

SANCTIONS AND EXPORT CONTROLS PROCESS MAP

COLOR LEGEND:

Blue	OFAC – Sanctions Authorization (Treasury)
Green	BIS – Export Controls (Commerce/EAR)
Gray	Core Compliance Steps (Screening, Shipment, Monitoring)

STEP 1: INITIAL SCREENING

Screen all parties (customer, end user, intermediaries, banks) against OFAC SDN list and BIS Entity/Denied Persons lists.

STEP 2: PARALLEL REGULATORY REVIEWS

OFAC Track (Treasury – Sanctions)

- Determine if transaction involves blocked parties or Government of Venezuela.
- Check if a General License applies.
- If not, apply for OFAC Specific License.
- Comply with reporting and recordkeeping requirements.

BIS Track (Commerce – EAR)

- Classify item (EAR99 or ECCN).
- Determine if Venezuela triggers license requirement.
- Evaluate military end-use/end-user restrictions.
- Apply for BIS license (if required).

STEP 3: AUTHORIZATION SECURED

All required authorizations obtained:

- OFAC authorization (General or Specific License)
- BIS export license (if required)
- State/DDTC license if defense-related

STEP 4: SHIPMENT & POST-EXPORT COMPLIANCE

- File export documentation (EEI/ACE).
- Ensure compliant payment processing.
- Maintain records (minimum 5 years).
- Monitor sanctions and export control updates.

Resource Links:

- **Overview:** [Venezuela-Related Sanctions](#)
- **Compliance Hotline:** [OFAC Compliance Hotline](#)
- **Specific Licensing Portal:** [Specific Licenses and Interpretive Guidance](#)