

**OFAC Civil Penalties Enforcement Information**

**ENTITIES - 31 CFR 501.805(d)(1)(i)**

<b>Name of Entity Involved</b>	<b>Address</b>	<b>Sanctions Program</b>	<b>Description of Actual or Alleged Violation</b>	<b>Voluntary Disclosure</b>	<b>Amount</b>	<b>Assessed (A) Settled (S)</b>
<b>Aeronet Worldwide</b>	San Francisco, CA 94083	Sudan	2000 Attempted export of goods to Sudan		\$ 3,978.00	<b>S</b>
<b>Bethyl Laboratories, Inc.</b>	Montgomery, TX 77356	Iran	2002 Trade with Iran		\$ 4,125.00	<b>S</b>
<b>Bridgeview Bank on behalf of Uptown National Bank of Chicago</b>	Bridgeview, IL 60455	Cuba	1999 Funds transfer		\$ 5,500.00	<b>S</b>
<b>East Bay Tire Co.</b>	Fairfield, CA 94533	Sudan	2000 Attempted export of goods to Sudan		\$ 4,747.00	<b>S</b>
<b>Farmland Industries, Inc. on behalf of Tradigrain, Inc.</b>	Kansas City, MO 64195	Sudan	1999 Execution of contract to export goods to Sudan		\$ 2,750.00	<b>S</b>
<b>HP Schmid, Inc.</b>	San Francisco, CA 94104	Sudan	2000 Facilitation of trade with Sudan		\$ 2,750.00	<b>S</b>
<b>Lockwood Trade Journal Co., Inc. and Lockwood Publications, Inc.</b>	New York, NY 10036	Cuba	2000 Unauthorized transactions with Cuban entity		\$ 2,008.13	<b>S</b>
<b>MRV Communications, Inc. on behalf of NBase-Xyplex</b>	Chatsworth, CA 91311	Kosovo	1999 Shipments to Yugoslavia		\$ 1,484.01	<b>S</b>
<b>Polsteam USA, Inc.</b>	New York, NY 10004	Libya	2002 Funds transfer		\$ 5,500.00	<b>S</b>

<b>Titmus Optical, Inc.</b>	Petersburg, VA 23805	Kosovo	2000 Shipment to Yugoslavia		\$ 1,623.00	<b>S</b>
<b>Topcon Positioning Systems, Inc. on behalf of Javad Position Systems</b>	Pleasanton, CA 94588	Kosovo	2000 Contract and funds transfers		\$ 12,000.00	<b>S</b>
<b>Transpo Electronics, Inc.</b>	Orlando, FL 32808	Iran	1999 - 2001 Purchases and sales of goods to Iran	Yes	\$ 15,500.00	<b>S</b>
<b>Transport Facilitators, Inc.</b>	Houston, TX 77042	Sudan	Facilitation of trade with Sudan and 2000 reimbursement of funds expended in Sudan		\$ 2,500.00	<b>S</b>
<b>Universal Services</b>	Harahan, LA 70123	Kosovo	1998 Funds transfers		\$ 11,000.00	<b>S</b>
<b>Zid Associates, Inc.</b>	Woodside, NY 11377	Kosovo	2000 Attempted commercial transaction with FRY entity		\$ 2,550.00	<b>S</b>

**INDIVIDUALS - 31 CFR 501.801(d) (1) (ii)**

(Aggregate Numbers For The Month Ending 12/05/03)

No. Penalties Imposed and Informal Settlements Reached	Sanctions Program	Description of Actual or Alleged Violation	Aggregate Amounts of Penalties Assessed, or Settled	Penalty Assessed (A), Informal Settlement (S), or Hearing (H)		
1	Cuba	Failure to respond to Requirement to Furnish Information	\$ 1,000.00	S		
1	Cuba	Travel-related transactions	\$ 7,500.00	A		
14	Cuba	Travel-related transactions	\$ 32,750.00	S		
1	Cuba	Travel-related transactions and importation of Cuban-origin goods	\$ 7,580.00	A		
9	Cuba	Travel-related transactions and importation of Cuban-origin goods	\$ 13,400.00	s		
1	Cuba	Importation of Cuban-origin goods	\$ 350.00	s		