

ENFORCEMENT INFORMATION FOR March 27, 2009

Information concerning the civil penalties process is discussed in OFAC regulations governing the various sanctions programs and in 31 CFR part 501. On September 8, 2008, OFAC published as Appendix A to part 501 new Economic Sanction Enforcement Guidelines. Although these new guidelines replace earlier enforcement guidelines published by OFAC, for certain matters that were in process at the time the new guidelines were published, the prior guidelines (which can be found at 68 *Fed. Reg.* 4422 and 71 *Fed. Reg.* 1971) are still applicable. Please see OFAC's Revised Interim Policy regarding use of the prior guidelines. The Revised Interim Policy, along with the new guidelines and copies of recent final Penalty Notices, can be found on OFAC's website at <http://www.treas.gov/offices/enforcement/ofac/civpen>.

ENTITIES – 31 CFR 501.805(d)(1)(i)

Casa de Cambio Delgado, Inc., Settles Allegations of Violations of the Foreign Narcotics Kingpin Sanctions Regulations: Casa de Cambio Delgado, Inc. (“CCDI”) of Jackson Heights, NY, has remitted \$40,160.46 to settle allegations of violations of the Foreign Narcotics Kingpin Sanctions Regulations. OFAC alleged that on or about January 12 through May 13, 2005, CCDI processed transactions on behalf of Specially Designated Narcotics Traffickers, designated pursuant to the Foreign Narcotics Kingpin Designation Act, without an OFAC license. As a remedial measure, upon learning of the alleged violations, CCDI implemented improvements to its OFAC compliance program in order to prevent future violations. CCDI voluntarily disclosed this matter to OFAC through a blocking report and cooperated with OFAC's investigation.

Golden Escrow, Inc. Assessed a Penalty for Violating the Sudanese Sanctions Regulations: Golden Escrow, Inc., Alhambra, CA (“Golden”) has been assessed an \$11,000 civil monetary penalty for its violation of the Sudanese Sanctions Regulations occurring in September 2004. Golden processed a transaction for the sale of real property. Golden provided the wire transfer instructions to send a USD 364,595.48 funds transfer to Bank of China, London for further credit to China Jilin. Golden did not voluntarily disclose this matter to OFAC. For a copy of OFAC's Penalty Notice issued to Golden, *please visit the following*
url: http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/golden_esc.pdf

INDIVIDUALS – 31 CFR 501.805(d)(1)(ii)

One individual was assessed a penalty totaling \$9,000 for dealing in property in which Cuba has an interest: On September 4, 2008, following an administrative hearing and review, the Secretary's Designee determined that the Decision and Order issued by an Administrative Law Judge should be modified to increase the penalty for violation.

For more information regarding OFAC regulations, please go to:
<http://www.treas.gov/offices/enforcement/ofac/legal/>.