



DEPARTMENT OF THE TREASURY
OFFICE OF FOREIGN ASSETS CONTROL

ENFORCEMENT INFORMATION FOR OCTOBER 12, 2005

ENTITIES - 31 CFR 501.805 (d) (1) (i)

Since the last report, OFAC has reached settlements with four companies or other entities. Information concerning the settlement process is discussed in OFAC's proposed Enforcement Guidelines, 68 FR 4422 - 4429 (January 29, 2003), available at <http://www.treas.gov/offices/enforcement/ofac/civpen/enfguide.pdf>.

Archer Daniels Midland Company Settles Allegations of Cuban Embargo Transactions: Archer Daniels Midland Company, Decatur, IL 62526 ("ADM"), has agreed to remit \$13,750 to settle allegations of violations of the Cuban embargo between February and March 2000. OFAC alleged that Finora Canada Ltd. ("Finora"), a wholly owned subsidiary of ADM, entered into a contract with an entity in which the government of Cuba has an interest. During the performance of the contract, Finora engaged in multiple export transactions. ADM did not voluntarily disclose this matter to OFAC.

Imbsen & Associates, Inc. Agrees to Settle Libyan Program Allegations: Imbsen & Associates, Sacramento, CA 95827 ("Imbsen"), has agreed to remit \$2,400 to settle allegations of a violation of the Libyan program in March 2004. OFAC alleged that Imbsen violated the Libyan program then in effect by contracting with an entity in Malta, for the sale of Imbsen software to Al Nibras for Science and Technology, Tripoli, Libya, and accepting payment for the sale. As a term of settlement, Imbsen agreed to enhance its OFAC compliance program. Imbsen did not voluntarily disclose this matter to OFAC.

IndeCorp Corporation Agrees to Settle Libyan Program Allegations: IndeCorp Corporation, Chicago, Illinois 60606 ("IndeCorp"), has agreed to remit \$14,520 to settle allegations of violations of the Libyan program between January 2001 and April 2003. OFAC alleged that, at the time prohibitions were in place, IndeCorp exported services, including sales, reservations and marketing support, to an entity, that at the time, was a Specially Designated National of Libya. IndeCorp has represented to OFAC that it has taken remedial measures and made upgrades to its OFAC compliance program; IndeCorp did not voluntarily disclose this matter to OFAC.

Stolt-Nielsen Transportation Group Agrees to Settle Iranian Program Allegations: Stolt-Nielsen Transportation Group, Greenwich, CT 06836 ("SNTG"), has agreed to remit \$16,500 to settle allegations of violations of the Iran program between December 2000 and February 2001. OFAC alleged that SNTG paid a foreign affiliate's port expenses in Iran by wire transfer. SNTG has reported upgrades to its OFAC compliance program; SNTG 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/>



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INDIVIDUALS - 31 CFR 501.801 (d) (1) (ii)

Four Individuals Agree to Civil Penalty Settlements totaling \$4,875 for allegedly violating the Cuban embargo by engaging in travel-related transactions incident to travel to Cuba: The travel-related transactions included, but were not limited to, the purchase of food, drinks, entertainment, lodgings, ground transportation and incidentals. During their travel to and from Cuba, two of the individuals traveled through Toronto, Canada and two traveled through Nassau, the Bahamas.

Two Individuals Agree to Civil Penalty Settlements totaling \$4,000 for allegedly violating the Cuban embargo by engaging in travel-related transactions incident to travel to Cuba and importing merchandise of Cuban origin: In addition to the travel-related transactions, each individual imported Cuban merchandise. The importations involved Cuban-origin goods valued at \$750 or less per individual. In their travel to and from Cuba, both of the individuals traveled through Toronto, Canada.

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