

ENFORCEMENT INFORMATION FOR JANUARY 20, 2016

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 31 CFR part 501, app. A. The Economic Sanctions Enforcement Guidelines, as well as recent final civil penalties and enforcement information, can be found on OFAC's Web site at www.treasury.gov/ofac/enforcement.

ENTITIES – 31 CFR 501.805(d)(1)(i)

WATG Holdings, Inc., and Its Subsidiary, Wimberly Allison Tong and Goo (UK) Limited, Settle Potential Civil Liability for Apparent Violations of the Cuban Assets Control Regulations: WATG Holdings, Inc. (WATG), of Irvine, California, and its subsidiary, Wimberly Allison Tong and Goo (UK), Limited (WATG-UK), have agreed to pay \$140,400 to settle potential civil liability for apparent violations of the Cuban Assets Control Regulations, 31 C.F.R. part 515 (the "Regulations"). The apparent violations of § 515.201 of the Regulations occurred when WATG-UK dealt in property in which Cuba or its nationals had an interest by entering into a contract to perform architectural and design work for a hotel project in Cuba, for which it received three payments from a Qatari company, from on or about October 13, 2009 to on or about May 20, 2010, totaling \$284,515. WATG further provided the Qatari company a \$72,199 write-off of the contract's original value of \$356,714.

OFAC determined that WATG did not voluntarily disclose the apparent violations and that the apparent violations constitute a non-egregious case. Both the statutory maximum civil monetary penalty and base penalty amounts for the apparent violations totaled \$260,000.

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: senior managers at WATG-UK performed the primary work related to the project; the apparent violations caused significant harm to the Cuba sanctions program objectives because WATG-UK provided more than \$350,000 in architecture and design services in support of Cuba's tourism industry; WATG is a relatively large and sophisticated multinational architectural design company; WATG has no prior sanctions history, including receipt of a penalty notice or Finding of Violation in the five years preceding the earliest date of these transactions; WATG had no OFAC compliance program at the time of the apparent violations; WATG took remedial action by conducting a global, comprehensive compliance review, submitting a disclosure of other transactions to OFAC, appointing a compliance officer, conducting global training of its personnel, and instituting a compliance program to prevent future apparent violations; and WATG agreed to toll the statute of limitations for a total of 877 days.

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