

ENFORCEMENT INFORMATION FOR October 14, 2011

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)

Sunrise Technologies and Trading Corporation Settles Iran Export Apparent Violations:

Sunrise Technologies and Trading Corporation (“Sunrise”), Flushing, NY, and its principal owner have agreed to settle administrative charges made by the Office of Foreign Assets Control (“OFAC”) arising from apparent violations of the Iranian Transactions Regulations, 31 C.F.R. part 560 (the “ITR”), which were promulgated pursuant to, *inter alia*, the International Emergency Economic Powers Act (“IEEPA”), and are administered by OFAC. The apparent violations relate to Sunrise and its principal owner’s unlicensed exports, between 2007 and 2011, of computer-related goods indirectly from the United States through Dubai, United Arab Emirates, to Iran in apparent violation of § 560.204 of the ITR. OFAC initiated the inquiry into these matters and referred the case to criminal law enforcement authorities for further investigation. Sunrise, its principal owner, and OFAC agreed to a settlement in the amount of \$1,661,672 with respect to apparent violations of the ITR by Sunrise and its principal owner. This settlement with OFAC is related to criminal plea agreements reached by Sunrise, its principal owner, and the Office of the United States Attorney for the District of Columbia, as well as settlement agreements between Sunrise, its principal owner, and the U.S. Department of Commerce’s Bureau of Industry and Security (“BIS”). OFAC’s settlement with Sunrise and its principal owner has been deemed satisfied by their acceptance of criminal responsibility, the criminal forfeiture of assets, and the restrictions imposed by BIS against Sunrise and its principal owner.

Sunrise and its principal owner each pleaded guilty in the U.S. District Court for the District of Columbia to one count of criminal conspiracy to violate IEEPA and the ITR after an indictment arising from the same conduct was filed by the U.S. Department of Justice. In addition to the forfeiture of a money judgment in the amount of \$1,250,000 by Sunrise and its principal owner, Sunrise and its principal owner also accepted BIS Export Denial Orders which prohibit them from exporting any goods from the United States for a ten-year period. The BIS Export Denial Orders were suspended in their entirety provided Sunrise and its principal owner remain in compliance with the terms of their Settlement Agreements with BIS and with the Export Administration Regulations.

Sunrise and its principal owner did not voluntarily disclose these matters to OFAC. OFAC considers the apparent violations to be egregious.

The entire Settlement Agreement with OFAC is posted under the Selected Settlement Agreement section of OFAC's Web site:

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