

ENFORCEMENT INFORMATION FOR April 18, 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 Economic Sanctions Enforcement Guidelines. See 31 CFR 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 www.treasury.gov/ofac/enforcement.

ENTITIES – 31 CFR 501.805(d)(1)(i)

CWT B.V. Settles Potential Civil Liability for Apparent Violations of the Cuban Assets Control Regulations. CWT B.V. ("CWT"), of the Netherlands, has agreed to pay \$5,990,490 to settle potential civil liability for apparent violations of the Cuban Assets Control Regulations (the "CACR"), 31 C.F.R. part 515. From on or about August 8, 2006, through on or about November 28, 2012, CWT dealt in property in which Cuba or its nationals had an interest when its business units mostly outside the United States provided services related to travel to or from Cuba, assisting 44,430 persons. In 2006, CWT, a travel services provider incorporated in the Netherlands, became majority-owned by U.S. persons and thus subject to U.S. jurisdiction pursuant to the Trading With the Enemy Act, 50 U.S.C. App. §§ 1-44 and the CACR.

OFAC determined that CWT voluntarily self-disclosed the apparent violations to OFAC, that the vast majority of the apparent violations occurred "prior to agency notice," and that a small portion of the apparent violations occurred "subsequent to agency notice," as they occurred after CWT filed its self-disclosure with OFAC. Pursuant to OFAC's Cuba Penalty Schedule, 68 Fed. Reg. 4,429 (Jan. 29, 2003), the base penalty for the apparent violations is \$11,093,500.

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: CWT failed to exercise a minimal degree of caution or care regarding its obligations to comply with OFAC sanctions against Cuba by processing unauthorized travel-related transactions for more than four years before recognizing that it was subject to U.S. jurisdiction; CWT is a commercially sophisticated international corporation and travel services provider; CWT processed a high volume of transactions and assisted a large number of travelers, which caused significant harm to the objectives of the CACR; CWT had no compliance program or an inadequate compliance program at the time of the apparent violations; the transactions were CWT's "first violation," as no Finding of Violation or penalty notice had been issued to CWT in the five years preceding these transactions; CWT provided substantial cooperation during OFAC's investigation of the apparent violations, including by agreeing to toll the statute of limitations and by providing to OFAC detailed and well-organized documents and information; and CWT has taken significant remedial action in response to the apparent violations.

For more information regarding OFAC regulations, please go to: www.treasury.gov/ofac.