

## **ENFORCEMENT INFORMATION FOR JULY 29, 2015**

**Information concerning the civil penalties process can be found in the OFAC regulations governing each sanctions program; the Reporting, Procedures, and Penalties Regulations, 31 C.F.R. part 501; and the Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, app. A. These references as well as recent final civil penalties and enforcement information can be found on OFAC's Web site at [www.treasury.gov/ofac/enforcement](http://www.treasury.gov/ofac/enforcement).**

### **ENTITIES – 31 CFR 501.805(d)(1)(i)**

**OFAC issues a Penalty to Blue Robin, Inc. for Violations of the Iranian Transactions and Sanctions Regulations.** OFAC issued an \$82,260 penalty to Blue Robin, Inc. (“Blue Robin”) for violations of the Iranian Transactions and Sanctions Regulations, 31 C.F.R. part 560 (the “ITSR”).

From on or about January 14, 2009, to on or about July 19, 2010, Blue Robin violated § 560.201 of the ITSR when it conducted 33 transactions in which it imported Web development services valued at \$205,650 from an Iranian company called PersiaBME. PersiaBME worked collaboratively with Blue Robin's computer engineers via a private Internet portal provided by Blue Robin to develop Web-based systems and applications that were used to automate online business processes and operations for Blue Robin's customers.

OFAC determined that Blue Robin voluntarily self-disclosed the violations and that the violations constituted a non-egregious case. The total transaction value of the violations was \$205,650. The statutory maximum civil monetary penalty for the alleged violations was \$8,250,000 and the base penalty amount for the violations was \$102,825.

The penalty 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. OFAC considered the following to be aggravating factors: 1) Blue Robin acted recklessly by conducting transactions over a period of more than five years with a company that it knew was located in Iran, without inquiring about the permissibility of those transactions; 2) at least one co-owner and manager of Blue Robin knew that Blue Robin was conducting transactions with an Iranian company; 3) the apparent violations resulted in \$205,650 in economic benefit to an Iranian company; 4) Blue Robin continued to receive services from PersiaBME in the form of technical assistance after Blue Robin became aware that it had violated the ITSR and this technical assistance was not covered by the informational material exemption in § 560.210(c) of the ITSR; 5) Blue Robin had no OFAC compliance program in place at the time of the transactions and has not implemented one since; and 6) Blue Robin engaged in a limited remedial response to the apparent violations. OFAC considered the following to be mitigating factors: 1) Blue Robin has no prior OFAC sanctions history, including no penalty notice or Finding of Violation in the five years preceding the date of the earliest transaction giving rise to the apparent violations; 2) Blue Robin is a small business that claims to be suffering financial difficulties; and 3) Blue Robin substantially cooperated with OFAC's investigation, including by agreeing to toll the statute of limitations for 541 days.

For a copy of the Penalty Notice, please visit the following url: [http://www.treasury.gov/resource-center/sanctions/CivPen/Documents/blue\\_robin\\_penalty.pdf](http://www.treasury.gov/resource-center/sanctions/CivPen/Documents/blue_robin_penalty.pdf).

For more information regarding OFAC regulations, please go to: [www.treasury.gov/ofac](http://www.treasury.gov/ofac).