

ENFORCEMENT INFORMATION FOR July 31, 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)

MGE UPS Systems, Inc., now known as American Power Conversion Corporation, Assessed a Penalty for Violating the Cuban Assets Control Regulations: MGE UPS Systems, Inc. ("MGE UPS"), Costa Mesa, CA, has been assessed and has remitted \$10,341.00 for its violation of the Cuban Assets Control Regulations occurring in September 2005. MGE UPS sold electrical regulators ultimately destined for Cuba. MGE UPS did not voluntarily disclose this matter to OFAC. For a copy of OFAC's Penalty Notice issued to MGE UPS, *please visit the following url:* http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/mge_ups_july.pdf

http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/mge_ups_aug.pdf

This matter was resolved according to the prior enforcement guidelines published by OFAC at 68 Fed. Reg. 4422.

First Incentive Travel, Inc. Settles Cuban Assets Control Regulations Allegations: First Incentive Travel, Inc., Kissimmee, FL ("FIT"), has remitted \$8,250 to settle allegations of violations of the Cuban Assets Control Regulations occurring on or about October 2006. OFAC alleged that FIT provided travel-related services in which Cuba or Cuban nationals had an interest by arranging Cuba travel for non-U.S. persons without an OFAC license. FIT did not voluntarily disclose this matter to OFAC. This matter was resolved according to the prior enforcement guidelines published by OFAC at 68 Fed. Reg. 4422.

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

One individual was assessed a penalty totaling \$15,000 for dealing in property in which Cuba has an interest: In December 2006, the individual engaged in financial transactions in which Cuba or a Cuban national has an interest. The individual did not voluntarily disclose this matter to OFAC. This matter was resolved according to the prior enforcement guidelines published by OFAC at 68 Fed. Reg. 4422.

One individual was assessed a penalty totaling \$8,000 for violating the Iraqi Sanctions Regulations: On or about January 28, 2003, the individual traveled to Iraq without an OFAC license. The individual did not voluntarily disclose this matter to OFAC. This matter was resolved according to the prior enforcement guidelines published by OFAC at 68 Fed. Reg. 4422.

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