

## **ENFORCEMENT INFORMATION FOR April 23, 2010**

**Information concerning the civil penalties process is discussed in OFAC regulations governing the various sanctions programs and in 31 CFR part 501. On November 9, 2009, 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, 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)**

**LD Telecommunications, Inc. of Coral Gables, FL, Settles Cuban Assets Control Regulations Allegations:** LD Telecommunications, Inc. has agreed to remit \$21,671 to settle allegations of violations of the Cuban Assets Control Regulations occurring between December 2005 and March 2006. OFAC alleged that LD Telecommunications, Inc. initiated unlicensed funds transfers for the provision of telecommunications services to Cuba. LD Telecommunications, Inc. did not voluntarily disclose this matter to OFAC. This matter was resolved according to the prior enforcement guidelines published by OFAC at 68 *Fed. Reg.* 4422.

**Hilton International Co. Settles Sudanese Sanctions Regulations Allegations:** Hilton International Co., McLean, VA ("HI"), a subsidiary of Hilton Worldwide, McLean, Virginia has remitted \$735,407 to settle allegations of violations of the Sudanese Sanctions Regulations ("SSR") occurring between June 2002 and February 2006. OFAC alleged that HI engaged in 142 apparent violations of the SSR in connection with its unlicensed operation of two Hilton brand hotels in Sudan. HI voluntarily disclosed this matter to OFAC. The alleged violations were discovered and self-reported as a result of pre-acquisition due diligence directed by Hilton Hotels Corporation, which acquired HI from the UK-based Hilton Group plc. in February 2006. Pursuant to OFAC's Civil Penalties – Interim Policy (Nov. 27, 2007), because HI signed a statute of limitation tolling agreement covering alleged violations for which the statute of limitations would have otherwise expired prior to October 16, 2007 (the effective date of the IEEPA Enhancement Act), the settlement agreement is based on the maximum statutory penalties in place at the time the tolling agreement was signed, which in this case equaled \$11,000 per alleged violation.

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