ENFORCEMENT INFORMATION FOR October 3, 2008

Information concerning the civil penalties process is discussed in OFAC regulations governing the various sanctions programs and in 31 CFR part 501. On September 8, 2008, OFAC published as Appendix A to part 501 new Economic Sanction Enforcement Guidelines. Although these new guidelines replace earlier enforcement guidelines published by OFAC, for certain matters that were in process at the time the new guidelines were published, including the matters listed below, the prior guidelines (which can be found at 68 Fed. Reg. 4422 and 71 Fed. Reg. 1971) are still applicable. Please see OFAC's Revised Interim Policy regarding use of the prior guidelines, which, along with the new guidelines and copies of recent final Penalty Notices, can be found on OFAC's website at http://www.treas.gov/offices/enforcement/ofac/civpen.

ENTITIES - 31 CFR 501.805(d)(1)(i)

Myers Industries, Inc. Settles Cuban Assets Control Regulations Allegations: Myers Industries, Inc. ("Myers"), Akron, OH has remitted \$16,250.00 to settle allegations of a violation of the Cuban Assets Control Regulations. OFAC alleged that in April 2004, a foreign subsidiary of Meyers made an unlicensed sale of goods in which Cuba or a Cuban national had an interest. Myers voluntarily disclosed this matter to OFAC.

Center for Cross Cultural Study, Inc. Settles Cuban Embargo Program Allegations: Center for Cross Cultural Study, Inc. ("CC-CS"), Amherst, MA has remitted \$15,000.00 to settle allegations of violations of the Cuban Assets Control Regulations occurring during the period March 2003 – January 2004. The alleged violations relate to CC-CS's transfer of funds to Cuba in connection with its operation of semester abroad programs on behalf of various licensed U.S. colleges and universities. CC-CS did not voluntarily disclose this matter to OFAC.

Priceline.com, Incorporated Settles Cuban Assets Control Regulations Allegations: Priceline.com, Incorporated, Norwalk, CT ("Priceline"), has remitted \$12,250.00 to settle allegations of violations of the Cuban Assets Control Regulations occurring between September 2004 and November 2007. OFAC alleged that foreign subsidiaries of Priceline provided travel-related services in which Cuba or Cuban nationals had an interest by arranging hotel reservations for Cuban nationals without an OFAC license. Priceline voluntarily disclosed this matter to OFAC.

INDIVIDUALS – 31 CFR 501.805(d)(1)(ii)

One individual Settles Narcotics Trafficking Sanctions Allegations: One individual has remitted \$3,165.14 to settle allegations of violations of the Narcotics Trafficking Sanctions Regulations occurring on or about June and July 2006. OFAC alleged that the individual acted without an OFAC license by dealing in blocked property in which a

Specially Designated Narcotics Trafficker has an interest by submitting mortgage payments on their behalf. The individual did not voluntarily disclose this matter to OFAC.

One individual has agreed to a settlement totaling \$422.43 for alleged violations of the Foreign Narcotics Kingpin Sanctions Regulations: OFAC alleged that on or about July 2007, the individual dealt in blocked property in which a Specially Designated Narcotics Trafficker has an interest without an OFAC license. The individual 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/.