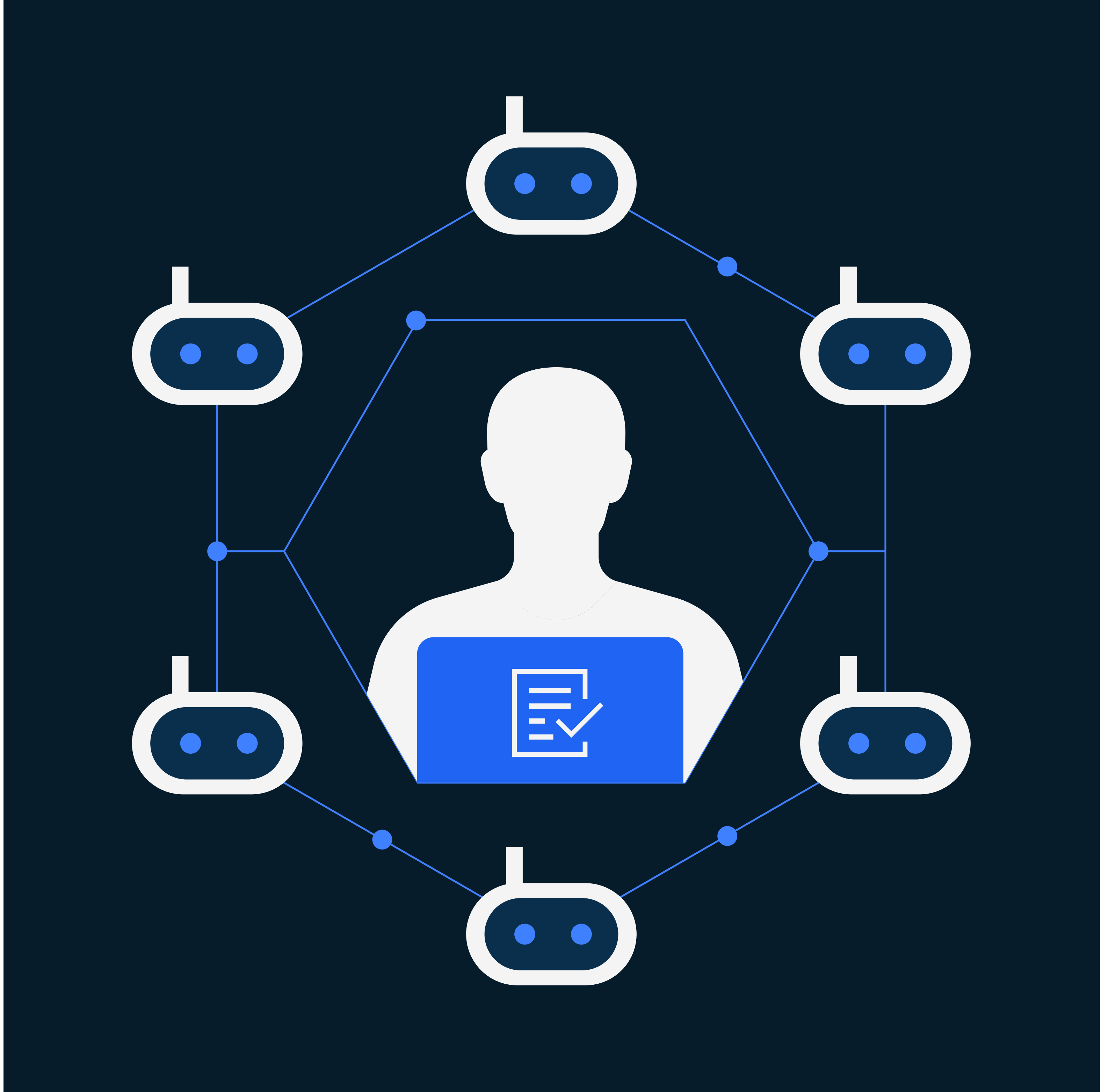




How Roxom is Pioneering Agentic Compliance



Roxom



Region

South America



Industry

Crypto Business



Products Used

TRM MCP

TRM Transaction Monitoring

Problem

Roxom's lean legal and compliance team faced scaling problems as its Bitcoin-based capital market business grew

