



YUKTINEXUS

Where strategy meets connectivity

FROM £4.7M BREACH TO A LAYERED FIX

Origin AI, Agentic AI, and Blockchain, applied stage by stage to the OFSI-Citibank London sanctions case.

£4.73m final penalty

970 breaching payments

£19.72m total value breached

11 failure points mapped

This framework treats the manual workaround as the likely gap filler, based on the pattern the OFSI notice describes. It is a reasonable inference, not a confirmed fact. OFSI did not publish exactly how CBNA staff closed the space between the product and the edge case.

The claim that individual judgment absorbed the cost is an assumption built from typical operational behavior, not from disclosed internal process detail. Treat it as the most likely explanation, not a verified one.

SWIPE THROUGH ALL 11 FAILURE POINTS →

01 · WHERE THE PRESSURE BUILT

1 Rule Relaxed Under Load

May 2022 backlog fix narrowed escalation to 50%+ designated ownership only, where everything used to escalate.
→ Origin AI stamps the rule's basis. Agentic AI re-flags it the moment guidance shifts.

TRADITIONAL Manual rule change under volume pressure, no re-check trigger.

NEW Rule integrity holds automatically as conditions change.

2 Category Misapplied

Staff applied sectoral guidance to asset-freeze facts under time pressure.
→ Origin AI tags the correct category before a person acts.

TRADITIONAL Category judged case-by-case, under load.

NEW Mislabels caught before a human ever sees them.

3 Role Confusion

A handler read a designated bank as beneficiary when it was the remitter.
→ Origin AI extracts and labels roles at ingestion.

TRADITIONAL Manual reading of raw message text.

NEW Misreads structurally prevented, not just retrained against.

02 · WHERE JUDGMENT AND VISIBILITY BROKE DOWN

4 Ownership Judgment

An ownership and control call was reached that OFSI deemed unreasonable.

→ Origin AI confidence-tags ownership as declared, confirmed, or unknown.

TRADITIONAL One-time judgment call, closed and forgotten.

NEW Uncertainty stays visible and alive, revisited as data changes.

5 Escalation Lost

A sanctions escalation was misrouted, never flagged, closed with no action.

→ Agentic AI monitors every queue for unresolved closures.

TRADITIONAL Routing errors invisible once filed.

NEW A closed item can no longer close itself unseen.

6 Name Mismatch

"PAO Sovcomflot" wasn't recognized as "Sovcomflot." 29 entities, £5.4m missed.

→ Origin AI normalizes name variants. Fixes propagate everywhere at once.

TRADITIONAL Each institution calibrates its own list, independently.

NEW One correction, not N independently repeated misses.

03 · WHERE THE PIPES THEMSELVES FAILED

7 Field Mismatch

List entries carried no BIC. Payment messages carried BIC only.

→ Origin AI normalizes identifier types before comparison.

TRADITIONAL Right data, right list, no intersection.

NEW Screening compares like-for-like, every time.

8 Screening Sequencing

Screened before correspondent banks were appended, never re-screened.

→ Atomic settlement re-screens on every party addition.

TRADITIONAL Screening happens once, at initiation only.

NEW The single highest-value fix in the whole case.

9 Late Reporting

53 late frozen-asset reports, a standalone aggravating factor.

→ On-chain, the report becomes a byproduct of the freeze event.

TRADITIONAL Freeze and report live in separate processes.

NEW No second process left to lag behind the first.

04 · WHERE ENFORCEMENT NEEDED TO REACH FURTHER

10 Licence Blind Spot

Live wind-down licences, never checked before payment.
→ Agentic AI checks licence applicability before every payment.

TRADITIONAL Applicability assessed from memory, if at all.

NEW Applicability is assessed by design, not by memory.

