

OFAC CHRONOLOGY

- 06/7/2001** U.N. letter to Bayoil asks for information about specific shipments.
- 06/25/2001** Bayoil refuses to provide shipping information, because it is “completely outside [the U.N. Oil Overseer’s] authority and mandate under the [OFF] program.”
- 07/14/2001** Bayoil supplies incomplete information.
- U.N. Office of Iraq Programme asks U.S. Mission to the U.N. for assistance.
- 08/17/2001** U.S. State Department writes to U.S. Treasury Department’s Office of Foreign Assets Control (OFAC) asking it to “contact Bayoil and urge the company respond quickly and completely to the Office of the Iraq Program’s request for information.”
- 11/28/2001** U.N. again asks Bayoil for information.
- 01/10/2002** U.N. again asks Bayoil for information.
- 01/24/2002** Bayoil writes to U.N. but still does not provide the requested information, claiming prejudice against the company.
- 01/2002** U.N. again asks the State Department for assistance and the State Department again contacts OFAC.
- 04/23/2002** Eight months after the initial request for assistance, OFAC writes to Bayoil and requests a report on its transactions in Iraq; letter does not request specific information sought by U.N. or direct Bayoil to answer the U.N.’s questions. OFAC told the Subcommittee that its investigator recalled that the request had to do with “surcharges.”
- 05/22/2002** Bayoil writes to OFAC saying that because Iraq will not issue contracts directly to U.S. companies, it is not doing work under its OFAC license.
- OFAC telephones Bayoil and asks to send Bayoil’s letter to the State Department.
- 07/2/2002** Bayoil writes back that OFAC can share its letter with the State Department and U.S. Mission to the U.N. but with no one else, which means it cannot be shared with the U.N.

**OFAC never forwards Bayoil's letter to anyone.
The U.N. never obtained the information it sought about Bayoil.**

Source: Report on Illegal Surcharges on Oil-for-Food Contracts and Illegal Oil Shipments from Khor al-Amaya, pp. 58-63. Prepared by U.S. Senate Permanent Subcommittee on Investigations, Minority Staff