



Organization: The 2017 Caterpillar Trust  
Address: Country: VIRGIN ISLANDS, U.S.  
Tracking ID: KYC [REDACTED]

Reporting ID:

Alerted Entity #: 1 of 1

Risk Priority: Critical

Alert ID: [REDACTED]

- December 2010 that took legal advantage of a controversial loophole in US sanctions legislation to procure a US Treasury Department license to sell selected goods in Iran despite trade sanctions and embargoes. The licenses were granted under a 2000 law mandating that agricultural and medical humanitarian aid be exempted from sanctions; the New York Times notes that this and other entities identified in the article received special licenses to enter into transactions that would otherwise be prohibited by trade embargoes and sanctions rules., 08/24/2012, [Iran Connect](#)
- IRC - Iran Connect / ASC - Associated with, Seen with, 08/24/2012  
Caterpillar has performed business in Iran through its wholly-owned subsidiary Lovat, (a Canadian tunnel-boring machine company), and Arya Machinery, which states it is the exclusive dealer of Caterpillar in Iran. Solar Turbines, a division of Caterpillar, requested license to bid on a project to build a natural mixing station needed by the Turkish government-owned pipeline company, Botas., 08/24/2012, [Iran Connect](#)
  - IRC - Iran Connect / ASC - Associated with, Seen with, 07/29/2010  
Caterpillar Belgium SA is an associate of National Iranian Oil Engineering and Construction Company. On July 29, 2010, Australian Department of Foreign Affairs and Trade has listed National Iranian Oil Engineering and Construction Company (NIOEC) under sub-regulation 17E (3) of the Charter of the United Nations (Sanctions - Iran) Regulations 2008. According to the Official Journal of the European Union Website, dated December 22, 2012, NIOEC was designated under Regulation (EU) No 1264/2012, as an entity which is a subsidiary of National Iranian Oil Refining and Distribution Company., 07/29/2010, [Iran Connect](#)
  - IRC - Iran Connect / ASC - Associated with, Seen with, 07/29/2010  
Caterpillar NI Limited is an associate of National Iranian Oil Engineering and Construction Company. On July 29, 2010, Australian Department of Foreign Affairs and Trade has listed National Iranian Oil Engineering and Construction Company (NIOEC) under sub-regulation 17E (3) of the Charter of the United Nations (Sanctions - Iran) Regulations 2008. According to the Official Journal of the European Union Website, dated December 22, 2012, NIOEC was designated under Regulation (EU) No 1264/2012, as an entity which is a subsidiary of National Iranian Oil Refining and Distribution Company., 07/29/2010, [Iran Connect](#)
  - REG - Regulatory Action / ACT - Disciplinary, Regulatory Action, 01/23/2003  
Entity appears on the Arizona Corporate Commission Securities Division Enforcement Actions site, 01/23/2003, [Arizona - Corp. Commission Securities Division Enforcement Actions](#)
  - DEN - Denied Entity / ASC - Associated with, Seen with, 07/31/2015  
This entity appears on the Iowa Board of Regents' list of scrutinized companies doing business in Sudan., 07/31/2015, [Iowa Board of Regents - Scrutinized Companies](#)
  - FRD - Fraud, Scams, Swindles / SET - Settlement or Suit, 03/14/2017  
Daniel Schlicksup in 2009 filed suit and accused Caterpillar of breaking the law and misleading stockholders. (The case was reportedly settled out of court.) Shareholder Judy Pill also sued, accusing Cat of violating its "fiduciary duties" in 2017., 03/14/2017, [Register-Mail, The \(Galesburg, IL\)](#)
  - TAX - Tax Related Offenses / DMS - Dismissed, 02/25/2016  
The Securities and Exchange Commission ends tax probe without action against its foreign subsidiary, known as Caterpillar SARL., 02/25/2016, [McClatchy Tribune Academic Restricted](#)
  - TAX - Tax Related Offenses / ASC - Associated with, Seen with, 03/03/2017

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