

ENFORCEMENT INFORMATION FOR October 19, 2012

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 new 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 <http://www.treasury.gov/resource-center/sanctions/CivPen/Pages/civpen-index2.aspx>.

ENTITIES – 31 CFR 501.805(d)(1)(i)

Brasseler USA Settles Potential Civil Liability for Alleged Violations of the Iranian Transactions Regulations: Brasseler USA (“Brasseler”), Savannah, GA, a U.S. medical supply company, has agreed to pay \$18,900 to settle potential civil liability for alleged violations of the Iranian Transactions Regulations, 31 C.F.R. part 560 (the “ITR”) from 2006 to 2009. Specifically, OFAC alleged that on or about February 24, 2006, January 21, 2009, and March 20, 2009, Brasseler exported goods or services to a person in a third country with knowledge or reason to know that such goods or services were intended specifically for transshipment to Iran, without authorization from OFAC. The alleged violations involved three transactions valued at \$5,241. OFAC determined that Brasseler 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 \$21,000.

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: Brasseler's conduct demonstrated reckless disregard for U.S. sanctions requirements; Brasseler's conduct involved a pattern of concealment whereby the company masked the identities of its Iranian customers; management level staff at Brasseler were involved with, and/or were aware of, both the reckless conduct and the fact that the goods or services were destined for Iran; Brasseler did not have a compliance program in place at the time of these alleged violations; the exports at issue likely would have been licensed by OFAC under existing licensing policy; Brasseler has not been the subject of prior OFAC enforcement action; Brasseler cooperated with OFAC, including by agreeing to toll the statute of limitations.

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