Results

- Built a seven-agent anti-money laundering investigation swarm, running on local models, in a week
- Many daily workflows now run more agents than people, with a person deciding every outcome
- Automated court and regulatory order responses end to end, scaling with the business without adding new headcount

Roxom is building Bitcoin capital markets where people can borrow, earn, invest, and build wealth with bitcoin. Its legal and compliance team is responsible for protecting the company as it grows.

Most people wouldn't expect a group of lawyers and compliance professionals to be at the forefront of AI adoption, but the compliance and legal team at Roxom has more AI agents than people. On many of the team's daily tasks — [anti-money laundering \(AML\)](#) investigations, sanctions and politically exposed person (PEP) screening, and responses to court orders — agents now handle the first pass. Then, a person reviews the work and makes the decision. The team built this agentic workflow in a week, without adding headcount.

Why hiring wasn't the answer

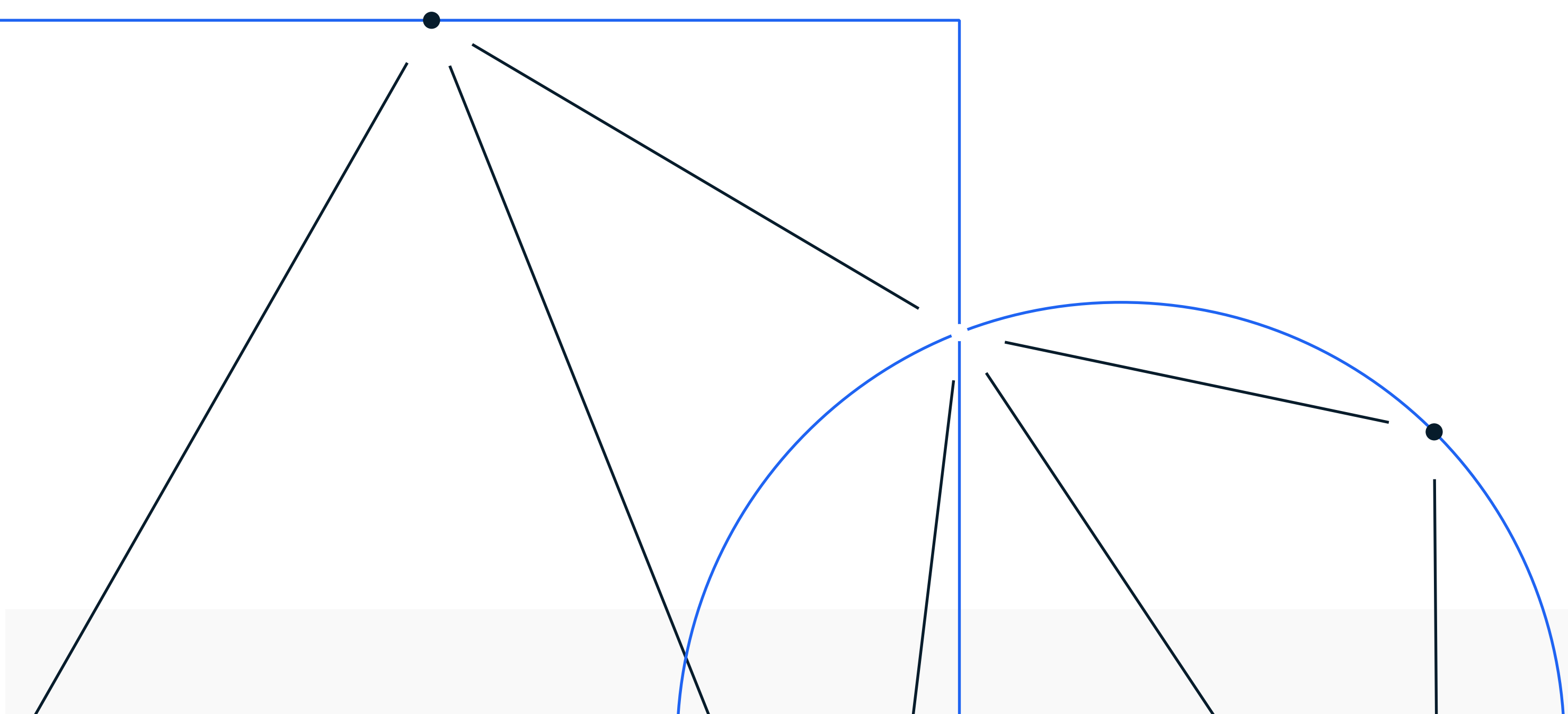
A growing exchange generates more compliance work every quarter with more investigations, more screening, more legal requests with hard deadlines. The default response is to hire more analysts and lawyers to keep pace.

