

ENFORCEMENT INFORMATION FOR JULY 24, 2015

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 CFR 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.

ENTITIES – 31 CFR 501.805(d)(1)(i)

Great Plains Stainless Co. Settles Potential Civil Liability for Alleged Violations of Executive Order 13382 and the Weapons of Mass Destruction Proliferators Sanctions Regulations:

Great Plains Stainless Co. (GPS) of Tulsa, Oklahoma, has agreed to pay \$214,000 to settle potential civil liability for alleged violations of Executive Order 13382 of June 28, 2005 “Blocking Property of Weapons of Mass Destruction Proliferators and Their Supporters” (E.O. 13382) and the Weapons of Mass Destruction Proliferators Sanctions Regulations, 31 C.F.R. part 544 (WMDPSR), that occurred from on or about April 9, 2009 to on or about July 4, 2009. Specifically, GPS sold goods that its Chinese vendor shipped from Shanghai, China, to GPS's customer in Dubai, United Arab Emirates, aboard the vessel M/V *Sahand*, a vessel that was identified as blocked property on September 10, 2008 pursuant to E.O. 13382 (“Count 1”); and GPS engaged in transactions that appear to have been intended to evade or avoid the prohibitions in the WMDPSR when the company requested the creation of new trade documents, with references to the blocked vessel removed, and then transferred the altered documents to its customer to facilitate the release of goods held at port in Dubai (“Count 2”).

This matter was not voluntarily self-disclosed to OFAC and the alleged violations constitute a non-egregious case. The statutory maximum penalty amount for the alleged violations was \$500,000, and the base penalty amount was \$340,000.

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: with respect to Count 2, GPS appears to have acted willfully by obtaining an altered bill of lading that concealed the involvement of a blocked vessel, and by disregarding verbal and written guidance from OFAC stating that GPS should consult with OFAC's Licensing Division before engaging in additional transactions involving the shipping documents; GPS was aware that the conduct giving rise to certain alleged violations was prohibited without an OFAC license, given that GPS submitted a license application to OFAC seeking authorization for the same conduct; GPS did not have a compliance program in place at the time of the alleged violations; GPS has not received a penalty notice or Finding of Violation from OFAC in the five years preceding the date of the first transaction giving rise to the alleged violations; GPS had no reason to know that a blocked vessel was to be used for the shipment until the vessel's sailing date; GPS is a small company; and GPS took remedial measures to prevent a recurrence of the alleged violations.

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