

ENFORCEMENT INFORMATION FOR January 31, 2011

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 Sanctions 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.treasury.gov/resource-center/sanctions/Pages/legal-index.aspx>

ENTITIES – 31 CFR 501.805(d)(1)(i)

Trans Pacific National Bank Settles Iranian Transactions Regulations Allegations: Trans Pacific National Bank, San Francisco, CA (“Trans Pacific”) has remitted \$12,500 to settle allegations of violations of the Iranian Transactions Regulations, 31 C.F.R. part 560 (the “Regulations”) occurring on or about September 18, 2007, and on or about March 19, 2008. OFAC alleged that Trans Pacific engaged in transactions or dealings in or related to goods of Iranian origin and services for exportation to Iran, and facilitated transactions by a foreign person where the transactions by the foreign person would be prohibited by the Regulations if performed by a United States person, by initiating two separate wire transfers on behalf of an account holder for an underlying commercial transaction prohibited by the Regulations. In one instance, the wire transfer instructions referenced “Iranian material” and in the other instance the instructions referenced “Iran material.” The value of the transactions totaled \$35,600. Trans Pacific did not voluntarily disclose this matter to OFAC. The base penalty amount was \$50,000. The settlement amount reflects the following factors: At the time of the transactions, Trans Pacific's filtering system was not designed to detect references to sanctions targets in the “Originator to Beneficiary Information” field, leading to both of these apparent violations; Trans Pacific has enhanced its compliance program in response to the apparent violations by requiring that the memorandum information of each wire transfer also be reviewed for OFAC sanctions references; in addition, Trans Pacific has strengthened its escalation procedures in the event of a possible OFAC sanctions reference; and Trans Pacific has not been subject to prior OFAC enforcement action and fully cooperated with OFAC's investigation of this matter.

Aon International Energy, Inc. Settles Iranian Transactions Regulations Allegations: Aon International Energy, Inc., Houston, TX (“Aon Energy”), a subsidiary of Aon Corporation, Chicago, IL (“Aon”), has remitted \$36,000 to settle allegations of violations of the Iranian Transactions Regulations, 31 C.F.R. part 560, that occurred in October 2005. OFAC alleged that Aon Energy had facilitated the placement of coverage and the payment of premiums for facultative retrocession reinsurance that reinsured construction risks associated with a petroleum project on Kharg Island in Iran. Aon Energy brokered and placed facultative retrocession reinsurance on behalf of a European

reinsurer with two European retrocessionaires. The combined premium for the two retrocession reinsurance placements was \$62,883. Aon Energy did not voluntarily disclose this matter to OFAC. The settlement amount reflects OFAC's consideration of the following General Factors: Aon Energy provides specialized insurance services resulting in transactions that were particularly harmful to the sanctions program; OFAC viewed the apparent violations as part of a pattern of reckless, but not egregious, conduct by Aon Energy in connection with these policies; Aon Energy, under the direction of its parent, Aon, took several steps to strengthen its OFAC compliance program and its existing OFAC procedures after the apparent violations; Aon Energy has not been the subject of prior OFAC penalties or other OFAC administrative actions; and Aon Energy cooperated with OFAC and also entered into a tolling agreement with OFAC which was undertaken by Aon on behalf of Aon Energy.

For more information regarding OFAC regulations, please go to:

<http://www.treasury.gov/resource-center/sanctions/Pages/legal-index.aspx>