

## **ENFORCEMENT INFORMATION FOR June 12, 2013**

**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 74 Fed. Reg. 57,593 (Nov. 9, 2009). 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](http://www.treasury.gov/ofac/enforcement).**

### **ENTITIES – 31 CFR 501.805(d)(1)(i)**

**ATP Tour, Inc. Settles Potential Civil Liability for Alleged Violations of the Iranian Transactions Regulations:** ATP Tour, Inc. (“ATP”), Ponte Vedra Beach, FL, has agreed to pay \$48,600 to settle potential civil liability for alleged violations of the Iranian Transactions Regulations (the “Regulations”).<sup>1</sup> OFAC alleged that between on or about May 8, 2007, and on or about July 15, 2010, ATP violated §§ 560.206 and 560.208 of the Regulations by approving, facilitating, and in some instances making, 18 salary payments to an individual who is ordinarily resident in Iran (the “individual”), for services rendered and expenses incurred in connection with ATP tournaments the individual officiated.

OFAC determined that ATP did not voluntarily self-disclose its conduct, and the alleged violations constituted a non-egregious case. The base penalty for the alleged violations was \$135,000.

The settlement reflects OFAC's consideration of the following facts and circumstances, pursuant to the General Factors Affecting Administrative Action listed in OFAC's Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, app. A: ATP demonstrated reckless disregard for U.S. sanctions requirements because eight of the 18 payments to the individual occurred after OFAC issued a “Warning Letter” to ATP on August 11, 2008, for acting as a funds transfer agent in connection with individuals in Iran; ATP's supervisory and managerial staff knew of the payments to the individual; ATP did not have an OFAC compliance program in place at the time of the alleged violations; ATP has not received a Penalty Notice or Finding of Violation from OFAC in the five years preceding the alleged violations; ATP cooperated with OFAC's investigation, including by agreeing to toll the statute of limitations; ATP's transactions represent relatively low harm to the sanctions program; ATP's transactions may have been licensable under then-existing policies; ATP is a non-profit, member-based organization; and ATP has implemented an OFAC compliance plan.

For more information regarding OFAC regulations, please go to: [www.treasury.gov/ofac](http://www.treasury.gov/ofac).

---

<sup>1</sup> On October 22, 2012, OFAC changed the heading of 31 C.F.R. part 560 from the Iranian Transactions Regulations to the Iranian Transactions and Sanctions Regulations (“ITSR”), amended the renamed ITSR, and reissued them in their entirety. See 77 Fed. Reg. 64,664 (Oct. 22, 2012).