

ENFORCEMENT INFORMATION FOR JANUARY 18, 2013

Information concerning the civil penalties process is discussed in OFAC regulations governing the various sanctions programs and in 31 CFR part 501. On November 9, 2009, OFAC published as Appendix A to part 501 Economic Sanctions Enforcement Guidelines. See 74 Fed. Reg. 57,593 (Nov. 9, 2009). The Economic Sanctions Enforcement Guidelines, as well as recent final civil penalties and enforcement information, can be found on OFAC's Web site at www.treasury.gov/ofac/enforcement.

ENTITIES – 31 CFR 501.805(d)(1)(i)

Dal-Tech Devices, Inc. Settles Potential Civil Liability for Apparent Violations of the Iranian Transactions Regulations: Dal-Tech Devices, Inc., of Boca Raton, FL, dba Microwave Distributors Company (“Dal-Tech”), has agreed to pay \$10,000 to settle potential civil liability for apparent violations of the Iranian Transactions Regulations, 31 C.F.R. part 560 (the “ITR”).

Under its prior ownership and management, Dal-Tech, a distributor of microwave radio frequency devices, apparently violated the ITR by making an unlicensed sale and export of radio frequency measurement devices (“RF devices”) to Austria with knowledge that the items were intended for transshipment to Iran. The total value of the RF devices was \$3,226. When Dal-Tech learned that the shipment had been returned from Austria without delivery, it re-exported the same goods to Slovenia for transshipment to Iran. The settlement coincides with a Deferred Prosecution Agreement (“DPA”) between Dal-Tech and the United States Attorney’s Office for the District of Delaware. Dal-Tech did not voluntarily disclose this matter to OFAC. The alleged violations constitute an egregious case.

The base penalty amount for Dal-Tech's apparent violations is \$500,000. The settlement amount reflects OFAC’s consideration of the following facts and circumstances, pursuant to the General Factors under OFAC’s Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, App. A: the criminal charges set forth in the DPA reflect knowing and willful conduct by an employee that is attributable to the company; Dal-Tech’s prior management at least had reason to know that the company’s goods were ultimately destined for Iran; Dal-Tech has not been the subject of any prior OFAC enforcement action; Dal-Tech lacked a sanctions compliance program at the time of the apparent violations; pursuant to the DPA, the company will implement a compliance program that includes sanctions and export compliance training of all employees; the settlement with OFAC is part of a comprehensive settlement with other federal law enforcement agencies; and the enforcement response is proportionate to the nature of the violations, given the totality of the circumstances.