

ENFORCEMENT INFORMATION FOR September 5, 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belonging to the Federal Financial Institutions Examination Council, the proposed enforcement guidelines have been withdrawn and replaced by an interim final rule (“Economic Sanctions Procedures for Banking Institutions”), 71 FR 1971 – 1976 (January 12, 2006), which has an effective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.

OFAC has issued an interim final rule, “Economic Sanctions Enforcement Guidelines,” as enforcement guidance for persons subject to the requirements of U.S. sanctions statutes, Executive orders and regulations. The following items were completed prior to the September 8, 2008 effective date of that interim final rule.

ENTITIES – 31 CFR 501.805(d)(1)(i)

Agoda Company, Pte Ltd. Settles Cuban Assets Control Regulations Allegations: Agoda Company, Pte Ltd., Bangkok, Thailand (“Agoda”), which is owned or controlled by persons subject to U.S. jurisdiction, has remitted \$6,750.00 to settle allegations of 50 violations of the Cuban Assets Control Regulations occurring between March 2006 and October 2007. OFAC alleged that Agoda provided travel-related services in which Cuba or Cuban nationals had an interest by arranging hotel reservations in Cuba without an OFAC license. Agoda has cooperated with OFAC's investigation and has implemented corrective measures and improvements to its OFAC compliance program. Agoda voluntarily disclosed this matter to OFAC.

Como Design, Inc. (“Como”), Settles Narcotics Trafficking Sanctions Allegations: Como has remitted \$5,980.03 to settle allegations of violations of the Narcotics Trafficking Sanctions Regulations occurring on or about December 2005. OFAC alleged that Como acted without an OFAC license by receiving and depositing checks issued by an OFAC Specially Designated Narcotics Trafficker. Como did not voluntarily disclose this matter to OFAC.

LI-COR, Inc. Settles Allegations of Violations of the Iranian Transactions Regulations: LI-COR, Inc. (“LI-COR”), of Lincoln, NE has remitted \$2,315.02 to settle allegations of violations of the Iranian Transactions Regulations. The alleged violations occurred on or about November 7, 2005. OFAC alleged LI-COR attempted to send a

funds transfer to Gulf Biosystems Trading LLC's Bank *Saderat* account without an OFAC license. LI-COR did not voluntarily disclose this matter to OFAC but has instituted a comprehensive U.S. sanctions compliance program.

Tabletops Unlimited, Inc. Agrees to Settle Allegations of a Violation of the Iranian Transactions Regulations: Tabletops Unlimited, Inc. ("Tabletops"), of Carson, CA has remitted \$1,000 to settle an allegation of a violation of the Iranian Transactions Regulations. OFAC alleged that on or about October 11, 2005, Tabletops attempted to send a funds transfer to the Bank Melli account of a company located in Tehran, Iran for purposes of purchasing and importing Iranian-origin goods into the United States without an OFAC license. Tabletops did not voluntarily disclose this matter to OFAC.

Ritz Camera Centers, Inc. Settles Burmese Sanctions Regulations Allegations: Ritz Camera Centers, Inc., Beltsville, MD 20705 ("Ritz Camera"), has remitted \$500 to settle allegations of violations of the Burmese Sanctions Regulations occurring in July 2006. OFAC alleged that Ritz Camera attempted to send a USD 1,000 funds transfer to an account holder at Myanmar Foreign Trade Bank. Ritz Camera did not voluntarily disclose this matter to OFAC.

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

One individual has agreed to a settlement totaling \$6,056.50 for dealing in property in which Cuba or a Cuban national had an interest: In October 2004, December 2004, February 2005, March 2005, May 2005, June 2005, July 2005, September 2005, October 2005, November 2005, December 2005, January 2006, March 2006, April 2006, May 2006 and June 2006, the individual purchased Cuban-origin cigars offered for sale on the Internet. The individual did not voluntarily disclose this matter to OFAC.

One individual has agreed to a settlement totaling \$500.00 for allegedly dealing in property in which Cuba or a Cuban national had an interest: In January 2005 and April 2005, the individual allegedly purchased Cuban-origin cigars offered for sale on 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/>.