

ENFORCEMENT INFORMATION FOR April 12, 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)

SAN Corporation Settles Potential Civil Liability for an Alleged Violation of the Iranian Transactions and Sanctions Regulations: SAN Corporation ("SAN"), Oxnard, CA, has agreed to pay \$22,500 to settle potential civil liability for an alleged violation of the Iranian Transactions and Sanctions Regulations, 31 C.F.R. part 560,¹ that occurred on or about September 30, 2007. OFAC alleged that SAN sold nutritional supplements to an entity in Kuwait with knowledge that such goods were intended for end use in Iran.

OFAC determined that SAN did not voluntarily disclose this matter to OFAC and that the alleged violation constitutes a non-egregious case. The base penalty amount for the alleged violation was \$25,000.

This 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: SAN acted with reckless disregard for U.S. sanctions requirements when it sold goods to an entity in Kuwait with the knowledge that the goods were destined for Iran, and having been informed by the Iranian end user that shipping to Iran required an OFAC license; SAN did not fully cooperate with OFAC's investigation, having provided incomplete and/or inaccurate statements to OFAC; SAN has no history of prior OFAC violations; the goods that SAN sold for end use in Iran appear to have been eligible for a license under the Trade Sanctions Reform and Export Enhancement Act of 2000.

For more information regarding OFAC regulations, please go to: 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.