

# Restricted Party Screening through Descartes / Visual Compliance

## University Export Control Program

<https://rgw.arizona.edu/compliance/export-control-program>

[export@arizona.edu](mailto:export@arizona.edu)



THE UNIVERSITY  
OF ARIZONA

# Why UA Conducts RPS

- Various U.S. government agencies maintain lists of individuals, companies, and organizations (foreign and domestic), whose U.S. export privileges have been blocked, restricted or revoked.
- Referred to as a: “prohibited party,” “specially designated national,” “denied party,” “restricted party,” etc.
- Per the regulations, UA may not engage in any transaction with a restricted party.
- Restricted Party Screening (RPS) is a part of UA’s due diligence to ensure we are compliant with the regulations.
- RPS should be conducted before engaging in any transaction (e.g., research, collaborations, procurement, etc.)



# Restricted Party Screening



# Conducting RPS

The more details you have, the less likely you are to run into false-positive 'hits'.

A 'hit' is a potential match.

A positive-match is when the result is 100% confirmed to be associated to the individual/entity screened.

Other details may be needed to resolve a 'hit,' such as: date of birth, middle name/initial, street address.



# Restricted Party Screening System

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**WELCOME**  
[ARIZ SYS - UNIVERSITY OF ARIZONA]

- \* CONTROLLED GOODS (CCL/ECCN)
- \* U.S. MUNITIONS LIST (ITAR/USML)
- \* CLASSIFICATION INVENTORY
- \* **RESTRICTED PARTY SCREENING**
- \* ADMINISTRATIVE SCREENING
- \* FEDERAL REGULATIONS, RULES, and NOTICES
- \* RECENT FEDERAL U.S. DOCUMENTS
- \* INCIDENT MANAGEMENT WORKFLOW
- \* GLOBAL TRADE RESOURCES
- \* TECH DATA AND HARDWARE EXPORTS

Best Practices Incident Manager Deemed & Hand-Carried Tech Data & Hardware Export Documents

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Last Update: SEP 29 2017

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# Restricted Party Screening System

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RESTRICTED PARTY SCREENING AUTHORITIES CONSULTED SANCTION PROGRAMS

REGISTERED USER: WENDY EPLEY, ARIZ SYS - UNIVERSITY OF ARIZONA

**INDIVIDUAL AND COMPANY SCREENING**

Name:

Company:

Address:

City:  State:

Country:

Comment

Exact  Phonetic  Fuzzy Level

Stemming  Thesaurus  Field Specific

Remove business words  Weighted

ECCN for country controls check:

Export  Sanctions  GSA

Police  PEP/OIG  International Reset Defaults

GSA data is updated in full every business day direct from SAM/EPLS. Fuzzy searches including GSA are automatically limited to level 2. Business endings is not selectable when already set as your profile default. Fuzzy or phonetic search with thesaurus often produces erratic results.

**BLOCKED FOREIGN NATIONALS BY COUNTRY**

Display a checklist of blocked foreign nationals in a country:

Select country for checklist ...

Main page nationalities are not identified by country in the official sources.

**BLOCKED ENTITIES AND FUGITIVE LISTS**

Display a checklist of entities on the selected government list:

Select list to display ...

**GEOGRAPHIC LOCATION FROM IP ADDRESS**

Display geographic location of provided IP address:

May entail a margin of error.

RPS Changes GSA Changes Blocked Vessels IAEA Facilities Risk Country

The method of queuing, validating, submitting and processing RPS queries used in Visual Compliance is protected under U.S. Patent 8,484,659 - Distributed processing of binary objects via message queues including a failover safeguard.

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These enabled features help to focus results and minimize false-positives.

