

Increased Penalties under the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015

Agency	Statute / Relevant Violation	Statutory Provision	Previous Maximum Per Violation (Civil)	Adjusted Maximum Per Violation (Civil)
Commerce (BIS)	International Emergency Economic Powers Act (IEEPA)	50 USC 1705(b)	\$250,000 (or twice value of transaction) (whichever is greater)	\$284,582 (or twice value of transaction) (whichever is greater)
Commerce (BIS)	Chemical Weapons Convention Implementation Act (1998)	22 USC 6761(a)(1)(A)	\$25,000	\$36,256
Commerce (BIS)	Chemical Weapons Convention Implementation Act (1998)	22 USC 6761(a)(1)(B)	\$5,000	\$7,251
Commerce (BIS)	Additional Protocol Implementation Act	22 USC 8142(a)	\$27,500	\$29,464
Commerce (BIS)	Fastener Quality Act (1990)	15 USC 5408(b)(1)	\$32,500	\$44,539
State Department	Arms Export Control Act (AECA)	22 CFR Part 127.10(a)(1)(i)	\$500,000	\$1,094,010
State Department	Feingold Amendment (Incentive Payments Related to Offsets)	22 CFR Part 127.10(a)(1)(ii)	\$500,000	\$795,445
State Department	AECA Prohibition on Facilitating Acquisition of Munition Items by State Sponsors of Terrorism	22 CFR Part 127.10(a)(1)(iii)	\$500,000	\$946,805
State Department	Chemical Weapons Convention Implementation Act – Inspection Related	22 CFR Part 103.6(a)(1)	\$25,000	\$36,256
State Department	Chemical Weapons Convention Implementation Act – Record-Keeping Related	22 CFR Part 103.6(a)(2)	\$5,000	\$7,251
State Department	Program Fraud Civil Remedies Act – Per False Claim	22 CFR Part 35.3(f)	\$5,000-\$150,000	\$10,781-323,442
State Department	Byrd Amendment – Improper Expenditures and Failure To Disclose	22 CFR Part 138.400	\$10,000-\$100,000	\$18,936-\$189,361
Treasury (FinCEN)	Relating to Recordkeeping Violations for Funds Transfers	12 USC 1929b(j)	\$10,000	\$19,787
Treasury (FinCEN)	Willful or Grossly Negligent Recordkeeping Violations	12 USC 1955	\$10,000	\$19,787
Treasury (FinCEN)	Failure To Terminate Correspondent Relationship with non-U.S. FI	31 USC 5318(k)(3)(C)	\$10,000	\$13,384
Treasury (FinCEN)	Willful Violations of Bank Secrecy Act	31 USC 5321(a)(1)	\$25,000-\$100,000	\$53,907-\$215,628
Treasury (FinCEN)	Foreign Financial Agency Transaction – Non-Willful	31 USC 5321(a)(5)(B)(i)	\$10,000	\$12,459
Treasury (FinCEN)	Foreign Financial Agency Transaction – Willful	31 USC 5321(a)(5)(C)	\$100,000	\$124,588
Treasury (FinCEN)	Negligent Violation by Financial Institution or Non-Financial Trade or Business	31 USC 5321(a)(6)(A)	\$500	\$1,078
Treasury (FinCEN)	Pattern of Negligent Activity by Financial Institution or Non-Financial Trade or Business	31 USC 5321(a)(6)(B)	\$50,000	\$83,864
Treasury (FinCEN)	Violation of Certain Due Diligence Requirements, Prohibition on Correspondent Accounts for Shell Banks, and Special Measures	31 USC 5321(a)(7)	\$1,000,000	\$1,338,420
Treasury (FinCEN)	Failure To Register as a Money Services Business	31 USC 5330(e)	\$5,000	\$7,954
Treasury (OFAC)	Trading with the Enemy Act (TWEA)	50 USC 4315	\$65,000	\$83,864
Treasury (OFAC)	IEEPA	50 USC 1705	\$250,000 (or twice transaction value) (whichever is greater)	\$284,582 (or twice transaction value) (whichever is greater)
Treasury (OFAC)	Antiterrorism and Effective Death Penalty Act of 1996 (AEDPA)	18 USC 2339B	\$55,000 (or twice the amount of which a financial institution was required to retain possession or control) (whichever is greater)	\$75,122 (or twice the amount of which a financial institution was required to retain possession or control) (whichever is greater)
Treasury (OFAC)	Foreign Narcotics Kingpin Designation Act (FNKDA)	21 USC 1901-1908	\$1,075,000	\$1,414,020
Treasury (OFAC)	Clean Diamond Trade Act (CDTA)	19 USC 3901-3913	\$10,000	\$12,856
Securities and Exchange Commission (SEC)	Foreign Corrupt Practices – any issuer	15 U.S.C. 78ff(c)(1)(B)	\$16,000	\$19,787
Securities and Exchange Commission (SEC)	Foreign Corrupt Practices – any agent or stockholder acting on behalf of issuer	15 U.S.C. 78ff(c)(2)(B)	\$16,000	\$19,787