

ENFORCEMENT INFORMATION FOR July 11, 2008

Information concerning the civil penalty process is discussed in OFAC regulations governing the various sanctions programs or, in the case of sanctions regulations issued pursuant to the Trading with the Enemy Act, in 31 CFR part 501. Civil penalty procedures are also discussed in OFAC's proposed Enforcement Guidelines, 68 FR 4422 – 4429 (January 29, 2003). However, please note that, for banking institutions regulated by one of the agencies belonging to the Federal Financial Institutions Examination Council, the proposed enforcement guidelines have been withdrawn and replaced by an interim final rule ("Economic Sanctions Procedures for Banking Institutions"), 71 FR 1971 – 1976 (January 12, 2006), which has an effective date of February 13, 2006. Both the proposed Enforcement Guidelines and the interim final rule are available on OFAC's website, available at <http://www.treas.gov/offices/enforcement/ofac/civpen/enfguide.pdf>.

OFAC is now posting on this website copies of its final agency Penalty Notices with the relevant case reports to the extent permitted under applicable law.

ENTITIES – 31 CFR 501.805(d)(1)(i)

Minxia Non-Ferrous Metals, Inc. Settles Cuban Assets Control Regulations Allegations: Minxia Non-Ferrous Metals, Inc., Columbia, Maryland 21044, ("Minxia"), remitted \$1,198,000.00 to settle allegations of violations of the Cuban Assets Control Regulations occurring between approximately May 2003 and October 2006. OFAC alleged that Minxia acted without an OFAC license or outside the scope of its license by purchasing or otherwise dealing in Cuban metals. Minxia did not voluntarily disclose this matter to OFAC.

Gate Gourmet, Inc. Settles Cuban Assets Control Regulations Allegations: Gate Gourmet, Inc. ("Gate Gourmet"), has agreed to remit \$581,901.54 to settle allegations of violations of the Cuban Assets Control Regulations occurring between December 2002 and September 2006. OFAC alleged that Gate Gourmet acted without an OFAC license or outside the scope of its license by supplying catering services to Cubana Airlines, referring business with Air Cubana to other suppliers, and funding employee travel to Cuba. Gate Gourmet voluntarily disclosed this matter to OFAC.

A.G. Edwards and Sons, Inc, Settles Narcotics Trafficking Sanctions Allegations: A.G. Edwards and Sons Inc., St. Louis, MO 63103 (A.G. Edwards), has remitted \$122,358.35 to settle allegations of violations of the Narcotics Trafficking Sanctions Regulations occurring between March and May of 2003. OFAC alleged that A.G. Edwards acted without an OFAC license by failing to block investment accounts, and processing transactions on the accounts owned by Specially Designated Narcotics Traffickers ("SDNTs"). A.G. Edwards voluntarily disclosed this matter to OFAC.

Concord Camera Corp. Settles Cuban Embargo Program Allegations: Concord Camera Corp., Hollywood, FL (“Concord”) has remitted \$12,000 to settle allegations of violations of the Cuban Assets Control Regulations occurring between April 2004 and July 2005. Concord voluntarily disclosed this matter to OFAC. OFAC alleged that a Concord subsidiary, Concord Camera HK Ltd., Hong Kong, made unlicensed sales of cameras for delivery in Cuba.

Aetna Life Insurance Company Settles Cuban Embargo Program Allegations: Aetna Life Insurance Company, Hartford, CT (“Aetna”) has remitted \$5,210.31 to settle allegations of a violation of the Cuban Assets Control Regulations occurring in January 2007. OFAC alleged that Aetna initiated a life insurance proceeds payment to a beneficiary in Cuba. Aetna did not voluntarily disclose this matter to OFAC.

Allied International Corporation Settles Allegations of Violations of the Iranian Transactions Regulations: Allied International Corporation (“AIC”) of Ashburn, Virginia has remitted \$4,455.37 to settle allegations of violations of the Iranian Transactions Regulations. OFAC alleged that between April 2005 and March 2006, AIC engaged in trade-related transactions involving the services of an Iranian shipper and an Iranian port without an OFAC license. AIC did not voluntarily disclose this matter to OFAC.