Roxom's team took a different approach, with cultural reasoning: this is a compliance function that builds its own tools. "In a legal and compliance team — where both fields are often seen as rigid — I can proudly say my team is ten steps ahead of many others," said Alfonso Martel Seward, Roxom's Chief Compliance and Legal Officer. "I have lawyers and accountants who are building workspaces and training agents so our daily work becomes more effective, faster, and ultimately better."

That instinct fits the company. Building a capital market that doesn't exist yet means the rules are not written down, which is exactly what drew Martel to the job. "What we're trying to create doesn't exist," he said. "There are no rules, nothing is written down, and the challenge is absolute." So when a new technology arrived, the team treated it the way it treats everything else: as something to build with.

"It was about the culture and mindset," Martel said. "We saw a new technology and sat down to see what we could do with it, and how we could work differently from all the other teams we knew. Suddenly we were doing more in less time, and we realized we could grow without adding headcount." The goal was efficiency. As Roxom continues to grow, Martel has confidence his team's existing resources will keep pace because the team is proactively looking for creative solutions to address problems before they gain traction.

One of these creative solutions was building a team of AI agents that could operate across Roxom's legal and compliance workflows. For this system to succeed, one rule shaped every downstream decision: no agent acts alone without a human counterpart. "We don't have AI agents operating on their own," Martel said. "We thoroughly understand the concept of human-in-command. We created workflows where a large part is done by agents with human supervision, because speed, efficiency, and accuracy matter as much as understanding what we're doing and protecting our clients' and company's data."



Inside the seven-agent AML swarm

The clearest expression of that approach is the team's AML investigation swarm — seven agents, each with a single job, run in sequence on a client under review. Yanina Acosta, a senior financial crime prevention analyst, built the division of labor around the phases a real investigation already moves through.

"An investigation progresses through several phases," Acosta said. "So we created a specific agent for each task, and the key was making sure each agent has its own expertise." The Know Your Customer (KYC) agent identifies who the person is from Roxom's own data. The transaction agent reviews their activity. The AML agent checks sanctions and PEP data. The onchain agent runs the blockchain analysis connected to [TRM's Model Context Protocol \(MCP\)](#) — pulling attribution, counterparties, risk, and exposure for an address, and returning a conclusion. The open-source intelligence (OSINT) agent conducts research on the subject. A documentation agent then proposes what to request from the client.

The seventh agent watches the other six. "The meta-audit agent checks quality and makes sure everything is coherent with what was investigated, so we have greater traceability," Acosta explained. The swarm delivers an executive summary of the client, including proposed next steps, and it runs on local models. This means sensitive client and corporate data stays inside Roxom's own environment, rather than going out to third-party models.

