out
PROPOSAL	11:22, clearance in approved category FP-2 · declared basis: the list as consolidated 07:10, 17:30 · operation P7738-C1
IN THE LIST SERVICE	from 11:15, B-311 is entry EU-2318, designated by the act of 09.10

EXHIBIT B · THE LIST, AS CLAIMS WITH THEIR SOURCE

CLAIM	SOURCE	OWNER	VALID
B-311 is a designated party, entry EU-2318	act of 09.10, in force from 00:00	the screening data team	from 09.10 · in the list service from 11:15
~~B-311 is not a designated party~~	consolidated list of 07.10, 17:30	the screening data team	to 08.10, superseded
The company behind P7718 is a partial name match to EU-2291 and is ruled out on two identifiers	list of 07.10 · FP-2 criteria	Financial Crime Operations	in force
A hit in FP-2 may be cleared by the agent at or below €25,000	screening policy SP-9 §6	Financial Crime Compliance	in force
The client is never told why a payment is held	screening policy SP-9 §11, on the bank's reading of the tipping-off rules	Financial Crime Compliance	in force

The act of the authority is the binding source. The claims are what the agent may use, each traced to its entry; where the copy and the list service disagree, the list service wins, and the copy is corrected.

EXHIBIT C · MANDATE FC-11, VERSION 11.3, SINCE 01.07.2026

OWNER	Head of Financial Crime Operations
AGENT	screening-agent-02, acting for Financial Crime Operations
ACTION	clear hits in the false-positive categories approved in the bank's screening policy, and request sending through the payment engine
LEVEL	decide for approved false-positive categories at lower exposure; every other hit goes to a trained analyst, and higher exposure to two
LIMIT	€25,000 per payment · €5m per day across the deployment
CONDITIONS	approved category (partial name match only) · at least two identifiers that rule the entry out · the list in force on the day of sending, as known at the moment of sending · no high-risk jurisdiction on the route · no freeze on the account · 5% of clearances sampled by an analyst
MAY NOT SAY	the agent never tells the client why a payment is held
REVIEW TRIGGER	three referrals for one reason in one day (R-07); a confirmed match on a stale list narrows at once (R-07S)
RESTRICTION	rules R-07 and R-07S: restrict to recommendations and open a review
REVOCATION	the owner, the second line, or a revocation rule
CHALLENGER	Head of Financial Crime Compliance, the second line
RESTORE	after 30 clean clearances from a test chosen for the cause, on two signatures, the owner's and the second line's; the second line may hold it
EXPIRY	31.12.2026, or the next release of the agent, whichever comes first; renewed on the evidence of the quarter
DEPUTY	the Head of Payment Operations signs in the owner's absence, within the same limits

EXHIBIT D · RELEASE V3.1, THE MANIFEST

IDENTITY	screening-agent-02, its own identity, tokens valid for 15 minutes
MODEL ROUTE	a small model (tier-1 model, version 2026.06.1, hash 7c41e0) reads every hit; a larger model (tier-2 model, version 2026.05.2, hash e9a3b7) reassesses about one in four · a provider change to either model under the same name is a new release
INSTRUCTIONS	prompt set screening-clear 3.1
TOOLS	list service lookup (read) · client and account record (read) · send request, through the check only (write)
RETRIEVAL	the screening copy of the list, refreshed every six hours; the act of 09.10 reaches it at 11:30, fifteen minutes after the list service
DEPENDS ON	mandate FC-11 · control standard CS-7: refer any hit outside FP-1 to FP-3, any route through a high-risk jurisdiction, and any mismatch of basis
VALIDATED	by model risk on 28.06.2026, report MRV-044 · 5% of clearances sampled by an analyst every day

EXHIBIT E · THE RECORD, AS IT STANDS AT 11:31:05 ON 09.10

P7718-C1 · 11:02:40 · screening-agent-02 · release v3.1 · list 07.10 (declared) / list service 07.10 at 11:02 · FC-11.3 · €9,200 · FP-2 · PERMIT
 six of six · permit bound to FC-11.3, release v3.1, the list of 07.10, and this exact action · valid for the next batch · queued for 11:30
... thirteen more clearances between 11:00:20 and 11:14:50, each PERMIT on the list of 07.10, each queued for 11:30

P7738-C1 · 11:22:05 · screening-agent-02 · release v3.1 · declared list 07.10 / list service 09.10 11:15 · FC-11.3 · €21,300 to B-311 · REFER
 owner: level two · reason: basis mismatch, entry EU-2318

P7738-L2 · 11:31:00 · analyst A-204, level two · entry EU-2318 confirmed · FREEZE · report to the authority opened

R-07S · a confirmed match on a stale list · FC-11.3 → FC-11.4, recommend · 11:31:02
 alerts: Head of Financial Crime Operations, Head of Financial Crime Compliance · review FR-031 opened

11:30:00 · batch to the correspondent · 212 payments cleared since 11:00, 14 of them by the agent between 11:00 and 11:15

The payment engine holds the credential to send. The agent cannot send; it can only ask, through the check.

