ENFORCEMENT INFORMATION FOR OCTOBER 27, 2015

Information concerning the civil penalties process can be found in the OFAC regulations governing each sanction program; the Reporting, Procedures, and Penalties Regulations, 31 C.F.R. part 501; and the Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, app. A. These references 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)

Gil Tours Travel, Inc. Settles Potential Civil Liability for Apparent Violations of the Cuban Assets Control Regulations: Gil Tours Travel, Inc. (Gil Travel), of Philadelphia, Pennsylvania, has agreed to pay \$43,875 to settle potential civil liability for apparent violations of the Cuban Assets Control Regulations, 31 C.F.R. part 515 (CACR). Between October 21, 2009 and August 19, 2010, Gil Tours appears to have violated § 515.201 of the CACR when it dealt in property in which Cuba or Cuban nationals had an interest, by providing Cuba travel-related services involving 191 individuals, without authorization from OFAC.

OFAC determined that Gil Travel did not voluntarily self-disclose the apparent violations and that the apparent violations occurred "prior to agency notice." Under the Cuba Penalty Schedule, 68 Fed. Reg. 4429 (Jan. 29, 2003), the base penalty amount is \$97,500.

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: Gil Travel had some awareness that it was providing Cuba-related travel services, and that its conduct could be in violation of the CACR; Gil Travel had no sanctions compliance plan at the time of the apparent violations; Gil Travel has not received a penalty notice or Finding of Violation from OFAC in the five years preceding the date of the first transaction giving rise to the apparent violations; and Gil Travel substantially cooperated with OFAC during its investigation of the apparent violations, including by entering into a statute of limitations tolling agreement for a total of 446 days.

For more information regarding OFAC regulations, please visit: http://www.treasury.gov/ofac.