

ENFORCEMENT INFORMATION FOR August 6, 2009

Information concerning the civil penalties process is discussed in OFAC regulations governing the various sanctions programs and in 31 CFR part 501. On September 8, 2008, OFAC published as Appendix A to part 501 new Economic Sanction Enforcement Guidelines. Although these new guidelines replace earlier enforcement guidelines published by OFAC, for certain matters that were in process at the time the new guidelines were published, the prior guidelines (which can be found at 68 *Fed. Reg.* 4422 and 71 *Fed. Reg.* 1971) are still applicable. Please see OFAC's Revised Interim Policy regarding use of the prior guidelines. The Revised Interim Policy, along with the new guidelines and copies of recent final Penalty Notices, can be found on OFAC's website at <http://www.treas.gov/offices/enforcement/ofac/civpen>.

ENTITIES – 31 CFR 501.805(d)(1)(i)

DHL Settles Iranian Transactions Regulations, Sudanese Sanctions Regulations, Reporting, Procedures and Penalties Regulations, and Export Administration Regulations Allegations with OFAC and the Department of Commerce's Bureau of Industry and Security (BIS): DPWN Holdings (USA), Inc. and DHL Express (USA), Inc. (collectively "DHL") have agreed to remit \$9,444,744 to settle allegations of violations of the Iranian Transactions Regulations, the Sudanese Sanctions Regulations, the Reporting, Procedures and Penalties Regulations (collectively, the "OFAC Regulations") and the Export Administration Regulations ("EAR"). OFAC alleged that, between August 2002 and March 2007, DHL made numerous shipments to Iran and Sudan in violation of the OFAC Regulations and that the company failed to maintain records with respect to other shipments to those countries. BIS alleged that between June 2004 and September 2004, DHL made certain unlicensed exports to Syria in violation of the EAR and in connection with a number of other exports to Syria failed to retain airway bills and other export control documents in violation of the EAR. DHL did not voluntarily disclose this matter to OFAC or BIS. This matter was resolved according to the prior enforcement guidelines published by OFAC at 68 *Fed. Reg.* 4422.

For more information regarding OFAC regulations, please go to:

<http://www.treas.gov/offices/enforcement/ofac/legal/>.