



## Easing of Restrictions – Effective January 16th, 2015

The Cuban Assets Control Regulations (the “CACR”) prohibits U.S. persons from engaging in travel-related transactions to Cuba, unless such persons qualify for a general license (stated below) or hold specific (written) licenses issued by the Office of Foreign Assets Control of the U.S. Department of the Treasury (“OFAC”). Our company has listed the general licenses below. Please review these general licenses very carefully.

### Categories of the General Travel Licenses

1. Visiting Close Relatives (Section 515.561(a)): U.S. persons, and persons traveling with them who share a common dwelling as a family, visiting close relatives who are:
  - a. Related by blood, marriage or adoption;
  - b. No more than three generations from the U.S. persons or their common ancestors; **and**
  - c. Any one of the following:
    - i. Cuban nationals;
    - ii. Persons ordinarily residing in Cuba;
    - iii. Persons who qualify under the general license for educational activities identified in (5)(a)(i) through (iv) below, provided that such generally licensed persons will be in Cuba for more than 60 days; **or**
    - iv. Persons located in Cuba under the general license for official government business identified in (2) below.
2. Official Government Business (Section 515.562): Persons who are:
  - a. Employees, contractors or grantees of the U.S. government, foreign governments, or intergovernmental organizations of which the United States is a member or holds observer status; **and**
  - b. Traveling on official business of their government or intergovernmental organization.
3. Journalistic Activities (Section 515.563(a)): U.S. persons:
  - a. Who are:
    - i. Regularly employed as journalists by a news reporting organization;
    - ii. Regularly employed as supporting broadcast and technical persons;
    - iii. Freelance journalists with a record of previous journalistic experience working on a freelance journalistic project; **or**
    - iv. Broadcast or technical persons with a previous record of broadcast or technical experience who are supporting freelance journalists meeting the requirements in 3(c) above, **and**
  - b. Who are engaging in a full-time schedule of activities that does not include free time or recreation “in excess of that which is consistent with a full-time schedule.”
4. Professional Research and Professional Meetings:
  - a. Professional Research (Section 515.564(a)(1)): Persons who are traveling to conduct professional research, provided that:
    - i. The purpose of the research directly relates to their profession, professional background, or area of expertise (including graduate level full-time study);
    - ii. Such persons do not engage in recreational travel, tourist travel, travel in pursuit of a hobby, or research for personal satisfaction only; **and**



iii. Such persons will engage in a full-time schedule of activities that does not include free time or recreation “in excess of that which is consistent with a full-time schedule;” or

b. Professional Meetings (515.564(a)(2)): Persons who are traveling to attend professional meetings and conferences in Cuba, provided:

i. The purpose of the meeting is **not** to promote tourism in Cuba;

ii. The purpose of the meeting directly relates to their profession, professional background, or area of expertise (including graduate level full-time study);

iii. Such persons do not engage in recreational travel, tourist travel, or travel in pursuit of a hobby;  
**and**

iv. Such persons engage in a full-time schedule of activities that do not include free time or recreation “in excess of that which is consistent with a full-time schedule.”

## 5. Educational Activities and People-to-People Exchanges:

a. Educational Activities (Section 515.565(a)): Persons subject to U.S. jurisdiction, including U.S. academic institutions and their faculty, staff, and students, whose travel is for:

i. Participation in a structured educational program in Cuba as part of a course offered for credit by a U.S. graduate or undergraduate degree-granting academic institution that is sponsoring the program;

ii. Non-commercial academic research in Cuba specifically related to Cuba and for the purpose of obtaining an undergraduate or graduate degree;

iii. Participation in a formal course of study at a Cuban academic institution, provided that credit will be accepted toward the undergraduate or graduate degree;

iv. Teaching at a Cuban academic institution related to a program at the Cuban academic institution, provided the person is regularly employed by a U.S. or non-Cuban academic institution;

v. Sponsorship (including payment of a stipend or salary) of a Cuban scholar to teach or engage in other scholarly activities at the sponsoring U.S. academic institution;

vi. Educational exchanges sponsored by Cuban or U.S. secondary schools involving participation by secondary students and a reasonable number of parent chaperones in either a structured educational program or a formal course of study offered by the secondary school or other academic institution, provided that the course or program is led by a teacher or other secondary school official;

vii. Sponsorship or co-sponsorship by U.S. academic institutions, and attendance by faculty, staff, and students of the participating U.S. academic institution, of non-commercial academic seminars, conferences, and workshops related to Cuba or global issues involving Cuba;

viii. Organization of, and preparation for, educational activities listed in (5)(a)(i) through (vii) above by faculty members and staff of the sponsoring U.S. academic institution or secondary school; or

ix. Facilitation by an organization subject to U.S. jurisdiction, or a staff member of such organization, of licensed educational activities in Cuba on behalf of U.S. academic institutions or secondary schools, provided that:

(a) The organization is directly affiliated with one or more U.S. academic institutions or secondary schools;

(b) The organization facilitates one or more educational activities authorized in (5)(a)(i), (ii), (iii), and (vi) above; **and**

(c) By prior agreement, the educational activities must be accepted for credit by the affiliated U.S. academic institution or approved by the affiliated secondary school; or

b. People-to-People Exchanges (Section 515.565(b)): Organizations and individuals participating in educational exchanges not involving academic study pursuant to a degree; provided that:

i. The exchanges occur under the auspices of an organization that sponsors and organizes programs that promote people-to-people contacts;



