

ENFORCEMENT INFORMATION FOR October 27, 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. See 74 Fed. Reg. 57,593 (Nov. 9, 2009). The Economic Sanctions Enforcement Guidelines, as well as recent final civil penalties and enforcement information, can be found on OFAC's Web site at <http://www.treasury.gov/resource-center/sanctions/CivPen/Pages/civpen-index2.aspx>.

ENTITIES – 31 CFR 501.805(d)(1)(i)

Zurigo Trading, Inc. Assessed a Penalty for Violating the Iranian Transactions

Regulations: Zurigo Trading, Inc. (“Zurigo”), Weston, FL, has been assessed a penalty of \$7,000 for violating the Iranian Transactions Regulations, 31 C.F.R. part 560. In September 2006, Zurigo attempted to export goods valued at \$7,168 to Iran on behalf of its foreign customer. OFAC determined that Zurigo did not voluntarily self-disclose the violation to OFAC and that the violation constituted a non-egregious case. The base penalty amount for the violation was \$10,000. The assessed penalty amount reflects OFAC's consideration of the following facts and circumstances, pursuant to the General Factors under OFAC's Economic Sanctions Enforcement Guidelines: Zurigo had knowledge or reason to know that the goods were destined for Iran; Zurigo did not have an OFAC compliance program in place at the time of the violation; Zurigo has not been the subject of an OFAC enforcement action in the five years preceding the transaction at issue; and, some of the goods Zurigo attempted to ship appear to have been eligible for an OFAC license had an application been submitted to OFAC.

For more information regarding OFAC regulations, please go to: <http://www.treasury.gov/ofac>.