

ENFORCEMENT INFORMATION FOR June 27, 2014

Information concerning the civil penalties process is discussed in OFAC regulations governing the various sanctions programs and in 31 CFR part 501. On November 9, 2009, OFAC published as Appendix A to part 501 new Economic Sanctions Enforcement Guidelines. See 31 C.F.R. part 501, app. A. The Economic Sanctions Enforcement Guidelines, as well as recent final civil penalties and enforcement information, can be found on OFAC's Web site at <http://www.treasury.gov/resource-center/sanctions/CivPen/Pages/civpen-index2.aspx>.

ENTITIES – 31 CFR 501.805(d)(1)(i)

Red Bull North America, Inc. Settles Potential Civil Liability for Alleged Violations of the Cuban Assets Control Regulations, 31 C.F.R. Part 515: Red Bull North America, Inc. (“RBNA”) has agreed to pay \$89,775 to settle potential civil liability for seven alleged violations of the Cuban Assets Control Regulations, 31. C.F.R. part 515 (the “CACR”). Between June 8 and June 18, 2009, seven representatives of RBNA traveled to Cuba in order to film a documentary, without authorization from OFAC. The production of the film, as well as the associated travel, was approved by RBNA management.

OFAC determined that RBNA did not voluntarily self-disclose the alleged violations and that the alleged violations constituted a non-egregious case. The maximum penalty amount for the alleged violations was \$455,000, and the base penalty amount was \$105,000.

The settlement 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: RBNA had prior knowledge of U.S. sanctions on Cuba and took steps to conceal the transactions; RBNA is a U.S. subsidiary of a sophisticated multinational company with extensive experience in international trade; RBNA made a remedial response by instituting an OFAC compliance program; and RBNA has not received a penalty notice or Finding of Violation from OFAC in the five years preceding the date of the unauthorized travel to Cuba.

For more information regarding OFAC regulations, please visit: <http://www.treasury.gov/ofac>