Fields to use for RPS

# Restricted Party Screening System

**INDIVIDUAL AND COMPANY SCREENING**

**Name:**  Insert name of individual; as it appears on passport (preferred)

**Company:**  Insert name of entity; do not use "DBA" in the field

**Address:**  Use street address

**City:**  **State:**

**Country:**  Select country if applicable .. For individuals, use country of citizenship

**Comment**  Reason for RPS 

Exact  Phonetic  Fuzzy Level

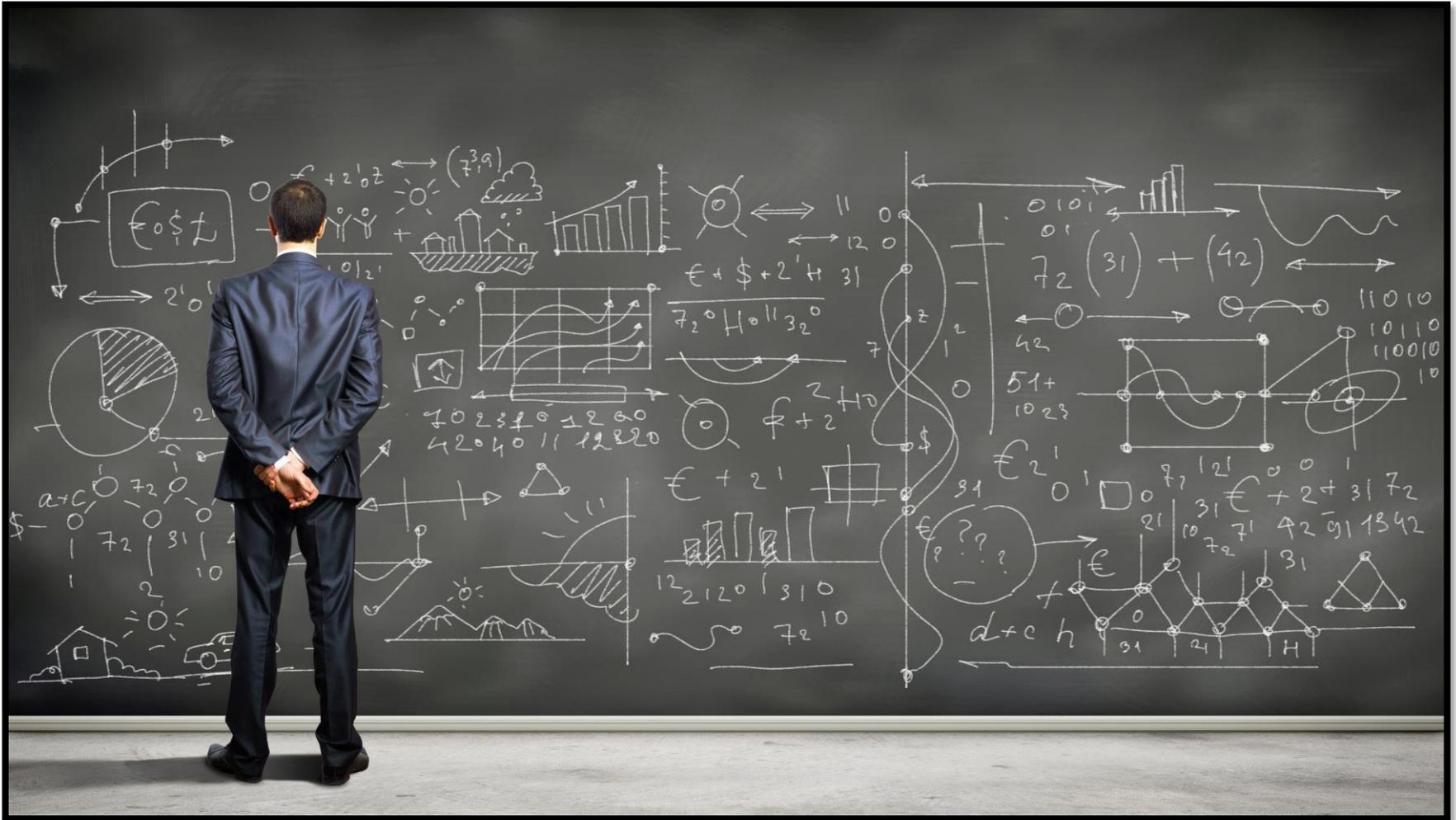
Stemming  Thesaurus  Field Specific

**SCREEN**

Helpful Video Tutorial

If you are screening an individual who is affiliated with an organization, conduct 2 separate screenings; one on the individual and one on the organization. It is not recommended that you conduct one screening with both the name of the individual and the organization because the system gives priority to the Company search results. This in turn could result in a false result if the individual name is on a prohibited party list.

# Understanding the Results



# RPS Example #1

**INDIVIDUAL AND COMPANY SCREENING**

**Name:**

**Company:**

**Address:**

**City:**  **State:**

**Country:**

**Comment:**

Exact  Phonetic  Fuzzy Level

Stemming  Thesaurus  Field Specific

Remove business words  Weighted

**SCREEN**

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**NO MATCHING RECORDS FOUND**

Your search of the Visual Compliance Restricted Party Screening database failed to return any records.  
**Comment: Training Example**

**Search criteria:**

Name: n/a  
Company: **Huawei Technologies**  
Address: **5700 Tennyson Pkwy**  
City: **Plano**  
State: **TX**  
Country: **U.S.A. [US]**

**Search type:** For **Exact** matches.  
Stemming on, Thesaurus on, Field Specific on, Business words removal [Export, Sanctions, GSA, Police, PEP and International data groups.\*]  
GSA data is updated in full every business day direct from SAM/EPLS.

