



## **Export Control Violations**

### **EXPORT ADMINISTRATION REGULATIONS (EAR)**

#### Criminal Sanctions

- University -- A fine of up to \$1,000,000 fine per violation
- Individuals -- A fine of up to \$1,000,000 and up to 20 years' imprisonment per violation

#### Civil Sanctions

- University -- A fine of up to the greater of \$250,000 per violation or twice the amount of the transaction that is the basis of the violation. May also include the denial of export privileges and the seizure and forfeiture of the goods involved in the transaction.
- Individuals -- A fine of up to the greater of \$250,000 per violation or twice the amount of the transaction that is the basis of the violation. May also include the denial of export privileges and the seizure and forfeiture of the goods involved in the transaction.

### **INTERNATIONAL TRAFFIC IN ARMS REGULATIONS (ITAR)**

#### Criminal Sanctions

- University -- A fine of up to \$1,000,000 per violation.
- Individuals -- A fine of up to \$1,000,000 per violation and up to 10 years' imprisonment.

#### Civil Sanctions

- University -- A fine of up to \$500,000 per violation. May also include the denial of export privileges and the seizure and forfeiture of the goods involved in the transaction.
- Individuals -- A fine of up to \$500,000 per violation. May also include the denial of export privileges and the seizure and forfeiture of the goods involved in the transaction.

### **OFFICE OF FOREIGN ASSETS CONTROL (OFAC)**

#### Criminal Sanctions

- University -- A fine of up to \$1,000,000 fine per violation
- Individuals -- A fine of up to \$1,000,000 and up to 20 years' imprisonment per violation

#### Civil Sanctions

- University -- A fine of up to \$250,000 per violation. May also include the denial of export privileges and the seizure and forfeiture of the goods involved in the transaction.
- Individuals -- A fine of up to \$250,000 per violation. May also include the denial of export privileges and the seizure and forfeiture of the goods involved in the transaction.