Not every agent runs on the same engine. "For more complex tasks we use more advanced models," Acosta said. "For simple tasks, like reviewing internal databases or data we already had, we use simpler models." The human stays in the workflow at every stage by design. The documentation agent drafts what to request from a client, but a person reviews it before anything goes out.

One standard for every investigation

The onchain step is where Roxom relies on TRM, and Acosta is specific about why the team uses the MCP rather than connecting the blockchain data through a standard API. With a standard integration, the tool hands over data and the team defines the investigative criteria itself, which means results shift from one run to the next.

"With the standard API, TRM gives you the data and you define the research criteria, so the result is different every run, and it lacks context," Acosta said. "With the MCP, a consistent standard is applied across investigations." In practice, TRM's MCP supplies the investigative workflow and the context around it, so every agent-run investigation follows the same order and reaches conclusions against the same criteria. For a compliance program that has to defend its decisions, that consistency is what holds up under review.

With the end goal in mind, Martel and his team worked quickly, going from idea to a working system in a week. "We built each agent from scratch, step by step, and made them work properly, first individually, and then as a whole system," Acosta said. "From day one, we included the human-in-the-loop as part of the design." After six months of daily use, the agents have improved: many of the team's processes now run on looping logic, store what they learn in memory, and get better over time. "The results are far superior to what they were on day one," Martel said, "and to what they were before we implemented this system."

Putting the same system to work on court orders

The AML swarm proved the model, so the team pointed the same approach at a very different problem. Court and regulatory orders are legal's responsibility with fixed deadlines and rising volume, and they now run agentially end to end. Guadalupe Asoratti, a lawyer on the team, walked through the transformation.

Before, a request would come in and the legal team would analyze it. When a request touched onchain activity, Asoratti and her team would hand it to the AML team for a manual investigation before drafting a response. Now, the handoff is automatic. "When we receive an information request, we upload it to our dashboard, and based on a semantic analysis of the request, we can detect whether the AML team's intervention is needed," Asoratti said. "When it is, the analysis runs through TRM's MCP against pre-set parameters and returns a report, without a manual investigation at that stage. The person who used to run the search now supervises the output for precision instead."

The payoff shows up in two critical ways: time and scale. Requests arrive with a deadline, and they grow as the business grows. "With the MCP, we reduced the time needed to respond by about 3x, and we can handle a growing volume of replies as the business expands, without increasing the number of people involved," Asoratti said.

Roles move from doing the work to supervising it

Because the agents absorbed the repetitive work, the job changed. Recurring drafting and review — the tasks where a person adds little judgment — now fall to agents, which frees the team for analysis where judgment counts.

"Adopting these agents let us replace very repetitive tasks where team members weren't adding value, so we can focus on deeper analysis and deliver substantial value to the product," said Facundo Pastorella, Roxom's Head of Legal. "Human judgment remains essential throughout the entire process. We're involved from day one in creating the process, and we review the results to keep improving it."

To compliance leaders who are skeptical, Pastorella's answer is that the fear comes from not knowing what building agents actually means. "There's a huge gap between what people think implementing agents is and what it actually is. It's not about replacing people — it's about replacing repetitive functions and tasks. Law and legal work are always kept far from technology, and it's time to bridge that gap."

Build the guardrails, then be bold

Martel's advice to peers starts with the guardrail. "When you're dealing with client data or corporate data, security and governance is the most important thing. Understand how models are routed, what data is sensitive, what can be shared, and how to set up local models when you need complete separation from third-party models." With that in place, his second pointer is to just start. "Don't be afraid to go for it. It's a world where we can be creative and go much further than we think. We can change the way we work and change it for the better."

Pastorella sees the same runway ahead: more agents, more automated tasks, and, as the agents get more specialized, more involvement from the people directing them. For a team that set out to build a market that didn't exist, it's fitting that they are building an approach to compliance that doesn't exist. Even though the team's agents outnumber its people, Roxom's system is intentionally designed with a human in command, with agents running initial investigations and drafting recommendations.

Watch Alfonso and his team's story

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