What the record does not yet show is what the payment engine did at 11:30:00 with the fourteen clearances of 11:00 to 11:15, permitted on a list the authority had already replaced and the bank replaced at 11:15. That is question 1.

EXHIBIT F · A MESSAGE FROM CLIENT C-2270, 09.10, 15:40

"Our payment of €21,300 to our supplier was due to arrive today and has not. Your app says 'under review' and nothing else. The supplier will not release the shipment until it is paid, and the vessel sails on Monday. What is being reviewed, who is reviewing it, and when will we have an answer? If this was decided by a computer, I want a person to look at it."

1. Do the fourteen payments cleared between 11:00 and 11:15 leave at 11:30? The list service held the same list as the agent when they were permitted, and a different one at the batch. What does the payment engine check at the batch, and what does the record show afterwards?

touches w3 · w4 · p4 · w5

2. The owner wants FC-11 restored before the 15:00 cut-off, with 310 payments waiting. The second line has an open review. Who may restore it, who may hold that, and what happens to the 310 payments while they disagree?

touches w3 · w6 · e3 · e4

3. From 11:31 until authority returns, with a new act possible any day: who takes the queue, in which order, and what are clients told?

touches w4 · w6 · e6 · the customer

4. Which evidence, produced by someone who did not run the agent, shows that no payment to a designated party left the bank on 9 October? Who runs the look-back, and from what?

touches w5 · p2 · p5 · e5

5. What test must pass before FC-11.5 is signed, and by whom? Are 30 clean clearances enough, and who decides that?

touches w6 · p6 · e4 · w1

6. What does client C-2270 receive, from whom, and by when? What may it be told about the review, and what may it never be told?

touches w5 · w4 · the customer

Afterwards, on your own workflow. For each question, mark the boxes it touches on the print map of your own workflow: not in place, designed, operating, or evidenced. Where the room disagrees, keep both marks and write down who resolves it.

THE RECORD, FILLED · PAYMENT 7730 · THE CLEAN ACT

Payment 7730 08.10.2026 · held 09:12, cleared 09:14, sent in the 09:30 batch

The fourteen fields of the record line (part three, slide 9), filled for this act; Exhibit E on page 4 continues the record on the day of the dossier.

FIELD	WHAT IT HOLDS	PAYMENT 7730 · THE CLEAN ACT
BEFORE THE ACT · WHAT THE CHECK READ		
when	the second the check decided, and the second the act committed	decided 08.10.2026 09:14:02 · committed 09:14:30 at the payment engine · left in the 09:30 batch to the correspondent
the agent and its identity	which agent, acting for whom, under its own identity, and how long its credential lived	screening-agent-02, acting for Financial Crime Operations · its own identity · token issued 09:12:10, valid 15 minutes
the release	the release id, each model by version and hash, the prompt set, the validation report	v3.1 · tier-1 model 2026.06.1 (7c41e0) · tier-2 model 2026.05.2 (e9a3b7) · prompt set screening-clear 3.1 · validated by model risk, MRV-044, 28.06.2026
the basis	each claim the act relied on, its version, and its standing at that second on both axes: evidential warrant, and authority	B-311 is not a designated party · the consolidated list of 07.10, 17:30 · in force on 08.10 · warrant validated · current on 08.10 · uncontradicted · authority: the authority's list, as the bank's list service holds it · the screening data team The hit on EU-2291 is a partial name match, ruled out on registration number, address, and country · the FP-2 criteria · screening policy SP-9 §6 · the client record · warrant validated · two identifiers compared · authority: Financial Crime Compliance, the policy owner A hit in FP-2 may be cleared by the agent at or below €25,000 · screening policy SP-9 §6, v9 · warrant foundational · in force · authority: Financial Crime Compliance
the mandate version	the mandate in force at that second, with its level and its limit	FC-11.3 · since 01.07.2026 · decide · €25,000 a payment · approved categories FP-1 to FP-3 · €5m a day across the deployment
the control standard	the control standard version and the rule set the check applied	CS-7 v2026.3 · rule set RS-FC-11 r9
the consequence tier	the tier the act was classified into, and the version of the taxonomy that classified it	material · taxonomy CT-2026.1 · to €25,000, a payment that leaves the bank and cannot be recalled, across a border, under the sanctions regulations
AT THE ACT · WHAT THE CHECK DECIDED		
the check's decision	permit, refer, or block, how many of the six inputs held, and the reason code	PERMIT · six of six · reason code OK
the exact act	what was done, to whom, for how much, under which id, once	clear and send payment 7730 · €18,500 to B-311 · P7730-C1 · once
the permit	its id and what it was bound to: the mandate version, the release, the basis version, the exact act; and how long it held	PR-7730-1 · bound to FC-11.3, release v3.1, the list of 07.10 17:30 and category FP-2, €18,500 to B-311 · valid for the next batch
AFTER THE ACT · WHAT CAME BACK		
the receipt	what the receiving system returned, and the reconciliation against it: one permit, one act, one receipt	S-7730 · €18,500 · accepted by the payment engine 09:14:30 · in the 09:30 batch to the correspondent · reconciled against the engine's ledger: one permit, one payment, one receipt
the human decision	where a person decided: who, under which authority, what they confirmed, and when	none needed
the cost	what the decision cost in tokens, and in a person's time where one was needed	€0.27 in tokens · no analyst time
retention	how long the record, the manifest, and the permits are kept, and personal data inside them by its purpose	the record, the manifest, and the permits: ten years from the act, the period the bank sets for screening decisions of this tier (illustrative) · personal data by purpose and retention rule · a corrected fact is a new, linked entry

