Denied Parties Database Check

Superior Freight Services has consolidated all lists compiled by government agencies into one program. These are lists of individuals or companies that have been denied export privileges by the Treasury Department, State Department, Secretary of State, and Department of Commerce.

Our program updates the list daily at 12am CST.

If a party to your transaction matches a party name on the consolidated list, the user must check the official publication of restricted parties in the Federal Register or the official lists of restricted parties maintained on the web sites of the Departments of Commerce, State and the Treasury to ensure full compliance with all of the terms and conditions of the restrictions placed on the parties on this list.

Lists

(Click on links below for additional details on each list)

Consolidated SDN Data Files

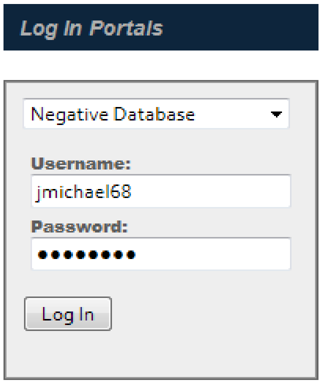
As part of its enforcement efforts, OFAC publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific. Collectively, such individuals and companies are called "Specially Designated Nationals" or "SDNs." Their assets are blocked and U.S. persons are generally prohibited from dealing with them.

Denied Persons List **(DPL)** A list of individuals and entities that have been denied export privileges. Any dealings with a party on this list that would violate the terms of its denial order is prohibited.
Unverified List **-** A list of parties where BIS has been unable to verify the end use in prior transactions. The presence of a party on this list in a transaction is a "red flag" that should be resolved before proceeding with the transaction.
Entity List **-** A list of parties whose presence in a transaction can trigger a license requirement under the Export Administration Regulations. The list specifies the license requirements that apply to each listed party. These license requirements are in addition to any license requirements imposed on the transaction by other provisions of the Export Administration Regulations.
Specially Designated Nationals List **(SDN) -** A list compiled by the Treasury Department, Office of Foreign Assets Control (OFAC). OFAC's regulations may prohibit a transaction if a party on this list is involved. In addition, the Export Administration Regulations require a license for exports or re-exports to any party in any entry on this list that contains any of the suffixes "SDGT", "SDT", or "FTO".
Debarred List **-** A list compiled by the State Department of parties who are barred by §127.7 of the International Traffic in Arms Regulations (ITAR) (22 CFR §127.7) from participating directly or indirectly in the export of defense articles, including technical data or in the furnishing of defense services for which a license or approval is required by the ITAR.
Nonproliferation Sanctions **-** Several lists compiled by the State Department of parties that have been sanctioned under various statutes. The Federal Register notice imposing sanctions on a party states the sanctions that apply to that party. Some of these sanctioned parties are subject to BIS's license application denial policy described in §744.19 of the EAR (15 CFR §744.19).

Consolidated Non-SDN Data Files

In order to make it easier to comply with OFAC's sanctions regulations, the office is now offering all of its non-SDN sanctions lists (including the Non-SDN Palestinian Legislative Council List "NS-PLC List," the Part 561 List, the Non-SDN Iran Sanctions Act List "NS-ISA List," the Foreign Sanctions Evaders List "FSE List," and the Sectoral Sanctions Identifications List "SSI List,") in a consolidated set of data files "the Consolidated Sanctions List." These consolidated files comply with all of OFAC's existing data standards. While the consolidated sanctions list data files are not part of OFAC's list of Specially Designated Nationals and Blocked Persons "the SDN List," some of the records in these consolidated files may also appear on the SDN List

