

## **ENFORCEMENT INFORMATION FOR December 5, 2008**

**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, including the matters listed below, 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)**

**Fidelity National Information Services, successor to Certegy Card Services, Settles Allegations of Violations of the Foreign Narcotics Kingpin Sanctions Regulations:** Fidelity National Information Services (“Fidelity”) of Maitland, FL, successor to Certegy Card Services (“Certegy”) of St. Petersburg, FL, has remitted \$12,260.86 to settle allegations of violations of the Foreign Narcotics Kingpin Sanctions Regulations. OFAC alleged that on or about June through July, 2004, and prior to the February 2006 acquisition of Certegy by Fidelity, Certegy processed transactions on behalf of an individual whose property was blocked pending investigation, pursuant to the Foreign Narcotics Kingpin Designation Act, without an OFAC license. As a remedial measure, upon learning of that failure, Fidelity deployed its OFAC compliance program in order to prevent future violations. Certegy did not voluntarily disclose this matter to OFAC.

**Eni Petroleum Co. Inc., Settles Iranian Transactions Regulations Allegations:** Eni Petroleum Co. Inc., Houston, TX (“Eni”) has remitted \$6,562.79 to settle allegations of violations of the Iranian Transactions Regulations occurring on or about October 2003. OFAC alleged that Eni engaged in a trade-related transaction with Iran by facilitating the exportation of goods or services, directly or indirectly, to Iran without an OFAC license. Eni cooperated with OFAC's investigation. Eni did not voluntarily disclose the matter to OFAC.

**Premier Agency Inc. Assessed a Penalty for Violating the Burmese Sanctions Regulations:** Premier Agency Inc. (“Premier”), Jamaica Queens, NY has been assessed a \$7,500.00 civil monetary penalty for its violation of the Burmese Sanctions Regulations. On or about December 9, 2005 and March 1, 2006, Premier was issued Requirement to Furnish Information letters regarding a funds transfer. There has been no response to those letters. Premier did not voluntarily disclose this matter to OFAC. For a copy of OFAC's Penalty Notice issued to Premier, *please visit the following url:* [http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/premier\\_pn.pdf](http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/premier_pn.pdf)

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

**One individual was assessed a penalty totaling \$7,500.00 for violating the Burmese Sanctions Regulations:** On or about August 3, 2006 and May 1, 2007, the individual was issued a Requirement to Furnish Information letter requesting information regarding a funds transfer. There has been no response to the letters. 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/>.

