



Enforcement Focus on Individual and Criminal Liability: Ohio Man Sentenced to 20 Months for Violations of Iranian Trade Sanctions

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On Thursday, October 24, 2019, Behrooz Behroozian, of Columbus, Ohio, pleaded guilty to all counts as alleged for violation of U.S. sanctions on Iran. Over the past twelve years, Behroozian exported and caused the exportation of American-made manifolds, valves, and connectors used for industrial pipelines in the gas and petrochemical (oil refinement) industry to Iran in what the Southern District of Ohio's Judge Graham found to be a deliberate violation of a U.S. embargo and trade sanctions.

According to the Sentencing Memorandum, Behroozian supplied the products to an intermediary company in the U.A.E., Sumar Industrial Equipment, in an attempt to cover-up his illegal conduct. Upon receiving the aforementioned goods, the Sumar company would then export them to Iran.

For U.S. manufacturers and vendors, this Behroozian case highlights the importance of exercising enhanced due diligence procedures to verify the ultimate end users of equipment purchases when a purchaser is unfamiliar, small, or seems not to have a clear use for the items. Sales personnel should be trained to identify red flags indicating a risk that a product will be "diverted" or resold to a prohibited destination. This scenario in this case is one that arises with some frequency and has been the hook for sanctions liability on the part of manufacturers and vendors.

If you have any questions about sanctions compliance, please contact one of the attorneys listed below or your usual Winston & Strawn contact.

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