ENFORCEMENT INFORMATION FOR July 10, 2012


ENTITIES – 31 CFR 501.805(d)(1)(i)

Great Western Malting Co. Settles Apparent Violations of Cuban Assets Control Regulations: Great Western Malting Co. (“Great Western”), of Vancouver, Washington, has agreed to pay $1,347,750 to settle apparent violations of the Cuban Assets Control Regulations. The apparent violations by Great Western occurred between August 2006 and March 2009, when it performed various back-office functions for the sales by a foreign affiliate of non-U.S. origin barley malt to Cuba. The base penalty amount for the apparent violations was $5,990,000. This matter was not the subject of a voluntary disclosure to OFAC and the apparent violations constitute a non-egregious case. 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: Great Western is a large, sophisticated entity; Great Western did not have an adequate OFAC compliance program in place at the time of the violations; a number of the violations involved transactions with Specially Designated Nationals (SDNs) in Cuba; some of the violations involved transactions which involved an SDN vessel; Great Western has no history of prior OFAC violations; Great Western substantially cooperated with OFAC, including entering into a statute of limitations tolling agreement; and, if the subject goods had been shipped from the United States, they would have been eligible for an OFAC license.