**Date of search:** **Friday, September 29, 2017**

**Time of search:** **05:44 PM EDT**

*License Determination country screening was checked, but does not apply to United States*

**PDF** **PRN**

[E-MAIL THESE RESULTS](#)

- “No Matching Records”
- ✓ Okay to proceed

# Example #2

**INDIVIDUAL AND COMPANY SCREENING**

**Name:**

**Company:**

**Address:**

**City:**  **State:**

**Country:**

**Comment:**

Exact  Phonetic  Fuzzy Level

Stemming  Thesaurus  Field Specific

**SCREEN**

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**NO MATCHING RECORDS FOUND**  
Sanctions, embargoes, or risk alerts apply to the country supplied for this entity.

Search same keywords again New Search

Your search of the Visual Compliance Restricted Party Screening database failed to return any records.  
Comment: **Comment: Training Example**

**Search criteria:**

**Name:** Vladimir Putin  
**Company:** n/a  
**Address:** n/a  
**City:** n/a  
**State:** n/a  
**Country:** Russian Federation [RU] \*

**Search type:** For Exact matches. Stemming on, Thesaurus on, Field Specific on, Business words removal [Export, Sanctions, GSA, Police, PEP and International data groups.\*] GSA data is updated in full every business day direct from SAM/EPLS.

**Date of search:** Friday, September 29, 2017  
**Time of search:** 04:44 PM EDT

**\*Country Notes:** The following conditions apply to the country supplied for this entity. For sanctions, see the U.S. Sanctions and Embargoes Programs Summary for more information.

- Subject to sanctions or special controls on specified items under EAR Part 746, Embargoes and Other Special Controls (and requirements under General Prohibition Six, Part 736).
- Restricted as an export destination under EAR Part 736 General Prohibition Three (Foreign-produced direct product re-exports).
- Restricted as an export destination under EAR Part 736 General Prohibition Eight (In transit shipments and items to be unladen from vessels or aircraft).
- Subject to Government of Canada Economic Sanctions.
- Restricted as an export destination under Office of Foreign Assets Control (OFAC) Sanctions, or to Specially Designated Nationals under OFAC Sanctions. General Licenses may apply.
- Subject to Department of State Directorate of Defense Trade Control restrictions, limitations, denial policy, case-by-case basis, or delays on license applications for the export of U.S. Munitions List (USML) items.
- Subject to military end-user and/or end-use based control policy for specified ECCN dual-use items under EAR Part 744 or related policy, or policy of denial for CCL items that contribute to military capabilities.
- Subject to European Union Arms Embargoes or E.U. restrictive measures related to the export of arms based on political commitment
- Restricted as an export destination under EAR Part 736 General Prohibition Three (Foreign-produced direct product re-exports) for ECCN 0A919 and 9x515 or "600 series" items in the Commerce Control List.

**PDF PRN**

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**\* Authorities:**

- AECA Debarred Parties [DDTC]
- AFOSI - Top Ten Fugitives
- ATF Most Wanted
- Australia Foreign Affairs Consolidated List
- Blocked Pursuant to EO 13599 [OFAC]
- Canada Economic Sanctions

- “No Matching Records”
- Transaction does not involve controlled activity under “Country Notes”
- ✓ Okay to proceed

Use Discernment – UECP Does Not Need to See All Country Warning Results

# What are Country Warnings?

## \*Country Notes:

The following conditions apply to the **country** supplied for this entity. For sanctions, see the U.S. Sanctions and Embargoes Programs Summary for more information.



