

ENFORCEMENT INFORMATION FOR March 21, 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)

Maritech Commercial Inc. Settles Potential Civil Liability for Alleged Violations of the Weapons of Mass Destruction Proliferators Sanctions Regulations: Maritech Commercial Inc. ("Maritech"), Kenner, LA, has agreed to pay \$20,800 to settle potential civil liability for alleged violations of the Weapons of Mass Destruction Proliferators Sanctions Regulations. Between on or about April 20, 2009, and on or about June 14, 2010, Maritech provided fuel inspection services, valued at \$9,868, on board five vessels affiliated with the Islamic Republic of Iran Shipping Lines ("IRISL") that had been identified by OFAC as blocked property and placed on OFAC's list of Specially Designated Nationals and Blocked Persons ("SDN List"). IRISL, which is known to engage in deceptive practices in an attempt to evade sanctions, had changed the names of four of the five vessels prior to the alleged violations; however, the vessels remained identifiable by their IMO numbers. "IMO numbers" are unique identifiers that are assigned to vessels of a certain size and nature when constructed, and are permanently and visibly marked on vessels. At the time of the transactions at issue in this case, Maritech was not screening the names or IMO numbers of any of the vessels to which it provided services against the SDN List.

OFAC determined that Maritech did not voluntarily self-disclose its conduct, and the alleged violations constituted a non-egregious case. The base penalty for the alleged violations was \$32,000.

The settlement reflects OFAC's consideration of the following facts and circumstances, pursuant to the General Factors Affecting Administrative Action listed in OFAC's Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501 app. A: Maritech had no sanctions compliance program at the time of the alleged violations; Maritech acted with reckless disregard for U.S. economic sanctions by failing to screen parties involved in its business transactions; Maritech conferred an economic or other benefit on a sanctioned entity, and undermined the integrity of the non-proliferation sanctions programs and its policy objectives; Maritech had no prior OFAC sanctions enforcement history; Maritech has instituted a system to screen against OFAC's List of Specially Designated Nationals; and Maritech is a small company.

For more information regarding OFAC regulations, please go to: www.treasury.gov/ofac.