

What happens if I violate export controls in the USA - 21 May 2014

Commerce/BIS News: "UAE Freight Forwarder Agrees to Pay \$125,000 Penalty in Connection with Export and Reexport of Monitoring Devices to Syria"

(Source: <http://www.bis.doc.gov/index.php/about-bis/newsroom>)

20th May 2014: WASHINGTON - The U.S. Department of Commerce's Bureau of Industry and Security (BIS) today announced that Aramex Emirates, LLC, located in Dubai, United Arab Emirates (U.A.E.), has agreed to pay a \$125,000 civil penalty in connection with the unlicensed export and reexport to Syria, via the U.A.E., of network devices and software without the required BIS licenses.

"Today's settlement shows the importance of compliance with U.S. law by foreign freight forwarders handling items subject to U.S. export controls," said Under Secretary of Commerce Eric L. Hirschhorn in announcing the settlement. "The items in question could be used by the Syrian government to monitor Internet activity and block pro-democracy websites as part of its brutal crackdown against the Syrian people."

BIS alleged that in December 2010, and again in February 2011, Aramex facilitated the unlicensed export or reexport of network devices and software to Syria, via the U.A.E., without the required BIS licenses. The network devices and software are used to monitor and control web traffic. Aramex Emirates agreed to receive the two shipments from another freight forwarder in the U.A.E. and, following receipt of the items, forwarded them from the U.A.E to Syria.

Aramex's cargo system team in the U.A.E., including employees involved in the transactions, were specifically advised of U.S. sanctions against Syria and instructed not to move U.S. products to Syria in an October 20, 2009, company-wide circular entitled "Exporting US-made Products to Countries under the U.S.A. Trade Ban." Aramex fully cooperated with investigators and as a result received a reduced penalty.

Today's announcement is related to an April 24, 2013, enforcement action where Computerlinks FZCO, of Dubai, U.A.E., agreed to pay a \$2.8 million civil penalty to BIS and conduct external audits covering a three-year period to settle charges that it committed three evasion violations of the Export Administration Regulations (EAR) for some of the same transactions.

BIS controls exports and reexports of commodities, technology, and software for reasons of national security, missile technology, nuclear non-proliferation, chemical and biological weapons non-proliferation, crime control, regional stability, foreign policy and anti-terrorism. Criminal penalties and administrative sanctions can be imposed for violations of the EAR. For more information, please visit www.bis.doc.gov.