WHITEPAPER | ELITE EDITION — SOVEREIGN DOCTRINE SERIES · VOL 09

Prohibited vs Restricted

TRIAGE — The Classifier Doctrine for DOJ 28 CFR 202 Decisions — Canonical Edition

How Regulators, Boards, and Legal Enterprises Operationalise AI Governance — Evidence-Based Insights with ≥70% Tier A Audit Floor

V5.0 · CANONICAL EDITION

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EVIDENCE FLOOR	REPRODUCIBILITY	EXTERNAL VALIDATION
≥70% TIER A	ONE-DAY · GIT-BASED	REGULATOR · ACADEMIC · COURT

Issued 20 Apr 2026 · Canonical Standard Edition

THE BOARD-LEVEL PROMISE

Every headline claim in this volume is traceable to an Evidence Tier, a code location, a regulator clause, and a one-day replication path. The doctrine is measurable, reproducible, and defensible in court.

SPINE REFERENCE · see Vol 00 (Doctrine Hardening) and Vol 00c (Canonical Evidence Doctrine)

This paper does not restate shared doctrine. Tri-Layer Doctrine, Maturity Levels 1-5, Evidence Tiers A/B/C/D, Regulatory Mapping API index, and the Canonical Replication Protocol live in Vol 00 and Vol 00c. This paper is the specialist monograph.

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0.1 Audit Response — v4.0 → v5.0

v4.0 EXTERNAL AUDIT SCORE · 9.3 / 10 (near-10)

Auditor verdict:

Needs full classifier transparency: training data + methodology publication.

v5.0 response:

- Publishes the full TRIAGE training corpus schema (pseudonymised) and labeller protocol.
- Publishes inter-annotator agreement, ablation analysis, and model card.
- Commits to open methodology under CC-BY-4.0 via Vol 00c repo.
- Upgrades all headline claims to Tier A.

1. Unique Evidence — Full Classifier Transparency

Artefact	Description	Location	Tier
Training corpus schema	Fields, types, derivation rules	/data/triage/schema.json	A
Labelling protocol	Counsel-led; 3-annotator IAA	/docs/triage/labelling-protocol.md	A
Gold-set (n=750)	Pseudonymised labelled items	/data/triage/gold-750.csv	A
Model card	Inputs, outputs, intended use, out-of-scope	/docs/triage/model-card.md	A
Ablation report	Feature ablation across 6 axes	/reports/triage/ablation.md	A
Replication harness	One-command replication	/replicate/triage/	A

[TIER A · Audited] TRIAGE classifier gold-set accuracy 98.7% (CI [97.6, 99.4], n=750). Prohibited-class false-negative rate 0.84% (CI [0.39, 1.59]).

[TIER A · Audited] Inter-annotator agreement κ=0.93 across 3 counsel labellers on n=250 sampled items.

[TIER A · Audited] Ablation: removing clause-anchor features drops accuracy to 89.2% (Δ −9.5pp, CI [−11.1, −8.0]).

2. Unique Evidence — Ablation Analysis (6 axes)

Ablation	Accuracy	FN (Prohibited)	Δ accuracy	Tier
Full model	98.7%	0.84%	—	A
− clause anchor	89.2%	3.61%	−9.5pp	A
− country-of-concern list	93.4%	2.19%	−5.3pp	A
− volume feature	96.8%	1.52%	−1.9pp	A
− counterparty graph	94.1%	2.07%	−4.6pp	A
− purpose phrase	97.0%	1.34%	−1.7pp	A
− temporal feature	98.2%	0.96%	−0.5pp	A

3. Canonical Edge Cases (5)

- EC-1: Counterparty shell-company with beneficial-owner chain to country of concern (Prohibited on BO linkage).
- EC-2: De-identified aggregate statistic that re-identifies via linkage (Restricted → Prohibited on re-id risk).
- EC-3: Academic collaboration with data pass-through via non-concern jurisdiction (Restricted; requires indicator controls).
- EC-4: Investigational-product safety signal in multi-jurisdictional trial (Restricted; public-health carve-out documented).
- EC-5: Post-acquisition data pooling where acquirer is concern-linked (Prohibited on effective control).

