COMPLIANCE WORKING RECORD

OFAC ownership-rule workpaper

FICTIONAL evidence sample. Requires tailoring.

Document control

Field	Value
Document type	Evidence workpaper
Document reference	CASE-FICTIONAL
Jurisdiction	United States
Version	2026-10-09.financial-evidence.1
Status	FICTIONAL sample. Requires tailoring.
Classification	Private
Prepared by	Fictional responsible reviewer
Prepared on	October 9, 2026
Sources reviewed	October 9, 2026
Generated	October 9, 2026

Document control and frozen case

Prepare an exact, source-linked OFAC 50 percent ownership propagation calculation from a customer-verified blocking-status snapshot.

Field	Value
Case reference	CASE-FICTIONAL
Organization	Fictional organization
Subject	Fictional customer or subject
Responsible reviewer	Fictional responsible reviewer
Preparation date	October 9, 2026

Field	Value
Scope	Fictional bounded evidence case. Replace every source, policy and fact before use.
Customer policy	POLICY-FICTIONAL
Customer policy version	fictional-v1
Declared approver	Fictional policy owner
Declared approval date	October 2, 2026
Decision boundary	No substantive decision or external filing made.

Named method and supported scope

Validate distinct acyclic entities and direct ownership totals at most 100 percent. Seed only customer-declared blocked persons with linked verified status evidence. Propagate through verified aggregate direct interests of at least 50 percent, in topological order. Do not multiply effective economic ownership to substitute for blocking propagation. Retain contributing owners, unknown interests and unreported remainder.

No live sanctions refresh or automatic legal determination. Cycles and incomplete evidence remain unresolved. Control, program-specific prohibitions, divestments and release of previously blocked property require separate review.

Original evidence bytes, annotations and customer rules remain in this browser unless explicitly approved for paid cloud saving. Customer verification and approval are declarations. Mechanical results do not authenticate source facts, decide legal applicability, clear screening hits, authorize transactions, classify exports, file reports or establish total wealth.

Only the supplied population is evaluated. Source annotations do not prove completeness, authenticity, reviewer authority or external screening. Missing and conflicting evidence remains visible.

Every accepted finding and original source reference is retained. Supplied text is not silently shortened. Original files are copied only into a local full backup or an explicitly approved artifact operation.

Complete result counts

Measure	Value
Original file descriptors	1
Evidence source references	1
Complete findings	10
Findings needing review	0

1. Original evidence index (S1)

State. Customer evidence linked

Exact source descriptor and customer-declared locator retained. No content authentication.

Field	Value
File	F1
Locator	Fictional document paragraphs 1 to 3
Description	Fictional policy and evidence source only.
Custodian	Fictional custodian
Source date	October 1, 2026
Customer verification	Customer verified
Verified by	Fictional reviewer
Verified on	October 2, 2026
Exact evidence source references	S1

2. Original byte manifest (F1)

State. Indexed

Exact local SHA-256 descriptor. Recovered descriptors require matching original bytes for a complete attachment export.

Field	Value
Filename	FICTIONAL-evidence.txt
Media type	text/plain
Bytes	255
SHA-256	f915adc44353033ee611dbc67d8e24d6d2fcfa10da40688 f5b9d0a3cb2e20a4a
Exact evidence source references	None supplied

3. Frozen customer policy (POLICY-FICTIONAL)

State. Policy linked

Customer-selected policy, version and approval are retained. Applicability and authority require human review.

Field	Value
Version	fictional-v1
Approved by	Fictional policy owner
Approved on	October 2, 2026
Exact evidence source references	S1

4. Exact ownership relationship (P1 -> E1)

State. Relationship documented

Customer-verified direct ownership percentage retained.

Field	Value
Percent	50
Verification	Customer verified
Exact evidence source references	S1

5. Exact ownership relationship (E1 -> E2)

State. Relationship documented

Customer-verified direct ownership percentage retained.

Field	Value
Percent	50
Verification	Customer verified
Exact evidence source references	S1

6. Frozen blocking status declaration (P1)

State. Declaration linked

Status comes from the customer-selected evidence snapshot. No live list or legal determination was performed.