- Subject to sanctions or special controls on specified items under EAR Part 746, Embargoes and Other Special Controls (and requirements under General Prohibition Six, Part 736).
- Restricted as an export destination under EAR Part 736 General Prohibition Three (Foreign-produced direct product re-exports).
- Restricted as an export destination under EAR Part 736 General Prohibition Eight (In transit shipments and items to be unladen from vessels or aircraft).
- Subject to Government of Canada Economic Sanctions.
- Restricted as an export destination under Office of Foreign Assets Control (OFAC) Sanctions, or to Specially Designated Nationals under OFAC Sanctions. General Licenses may apply.
- Subject to Department of State Directorate of Defense Trade Control restrictions, limitations, denial policy, case-by-case basis, or delays on license applications for the export of U.S. Munitions List (USML) items.
- Subject to military end-user and/or end-use based control policy for specified ECCN dual-use items under EAR Part 744 or related policy, or policy of denial for CCL items that contribute to military capabilities.
- Subject to European Union Arms Embargoes or E.U. restrictive measures related to the export of arms based on political commitment
- Restricted as an export destination under EAR Part 736 General Prohibition Three (Foreign-produced direct product re-exports) for ECCN 0A919 and 9x515 or "600 series" items in the Commerce Control List.

A country warning appears for countries where there are restrictions due to sanctions or embargoes (*e.g.*, China, Iran, Syria, North Korea). As long as the transaction does not involve export control activities, UECP does not need to review.

**Example-A:** RPS is for Iran national and their H1B application. Scope of work is to teach and conduct research. Assuming there were no results on individual; as long as research is considered fundamental and all data is publicly available, and the individuals is not going to work on any projects covered by a Technology Control Plan (TCP), UECP does not need to review RPS results.

**Example-B:** RPS is for visiting scholar from China. The visiting scholar will work on DoD funded research involving cybersecurity. UECP should review to ensure there are no restrictions in the terms of the award, and confirm that the project is not on a Technology Control Plan.

# Example #3

**INDIVIDUAL AND COMPANY SCREENING**

**Name:**

**Company:**

**Address:**

**City:**  **State:**

**Country:**

**Comment:**

Exact  Phonetic  Fuzzy Level

Stemming  Thesaurus  Field Specific

Remove business words  Weighted

ECCN for country controls check:

---

Export  Sanctions  GSA  
 Police  PEP/OIG  International

GSA data is updated in full every business day direct from SAM/EPLS.  
Fuzzy searches including GSA are automatically limited to level 2.  
Business endings is not selectable when already set as your profile default.  
Fuzzy or phonetic search with thesaurus often produces erratic results.

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You searched for any records containing:

**Search criteria:** Name: **Denise Blake**  
Company: n/a  
Address: n/a  
City: n/a  
State: n/a  
Country: n/a

**Comment:** **Comment: Training Sample**

**Search type:** for Exact matches, which returned 2 results. Stemming on, Thesaurus on, Field Specific on, Business words removal [Export, Sanctions, GSA, Police, PEP and International data groups.]\*  
GSA data is updated in full every business day direct from SAM/EPLS.

**Date of search:** Thursday, November 2, 2017  
**Time of search:** 11:53 AM EDT

**RESOLVE MATCH RESULTS**

Clear

Action

Escalate

Reference	Name	FRC [Click for PDF]	Alert
LEIE08459	SHELIA <b>DENISE BLAKES</b> BATON ROUGE LA United States	<input type="checkbox"/>	
RELO36607	Shelia <b>Denise BLAKES</b> BATON ROUGE LA United States	<input type="checkbox"/>	

- Name does not match
- ✓ Okay to move forward

It is important to pay close attention to spelling in the search results and compare to what you typed in the search criteria.

# Example #4

**INDIVIDUAL AND COMPANY SCREENING**

Name:

Company:

Address:

City:  State:

Country:

Comment:

Location and AKA verified  
100% Match  
Do not move forward; contact UECP

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You searched for any records containing:

**Search criteria:**  
Name: n/a  
Company: **Zorsecurity**  
Address: n/a  
City: n/a  
State: n/a  
Country: n/a

**Comment:** **Comment: Training Sample**

**Search type:** for **Exact** matches, which returned **5** results.  
Stemming on, Thesaurus on, Field Specific on, Business words removal [Export, Sanctions, GSA, Police, PEP and International data groups.\*]  
GSA data is updated in full every business day direct from SAM/EPLS.

**Date of search:** **Thursday, November 2, 2017**

**Time of search:** **12:11 PM EDT**

**RESOLVE MATCH RESULTS**

Clear  Action  Escalate

Add notes if required.

