

OFAC can consider the **EFFECTIVENESS** of the SCP when making the “egregious” determination

Non-Egregious and Voluntarily Disclosed

One-half Transaction Value
(with certain caps)

Egregious and Voluntarily Disclosed

One-half of the
Applicable Statutory Maximum

OFAC Base Penalty Matrix

Non-Egregious and NOT Voluntarily Disclosed

Applicable Schedule Amount
(with certain caps)

Egregious and NOT Voluntarily Disclosed

Applicable Statutory
Maximum

OFAC can consider the SCP as an **AGGRAVATING** or **MITIGATING** factor and adjust the base penalty in any quadrant upwards or downwards.