



DEPARTMENT OF THE TREASURY  
OFFICE OF FOREIGN ASSETS CONTROL

**ENFORCEMENT INFORMATION THROUGH SEPTEMBER 1, 2006**

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belonging to the Federal Financial Institutions Examination Council, the proposed enforcement guidelines have been withdrawn and replaced by an interim final rule (Economic Sanctions Procedures for Banking Institutions), 71 FR 1971 – 1976 (January 12, 2006), which has an effective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

**OFAC has reached settlement with the following entities:**

**Aero Systems Engineering, Inc. Settles Libyan Sanctions Allegations:** Aero Systems Engineering, Inc., St. Paul, MN 55107 ("ASE"), has remitted \$1,000 to settle allegations of violations of the Libyan sanctions occurring during June 2003. OFAC alleged that ASE initiated an unauthorized funds transfer destined for Ai Ain Air Conditioning and Refrigeration Co.'s account at Arab Bank for Investment and Foreign Trade, which at the time of this funds transfer was a Specially Designated National of Libya. ASE has reported to OFAC corrective measures and improvements to its OFAC compliance program. ASE did not voluntarily disclose this matter to OFAC.

**Dresser-Rand Group, Inc. Settles Allegations of Violations of Cuban Embargo Program:** Dresser-Rand Group, Inc., Olean, NY 14760 ("Dresser-Rand"), has remitted \$171,305.87 to settle allegations of violations of the Cuban Assets Control Regulations occurring between April 2002 and June 2005. OFAC alleged that Dresser-Rand acted without an OFAC license or outside the scope of its license by exporting goods and services to Cuba. Dresser-Rand voluntarily disclosed this matter to OFAC. Dresser-Rand has also improved its compliance program and has instituted compliance training for employees in sales, marketing, finance, management and engineering functions.

**Exel Global Logistics, Inc. Settles Iranian Sanctions Program Allegations:** Exel Global Logistics, Inc., Hayward, CA 94545 ("Exel"), has remitted \$6,226.50 to settle allegations of violations of the Iranian Transactions Regulations occurring between February and September 2001. Exel voluntarily disclosed to OFAC that it had coordinated shipments to Iran. Exel has also represented to OFAC that it has made upgrades to its OFAC compliance program.

**The Lubrizol Corporation Settles Iranian Sanctions Program Allegations:** The Lubrizol Corporation, Wickliffe, OH 44092 ("Lubrizol"), has remitted \$5,500 to settle allegations of violations of the Iranian Transactions Regulations occurring between July 2001 and April 2005. OFAC alleged that Noveon Inc., Lubrizol's acquired subsidiary, acted without an OFAC license or outside the scope of its license by facilitating trade with Iran. Lubrizol voluntarily disclosed this matter to OFAC.



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**DHL Danzas Air and Ocean Settles Sudanese Sanctions Program Allegations:** DHL Danzas Air and Ocean, Franklin Park, IL (“DHL Danzas”), has remitted \$2,750 to settle allegations of violations of the Sudanese Sanctions Regulations occurring in December 2001. OFAC alleged that DHL Danzas acted without an OFAC license or outside the scope of its license by arranging for the shipment of cargo to Sudan. DHL Danzas voluntarily disclosed this matter to OFAC.

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



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