Reference	Name	FRC [Click for PDF]	Alert
ELT069000	ZORSECURITY CENTER AKA TSOR SECURITY FKA ESAGE LAB Moscow Russia	<input type="checkbox"/> 82 FR 722-25	<input type="button" value="1"/>
NPO06770	ZORSECURITY Russia	<input type="checkbox"/>	<input type="button" value="1"/>
REL11299	ZORSECURITY MOSCOW Russian Federation	<input type="checkbox"/>	<input type="button" value="1"/>
REL11251	ZORSECURITY MOSCOW Russian Federation	<input type="checkbox"/>	<input type="button" value="1"/>
SDN0703	ZORSECURITY FKA ESAGE LAB AKA TSOR SECURITY Moscow RU	<input type="checkbox"/>	<input type="button" value="1"/>

# Verifying 100% Match Results

## INDIVIDUAL AND COMPANY SCREENING

**Name:** Alexis Flores

**Company:**

**Address:**

**City:** **State:**

**Country:** Select country if applicable ...

**Comment:** Training Sample

Exact  Phonetic  Fuzzy Level 2

Stemming  Thesaurus  Field Specific

**SCREEN**

Even though the names do indeed match, are you sure it is a true match?

Let's assume the "Alexis Flores" you are screening is a female. Is there anything in the results that would confirm this may be a female? Look at AKA's.

You can also click on the hyperlink reference number for additional details.

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You searched for any records containing:

**Search criteria:** Name: Alexis Flores  
Company: n/a  
Address: n/a  
City: n/a  
State: n/a  
Country: n/a

**Comment:** Training Sample

**Search type:** for Exact matches, which returned 7 results.  
Stemming on, Thesaurus on, Field Specific on, Business words removal [Export, Sanctions, GSA, Police, PEP and International data groups.\*]  
GSA data is updated in full every business day direct from SAM/EPLS.

**Date of search:** Friday, November 3, 2017  
**Time of search:** 02:17 PM EDT

**RESOLVE MATCH RESULTS**

PDF PRN EXCEL

Reference	Name	FRC (Click for PDF)	Alert
FTF000017	FLORES, Alexis AKA FLORES, Mario AKA FLORES, Mario Roberto AKA ROBERTO, Mario F. AKA CONTRERAS, Alex AKA CONTRERAS, Alesis		
REL065651	Alejandro FLORES CACHO OJOS NEGROS, BAJA CALIFORNIA NORTE Mexico		
REL065652	Alejandro CACHO FLORES XUN		
REL065685	Alejandro HERNANDEZ-FLORES XX United States		
REL091103	Alexander Jose GONZALEZ-FLORES LOXAHATCHEE FL United States		
REL091105	Alexander GONZALEZ-FLORES LOXACHATCHEE FL United States		
SDN056186	FLORES CACHO, Alejandro AKA BOLANOS CACHO, Alejandro AKA CACHO FLORES, Alejandro AKA ROBLES VALDEZ, Abel AKA "Alejandro Labastida" AKA "Guillermo Labastida" Ojos Negros MX		

PDF PRN EXCEL

**E-MAIL THESE RESULTS**

**AUTHORITIES**

# Verifying 100% Match Results

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You searched for any records containing:

**Search criteria:** Name: **Alexis Flores**  
Company: n/a  
Address: n/a  
City: n/a  
State: n/a  
Country: n/a

**Comment:** **Comment: Training Sample**

**Search type:** for **Exact** matches, which returned **7** results.  
Stemming on, Thesaurus on, Field Specific on, Business words removal  
[Export, Sanctions, GSA, Police, PEP and International data groups.\*]  
GSA data is updated in full every business day direct from SAM/EPLS.

**Date of search:** **Friday, November 3, 2017**

**Time of search:** **02:17 PM EDT**

**RESOLVE MATCH RESULTS**

PDF PRN EXCEL

Reference	Name	FRC (Click for PDF)	Alert
FTF000017	<b>FLORES, Alexis</b> AKA FLORES, Mario AKA FLORES, Mario Roberto AKA ROBERTO, Mario F. AKA CONTRERAS, Alex AKA CONTRERAS, Alesis		
REL065651	Alejandro <b>FLORES</b> CACHO OJOS NEGROS, BAJA CALIFORNIA NORTE Mexico		
REL065652	Alejandro CACHO <b>FLORES</b> XUN		
REL065685	Alejandro HERNANDEZ- <b>FLORES</b> XX United States		
REL091103	Alexander Jose GONZALEZ- <b>FLORES</b> LOXAHATCHEE FL United States		
REL091105	Alexander GONZALEZ- <b>FLORES</b> LOXACHATCHEE FL United States		
SON056186	<b>FLORES</b> CACHO, Alejandro AKA BOLANOS CACHO, Alejandro AKA CACHO <b>FLORES</b> , Alejandro AKA ROBLES VALDEZ, Abel AKA "Alejandro Labastida" AKA "Guillermo Labastida" Ojos Negros MX		

**RPS Details** Close

**Reference** FTF000017

**Description** FLORES, Alexis  
AKA FLORES, Mario  
AKA FLORES, Mario Roberto  
AKA ROBERTO, Mario F.  
AKA CONTRERAS, Alex  
AKA CONTRERAS, Alesis

**Notes** Wanted for: Unlawful flight to avoid prosecution, kidnapping, murder.  
DOB: (07/18/1975)(07/18/1982)(09/15/1980)(07/17/1982) POB: (HN).  
  
