ENFORCEMENT INFORMATION FOR April 7, 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)

Aegis Electronic Group, Inc. Settles Iranian Transactions Regulations Allegations: Aegis Electronic Group, Inc., Gilbert, AZ ("Aegis"), has agreed to pay $20,000 to settle allegations of violations of the Iranian Transactions Regulations, 31 C.F.R. part 560 (the "ITR"), which were promulgated pursuant to, *inter alia*, the International Emergency Economic Powers Act, and are administered by the Office of Foreign Assets Control ("OFAC").

OFAC alleged that Aegis, a U.S. distributor of industrial imaging products, including cameras, monitors, and related control units, violated the ITR by its unlicensed sale and export of camera control units to Austria with knowledge that the items were intended for re-export to Iran. The settlement is related to a Deferred Prosecution Agreement reached by Aegis and the Office of the United States Attorney for the District of Delaware. The case against Aegis was initiated for criminal investigation by the U.S. Immigration and Customs Enforcement, Office of Investigations in Philadelphia, PA.

OFAC alleged that, during the period August 2008 - January 2009, Aegis violated the ITR when it exported two camera control units from the United States to Austria for re-export to Iran. Aegis did not voluntarily disclose this matter to OFAC. The total transaction value of the camera control units exported to Austria for re-export to Iran was $2,685. The base penalty amount for Aegis' apparent violation was $10,000, the Applicable Schedule Amount established by OFAC's Economic Sanctions Enforcement Guidelines, 74 Fed. Reg. 57,593 (Nov. 9, 2009) (the "Guidelines"). The Guidelines authorize the adjustment of the base amount of the proposed civil penalty to reflect applicable General Factors. Each factor may be considered mitigating or aggravating resulting in a lower or higher proposed penalty amount. The settlement amount reflects OFAC's consideration of multiple factors including: the criminal charges set forth in the Deferred Prosecution Agreement reflect knowing and willful conduct by an employee that is attributable to the company; there is no indication that Aegis' senior management participated in the apparent violations; and Aegis lacked a sanctions compliance program at the time of the apparent violations, but it has since implemented a compliance program that requires sanctions and export compliance training of all employees.

McGriff, Seibels & Williams of Texas, Inc. Settles Iranian Transactions Regulations Allegations: McGriff, Seibels & Williams of Texas, Inc., Houston, TX ("McGriff"), has paid $122,408 to settle allegations of violations of the Iranian Transactions Regulations, 31 C.F.R. part 560 (the "ITR"), which were promulgated pursuant to, *inter alia*, the International Emergency Economic Powers Act, and are administered by the Office of Foreign Assets Control ("OFAC").

OFAC alleged that McGriff, a U.S. insurance brokerage firm specializing in insurance coverages for the energy sector, violated the ITR by its unlicensed design, revision, and placement, with foreign insurers, of six commercial multiple peril ("CMP") insurance policies that insured the risks of a submersible oil rig in Iranian waters. The policy periods were between May 1, 2004, and April 31, 2005.

The combined premiums received by the foreign insurers for the six CMP insurance placements totaled $453,364. McGriff voluntarily disclosed this matter to OFAC and the alleged violations constituted a non-egregious case. The settlement amount reflects OFAC's consideration of the following: the insurance services provided by McGriff, which were highly specialized and involved the Iranian petroleum industry, were particularly harmful to the objectives of the sanctions program; the apparent violations resulted from the actions of a senior employee outside the knowledge of McGriff's senior management; McGriff strengthened its OFAC compliance program in response to the apparent violations; McGriff has not been the subject of prior OFAC penalties or other OFAC administrative actions; and McGriff cooperated with OFAC in the investigation, including entering into two tolling agreements.

Metropolitan Life Insurance Company Settles Cuban Assets Control Regulations Allegations: Metropolitan Life Insurance Company, New York, NY ("MetLife") has remitted $22,500 to settle allegations of a violation of the Cuban Assets Control Regulations, 31 C.F.R. part 515, which were promulgated pursuant to the Trading With The Enemy Act, 50 U.S.C. App. 1-44, and are administered by the Office of Foreign Assets Control ("OFAC").

OFAC alleged that, in June 2006, MetLife mailed a check representing a $30,162 lump sum death benefit payment directly to the beneficiary in Cuba. This matter was not voluntarily disclosed by MetLife. The alleged violation was reported to OFAC and to MetLife by the attorney who administered the estate of the U.S. decedent. Upon the receipt of the notice, MetLife stopped payment and deposited the death benefit payment into a blocked account. The funds were subsequently transferred to a bank for distribution to the beneficiary. The alleged violations constituted a non-egregious case.

The base penalty amount for MetLife's apparent violation was $50,000, the Applicable Schedule Amount established by the OFAC Economic Sanctions Enforcement Guidelines applicable to the apparent violation. The settlement amount reflects OFAC's consideration of the following: MetLife provides specialized insurance services; MetLife has not been the subject of prior OFAC penalties; MetLife cooperated with OFAC by making an authorized transfer of the blocked payment to a blocked account opened in the name of the beneficiary for the purpose of making authorized distributions to the beneficiary; and MetLife has taken several steps to strengthen its OFAC compliance program, including requiring sanctions compliance training of all employees.

For more information regarding OFAC regulations, please go to:
http://www.treasury.gov/resource-center/sanctions/Pages/legal-index.aspx