

ENFORCEMENT INFORMATION FOR July 1, 2009

Information concerning the civil penalties process is discussed in OFAC regulations governing the various sanctions programs and in 31 CFR part 501. On September 8, 2008, OFAC published as Appendix A to part 501 new Economic Sanction 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.treas.gov/offices/enforcement/ofac/civpen>.

ENTITIES – 31 CFR 501.805(d)(1)(i)

Oxbow Carbon and Minerals LLC Settles Allegations of Violations of the Iranian Transactions Regulations: Oxbow Carbon and Minerals LLC (“Oxbow”), of West Palm Beach, FL has agreed to remit \$276,250.00 to settle allegations of violations of the Iranian Transactions Regulations occurring on or about November 2006 through October 2007. OFAC alleged that Oxbow engaged in transactions in or related to services of Iranian origin and facilitated trade-related transactions by non-U.S. persons which involved the use of vessels owned and/or managed by the Islamic Republic of Iran Shipping Lines in Tehran, Iran, without an OFAC license. Oxbow did not voluntarily disclose the alleged violations to OFAC. The company demonstrated cooperation during OFAC's review of the matter and as a remedial measure has made revisions to its compliance program. This matter was resolved according to the prior enforcement guidelines published by OFAC at 68 *Fed. Reg.* 4422.

National Marine Consultants, Inc. (“NMCI”), Settles Iranian Transactions Regulations Allegations: NMCI has remitted \$42,075.00 to settle allegations of violations of the Iranian Transactions Regulations that occurred between March 2005 and May 2007. OFAC alleged that NMCI outsourced to an Iranian entity inspection services it was contractually bound to perform for a third-party, without an OFAC license. NMCI cooperated with OFAC's investigation. NMCI did not voluntarily disclose the matter to OFAC. This matter was resolved according to the prior enforcement guidelines published by OFAC at 68 *Fed. Reg.* 4422.

Philips Electronics of North America Corporation Settles Cuban Assets Control Regulations Allegations: Philips Electronics of North America Corporation (“PENAC”), New York, NY, has remitted \$128,750.00 to settle allegations of violations of the Cuban Assets Control Regulations occurring between June 2004 and March 2006. OFAC alleged that PENAC acted without an OFAC license through an employee's travel to Cuba in connection with the sale of medical equipment by a foreign affiliate of PENAC. PENAC voluntarily disclosed this matter to OFAC. This matter was resolved according to the prior enforcement guidelines published by OFAC at 68 *Fed. Reg.* 4422.

Willbros USA, Inc. kna Willbros United States Holdings, Inc. Settles Sudanese Sanctions Violation Allegation: Willbros USA, Inc. kna Willbros United States Holdings, Inc., Houston, TX 77027 (“Willbros”) has remitted \$6,600 to settle an allegation of violation of the Sudanese Sanctions Regulations occurring between June 18, 2003 and December 29, 2004. OFAC alleged that Willbros, through a former Senior Vice President, willfully violated the Sudanese Sanctions Regulations (the “Regulations”) when it entered into a contract to bid on an oil development project in Sudan, despite its knowledge that such activities violated the Regulations, by facilitating the export of goods, technology or services to Sudan and evading the prohibitions set forth in the Regulations. Willbros voluntarily disclosed this matter to OFAC. Additionally, OFAC applied its 2003 Economic Sanctions Enforcement Guidelines to this violation because Willbros and OFAC agreed to settle the allegation of violation, and memorialized the tentative agreement, prior to the issuance of OFAC’s Civil Penalties Interim Policy of November 27, 2007. This matter was resolved according to the prior enforcement guidelines published by OFAC at 68 Fed. Reg. 4422.

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