Tours International America Settles Cuban Assets Control Regulations Violation Allegation: Tours International America, Beverly Hills, CA 90211 (“TIA”) has remitted \$2,500.00 to settle allegations of violations of the Cuban Asset Control Regulations occurring on December 27, 2006. OFAC alleged that TIA operated as an unauthorized travel service provider by making a hotel reservation at a hotel in Cuba. TIA did not voluntarily disclose this matter to OFAC.

Logysis, Inc. Settles Iranian Transaction Regulations Allegations: Logysis, Inc., Anaheim, CA, has remitted \$2,750 to settle allegations of violations of the Iranian Transaction Regulations which occurred on November 26, 1999. OFAC alleged that Logysis acted without an OFAC license or outside the scope of its license by initially accepting a letter of credit issued by a bank owned or controlled by the government of Iran. Logysis did not voluntarily disclose this matter to OFAC.

Geico Corporation Settles Former Liberian Regime of Charles Taylor Sanctions Regulations Allegations: Geico Corporation (“Geico”) has remitted \$1,085.63 to settle allegations of violations of the Former Liberian Regime of Charles Taylor Sanctions Regulations occurring between August 11, 2004 and March 10, 2005. OFAC alleged that Geico dealt in property and/or interests in property of a Specially Designated National. Geico cooperated with OFAC’s investigation. Geico voluntarily disclosed this matter to OFAC.

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

One individual was assessed a penalty totaling \$4,351.50 for dealing in property in which Cuba or a Cuban national had an interest: On or about July 26, 2003, August 20, 2003, October 31, 2003, May 3, 2004, June 4, 2004 and July 3, 2004, the individual purchased Cuban-origin cigars offered for sale on the Internet. The individual did not voluntarily disclose this matter to OFAC.

One individual was assessed a penalty totaling \$3,250 for dealing in property in which Cuba has an interest: On August 11, 2004, the individual attempted to transfer money to a friend in Cuba. The individual did not voluntarily disclose this matter to OFAC.

One individual was assessed a penalty totaling \$1,225 for dealing in property in which Cuba or a Cuban national had an interest: On or about October 25, 2003, November 6, 2003, December 4, 2003 and March 29, 2004, the individual purchased Cuban-origin cigars offered for sale on the Internet. The individual did not voluntarily disclose this matter to OFAC.

One individual has agreed to a settlement totaling \$1,681.55 for allegedly dealing in property in which Cuba or a Cuban national had an interest: Between November 2004 and August 2006, the individual allegedly purchased Cuban-origin cigars offered for sale on the Internet. The individual did not voluntarily disclose this matter to OFAC.

One individual has agreed to a settlement totaling \$840 for alleged violation of the prohibitions in the Iranian Transactions Regulations: OFAC alleged that in August 2006, the individual attempted to transfer funds to Me-Gold Kish, Co. in Iran in an apparent attempt to purchase electronic gold without an OFAC license. The individual did not voluntarily disclose this matter to OFAC.

One individual was assessed a penalty totaling \$700.00 for dealing in property in which Cuba or a Cuban national had an interest: From 2003-2005 the individual engaged in unlicensed travel-related transactions incident to a trip to Cuba. The individual did not voluntarily disclose this matter to OFAC.

One individual was assessed a penalty totaling \$650.00 for dealing in property in which Cuba or a Cuban national had an interest: On December 24, 2004 and March 15, 2005, the individual purchased Cuban-origin cigars offered for sale on the Internet. The individual did not voluntarily disclose this matter to OFAC.

One individual has agreed to a settlement totaling \$561.54 for allegedly engaging in a funds transfer to a sanctioned Burmese entity relating to Burma: On or about November 2006, the individual allegedly exported financial services to Burma by sending a funds transfer to the account of a Specifically Designated National of Burma to pay for the purchase in Burma of merchandise, without an OFAC license.

One individual has agreed to a settlement totaling \$400 for alleged violation of the prohibitions in the Iranian Transactions Regulations: OFAC alleged that in June 2006, the individual attempted to purchase electronic gold from Me-Gold Kish Co. in Iran in apparent violation of §§ 560.201, 560.203 and 560.204 of the Iranian Transactions Regulations. The individual did not voluntarily disclose this matter to OFAC.

One individual has agreed to a settlement totaling \$395.25 for allegedly dealing in property in which Cuba or a Cuban national had an interest: In December 2004 and January 2005, the individual allegedly purchased Cuban-origin cigars offered for sale on the Internet. The individual did not voluntarily disclose this matter to OFAC.

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