

ENFORCEMENT INFORMATION FOR March 5, 2013

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 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 www.treasury.gov/ofac/enforcement.

ENTITIES – 31 CFR 501.805(d)(1)(i)

EGL, Inc. Settles Potential Civil Liability for Alleged Violations of the Cuban Assets Control Regulations and the Iranian Transactions and Sanctions Regulations: EGL, Inc. (now part of the CEVA Logistics group of companies) (“EGL”), Houston, TX, has agreed to pay \$139,650 to settle potential civil liability for alleged violations of the Cuban Assets Control Regulations, 31 C.F.R. part 515 (the “CACR”) and the Iranian Transactions and Sanctions Regulations, 31 C.F.R. part 560 (the “ITSR”).¹ The alleged violations of the CACR occurred from on or about April 19, 2005, to on or about December 15, 2008, when EGL's foreign affiliates engaged in 280 transactions in which they provided freight forwarding services with respect to shipments to and from Cuba. The alleged violations of the ITR occurred from on or about August 15, 2008, to on or about October 27, 2008, when affiliates of EGL (then part of the CEVA Logistics group) acted as the freight forwarder of ten shipments containing oil rig supplies to Aban VIII, an oil drilling rig located in Iranian coastal waters and operated by Petropars, an affiliated company of the National Iranian Oil Company.

EGL made a voluntary self-disclosure of the alleged violations of the CACR, but did not make a voluntary self-disclosure of the alleged violations of the ITR. The alleged violations constitute a non-egregious case. The base penalty amount for the alleged violations was \$206,889.

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: EGL has no history of prior sanctions violations; EGL substantially cooperated with OFAC's investigation, including by entering into statute of limitations tolling agreements, and by producing responsive materials in a clear and organized fashion; EGL took remedial measures to prevent future OFAC violations; the alleged violations of the CACR and the ITR by EGL resulted in significant harm to OFAC's sanctions programs; and EGL had reason to know that the Aban VIII was an oil rig operated by an Iranian company in Iranian waters.

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

¹ On October 22, 2012, OFAC changed the heading of 31 C.F.R. part 560 from the Iranian Transactions Regulations to the Iranian Transactions and Sanctions Regulations (“ITSR”), amended the renamed ITSR, and reissued them in their entirety. See 77 Fed. Reg. 64,664 (Oct. 22, 2012). For the sake of clarity, all references herein to the ITSR shall mean the regulations in 31 C.F.R. part 560 in effect at the time of the activity, regardless of whether such activity occurred before or after the regulations were renamed.