



DEPARTMENT OF THE TREASURY
OFFICE OF FOREIGN ASSETS CONTROL

ENFORCEMENT INFORMATION FOR SEPTEMBER 7, 2007

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belonging to the Federal Financial Institutions Examination Council, the proposed enforcement guidelines have been withdrawn and replaced by an interim final rule ("Economic Sanctions Procedures for Banking Institutions"), 71 FR 1971 – 1976 (January 12, 2006), which has an effective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

National Australia Bank Ltd. Settles Burmese Sanctions Regulations, Sudanese Sanctions Regulations and Cuban Assets Control Regulations Allegations: National Australia Bank Ltd. ("NAB") has remitted \$100,000 to settle allegations of violations of the Burmese Sanctions Regulations, 31 C.F.R. Part 537, the Sudanese Sanctions Regulations, 31 C.F.R. Part 538, and the Cuban Assets Control Regulations, 31 C.F.R. Part 515, (the "Alleged Violations") occurring between November 2003 and December 2005 involving the processing of several transactions through the United States. The transactions were voluntarily disclosed to OFAC following an extensive review by NAB of all of its transactions that were processed through the United States during this time period. Some of the transactions were processed through NAB's branch in New York City, but the majority were processed through correspondent accounts held by it at other U.S. banks. Due to the significant remediation taken by the bank, including major upgrades to its worldwide compliance policies, as well as the fact that the violations were voluntarily disclosed, OFAC mitigated the potential penalties for these transactions by nearly 90%.

Lakes Community Credit Union Settles Cuban Assets Control Regulations Violation Allegation: Lakes Community Credit Union, Lake Orion, MI 48362 ("LCCU") has remitted \$1,484.00 to settle allegations of violations of the Cuban Asset Control Regulations occurring on July 7, 2003. OFAC alleged that LCCU initiated a transaction incident to Cuba travel. LCCU did not voluntarily disclose this matter to OFAC.

GE Security Settles Cuban Embargo Program Allegations: GE Security has remitted \$1,900 to settle allegations of violations of the Cuban Assets Control Regulations by a wholly-owned foreign subsidiary of InVision Technologies, Inc., Newark, CA 94560 ("InVision"). The alleged violations occurred between July and August 2003, prior to the acquisition of InVision by GE Security. OFAC alleged that InVision's foreign subsidiary acted without an OFAC license by exporting goods and services to Cuba. InVision voluntarily disclosed this matter to OFAC.



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Primavera Systems, Inc. Settles Iranian Embargo Allegations: Primavera Systems, Inc. (“Primavera”) has remitted \$13,430 to settle allegations of violations of the Iranian Transactions Regulations. The alleged violations occurred between November 2002 and July 2005. OFAC alleged that Primavera acted without an OFAC license when it exported goods and services to Primavera’s Dubai, U.A.E. based authorized representative with knowledge that the goods and services were destined for re-export to Iran. Primavera voluntarily disclosed this matter to OFAC.

Parkdale Mills, Inc. Assessed a Penalty for Violating the Sudanese Sanctions Regulations: Parkdale Mills, Inc., Gastonia, NC 28055 (“Parkdale”) has been assessed an \$8,250 civil monetary for its violation of the Sudanese Sanctions Regulations occurring on October 20, 2003. Parkdale attempted to import goods in the form of cotton from Sudan to Norfolk Port, USA when it initiated a financial transaction to pay for the goods. Parkdale did not voluntarily disclose this matter to OFAC. For a copy of OFAC’s Penalty Notice issued to Parkdale, *please visit the following url:* http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/parkdale_pn.pdf.

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

One individual has agreed to a settlement totaling \$770.25 for dealing in property in which Cuba or a Cuban national had an interest: On December 24, 2004, 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/>.