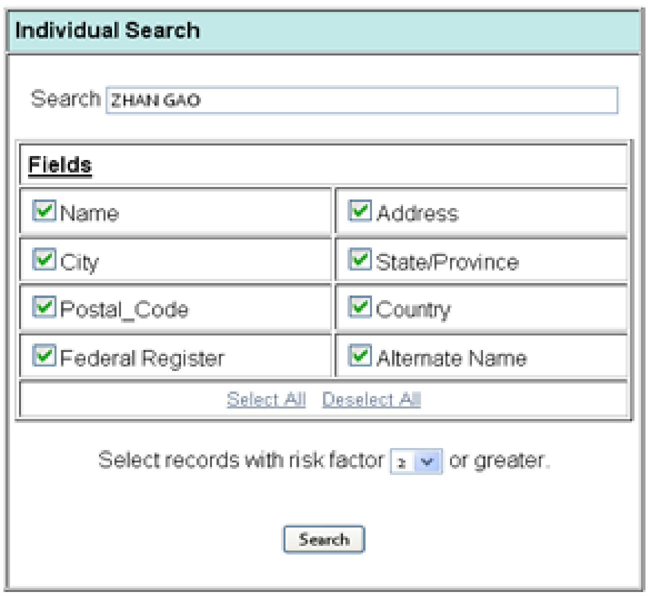
Foreign Sanctions Evaders (FSE) - OFAC publishes a list of foreign individuals and entities determined to have violated, attempted to violate, conspired to violate, or caused a violation of U.S. sanctions on Syria or Iran. It also lists foreign persons who have facilitated deceptive transactions for or on behalf of persons subject to U.S. sanctions. Collectively, such individuals and companies are called "Foreign Sanctions Evaders" or "FSEs." Transactions by U.S. persons or within the United States involving FSEs are prohibited.
Sectoral Sanctions Identifications (SSI) - OFAC publishes a list of to identify persons operating in sectors of the Russian economy identified by the Secretary of the Treasury pursuant to Executive Order 13662. Directives found within the list describe prohibitions on dealings with the persons identified.
Palestinian Legislative Council (NS-PLC) - The individuals in the following list are PLC members who were elected on the party slate of an FTO, SDT, or SDGT. They do not, however, appear on the SDN List. As indicated above, transactions involving these individuals must be rejected.
The List of Foreign Financial Institutions Subject to Part 561 (the Part 561) In order to implement certain provisions of the Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010 (CISADA), the National Defense Authorization Act of Fiscal Year 2012 (NDAA), the Iran Freedom and Counter-Proliferation Act of 2012 (IFCA) and certain executive orders, OFAC has developed a list of foreign financial Institutions that are subject to sanctions under these laws and orders.
Non-SDN Iranian Sanctions Act (NS-ISA) - On May 23, 2011, the President signed Executive Order ("E.O.") 13574, "Authorizing the Implementation of Certain Sanctions Set Forth in the Iran Sanctions Act of 1996, as Amended." E.O. 13574 states that the Secretary of the Treasury, pursuant to authority under the International Emergency Economic Powers Act ("IEEPA"), shall implement certain sanctions that the Secretary of State imposes and selects under the pre-existing authority of the Iran Sanctions Act of 1996 ("ISA") as amended by the Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010 ("CISADA")



To log into the system please select "Negative Database" in the drop down menu on the left side menu on supfrt.com and enter your username and password.

If you do not have a username and password you may request one by contacting Karen Edwards at kedwards@supfrt.com.

Individual Search



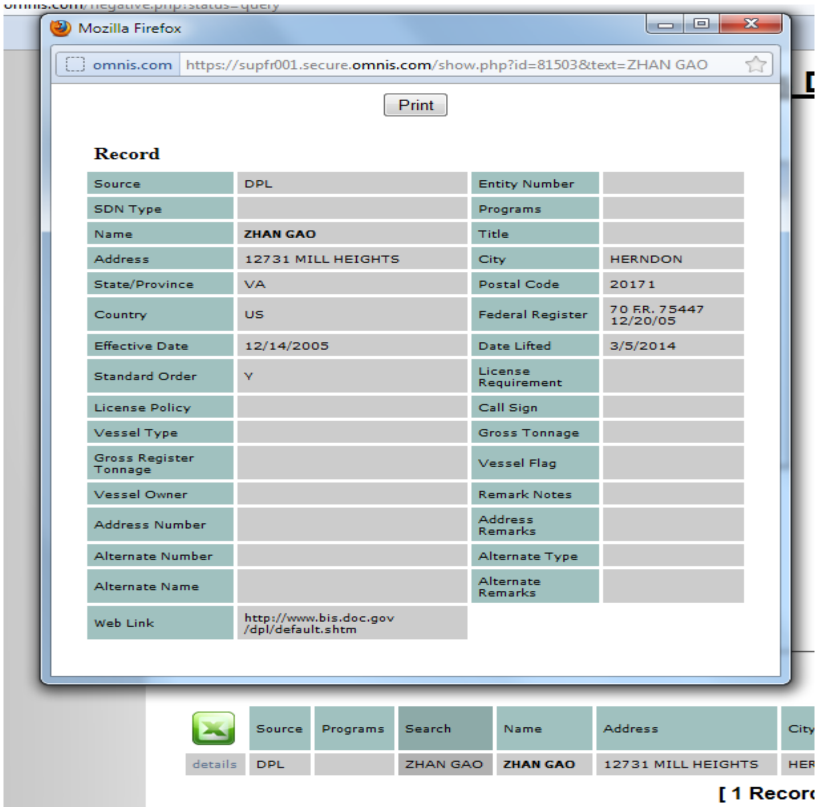
Example Search: In this example, the name "ZHAN GAO' has been entered. We check boxed every field just to be thorough. Risk factor is how likely a search will be a perfect match. A risk factor of 2 means that the search string entered will need 2 or more matches before returning a result. Matches will be shown in bold in the search results below.

