

FAC No. CU-[text deleted]

RMO, Inc.

Ms. Janet L. Durkin, Registered Agent
950 So. Cherry Street, #710
Denver, CO 80246

Mr. Martin Brusse, President
650 W. Colfax Ave.
Denver, CO 80204

PENALTY NOTICE

Dear Ms. Durkin & Mr. Brusse:

The Office of Foreign Assets Control (“OFAC”) issued to you a Prepenalty Notice (“PPN”) dated June 6, 2006, based on evidence that you engaged in certain transactions prohibited by the Cuban Assets Control Regulations, 31 C.F.R. part 515 (the “CACR”). The PPN proposed a penalty in the amount of \$1,711.02 and informed you of your right to submit a written response within 60 days explaining why you believe there should be no finding of violation, why a monetary penalty should not be imposed, or why the monetary penalty should be in a lesser amount than proposed. The PPN also informed you that the submission of a written response is a factor that may result in a lower penalty absent any aggravating factors and that OFAC may proceed with the issuance of a Penalty Notice in 60 days whether or not you submit a written response.

On June 6, 2006, OFAC mailed the PPN by first class (regular) mail to you at your last known address. In a response to OFAC dated July 24, 2006 and postmarked July 25, 2006, you stated that the employee responsible for the violation has since been terminated and that, had the employee followed company procedure, the violation would not have occurred. You also stated that RMO is in the process of instituting a compliance program for its employees.

After consideration of the entire record, OFAC determines that you violated the CACR and that a monetary penalty is warranted. OFAC further determines that some mitigation is warranted to reflect the presence of the following mitigating factors: first offense, provision of a written response to the PPN and implementation of a compliance program. Accordingly, OFAC determines that the proposed civil penalty should be reduced to \$941.00.

If you believe this determination is incorrect and wish to argue this matter at a hearing before an administrative law judge, you may submit a written request for an administrative

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hearing. Such a request must be postmarked no later than 30 days after the date of service* of this Penalty Notice.

Absent your timely written request for an administrative hearing:

(1) The issuance of this Penalty Notice constitutes final agency action, and a civil monetary penalty in the amount of \$941.00 is imposed;

(2) You must submit this full penalty amount by check payable to “U.S. Treasury” postmarked no later than 30 days after the date of service of this Penalty Notice. Alternatively, you may arrange with the Office of Financial Management of the Department of the Treasury for installment payment. Such an arrangement must be completed no later than 30 days after the date of service of this Penalty Notice. Failure to pay in full or make arrangements with the Office of Financial Management will result in interest, administrative charges, and late fees beginning to accrue 30 days after the date of service of this Penalty Notice; and

(3) You must provide to OFAC your taxpayer identification number (for example, your social security number) pursuant to 31 U.S.C. 7701. OFAC intends to use your taxpayer identification number for the purposes of collecting and reporting on any delinquent penalty amount in the event of a failure to pay the penalty imposed.

Any request for an administrative hearing, submission of payment, or other correspondence concerning this penalty matter should be sent to: Assistant Director, Civil Penalties Division, Office of Foreign Assets Control, U.S. Treasury Department, 1500 Pennsylvania Avenue, N.W., Washington, DC 20220, with the envelope prominently marked “Urgent: Part 501 Action.”

For more information on the OFAC civil penalty process and on the consideration of mitigating and aggravating factors, see the Reporting, Procedures and Penalties Regulations, 31 C.F.R. Part 501, and the OFAC Enforcement Guidelines, which are available on OFAC’s web site at www.treas.gov/ofac.

Sincerely,

[signature]

Adam J. Szubin
Director
Office of Foreign Assets Control

* The date of service of this Penalty Notice is the date stamped on the first page of this Penalty Notice, unless you submit to OFAC a copy of the envelope in which this Penalty Notice was sent showing a later postmark date, in which case the later date will be the date of service.