

ENFORCEMENT INFORMATION FOR March 7, 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belonging to the Federal Financial Institutions Examination Council, the proposed enforcement guidelines have been withdrawn and replaced by an interim final rule ("Economic Sanctions Procedures for Banking Institutions"), 71 FR 1971 – 1976 (January 12, 2006), which has an effective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)

Libya Program Allegations Settled on behalf of Fleet National Bank: Bank of America, N.A. ("BofA"), Charlotte, NC, which acquired Fleet National Bank ("Fleet") in 2005, remitted the sum of \$1,337.50 to settle allegations of a violation of the former Libyan Sanctions Regulations by the Montevideo, Uruguay branch office of Fleet. The alleged violation by the Fleet branch occurred in April 2003 and prior to the June 2005 merger of Fleet into BofA. This matter was not the subject of a voluntary disclosure to OFAC.

Citigroup, N. A. Settles Cuban Assets Control Regulations Allegations: Citigroup, N.A., New York, NY, has remitted \$16,250 to settle allegations of violations of the Cuban Assets Control Regulations occurring October 2004. OFAC alleged that Citigroup acted without an OFAC license or outside the scope of its license by creating a banker's acceptance for goods shipped by a Cuban carrier. Citigroup voluntarily disclosed this matter to OFAC.

America Servi Express, Inc. Assessed a Penalty for Violating the Narcotics Trafficking Sanctions Regulations: America Servi Express, Inc. ("ASE"), Fort Lauderdale, FL, has been assessed a \$2,465.00 civil monetary for its violation of the Narcotics Trafficking Sanctions Regulations occurring on or about September 10, 2003. ASE initiated a wire transfer to a U.S. life insurance company in payment of a premium on a policy issued on the life of a Specially Designated Narcotics Trafficker. ASE did not voluntarily disclose this matter to OFAC. For a copy of OFAC's Penalty Notice issued to ASE, *please visit the following url:*
http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/ace_letter.pdf

INDIVIDUALS – 31 CFR 501.805(d)(1)(ii)

One individual has agreed to a settlement totaling \$6,000.00 for allegedly dealing in property in which Cuba has an interest: In March 2007, the individual allegedly engaged in financial transactions in which Cuba or a Cuban national has an interest, including the receipt of and payment for goods and services. The individual did not voluntarily disclose this matter to OFAC.

One individual has agreed to a settlement totaling \$1,063.00 for alleged transactions with Cuba: In January 2003, the individual allegedly dealt in services in which the government of Cuba or a Cuban national has an interest, incident to the making of a commercial. The individual did not voluntarily disclose this matter to OFAC.

One individual has agreed to a settlement totaling \$282.50 for allegedly dealing in property in which Cuba or a Cuban national had an interest: In January 2004, the individual allegedly purchased Cuban cigars over the Internet. The individual did not voluntarily disclose this matter to OFAC.

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

