



DEPARTMENT OF THE TREASURY
OFFICE OF FOREIGN ASSETS CONTROL

ENFORCEMENT INFORMATION FOR November 2, 2007

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belonging to the Federal Financial Institutions Examination Council, the proposed enforcement guidelines have been withdrawn and replaced by an interim final rule ("Economic Sanctions Procedures for Banking Institutions"), 71 FR 1971 – 1976 (January 12, 2006), which has an effective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

The civil penalty settlements listed below all were completed prior to the President's signing of the International Emergency Economic Powers Enhancement Act on October 16, 2007.

ENTITIES – 31 CFR 501.805(d)(1)(i)

SKE Midwestern, Inc. Settles Alleged Violations of Sudanese Sanctions: SKE Midwestern, Inc., San Francisco, CA ("SKE") has remitted \$20,000 to settle alleged violations of the Sudanese Sanctions Regulations occurring during October 2003 and November 2005. OFAC alleged that SKE brokered the exportation of goods from Sudan to Mexico. SKE did not voluntarily disclose this matter to OFAC.

Wachovia Bank Settles Global Terrorism Sanctions Regulations Allegations: Wachovia Bank, Philadelphia, PA (Wachovia) has remitted \$11,000 to settle allegations of a violation of the Global Terrorism Sanctions Regulations which occurred on or about October 29, 2004. OFAC alleged that Wachovia acted without an OFAC license or outside the scope of its license by rejecting instead of blocking a payment destined for a "Specifically Designated Global Terrorist." Wachovia voluntarily disclosed this matter to OFAC.

RITA Medical Systems, LLC Settles Iranian Transactions Violation Allegation: RITA Medical Systems, Inc., of Mountain View, CA ("RITA") has remitted \$2,750 to settle allegations that its predecessor, RITA Medical Systems, Inc., violated the Iranian Transactions Regulations between October 2002 and January 2003. OFAC alleged that RITA engaged in or attempted to engage in trade-related transactions for the sale of goods to an entity located in Iran. RITA 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/>.