

Report on Supply Chain Compliance Volume 2, Number 22. November 21, 2019 Apollo Aviation's Sudanese sanctions settlement

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On November 7, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) reached a settlement of \$210,600 with Apollo Aviation Group LLC (now known as Carlyle Aviation Partners Ltd.) for violations of OFAC sanctions against the government of Sudan.

Apollo Aviation was acquired by the Carlyle Group in 2018. The settlement reflects a number of mitigating factors, including Apollo Aviation's willingness to self-report in a timely, clear, concise, and well-organized manner as well as to implement remedial measures, such as improved Know Your Customer screening procedures and enhanced employee training on U.S. law.

The case also provides a good look at how difficult proper due diligence is, and how important it is to go as deep as possible into the supply chain to understand where products are going, and where they are coming from.

"This enforcement action highlights the importance of companies operating in high-risk industries to implement effective, thorough and on-going, risk-based compliance measures, especially when engaging in transactions concerning the aviation industry," OFAC stated. "This action also highlights the importance of companies operating internationally to implement Know You Customer screening procedures and implement compliance measures that extend beyond the point-of-sale and function throughout the entire business or lease period."^[1]

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