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## OFAC reaches settlement agreement with Swiss telecommunications company

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On Feb. 26, the United States Department of the Treasury's Office of Foreign Assets Control (OFAC) and the Société Internationale de Télécommunications Aéronautiques SCRL (SITA) reached a settlement agreement<sup>[1]</sup> regarding "apparent violations" of the Global Terrorism Sanctions Regulations, 31 C.F.R. § 594 (GTSR) . According to the agreement, SITA will pay \$7,829,640 for more than 9,000 apparent violations.

SITA apparently violated the GSTR by providing software and services to airlines that had been specially designated global terrorists pursuant to Executive Order 13224,<sup>[2]</sup> which was issued in 2001 by former U.S. President George W. Bush in response to the attacks of Sept. 11, 2001. The order allows the U.S. to designate certain entities as terrorist threats and block any assets that come into U.S. control. The order also prohibits "any transaction or dealing by U.S. persons or within the United States in property or interests in property blocked pursuant to the Order."

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