

ENFORCEMENT INFORMATION FOR April 15, 2015

Information concerning the civil penalties process can be found in the OFAC regulations governing each sanctions program; the Reporting, Procedures, and Penalties Regulations, 31 C.F.R. part 501; and the Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, app. A. These references as well as recent final civil penalties and enforcement information can be found on OFAC's Web site at www.treasury.gov/ofac/enforcement.

ENTITIES – 31 CFR 501.805(d)(1)(i)

First Data Resources, LLC Settles Potential Civil Liability for Alleged Violations of the Foreign Narcotics Kingpin Sanctions Regulations: First Data Resources, LLC (First Data), of Atlanta, Georgia, has agreed to pay \$23,336 to settle potential civil liability for alleged violations of the Foreign Narcotics Kingpin Sanctions Regulations (FNKSR). The alleged violations involve First Data's provision of third party data processing services to a Specially Designated Narcotics Trafficker (SDNT) in alleged violation of § 598.203 of the FNKSR, between on or about February 23, 2011 and June 7, 2011.

OFAC determined that First Data voluntarily self-disclosed the alleged violations, and that the alleged violations constitute a non-egregious case. The total transaction value for the alleged violations was \$69,144 and the base penalty amount was \$34,572.

The settlement amount reflects OFAC's consideration of the following facts and circumstances, pursuant to the General Factors under OFAC's Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, app. A: First Data failed to exercise a minimal degree of caution or care in reviewing the information flagged by its interdiction software; First Data had reason to know that it was providing services to an SDNT as early as February 25, 2011, the date on which First Data's automated interdiction software flagged the SDNT as a potential match; the alleged violations caused significant harm to U.S. sanctions program objectives by conveying economic benefit to an SDNT and undermining the policy objectives of U.S. counternarcotics sanctions; First Data is a highly sophisticated commercial entity; First Data has no prior sanctions history in the five years preceding the date of the earliest transaction giving rise to the alleged violations; the majority of the alleged violations occurred due to a deficiency in First Data's OFAC compliance program that incorrectly categorized potential matches to OFAC's List of Specially Designated Nationals and Blocked Persons (the "SDN List"), and the remainder of the alleged violations occurred due to a deficiency in First Data's OFAC compliance program that allowed its client to reactivate the SDNT's access to First Data services even after First Data deactivated the SDNT's access in order to comply with OFAC regulations; First Data took remedial action to correct the deficiency in its categorization of potential matches to the SDN List; and First Data cooperated with OFAC during OFAC's investigation of the alleged violations.