

## ENFORCEMENT INFORMATION FOR November 15, 2012

**Information concerning the civil penalties process is discussed in OFAC regulations governing the various sanctions programs and in 31 CFR part 501. On November 9, 2009, OFAC published as Appendix A to part 501 Economic Sanctions Enforcement Guidelines. See 74 Fed. Reg. 57,593 (Nov. 9, 2009). The Economic Sanctions Enforcement Guidelines, as well as recent final civil penalties and enforcement information, can be found on OFAC's Web site at <http://www.treasury.gov/resource-center/sanctions/CivPen/Pages/civpen-index2.aspx>.**

### ENTITIES – 31 CFR 501.805(d)(1)(i)

**Sogda Limited, Inc. Settles Potential Civil Liability for Alleged Violations of the Iranian Transactions Regulations:** Sogda Limited, Inc. (“Sogda”), of Kirkland, WA, has agreed to pay \$128,250 to settle potential civil liability for alleged violations of the Iranian Transactions Regulations. The alleged violations by Sogda occurred between March 25, 2009 and August 26, 2010, when it engaged in seven export transactions that involved the transshipment of goods through Bandar Abbas, Iran.

This matter was not voluntarily disclosed to OFAC and the alleged violations constitute a non-egregious case. The base penalty amount for the alleged violations was \$570,000.

The settlement amount reflects OFAC's consideration of the following facts and circumstances, pursuant to the General Factors under OFAC's Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, App. A: Sogda has no history of prior OFAC violations; Sogda undertook remedial measures by creating an OFAC compliance program; and Sogda cooperated with OFAC by providing information regarding substantially similar additional transactions of which OFAC had not been aware.

**Natoli Engineering Company, Inc. Settles Potential Civil Liability for Alleged Violations of the Foreign Narcotics Kingpin Sanctions Regulations:** Natoli Engineering Company, Inc. (“Natoli”) has agreed to pay \$52,920 to settle potential civil liability for alleged violations of the Foreign Narcotics Kingpin Sanctions Regulations. The alleged violations by Natoli occurred between November 2008 and January 2010, when it sold various products to Productos Farmaceuticos Collins, S.A. de C.V. (“Productos Farmaceuticos”), an entity on the Specially Designated Nationals and Blocked Persons List, and when it attempted to reimburse Productos Farmaceuticos for overpayments that it had previously made to Natoli. This matter was not voluntarily disclosed to OFAC and the alleged violations constitute a non-egregious case. The base penalty amount for the alleged violations was \$98,000. The settlement amount reflects OFAC's consideration of the following facts and circumstances, pursuant to the General Factors under OFAC's Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 601, App. A: Natoli has no history of prior OFAC violations; and Natoli cooperated with OFAC's investigation.

For more information regarding OFAC regulations, please go to: <http://www.treasury.gov/ofac>.