

## **ENFORCEMENT INFORMATION FOR August 1, 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belonging to the Federal Financial Institutions Examination Council, the proposed enforcement guidelines have been withdrawn and replaced by an interim final rule (“Economic Sanctions Procedures for Banking Institutions”), 71 FR 1971 – 1976 (January 12, 2006), which has an effective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)**

**Environmental Systems Research Institute, Inc. Settles Allegations of Violations of the Iranian Transactions Regulations:** Environmental Systems Research Institute, Inc. (“ESRI”), of Redlands, CA has remitted \$4,120.29 to settle allegations of violations of the Iranian Transactions Regulations. The alleged violations occurred on or about December 1, 2005 and March 1, 2007. OFAC alleged that ESRI attempted to send a funds transfer to a company in the United Arab Emirates through the company's Bank Saderat account. ESRI did not voluntarily disclose this matter to OFAC but it has instituted a comprehensive U.S. sanctions compliance program.

**8e6 Technologies Settles Iranian Transactions Regulations Allegations:** 8e6 Technologies, Orange, CA (“8e6”), has remitted \$3,300 to settle allegations of violations of the Iranian Transactions Regulations occurring between April 2000 and October 2003. OFAC alleged that 8e6 acted without an OFAC license or outside the scope of its license by exporting its internet services to Iran. 8e6 did not voluntarily disclose this matter to OFAC.

**Wire Pro Incorporated Settles Allegations of Violations of the Iranian Transactions Regulations:** Wire Pro Incorporated (“WPI”), of Salem, NJ, has remitted \$2,932.50 to settle allegations of violations of the Iranian Transactions Regulations. The alleged violations occurred in September, 2003. OFAC alleged that WPI allegedly attempted to use the services of Bank *Saderat*, an entity owned and controlled by the government of Iran, to send a refund to a company in the United Arab Emirates without an OFAC license. WPI did not voluntarily disclose this matter to OFAC.

**HM Digital, Inc. Assessed a Penalty for Violating the Iranian Transactions**

**Regulations:** HM Digital, Inc. (“HM”), Culver City, CA, has been assessed a \$2,662.00 civil monetary penalty for its violation of the Iranian Transactions Regulations. On February 2, 2006, HM attempted to export water testing equipment to an entity located in Iran. HM did not voluntarily disclose this matter to OFAC. For a copy of OFAC’s Penalty Notice issued to HM, *please visit the following url:*

[http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/hm\\_digital.pdf](http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/hm_digital.pdf)

**Aerovacations, Inc. Assessed a Penalty for Violating the Cuban Assets Control**

**Regulations:** Aerovacations, Inc. (“Aerovacations”), Los Angeles, CA, has been assessed a \$1,761.00 civil monetary penalty for its violation of the Cuban Assets Control Regulations occurring on or about August 10, 2007. Aerovacations attempted to transfer USD 2,709.54 to book a trip to Argentina for a Specially Designated National of Cuba. Aerovacations did not voluntarily disclose this matter to OFAC. For a copy of OFAC’s Penalty Notice issued to Aerovacations, *please visit the following url:*

[http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/aero\\_vaca.pdf](http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/aero_vaca.pdf)

**WSR Corporation Settles Allegations of a Violation of the Iranian Transactions**

**Regulations:** WSR Corporation (“WSR”), of Chicago, Illinois, has remitted \$1,024.80 to settle an allegation of a violation of the Iranian Transactions Regulations. OFAC alleged that on or about June 6, 2006, WSR attempted to facilitate a trade-related transaction with Iran on behalf of a non-U.S. person without an OFAC license. WSR did not voluntarily disclose this matter to OFAC.

**Pala International Inc. Settles Burmese Sanctions Regulations Allegations:**

Pala International Inc. (“Pala”), of Fallbrook, California has remitted \$845.85 to settle allegations of violations of the Burmese Sanctions Regulations. OFAC alleged that on or about July 13, 2004, Pala sent a funds transfer to Burma, via an account at a Burmese Specially Designated National, without an OFAC license. Pala did not voluntarily disclose this matter to OFAC.

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

**One individual was assessed a penalty totaling \$550 for attempting to violate the prohibitions in the Iranian Transactions Regulations:** On or about May 22, 2006, the individual attempted to transfer funds to an entity in a third country in order to pay a debt of an entity in Iran.

**One individual has agreed to a settlement totaling \$1,000 for allegedly dealing in property in which Cuba or a Cuban national had an interest:** Between December 2004 and July 2005, 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 \$952.25 for allegedly dealing in property in which Cuba or a Cuban national had an interest:** Between July 2003 and March 2004, the individual allegedly purchased, on four occasions, 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/>.