

ENFORCEMENT INFORMATION FOR November 8, 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)

Wilson Tool International, Inc. Settles Iranian Transactions Regulations Violation

Allegation: Wilson Tool International, Inc. (“Wilson Tool”), White Bear Lake, MN, has agreed to remit \$15,000 to settle an alleged violation of the Iranian Transactions Regulations, 31 C.F.R. part 560, occurring on or about September 12, 2005. OFAC alleged that Wilson Tool sold and exported punch press tooling equipment to an entity in Iran without an OFAC license. The transaction value was \$10,304.33. OFAC determined that Wilson Tool did not voluntarily self-disclose this matter to OFAC and that the alleged violation constituted a non-egregious case. The base penalty amount for the alleged violation was \$25,000. The settlement amount reflects OFAC's consideration of the following facts and circumstances, pursuant to the General Factors under OFAC's Economic Sanctions Enforcement Guidelines: Wilson Tool has not been the subject of prior OFAC penalties or other administrative actions, and Wilson Tool cooperated with OFAC by promptly responding to OFAC's administrative subpoenas and entering into a statute of limitations tolling agreement with OFAC.

ASF, Inc. Settles Iranian Transactions Regulations Allegation: ASF, Inc. (“ASF”), Mobile, AL, has agreed to remit \$5,400 to settle allegations of a violation of the Iranian Transactions Regulations, 31 C.F.R. part 560, that occurred on or about May 2, 2006. OFAC alleged that ASF engaged in a transaction related to goods destined for Iran and facilitated the exportation of goods from a third country to Iran by a foreign person, without an OFAC license. OFAC determined that ASF did not voluntarily disclose this matter to OFAC and that the apparent violation constituted a non-egregious case. The base penalty amount for the alleged violation was \$10,000. The settlement amount reflects OFAC's consideration of the following facts and circumstances, pursuant to the General Factors under the Economic Sanctions Enforcement Guidelines: ASF appears to have lacked an OFAC compliance program at the time of the alleged violation; ASF had knowledge or reason to know the goods were destined for Iran; ASF has not been the subject of an OFAC enforcement action in the five years preceding the transactions at issue; the goods may have been eligible for an OFAC license; and ASF cooperated with OFAC's investigation of this matter, including by agreeing to toll the statute of limitations.

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