



DEPARTMENT OF THE TREASURY
OFFICE OF FOREIGN ASSETS CONTROL

ENFORCEMENT INFORMATION FOR January 4, 2008

Information concerning the civil penalty process is discussed in OFAC regulations governing the various sanctions programs or, in the case of sanctions regulations issued pursuant to the Trading with the Enemy Act, in 31 CFR part 501. Civil penalty procedures are also discussed in OFAC's proposed Enforcement Guidelines, 68 FR 4422 – 4429 (January 29, 2003). However, please note that, for banking institutions regulated by one of the agencies belonging to the Federal Financial Institutions Examination Council, the proposed enforcement guidelines have been withdrawn and replaced by an interim final rule ("Economic Sanctions Procedures for Banking Institutions"), 71 FR 1971 – 1976 (January 12, 2006), which has an effective date of February 13, 2006. Both the proposed Enforcement Guidelines and the interim final rule are available on OFAC's website, available at <http://www.treas.gov/offices/enforcement/ofac/civpen/enfguide.pdf>.

OFAC is now posting on this website copies of its final agency Penalty Notices with the relevant case reports to the extent permitted under applicable law.

ENTITIES – 31 CFR 501.805(d)(1)(i)

Zimmer Dental Inc. Settles Iran Embargo Program Allegations: Zimmer Dental Inc., successor to Centerpulse Dental Inc., Carlsbad, CA ("Zimmer Dental") has remitted \$82,850 on behalf of itself and its predecessors in interest to settle allegations of violations of the Iranian Transactions Regulations. The alleged violations occurred between March 2002 and May 2004 and primarily prior to the October 2003 acquisition of Centerpulse Dental Inc. by Zimmer Dental's parent company. OFAC alleged that goods and services were exported to Iran without an OFAC license. Zimmer Dental voluntarily disclosed this matter to OFAC and has instituted a comprehensive U.S. sanctions compliance program.

BB&T Settles Global Terrorism Sanctions Regulations Allegations: BB&T, Winston-Salem, NC ("BB&T") has remitted \$10,000 to settle allegations of violations of the Global Terrorism Sanctions Regulations occurring on July 3, 2002. OFAC alleged that BB&T acted without an OFAC license or outside the scope of its license by permitting an ACH Debit against an account held for a Specifically Designated Global Terrorist. BB&T did not voluntarily disclose this matter to OFAC.

Colonial Navigation Co., Inc. Settles Iranian Transactions Regulations Allegations: Colonial Navigation Co., Inc., New York, NY ("Colonial") has remitted \$6,000.00 to settle allegations of violations of the Iranian Transactions Regulations occurring during May 2003. OFAC alleged that Colonial facilitated a transaction by a foreign person where the transaction by that foreign person would be prohibited if performed by a United States person by attempting to transfer funds to an Iranian port agent. Colonial did not voluntarily disclose this matter to OFAC.

Medcraft Industries, Inc. Settles Iranian Transactions Violation Allegation: Medcraft Industries, Inc., Darien, CT ("Medcraft") has remitted \$3,000 to settle allegations that it violated the Iranian Transactions Regulations in November 2003. OFAC alleged that Medcraft engaged in a trade-related transaction for the exportation of goods to an entity in Iran. Medcraft did not voluntarily disclose this matter to OFAC.



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Millipore Corporation, Inc. Settles Allegations of Violations of the Iranian Transactions Regulations: Millipore Corporation, Inc., Billerica, MA (“Millipore”) has remitted \$1,000 on behalf of itself and two of its subsidiaries to settle allegations of violations of the Iranian Transactions Regulations. The alleged violations occurred between May and September 2005 and prior to the July 2006 acquisition of the two subsidiaries by Millipore. OFAC alleged that scientific samples were exported to Iran without an OFAC license. Millipore voluntarily disclosed this matter to OFAC and has instituted a comprehensive U.S. sanctions compliance program.

Voipescrow Inc. Settles Allegations of Violations of the Iranian Transactions Regulations: Voipescrow, Inc., Portland, Oregon has remitted \$750 to settle allegations of violations of the Iranian Transactions Regulations. OFAC alleged that in June 2006, Voipescrow, Inc. attempted to transfer funds to Iran in connection with the purchase of prepaid calling card minutes in violation of § 560.201 of the Iranian Transactions Regulations. Voipescrow, Inc. did not voluntarily disclose this matter to OFAC.

Diversified Business Communications Assessed a Penalty for Violating the Iranian Transactions Regulations: Diversified Business Communications, Portland, ME (“Diversified”) has been assessed a \$5,500.00 civil monetary penalty for its violation of the Iranian Transactions Regulations occurring between April 23-25, 2002. Diversified exported a service in the form of booth space booking arrangements at an annual European seafood exposition to an entity located in Iran. Diversified did not voluntarily disclose this matter to OFAC. For a copy of OFAC’s Penalty Notice issued to Diversified, *please visit the following url:*
http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/div_com.pdf

For more information regarding OFAC regulations, please go to:
<http://www.treas.gov/offices/enforcement/ofac/legal/>.



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