

ENFORCEMENT INFORMATION FOR March 9, 2010

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 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)

Aviation Services International, B.V. Settles Iran Export Allegations: Aviation Services International, B.V., also known as Delta Logistics, B.V., Heerhugowaard, The Netherlands (collectively, "ASI"), a Dutch aviation services company, has settled administrative charges filed by OFAC and by the U.S. Department of Commerce's Bureau of Industry and Security ("BIS") arising from ASI's alleged violation of the International Emergency Economic Powers Act ("IEEPA") through the unlicensed export of aircraft parts and other goods to Iran during the period 2005 – 2007. The violations alleged by OFAC involve ASI's unlicensed export and attempted export of goods indirectly from the United States through a third country to Iran in violation of §§ 560.203 and 560.204 of the Iranian Transactions Regulations (the "ITR"), which are promulgated pursuant to IEEPA and administered by OFAC. ASI and OFAC agreed to a settlement in the amount of \$750,000 with respect to ASI's apparent violations of the ITR.

ASI and its principal owners, Robert Kraaiipoel and Niels Kraaiipoel, each previously pleaded guilty in the U.S. District Court for the District of Columbia to one count of criminal conspiracy to violate IEEPA after a criminal complaint arising from the same conduct was filed by the U.S. Department of Justice. In addition to ASI's payment of a \$100,000 criminal penalty pursuant to that guilty plea, ASI has accepted a BIS Export Denial Order which prohibits it from exporting any goods from the United States for a seven-year period. OFAC's \$750,000 settlement with ASI has been deemed satisfied by ASI's acceptance of criminal responsibility and agreement to pay the criminal fine, and by the sanctions imposed by BIS against ASI. A copy of the entire Settlement Agreement among ASI, BIS, and OFAC is posted under the Selected Settlement Agreements section of this website.

For more information regarding OFAC regulations, please go to:
<http://www.treas.gov/offices/enforcement/ofac/legal/>.