

OFAC ALERT DUE DILIGENCE GUIDE

The following guidance is provided for clients receiving OFAC Alert notices indicating some level of match with a person on the OFAC List.

Notices: (i) Do **NOT** use this Alert to determine an individual's eligibility for any credit or any other purpose authorized under the FCRA. This Alert is **NOT** a consumer report. It is only an Alert for you to take further due diligence steps. (ii) Equifax and its affiliate, Compliance Data Center, LLC, assume no liability for any errors or omissions in this guide. While this Guide is intended to facilitate OFAC compliance, its use does not guarantee compliance with applicable law.

Recommended Due Diligence Steps

- A. Access: <http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>
- B. Locate the name in question.

Compare the complete OFAC entry with all of the information you have on the subject of your request. An OFAC entry often will have a full name, address, nationality, passport, tax ID or cedula number, place of birth, date of birth, former names and aliases.

If you are missing a lot of this information for your subject, contact the individual for additional information and then compare the complete information against the information provided in the OFAC entry.

The following are False Positive Review Standard Match Comparison Guidelines:

- Name Match – Compare the First and Last Names.
- Middle Name Match – Compare the Middle Names/Initials.
- Address Match – Compare Street Addresses.
- City/State Match – Compare city & state information.
- Date of Birth – Compare DOB and/or ages, if provided.
- Spouse – Compare the spouse names if the information is provided.
- Occupation – Compare the occupation if the information is provided.
- Suffix/Title/Prefix – Compare the suffix/title/prefix if the information is provided.

C. Are there a number of similarities or exact matches?

- If yes, please call the OFAC hotline at 1-800-540-6322.
- If no, you do not have a valid match.*

**However, if you have reason to know or believe that allowing this person to do business in the United States would violate any of the Department of the Treasury of other Regulations; you should call the OFAC hot line and explain this knowledge or belief.*

Much of the above information is from the due diligence steps recommended by the U.S. Department of Treasury for handling and reporting Office of Foreign Assets Control (OFAC) hits. To ensure you have the most recent version of the due diligence steps, please go to:

<http://www.treasury.gov/resource-center/sanctions/Pages/regulations.aspx>

D. If a consumer disputes the OFAC Alert match, have them contact:

Compliance Data Center, LLC
Attn: CDC Disclosure
1550 Peachtree St NW
Mail Drop – JV23
Atlanta, GA 30309
1-800-221-3758