

Export Control Regulations Civil and Criminal Penalties¹

Export Administration Regulations (U.S. Department of Commerce)		
Willful Violations		
	<u>Fine</u>	<u>Imprisonment</u>
University	Up to \$1 million or 5 times the value of the exports for <i>each</i> violation.	
Individual	Up to \$250,000 for <i>each</i> violation.	Up to 10 years for <i>each</i> violation.
Knowing Violations		
University	Up to \$50,000 or 5 times the value of the exports for <i>each</i> violation.	
Individual	Up to \$50,000 or 5 times the value of the exports for violation.	Up to 5 years for <i>each</i> violation.
Civil (Administration Sanctions: Up to \$12,000 for <i>each</i> violation. If the violations involve items controlled for national security reasons, the fine is ten times greater or up to \$120,000 for <i>each</i> violation.		
Possible additional sanctions for each violation include the denial of export privileges, and/or the exclusion from practice, and/or seizure or forfeiture of goods.		

¹ Thanks to Stanford University for its summary from which this is heavily drawn, <http://export.stanford.edu/penalty.html>

International Traffic in Arms Regulations (U.S. Department of State)		
Criminal Sanctions		
	<u>Fine</u>	<u>Imprisonment</u>
University	Up to \$1 million for <i>each</i> violation.	N/A
Individual	Up to \$1 million for <i>each</i> violation.	Up to 10 years for <i>each</i> violation.
Civil (Administrative) Sanctions		
University	Up to \$500,000 or 5 times the value of the exports for <i>each</i> violation.	N/A
Individual	Up to \$500,000 or 5 times the value of the exports for violation.	N/A
Possible additional sanctions for each violation include the denial of export privileges and/or seizure or forfeiture of goods.		

Office of Foreign Assets Control (U.S. Department of the Treasury)		
Criminal Sanctions		
	<u>Fine</u>	<u>Imprisonment</u>
University	Up to \$1 million for <i>each</i> violation.	N/A
Individual	Up to \$1 million for <i>each</i> violation.	Up to 20 years for <i>each</i> violation.
Civil (Administrative) Sanctions		
University	Up to \$55,000 for <i>each</i> violation.	N/A
Individual	Up to \$55,000 for <i>each</i> violation.	N/A
Possible additional sanctions for each violation include the seizure or forfeiture of goods.		