; White (Hispanic) male, 5 feet 4 inches, 130 to 140 lbs., black hair, brown eyes;

**Federal Register** N/A

**Source** FBI Ten Most Wanted Fugitives

PDF PRN **E-MAIL THESE RESULTS**

PDF PRN EXCEL

**E-MAIL THESE RESULTS**

**AUTHORITIES**

When you click on the Reference link, a dialogue box will appear with additional details that may help in discerning whether the screening results are indeed connected to the individual or entity that you are screening.

# Emailing Results

At the bottom of the search results will be a expandable box that states “E-MAIL THESE RESULTS.” Click on the + to expand.



**E-MAIL THESE RESULTS**

Send to me.

Send to this address:   
*Please type carefully. Email addresses with errors cannot be delivered.*

Send to addresses on my list: *There are no email addresses in your personal distribution list.*

Send to address groups on my list: *There are no email groups in your personal distribution list.*

Notations to this results email:

Include entity searched in subject line.

Include your name (the user who made the search) in subject line.

Emailing results should only be to those within the University that have a need to know.

# Dynamic Screening Alerts

report@visualcompliance.com VPR-export  
Daily RPS Dynamic Screening Alert (CSRPS01)

**NOTICE: Visual Compliance RPS Dynamic Screening has found a same-alert match for a previously screened party.**

Attn: ARIZ SYS - UNIVERSITY OF ARIZONA - SPONSORED PROJECTS - KYLE JOHNSON (C0564)

Original Search

User: KYLE JOHNSON (SPONSORED PROJECTS)  
Date of Search: Friday, April 22, 2016  
Time of Search: 5:56:24 PM EST  
Search Type: Fuzzy 2 (F03) [Export, Sanction, GSA, Police, PEP, International]

Name: N/A  
Company: Navarro  
Address: N/A  
Country: US  
Comment: N/A

Dynamic Screening Alert

Date of Search: Monday, July 10, 2017  
Time of Search: 11:20:32 AM EST  
Alert Type: RED FLAG

**MSR Reference Number:** REL073544  
**Name:** Richard NAVARRO \*  
**Notes:** Code: {} Agency: NAVY Status: Ineligible (Proceedings Pending) - Suspension: 2-25-2013. - Proposed Debarment: 7-06-2017.  
**Federal Register:**  
**Source:** GSA Excluded Parties - Reciprocal

**MSR Reference Number:** REL118119  
**Name:** Richard NAVARRO, SR.  
**Notes:** Code: {} Agency: NAVY Status: Ineligible (Proceedings Pending) - Proposed Debarment: 7-06-2017. References: RICHARD  
**Federal Register:**  
**Source:** GSA Excluded Parties - Reciprocal

**MSR Reference Number:** REL118121  
**Name:** Richard N NAVARRO  
**Notes:** Code: {} Agency: NAVY Status: Ineligible (Proceedings Pending) - Proposed Debarment: 7-06-2017. References: RICHARD  
**Federal Register:**  
**Source:** GSA Excluded Parties - Reciprocal

Original Search

User: KYLE JOHNSON (SPONSORED PROJECTS)  
Date of Search: Friday, April 22, 2016

When an individual or entity has been initially screened it is automatically re-screened periodically. If the original search appears on a new list, or there is new information related to the search result – the person who conducted the screening will receive an email to alert of the update.

When these emails are sent, it is the Screener’s responsibility to verify that the emailed results are not an issue. This is where inserting a comment in the original search becomes helpful (Refer to slide 7).

If the search results are not applicable, please forward the Dynamic Screening Alert email to UECP ([export@email.Arizona.edu](mailto:export@email.Arizona.edu)) to have the lists ‘cleared’ with an explanation as to why the results are not applicable to the original search. (*i.e.*, name does not match, address does not match, not the same person/entity, different date of birth, etc.)