Note that the column titled "Source", indicates which specific consolidated screening list is the source for each returned result. In this case the "Denied Persons List" has returned a match.

Blank data fields in the file are not applicable to the consolidated screening list in the "Source" column. Further scrutiny may be required by checking the address column.

	Source	Programs	Search	Name	Address	City	State/Province	Postal	Country	Federal Register	Alternate Name	Alerts
details	DPL		ZHAN GAO	**ZHAN GAO**	12731 MILL HEIGHTS	HERNDON						2

[1 Records]



Download/Details/Print:

For every field in the record, click on “details” to open another window. The new window will show every field available in the database.

To save the search result on your computer click on the excel icon in the upper left column of the results.

Batch Request

The first step is to have a working copy of your client list in excel (.xls) format. Next, follow the steps below to save in CVS format.

To save an Excel file as a .CSV file:

1. Open Excel and open the file containing your contact list.
2. On the Excel toolbar, select **File** > **Save As**. A dialog box pops up.
3. Type a new name for the file in the File Name text field.
4. In the "Save as Type" drop-down menu, scroll down to locate and select **CSV (comma delimited)**.
5. Click **Save**.
   - If you see a message that the file type doesn't support multiple worksheets, click **OK**.
   - If you see a message that the file may contain features that may not be compatible with the file type, click **Yes** to continue.
6. Close the file and exit from Excel.

Batch Request

File to upload C:\Websites\SUPFRT. Browse...

Name Column B   Start at row 2

Address Column C   (Optional)

Select records with risk factor 1 or greater.

Submit

* Batch files must be in .csv format

Example Batch: Take your saved CSV file and enter it into the "File to Upload" filed. Make sure you put the correct column for Name and Address is optional. Selecting a higher risk factor will eliminate records that are not matches.

Below is an example of 8 returned records. 7 records matched "PO BOX", on the address field. 1 record matched a word in the Name field.

It is up to the individual user to determine if a match has been made.

Results

	Source	Search Name	Name	Alternate Name	Search Address	Address	City	State/Province	Postal	Country	Risk
details	SDN	HYDRITE CHEMICAL COMPANY	ZIDCO HOLDINGS		PO BOX 12	**Po Box** 1275	Harare			Zimbabwe	2
details	SDN	HYDRITE CHEMICAL COMPANY	BANK SADERAT IRAN		PO BOX 12	**PO Box** 1269	Muscat 112			Oman	2
details	EL	SHELMET PRECISION CASTING	Ralph Brucher		PO BOX 95	**PO Box** 9523	Centurion		46	South Africa	2
details	SDN	WINDSOR INDUSTRIAL SERVICES	ZIDCO HOLDINGS		PO BOX 12	**Po Box** 1275	Harare			Zimbabwe	2
details	SDN	WINDSOR INDUSTRIAL SERVICES	BANK SADERAT IRAN		PO BOX 12	**PO Box** 1269	Muscat 112			Oman	2
details	SDN	ARTUS CORPORATION	SENNAR SUGAR COMPANY LIMITED		BOX 511	P.O. **Box 511**	Khartoum			Sudan	2
details	SDN	ARTUS CORPORATION	GUNEID SUGAR COMPANY LIMITED		BOX 511	P.O. **Box 511**	Khartoum			Sudan	2
details	SDN	PEDCO	PETROIRAN DEVELOPMENT COMPANY **(PEDCO)** LIMITED		2737 NW NELA STREET	P.O. Box 15875-6731	Tehran			Iran	1

[8 Records]

RISK FACTOR

The risk column is on the end of each record. When doing a search select a risk factor from 1-9. This becomes useful if you are returning too many results with a risk factor of less than 3. Many of these results are matches that do not contain relevant street names or businesses. For example, in the above result "PO BOX" is matched 7 times, but the name and the rest of the address do not match.

