

ENFORCEMENT INFORMATION FOR May 6, 2014

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 31 C.F.R. part 501, app. A. 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.

INDIVIDUALS – 31 CFR 501.805(d)(1)(ii)

Individual Settles Potential Civil Liability for Alleged Violations of the Iranian

Transactions and Sanctions Regulations: An individual from Washington state has agreed to pay \$29,340 to settle potential civil liability for alleged violations of the Iranian Transactions and Sanctions Regulations, 31 C.F.R. part 560 (the "ITSR").¹ Specifically, OFAC alleged that from on or about May 21, 2007, to on or about November 12, 2009, the individual exported, sold, and/or supplied unlicensed medical goods and/or related financial services from the United States to Iran, in violation of the ITSR. The alleged violations involved 19 separate transactions, valued at \$49,341, in which the individual acted as a third-party recipient for goods destined for Iran and/or provided banking services to a person in Iran.

OFAC determined that the individual did not voluntarily self-disclose the matter to OFAC and that the alleged violations constituted a non-egregious case. The base penalty amount for the alleged violations totaled \$163,000.

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 individual demonstrated recklessness by continuing to engage in the conduct after OFAC issued a warning letter for similar past conduct; the individual had not previously received a penalty notice or Finding of Violation from OFAC in the five years preceding the earliest date of the transactions giving rise to the alleged violations; the goods were medical devices that are potentially licensable by OFAC under existing licensing policy; the individual cooperated with OFAC's investigation and agreed to toll the statute of limitations; and, OFAC considered the totality of the circumstances to ensure that the civil monetary penalty is proportionate to the nature of the alleged violations.

For more information regarding OFAC regulations, please go to: www.treasury.gov/ofac.

¹ On October 22, 2012, OFAC changed the heading of 31 CFR part 560 from the Iranian Transactions Regulations to the Iranian Transactions and Sanctions Regulations ("ITSR"), amended the renamed ITSR, and reissued them in their entirety. See 77 Fed. Reg. 64,664 (Oct. 22, 2012). For the sake of clarity, all references herein to the ITSR shall mean the regulations in 31 CFR part 560 in effect at the time of the activity, regardless of whether such activity occurred before or after the regulations were renamed.