control standard CS-7, version 2026.3 · rule set RS-FC-11 r9: refer any hit outside FP-1 to FP-3, any route through a high-risk jurisdiction, any mismatch of basis · CT-2026.1 · the bank's consequence taxonomy · proposed by the CRO with financial crime compliance and Financial Crime Operations, set by the board, 06.2026 · ids and figures invented

THE RECORD, FILLED · PAYMENT 7738 · THE REFERRAL

Payment 7738 09.10.2026 · held 11:20, referred 11:22, frozen by level two at 11:31

The fourteen fields of the record line (part three, slide 9), filled for this act; Exhibit E on page 4 continues the record on the day of the dossier. The agent's line and the person's are marked C1 and L2.

FIELD	WHAT IT HOLDS	PAYMENT 7738 · THE REFERRAL
BEFORE THE ACT · WHAT THE CHECK READ		
when	the second the check decided, and the second the act committed	C1 referred 09.10.2026 11:22:05 L2 decided 09.10.2026 11:31:00 · the freeze at once · reported 12:05
the agent and its identity	which agent, acting for whom, under its own identity, and how long its credential lived	C1 screening-agent-02, acting for Financial Crime Operations · its own identity · token valid 15 minutes L2 analyst A-204, level two, Financial Crime Operations · her own login · trained in sanctions screening
the release	the release id, each model by version and hash, the prompt set, the validation report	C1 v3.1 · tier-1 model 2026.06.1 (7c41e0) · tier-2 model 2026.05.2 (e9a3b7) · prompt set screening-clear 3.1 L2 none · a person's decision in the screening system
the basis	each claim the act relied on, its version, and its standing at that second on both axes: evidential warrant, and authority	B-311 is not a designated party · declared: the list of 07.10, 17:30 · superseded by the act of 09.10, in the list service since 11:15 · warrant fails on currency · contradicted by the list service · authority: the authority's list · the screening data team B-311 is a designated party, entry EU-2318 · applicable: the act of 09.10, in force from 00:00 · in the list service from 11:15 · confirmed by A-204 at 11:31 · warrant validated · current · authority: the act of the authority · the screening data team Funds of a designated party are frozen and the freeze is reported · the sanctions regulations as the bank reads them · screening policy SP-9 §9 · warrant foundational · in force · authority: Financial Crime Compliance
the mandate version	the mandate in force at that second, with its level and its limit	C1 FC-11.3 · decide · €25,000 · approved categories L2 the analyst's level-two authority · clear and freeze · the screening procedure
the control standard	the control standard version and the rule set the check applied	CS-7 v2026.3 · rule set RS-FC-11 r9
the consequence tier	the tier the act was classified into, and the version of the taxonomy that classified it	material · taxonomy CT-2026.1 · a confirmed match is critical, and the agent never decides one
AT THE ACT · WHAT THE CHECK DECIDED		
the check's decision	permit, refer, or block, how many of the six inputs held, and the reason code	C1 REFER · five of six · reason code BASIS-01: declared list 07.10, list service 09.10 11:15, entry EU-2318 · owner: level two L2 FREEZE · the analyst's decision · the match confirmed on two identifiers
the exact act	what was done, to whom, for how much, under which id, once	C1 proposed: clear and send €21,300 to B-311 · P7738-C1 · not executed L2 freeze payment 7738 · €21,300 · P7738-L2 · report to the national sanctions authority · once
the permit	its id and what it was bound to: the mandate version, the release, the basis version, the exact act; and how long it held	C1 none · the proposal went to level two with the reason L2 none needed for a freeze · the engine holds the payment on the analyst's instruction
AFTER THE ACT · WHAT CAME BACK		
the receipt	what the receiving system returned, and the reconciliation against it: one permit, one act, one receipt	C1 none L2 the engine's hold confirmation 11:31:20 · report filed 12:05, reference R-2318-09 · reconciled: one payment held, one report
the human decision	where a person decided: who, under which authority, what they confirmed, and when	C1 none yet · referred to a person with the reason L2 analyst A-204 confirmed entry EU-2318 on registration number and address, and froze the funds at 11:31
the cost	what the decision cost in tokens, and in a person's time where one was needed	C1 €0.27 in tokens L2 €6.00 of an analyst's time
retention	how long the record, the manifest, and the permits are kept, and personal data inside them by its purpose	the record, the manifest, and the permits: ten years from the act, the period the bank sets for screening decisions of this tier (illustrative) · personal data by purpose and retention rule · a corrected fact is a new, linked entry

ids and figures invented; the control standard and the taxonomy are on the page before