In addition to returning results that are exact matches, searches can also provide a broader set of results using fuzzy logic. This logic uses character and string matching as well as phonetic matching. Only the name field of List Search invokes fuzzy logic when the tool is run. The other fields on the tool use character matching logic.

The Risk Factor indicates the similarity between the name entered and resulting matches on one of OFAC's sanctions lists. It is calculated using two matching logic algorithms: one based upon phonetics, and a second based upon the similarity of the characters in the two strings. Using a higher Risk Factor will eliminate many of the partial matches that rule out an exact match.

Superior Freight Services, Inc. cannot make a recommendation as to which Risk Factor should be used on your search because each search has its own unique set of facts surrounding it. Users of this search tool must make their own match threshold determinations based upon their own internal risk assessments and established compliance practices.

Definitions

Specially Designated Nationals List (SDN)

As part of its enforcement efforts, OFAC publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific. Collectively, such individuals and companies are called "Specially Designated Nationals" or "SDNs." Their assets are blocked and U.S. persons are generally prohibited from dealing with them.

Entity List (EL)

The Export Administration Regulations (EAR) contain a list of names of certain foreign persons – including businesses, research institutions, government and private organizations, individuals, and other types of legal persons – that are subject to specific license requirements for the export, reexport and/or transfer (in-country) of specified items. These persons comprise the Entity List, which is found in Supplement No. 4 to Part 744 of the EAR. On an individual basis, the persons on the Entity List are subject to licensing requirements and policies supplemental to those found elsewhere in the EAR.

License Requirements Imposed by the Entity List

The Entity List specifies the license requirements that it imposes on each listed person. Those license requirements are independent of, and in addition to, license requirements imposed elsewhere in the EAR. For example, if you want to export, re-export or transfer (in-country) an EAR99 item to a listed entity and the license requirements for that person as specified in the “License Requirement” column of the Entity List state "all items subject to the EAR," you would have to obtain a license before exporting, re-exporting or transferring (in-country) the item, even if the EAR99 item could otherwise be sent to the country of destination without a license provided the proposed end-use does not trigger another license requirement under Part 744 of the EAR.

Note also that provisions of the EAR other than the Commerce Control List (Supplement No. 1 to Part 774 of the EAR) (CCL) and the Entity List impose license requirements on exports, re-exports and transfers (in-country) of items subject to the EAR. See, for example, the end-use requirements in Part 744 or the embargo and special destination requirements in Part 746, and note that if any of these parts impose a license requirement, you would have to obtain a license prior to the export, re-export or transfer (in-country) of the item.

License Application Review Policy

BIS evaluates license applications to any listed entity according to the policy stated in the "License Review Policy" column of the Entity List. If there is more than one license requirement for a particular transaction (*e.g.,* if the export transaction contains both persons included on the Entity List and an item that requires a license based on reason for control and destination, as determined by the classification of the item on the CCL and the Country Chart), you should submit only one license application, which BIS will evaluate according to all applicable licensing policies. For such license applications, the applicant should indicate the involvement of a person listed on the Entity List. If any applicable policy requires denial, BIS will deny the application, even if another policy provides for approval. For example, if your proposed transaction requires a license based on the item's reason for control and your proposed consignee is on the Entity List, BIS will evaluate your application on the basis of the CCL licensing policy in Part 742 of the EAR and the policy for the consignee stated on the Entity List. If either policy requires denial, BIS will deny your application.

License Exceptions and the Entity List

Section 744.1(c) of the EAR prohibits the use of license exceptions for almost all exports and re-exports to listed entities. If the citation "§744.20 of the EAR" appears in the "Entity" column of the Entity List for a particular entity, the License Requirement column will indicate whether or not any license exceptions are available for exports, re-exports or transfers (in-country) to that entity. If the citation "§744.20 of the EAR" does not appear then no license exceptions are available to that entity.

Background and Purpose of the Entity List

BIS first published the Entity List in February 1997 as part of its efforts to inform the public of entities who have engaged in activities that could result in an increased risk of the diversion of exported, re-exported and transferred (in-country) items to weapons of mass destruction (WMD) programs. Since its initial publication, grounds for inclusion on the Entity List have expanded to activities sanctioned by the State Department and activities contrary to U.S. national security and/or foreign policy interests.