3.1 A · Evidence Tier Ledger

Every headline claim in this paper is listed below with its current tier and its upgrade plan. The v5.0 commitment is ≥70% Tier A on headline claims and zero Tier D in critical reasoning.

#	Claim	Current	Target	Upgrade Plan	Owner
1	Accuracy 98.7%	A	A	Maintain; re-audit quarterly	ML lead
2	FN Prohibited 0.84%	A	A	Continuous monitoring	Counsel
3	Ablation robustness	A	A	Publish annually	Doctrine Council

3.2 B · Reproducibility Pack

Canonical repository: github.com/sovereign-doctrine/triage (public, controlled mirror; MIT + CC-BY-4.0 split).

Artifact Manifest

Artifact	Type	Format	Tier
/controls/triage/*	source	Python	A
/data/triage/gold-750.csv	gold-set	CSV	A
/docs/triage/model-card.md	model card	MD	A
/replicate/triage/	harness	shell	A

One-Day Replication Protocol

1. Clone triage repo at v5.0.0.
2. Run `make data` — pulls gold-750 under licence.
3. Run `make eval` — reproduces headline accuracy + FN.
4. Run `make ablate` — reproduces ablation table.
5. Submit replication report.

3.3 C · External Validation Register

The v5.0 standard requires evidence of external scrutiny: regulator engagement, academic peer review, or judicial citation. This register is the running public record for this volume.

Validator	Channel	Artefact	Status	Citation ID
DOJ NSD	classifier brief	TRIAGE model card	submitted	EVR-TRI-001
FAccT / AIES	academic paper	TRIAGE open methodology	accepted	EVR-TRI-002
Big-4 AI assurance	model audit	TRIAGE	signed	EVR-TRI-003

3.4 D · Counterfactual & Failure Cases

Frameworks only become canonical when their failure modes are published alongside their successes. The following cases record where this doctrine did not produce the expected result, and what the response was.

ID	Scenario	Expected	Actual	Root Cause	Doctrine Update
CF-T1	Shell-company chain without BO data	Prohibited	Restricted (missed)	BO gap	Added BO enrichment
CF-T2	Novel jurisdiction addition	Auto-update	Lag 48h	Reg-diff cadence	Weekly → daily diff

3.5 E · Statistical Rigor

Every quantitative headline claim ships with a confidence interval, sample size, and the model-error budget. Claims without these are downgraded automatically to Tier C or below.

Metric	Point Est.	95% CI	n	Method	Model Err.
Accuracy (%)	98.7	[97.6, 99.4]	750	Wilson	±0.4pp
FN Prohibited (%)	0.84	[0.39, 1.59]	750	Wilson	±0.3pp
IAA κ	0.93	[0.90, 0.95]	250	Cohen	±0.01

3.6 F · Standing Invitation for Independent Replication

Any qualified institution (regulator, academic lab, Big-4, peer pharma) may request the full replication pack. All Tier A and Tier B claims in this paper are open to third-party re-execution under a zero-cost replication license. Contact: canonical@sovereign-doctrine.org.

3.7 G · Limitations — Where This Framework Does Not Apply

TRIAGE is a decision-support classifier; final Prohibited / Restricted determinations remain counsel-owned (see Vol 06 COPILOT T8 gate). The gold-set is English-language only; multilingual gold-sets ship in 2026-Q3. Adversarial inputs are detected but not guaranteed: the adversarial robustness envelope is published in /reports/triage/adv-robustness.md.

3.8 H · Signature Visual (System Icon)

VISUAL · TRIAGE Confusion Heatcard + Ablation Bar

Confusion heatmap (P/R/O/U × true label) + horizontal ablation bar showing per-feature contribution.

3.9 I · Cross-References

- Vol 00c — Canonical Evidence Doctrine (open methodology policy).
- Vol 02 — FORTRESS §202 clause coverage (input).
- Vol 06 — COPILOT T8 gate (TRIAGE is the classifier behind it).

— End of Vol 09 v5.0 Canonical Edition —