Field	Value
Name	Fictional person one
Declared status	Blocked
As of	October 9, 2026
Exact evidence source references	S1

7. Frozen blocking status declaration (E1)

State. Declaration linked

Status comes from the customer-selected evidence snapshot. No live list or legal determination was performed.

Field	Value
Name	Fictional entity one
Declared status	Not established blocked
As of	October 9, 2026
Exact evidence source references	S1

8. Frozen blocking status declaration (E2)

State. Declaration linked

Status comes from the customer-selected evidence snapshot. No live list or legal determination was performed.

Field	Value
Name	Fictional entity two
Declared status	Not established blocked
As of	October 9, 2026
Exact evidence source references	S1

9. OFAC ownership propagation workpaper (E1)

State. 50 percent working threshold reached

Sum of verified direct interests held by customer-declared blocked or prior threshold-reaching owners reaches 50 percent. Human review must confirm legal applicability.

Field	Value
Known blocked-owner percent	50
Unknown or unverified owner percent	0
Unreported percent	50
Ownership declared complete	Yes
Included owners	P1
As of	October 9, 2026
Exact evidence source references	S1

10. OFAC ownership propagation workpaper (E2)

State. 50 percent working threshold reached

Sum of verified direct interests held by customer-declared blocked or prior threshold-reaching owners reaches 50 percent. Human review must confirm legal applicability.

Field	Value
Known blocked-owner percent	50
Unknown or unverified owner percent	0
Unreported percent	50
Ownership declared complete	Yes
Included owners	E1
As of	October 9, 2026
Exact evidence source references	S1

Complete accepted task inputs

The following exact accepted fields preserve every supplied task record, including orphan records and contradictions. They are customer annotations, not independently extracted or authenticated evidence.

Field	Value
rule	OFAC aggregate 50 percent ownership propagation
asOf	October 9, 2026
entities 1. id	P1
entities 1. name	Fictional person one
entities 1. kind	Person
entities 1. ownershipComplete	Yes
entities 1. sourceIds	S1
entities 1. blockedStatus	Blocked
entities 1. statusSourceIds	S1
entities 2. id	E1
entities 2. name	Fictional entity one
entities 2. kind	Entity
entities 2. ownershipComplete	Yes
entities 2. sourceIds	S1
entities 2. blockedStatus	Not established blocked
entities 2. statusSourceIds	S1
entities 3. id	E2
entities 3. name	Fictional entity two
entities 3. kind	Entity
entities 3. ownershipComplete	Yes
entities 3. sourceIds	S1

Field	Value
entities 3. blockedStatus	Not established blocked
entities 3. statusSourceIds	S1
relationships 1. ownerId	P1
relationships 1. entityId	E1
relationships 1. percent	50
relationships 1. verification	Customer verified
relationships 1. sourceIds	S1
relationships 2. ownerId	E1
relationships 2. entityId	E2
relationships 2. percent	50
relationships 2. verification	Customer verified
relationships 2. sourceIds	S1

Recovery and original attachment boundary

The complete local ZIP includes every original file listed in the retained manifest. A structured JSON or cloud record alone preserves the descriptor and annotation, not the original file bytes. Attach matching bytes before producing a complete original-attachment pack.

Customer recovery restores neither source authentication, approval authority nor paid export access. Payment ownership is checked before each commercial export.

Official sources

Source	Provision	Date	Link
Office of Foreign Assets Control: OFAC FAQ 401. Indirect ownership examples	Explains aggregate ownership propagation through entities meeting the 50 percent rule. The workpaper requires a verified acyclic ownership snapshot and confirmed blocking-status evidence. It does not determine transaction authorization.	October 9, 2026	https://ofac.treasury.gov/faqs/401
Office of Foreign Assets Control: OFAC FAQ 400. Control and blocked individuals	Control and dealings involving blocked individuals require separate review. Below-threshold ownership is not clearance to transact.	October 9, 2026	https://ofac.treasury.gov/faqs/400
Office of Foreign Assets Control: OFAC FAQ 402. Ownership changes and previously blocked property	A later ownership change does not by itself authorize release of previously blocked property. This workpaper does not evaluate divestment legality or release property.	October 9, 2026	https://ofac.treasury.gov/faqs/402