



DEPARTMENT OF THE TREASURY
OFFICE OF FOREIGN ASSETS CONTROL

ENFORCEMENT INFORMATION FOR February 1, 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belonging to the Federal Financial Institutions Examination Council, the proposed enforcement guidelines have been withdrawn and replaced by an interim final rule ("Economic Sanctions Procedures for Banking Institutions"), 71 FR 1971 – 1976 (January 12, 2006), which has an effective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)

La Salle Bank Midwest, N.A. on the behalf of Standard Federal Bank Settles Iranian Transactions Regulations Allegations: La Salle Bank Midwest, N.A. on the behalf of Standard Federal Bank ("Standard Bank"), Chicago, IL, has remitted \$5,500 to settle allegations of violations of the Iranian Transactions Regulations occurring on February 22, 2002. OFAC alleged that Standard Bank acted without an OFAC license or outside the scope of its license by initiating a funds transfers destined for a bank owned or controlled by the Government of Iran. Standard Bank did not voluntarily disclose this matter to OFAC.

BankAtlantic Settles Cuban Embargo Program Allegations: BankAtlantic, Fort Lauderdale, FL has remitted \$7,500 to settle allegations of possible violations of the Cuban Assets Control Regulations occurring in July 2004. OFAC alleged that BankAtlantic failed to block a payment in which the Government of Cuba had an interest. BankAtlantic has cooperated with OFAC's investigation and has implemented corrective measures and improvements to its OFAC compliance program. BankAtlantic voluntarily disclosed this matter to OFAC.



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Key Bank National Association Settles Iranian Transaction Regulations Allegations:

Key Bank National Association, Cleveland, OH (Key Bank), has remitted \$200,000 to settle allegations of violations of the Iranian Transaction Regulations occurring between 2002 and August 2004. OFAC alleged that Key Bank acted without an OFAC license or outside the scope of its license by operating accounts for an entity and a person located in Iran. Key Bank did not voluntarily disclose this matter to OFAC.

Buehler Ltd. Settles Iranian Transactions Regulations Allegations:

Buehler Ltd. of Lake Bluff, IL has remitted \$20,000 to settle allegations of violations of the Iranian Transactions Regulations occurring between September 2002 and November 2003. OFAC alleged that Buehler acted without an OFAC license or outside the scope of its license by exporting technological equipment to entities in Iran. Buehler cooperated with OFAC in its investigation. Buehler did not voluntarily disclose the matter to OFAC.

RMO, Inc. Assessed a Penalty for Violating the Cuban Assets Control Regulations:

RMO, Inc., Denver, CO has been assessed a \$941 civil monetary for its violation of the Cuban Assets Control Regulations occurring on or about June 22, 2005. OFAC alleged that RMO, Inc. dealt in property in which a Cuba or a Cuban national had an interest by initiating a funds transfer involving travel to Cuba. RMO, Inc. did not voluntarily disclose this matter to OFAC. For a copy of OFAC's Penalty Notice issued to RMO, Inc., *please visit the following url:*

<http://www.treas.gov/offices/enforcement/ofac/civpen/penalties/RMOpn.pdf>

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

One individual has agreed to a settlement totaling \$2,127.45 for allegedly dealing in property in which Cuba or a Cuban national had an interest:

In February 2005, one individual allegedly 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 \$1,000 for travel-related transactions incident to travel to Cuba:

In February 2005, the individual allegedly engaged in travel-related transactions involving Cuba, including the receipt of and payment for goods and services. The individual traveled to and from Cuba through third countries. The individual did not voluntarily disclose this matter to OFAC.

One individual has agreed to a settlement totaling \$456.95 for allegedly dealing in property in which Cuba or a Cuban national had an interest:

In December 2004 and



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March 2005, the individual allegedly 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 \$5,213.42 for allegedly dealing in property in which Cuba or a Cuban national had an interest: Between November 2004 and July 2006, the individual allegedly 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 \$358.15 for allegedly dealing in property in which Cuba or a Cuban national had an interest: In December 2004 and January 2005, the individual allegedly 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 \$1,082.90 for allegedly dealing in property in which Cuba or a Cuban national had an interest: In January 2004, March 2004 and April 2004, 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/>.