Unverified List (UVL)

The Unverified List includes names and countries of foreign persons who in the past were parties to a transaction with respect to which BIS could not conduct a pre-license check (PLC) or a post-shipment verification (PSV) for reasons outside of the U.S. Government's control. Any transaction to which a listed person is a party will be deemed by BIS to raise a Red Flag with respect to such transaction within the meaning of the guidance set forth in Supplement No. 3 to 15 C.F.R. Part 732. The Red Flag; applies to the person on the Unverified List regardless of where the person is located in the country included on the list.

Denied Persons List (DPL)

Export Privileges are denied by written order of the Department of Commerce. Each order affecting export privileges is published in the *Federal Register*. These orders are the official source of information about denied persons and are controlling if there is an inconsistency with anything on this list or elsewhere on this Web site. The *Federal Register* from 1998 to the present is available on the Government Printing Office Access Web site. Prior to 1998, you may need to consult the printed version or other on-line source of the *Federal Register*.

Debarred List (DTC)

A list compiled by the State Department of parties who are barred by §127.7 of the International Traffic in Arms Regulations (ITAR) (22 CFR §127.7) from participating directly or indirectly in the export of defense articles, including technical data or in the furnishing of defense services for which a license or approval is required by the ITAR.

Nonproliferation Sanctions (ISN)

The United States imposes sanctions under various legal authorities against foreign individuals, private entities, and governments that engage in proliferation activities. Announcements of such sanctions determinations are printed in the Federal Register and can be accessed through the Government Printing Office web page. Copies of relevant statutes can also be accessed via the same site as well as via the Library of Congress's Congressional Service. The Federal Register notices are the official notifications for all nonproliferation sanctions determinations. Links to those notices found on this page are updated as appropriate, but the Federal Register is the only official and complete listing of nonproliferation sanctions determinations.

How Do I Avoid Dealing with Unauthorized Parties?

There are several steps you should take.

1. Read and understand the "Know Your Customer Guidance" provided in the Export Administration Regulations (EAR) and as part of this Web site. It will help you recognize and avoid prohibited transactions.

2. Be familiar with the "Red Flag Indicators" (below) that can help you recognize illegal, or potentially illegal, transactions. (See real life case history example.) If Red Flags are present you must exercise appropriate due

diligence to either resolve questions before engaging in the proposed transaction; or, if questions cannot be resolved, either refrain from the transaction or submit a license application to BIS.

3. Check the parties to your transaction (including freight forwarders, intermediate consignees, and the ultimate consignee) against key U.S. Government Lists to Check to identify parties subject to denial orders or otherwise restricted or prohibited from engaging in U.S. export transactions. Note that the presence of a party's name on BIS's Unverified List, which identifies parties whose bona fides BIS has been unable to determine in End-Use Checks, is considered a "Red Flag" calling for you to exercise due diligence (see point 2, above).

4. If you are being asked to participate in an export transaction that you believe may be illegal, or if you have information that such an illegal transaction may be about to occur, you are encouraged to contact BIS's Office of Export Enforcement immediately. You may also confidentially report these situations via the Leads and Tips form on this website.

Please use the subject "Enforcement Leads/Tips" to ensure your information reaches BIS. Submissions using this form are kept confidential.

Finally, you may want to review our web page on "Recognizing and reporting possible violations."

Red Flag Indicators

Things to Look for in Export Transactions

Use this as a check list to discover possible violations of the Export Administration Regulations. You may also wish to visit our page that provides "Know Your Customer Guidance".

- The customer or its address is similar to one of the parties found on one of the lists.
- The customer or purchasing agent is reluctant to offer information about the end-use of the item.
- The product's capabilities do not fit the buyer's line of business, such as an order for sophisticated computers for a small bakery.
- The item ordered is incompatible with the technical level of the country to which it is being shipped, such as semiconductor manufacturing equipment being shipped to a country that has no electronics industry.
- The customer is willing to pay cash for a very expensive item when the terms of sale would normally call for financing.
- The customer has little or no business background.
- The customer is unfamiliar with the product's performance characteristics but still wants the product.
- Routine installation, training, or maintenance services are declined by the customer.
- Delivery dates are vague, or deliveries are planned for out of the way destinations.
- A freight forwarding firm is listed as the product's final destination.
- The shipping route is abnormal for the product and destination.
- Packaging is inconsistent with the stated method of shipment or destination.
- When questioned, the buyer is evasive and especially unclear about whether the purchased product is for domestic use, for export, or for re-export.

If you have reason to believe a violation is taking place or has occurred, you may report it to the Department of Commerce by calling its 24 hour hot line number: 1 (800) 424-2980. Or if you prefer use our form to submit a confidential tip.