

From: [REDACTED] [LCDR](#)
To: [Tucker Adam](#)
Cc: [Farley, Timothy](#); [Neubauer, Jason CAPT](#); [Terminella Jr., Emanuel J CIV](#)
Subject: RE: 46 USC 8102 - civil penalty history
Date: Friday, December 13, 2019 11:11:16 AM
Attachments: [Watchmen and Crew Training Violations for T and K.xlsx](#)
[image001.png](#)

Adam,

Great seeing you the other day! We pulled all "proved" and "imposed" enforcement actions for violations of 46 USC 8102 as well as the corresponding cites in subchapter T and K for watchmen and crew training (46 CFR 122.410, 46 CFR 122.420, 46 CFR 185.410, or 46 CFR 185.420).

BLUF: No enforcement actions were prove and imposed for violations of 46 USC 8102 or the corresponding cites in 46 Subchapter T or K for "watchmen" violations.

However, there have been 7 violations for crew training in the same subpart (46 CFR Subchapter T, Subpart D - Crew Requirements). Two of these actions were Letters of Warning in lieu of Civil Penalty (LOW); the other five were Notices of Violation (NOV aka Ticket) each with a \$100 fine.

There are additional details in the attached spreadsheet. Please don't hesitate to call if you have any questions.

Regards,

[REDACTED]

[REDACTED], LCDR

Chief, Compliance Analysis Division (CG-INV-2)

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