

# U.S. DEPARTMENT OF THE TREASURY

## Office of Foreign Assets Control

April 1, 2026

### OFAC Enters into Settlement with Quark's Interstellar Logistics & Procurement, LLC for Apparent Violations of the Gamma Quadrant Sanctions Regulations

The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) today announced a settlement with **Quark's Interstellar Logistics & Procurement, LLC (QILP)**, a Moorestown, New Jersey-based trading house and logistics provider. QILP has agreed to pay **\$12,650,401** to settle its potential civil liability for 47 apparent violations of the **Gamma Quadrant Sanctions Regulations (GQSR), 31 C.F.R. part 599**.

The apparent violations involved QILP's facilitation of the sale and shipment of industrial-grade "Self-Sealing Stem Bolts" and "Yamok Sauce Concentrate" to the **Central Command of the Cardassian Union**, an entity designated pursuant to **Executive Order 13883**, "Blocking Property of Certain Persons with Respect to the Destabilization of the Alpha Quadrant."

### Description of the Apparent Violations

Between February 2023 and November 2025, QILP processed 47 transactions totaling approximately \$3.2 million for the benefit of the Cardassian Central Command. The transactions were orchestrated by QILP's Managing Director, **Quark**, who utilized a series of sub-ledgers titled "The Rules of Acquisition" to bypass the company's automated screening system.

According to internal communications obtained by OFAC, QILP's Assistant Manager, **Rom**, initially flagged the shipments as potentially violating U.S. sanctions. However, Quark reportedly overrode these alerts, stating in a subspace memorandum that "Rule of Acquisition #34: War is good for business" and "Rule #35: Peace is good for business" collectively created a "regulatory gray area" for logistics providers.

To further obscure the transactions, QILP routed the shipments through a front company, **The Grand Nagus Trading Collective**, based in the Ferenginar Free Trade Zone, before the goods were transhipped to the Cardassian stronghold on **Terok Nor**.

### Penalty Calculation and Settlement Amount

OFAC determined that QILP did not voluntarily self-disclose the apparent violations and that the apparent violations constitute an egregious case.

The statutory maximum civil monetary penalty was **\$18,237,974**, based on the 2026 adjusted rate of **\$388,042** per violation. Under the **Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, app. A**, the base civil monetary penalty amount was **\$15,400,000**.

The settlement amount of **\$12,650,401** reflects OFAC's consideration of the following General Factors:

### **Aggravating Factors**

- **Willful Evasion:** QILP's leadership actively concealed the identity of the end-user by altering Manifest Data in the company's "Holosuite" enterprise resource planning (ERP) system.
- **Harm to Sanctions Program Objectives:** The provision of Self-Sealing Stem Bolts directly supported the repair of Cardassian Galor-class cruisers, undermining U.S. efforts to maintain regional stability.
- **Commercial Sophistication:** As a multi-planetary logistics firm with over 10 years of experience in Moorestown, QILP should have been well-versed in the risks of dealing with "High-Density Military Aggressors."

### **Mitigating Factors**

- **No Prior Violations:** QILP has not received a Penalty Notice or Finding of Violation from OFAC in the five years preceding the earliest date of the transactions.
- **Substantial Cooperation:** Following a change in internal leadership, the new Compliance Director, **Odo**, provided OFAC with "Liquid Crystal Logs" that detailed the full scope of the scheme and identified several unlisted "Deep Space" shell companies.
- **Remediation:** QILP has terminated the employment of the individuals involved and implemented a new "Universal Translator" compliance module that automatically blocks any transaction containing Ferengi financial metaphors.

### **Compliance Considerations**

This action highlights the importance of maintaining an independent compliance function that cannot be overridden by "Profit-Center" managers. OFAC reminds U.S. persons that "The Rules of Acquisition" do not constitute an acceptable alternative to the **Framework for OFAC Compliance Commitments**.

Financial institutions and logistics firms are encouraged to review the "**Alpha Quadrant Advisory on Transshipment Risks**" (published 2025) and the "**Guide to Dilithium-Based Money Laundering**" to ensure their screening algorithms are calibrated to detect non-human entity structures.

### **For Further Information**

Parties with questions regarding the "Cardassian Stem Bolt" enforcement action or seeking to verify the "Rule of Acquisition" exceptions should contact the OFAC Compliance Hotline at **1-800-APR-FOOL**.