- ii. Travel must be for purposes of engaging in a full-time schedule of activities intended to enhance contact with the Cuban people, support civil society in Cuba, or promote the Cuban people's independence from the Cuban authorities;
  - iii. Each traveler has a full-time schedule of educational activities that will result in meaningful interaction with the Cuban people;
  - iv. An employee, consultant or agent of the sponsoring organization travels with each group to ensure that each traveler has a full-time schedule of educational activities; **and**
  - v. The predominant portion of the activities is not with or on behalf of individuals or entities acting for Prohibited Government Officials or Prohibited Communist Party members (as defined in the CACR).
6. U.S. Religious Organizations (Section 515.566(a)): Persons subject to U.S. jurisdiction, including U.S. organizations and their members and staff, traveling to Cuba to engage in a full-time schedule of religious activities.
7. Public Performances, Clinics, Workshops, Athletic and Other Competitions and Exhibitions :
  - a. Amateur or Semi-Professional International Sports Federation Competitions (Section 515.567(a)): Amateur or semi-professional athletes and athletic teams participating in athletic competitions, provided that:
    - i. The athletic competition is held under the auspices of an international sports federation of the relevant sport;
    - ii. The U.S. federation of the relevant sport selects the U.S. participants in the competition; **and**
    - iii. The competition is open for attendance and, in relevant situations, for participation by Cuban nationals.
  - b. Public Performances, Clinics, Workshops, Athletic and Non-Athletic Competitions, and Exhibitions (Section 515.567(b)): U.S. persons participating in public performances, clinics, workshops, athletic competitions (not covered in (7)(a) above), and exhibitions, provided that:
    - i. The event is open for attendance and, in relevant situations, for participation by Cuban nationals;
    - ii. All profits (after costs) from the event are donated to a non-governmental organization in Cuba or to a U.S.-based charity for purposes of promoting people-to-people contacts or benefiting the Cuban people; **and**
    - iii. The traveler must organize and run, at least in part, any clinics and workshops.
8. Support for the Cuban People (Section 515.574): U.S. persons supporting the Cuban people, provided that:
  - a. The activities are of:
    - i. Recognized human rights organizations;
    - ii. Independent organizations designed to promote a rapid and peaceful transition to democracy; **or**
    - iii. Individuals or nongovernmental organizations that promote independent activity to strengthen civil society in Cuba; **and**
  - b. Such persons will engage in a full-time schedule of activities that does not include free time or recreation "in excess of that which is consistent with a full-time schedule."
9. Humanitarian Projects (Section 515.575): U.S. persons developing and participating in humanitarian projects, such as medical and health related projects, construction projects designed to benefit legitimately independent groups, environmental projects, formal or non-formal educational training projects, community-based grassroots projects, small scale private enterprise projects, agricultural and rural development projects, certain micro financing projects (except for loans, extensions of credit and other financing prohibited in Section 515.208 of the CACR), and projects to meet basic human needs,



provided that such persons will engage in a full-time schedule of activities that does not include free time or recreation “in excess of that which is consistent with a full-time schedule.”

10. Private Foundations or Research or Educational Institutes (Section 515.576): Private foundations or nonprofit organizations or research or educational institutes with an established interest in international relations collecting non-commercial information relating to Cuba, provided that the travelers will engage in a full-time schedule of activities that does not include free time or recreation “in excess of that which is consistent with a full-time schedule.”
11. Exportation/Importation of Informational Materials (Section 515.545): U.S. persons engaging in activities directly related to the exportation to, importation from, and transmission to and from Cuba of information and informational materials, provided that such persons will engage in a full-time schedule of activities that does not include free time or recreation “in excess of that which is consistent with a full- time schedule.”
12. Exportation of BIS Authorized or Licensed Goods:
  - a. Authorized or Licensed Goods (Section 515.533(d)): U.S. persons engaging in activities directly related to market research, marketing, commercial sales negotiation, delivery, or servicing of items that BIS has authorized or licensed, provided that such persons engage in a full-time schedule of activities that do not include free time or recreation “in excess of that which is consistent with a full-time schedule;” or
  - b. Medicines and Medical Supplies (Section 515.559(d)): U.S. persons engaging in activities directly related to market research, marketing, commercial sales negotiation, delivery, or servicing of medicines and medical supplies that BIS has authorized or licensed, provided that such persons engage in a full-time schedule of activities that do not include free time or recreation “in excess of that which is consistent with a full-time schedule.”

If a potential traveler does not qualify for one of the above general licenses, he or she must apply for and obtain a written specific license from OFAC. Our company cannot provide travel services until he or she presents the license to us.

If you have any questions regarding the license requirements, please contact OFAC at (786) 845-2828.

For more information visit the OFAC website at

<http://www.treasury.gov/resource-center/sanctions/Programs/pages/cuba.aspx>



## TRAVEL AFFIDAVIT

I understand that, under Cuban Assets Control Regulations (the “CACR”), U.S. persons are prohibited from engaging in travel-related transactions to Cuba, unless such persons qualify for travel under one of twelve categories stated in the CACR. I further understand that the Office of Foreign Assets Control of the U.S. Department of the Treasury (“OFAC”) administers and enforces the CACR and has authority to request information about my travel to Cuba.

I, the undersigned, declare and certify the following:

1. I have reviewed the travel categories, and I hereby certify that:



I qualify for a general license stated in section number  
Section 515.565(b) – People to People Exchanges

or



I hold a specific (written) license number. \_\_\_\_\_ (copy enclosed).

2. I also acknowledge and agree that I must maintain copies of all records relating to my travel (including but not limited to copies of this Affidavit, tickets, invoices, receipts, and itineraries, etc.) for a period of five years.

I solemnly affirm under penalty of perjury that to the best of my knowledge, the foregoing is true and accurate.

Signature of Traveler

04/30/2018

Date Signed

Brian Shea

Name of Traveler

1201 Pine Street, unit 121, Oakland, California, 94607

Home Address

510-701-2778

Telephone Number