



DEPARTMENT OF THE TREASURY
OFFICE OF FOREIGN ASSETS CONTROL

ENFORCEMENT INFORMATION THROUGH JUNE 30, 2006

Information concerning the civil penalty process is discussed in OFAC regulations governing the various sanctions program 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belonging to the Federal Financial Institutions Examination Council, the proposed enforcement guidelines have been withdrawn and replaced by an interim final rule (Economic Sanctions Procedures for Banking Institutions), 71 FR 1971 – 1976 (January 12, 2006), which has an effective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)

OFAC has reached settlement with the following entity:

GasTech Engineering Corp. Settles Iranian Program Allegations with OFAC as a Condition of its Plea Agreement with the United States Attorney: Pursuant to a Plea Agreement between GasTech Engineering Corp., Tulsa, OK 74120 ("GasTech"), and the United States Attorney, Northern District of Oklahoma (the "Plea Agreement"), GasTech plead guilty in May 2006 to conspiracy to violate the Iranian Transactions Regulations and in March 2006 was sentenced to probation and a \$50,000 criminal fine by the United States District Court, Northern District of Oklahoma. As a condition of the Plea Agreement, in addition to the criminal fine imposed by the U.S. District Court, GasTech agreed to remit \$33,000 to settle allegations of violations of the Iranian program occurring between January 2001 and December 2002. OFAC alleged that GasTech willfully exported its engineering and procurement services to the National Iranian Gas Company for the development of a gas processing plant to be constructed in Iran. As a further condition of the Plea Agreement, GasTech has agreed to demonstrate that it has implemented a corporate compliance program. GasTech did not voluntarily disclose this matter to OFAC. The investigation that led to the Plea Agreement was a joint effort of federal law enforcement and prosecuting agencies, including the United States Immigration and Customs Enforcement, the Commerce Department's Office of Export Enforcement, the Counter-Terrorism Section of the United States Department of Justice, and the United States Department of Treasury's Office of Foreign Assets Control.

OFAC has assessed a penalty against the following entity:

Jarden Zinc Products, Inc. Assessed a Penalty for Sudan Program Violation: OFAC imposed a penalty of \$2,750 against Jarden Zinc Products, Inc., Greenville, TN 37744 ("Jarden") for its violation of the Sudanese program in October 2001. OFAC determined that Jarden exported merchandise to Sudan without OFAC authorization. Jarden voluntarily disclosed this matter to OFAC. For a copy of OFAC's Penalty Notice issued to Jarden, *please visit the following url:*

http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/jarden_pn.pdf.

For more information regarding OFAC regulations, please go to:

<http://www.treas.gov/offices/enforcement/ofac/legal/>.



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INDIVIDUALS - 31 CFR 501.801 (d)(1)(ii)

Civil penalties assessed for allegations of Cuban embargo violations:

Seven individuals assessed penalties totaling \$18,940 for travel-related transactions incident to travel to Cuba: The individuals engaged in travel which took place in December 2000; February 2001; November – December 2002 and December 2002 – January 2003; March, April and May 2005; May 2005; and June 2005 and July 2005. The individuals engaged in travel-related transactions, including the purchase of food and lodgings. The individuals traveled to and from Cuba through third countries.

Hearings Requested: One hearing has been requested for allegations of violations of the Cuban embargo involving travel-related transactions.

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