



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

FINDING OF VIOLATION

ENF [REDACTED]

JAN 07 2016

[REDACTED]
Johnson & Johnson (Middle East) Inc.
[REDACTED]
[REDACTED]

Dear [REDACTED]:

The Office of Foreign Assets Control (OFAC) has determined that Johnson & Johnson (Middle East) Inc. (JJME), a U.S. subsidiary of Johnson & Johnson at the time of the transactions detailed below, engaged in certain conduct in violation of the Sudanese Sanctions Regulations (the "Regulations"), 31 C.F.R. part 538, promulgated pursuant to the International Emergency Economic Powers Act 50 U.S.C. §§ 1701-06 (IEEPA). Specifically,

OFAC has determined that between on or about March 23, 2010, to on or about October 20, 2010, JJME violated § 538.206 of the Regulations when it facilitated the exportation of goods to Sudan by coordinating and supervising five shipments from Johnson & Johnson (Egypt) S.A.E. to Khartoum, Sudan.

OFAC has considered the General Factors Affecting Administrative Action set forth in OFAC's Economic Sanctions Enforcement Guidelines (the "Guidelines"), 31 C.F.R. Part 501, app. A, available at www.treasury.gov/ofac, as well as your response dated December 18, 2014 to our initial Finding of Violation dated November 6, 2014, and your supplemental response dated January 5, 2015. After due consideration, OFAC has determined that the issuance of this Finding of Violation, in lieu of a civil monetary penalty, is the appropriate enforcement response to the transactions identified above. This Finding of Violation represents a final enforcement response, unless OFAC later learns of additional related violations or other relevant facts, and constitutes OFAC's final agency determination that a violation has occurred.

In accordance with the Guidelines, JJME's compliance history, including the issuance of this Finding of Violation, may be considered by OFAC in determining an appropriate enforcement response to any apparent violations of OFAC-administrated sanctions programs that come to our attention in the future. Civil monetary penalties may be imposed for violations of orders or regulations issued pursuant to IEEPA, not to exceed the greater of \$250,000 or an amount that is twice the amount of the transaction that is the basis of the violation. In appropriate circumstances, OFAC may refer the matter to appropriate law enforcement agencies for criminal investigation and/or prosecution.

ENF: [REDACTED]
Johnson & Johnson (Middle East) Inc.

Page 2 of 2

Contact Person

If JJME has any questions concerning this matter, please feel free to contact [REDACTED] at telephone number [REDACTED]. Please have the ENF number listed at the top of this Notice available when you call.

Sincerely,



John E. Smith
Acting Director
Office of Foreign Assets Control