11 Group vs Branch Gap

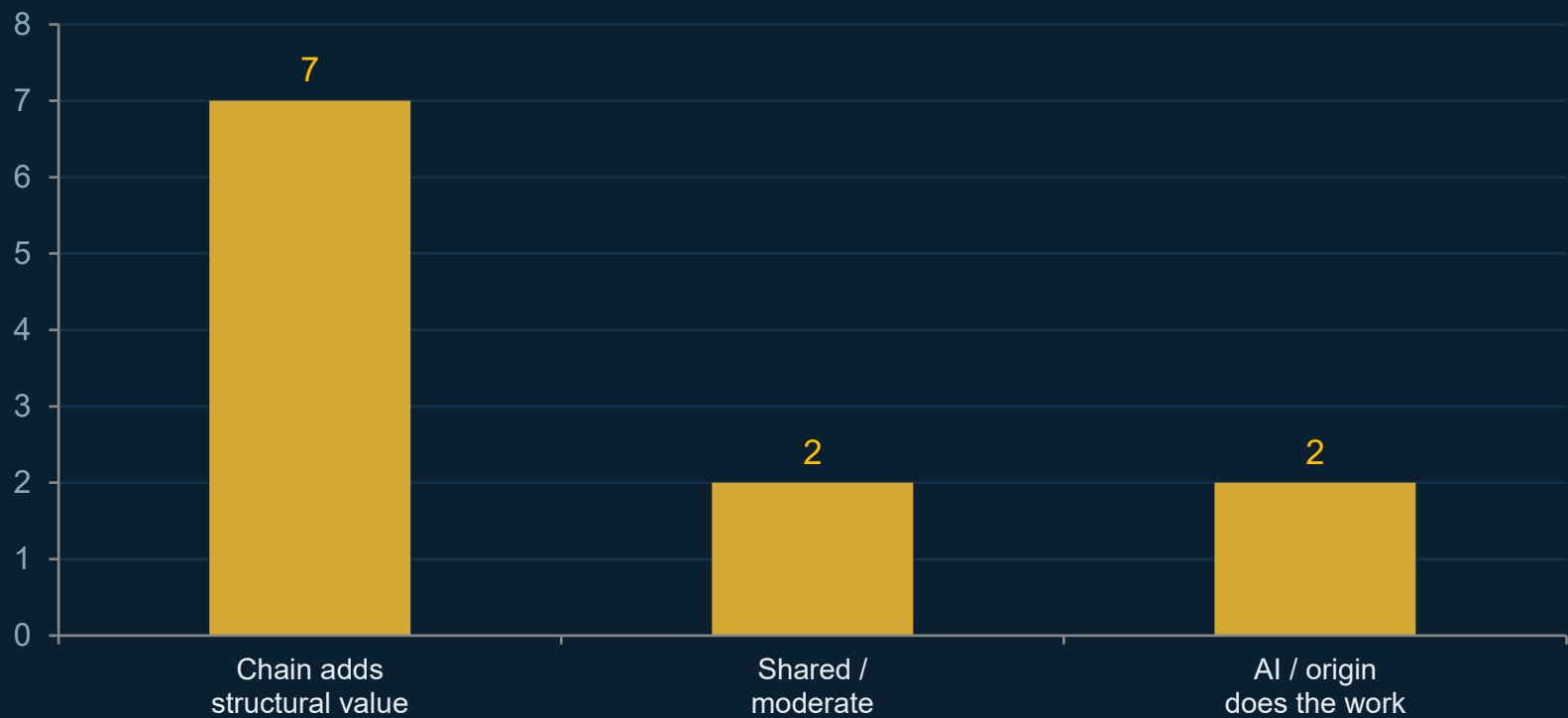
Group-level prep accepted as strong. Branch-level still fell short.
→ Origin AI scopes readiness data per legal entity.

TRADITIONAL Branch inherits group's homework, unverified.

NEW Entity-level accountability can't be borrowed from the parent.

WHERE EACH LAYER CARRIES THE WEIGHT

Across all 11 issues cited in the OFSI notice



Blockchain leads 7 of 11, sequencing, propagation, immutable logs. AI leads the other 2, judgment and matching. Neither replaces a human where the underlying data is genuinely unknown.



Managed sanctions risk doesn't disappear under automation, it moves up a layer.

From judgment calls to a governed machine. This carousel walked all 11 failures OFSI cited across the CBNA London case, and where each one lands once Origin AI, Agentic AI, and blockchain settlement take a share of the load.

LEGEND

- **AI / ORIGIN LEADS** - Category judgment, entity resolution. No ledger corrects a wrong read.
- **SHARED WEIGHT** - Role labeling, escalation visibility. Both layers contribute.
- **BLOCKCHAIN LEADS** - Sequencing, propagation, immutable logging. Structural fixes.

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Source. OFSI Penalty Notice, CBNA London, 11 August 2026, and the YuktiNexus Blockchain Tokenization White Paper, June 2026.

Layered-fix framework reflects an early-stage design analysis. Full operational adoption depends on timelines, regulation, and implementation still to be determined.