



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

**U.S. DEPARTMENT OF THE TREASURY
OFFICE OF FOREIGN ASSETS CONTROL
LICENSING DIVISION**

From: The Licensing Division
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Subject: Your License Application Regarding Travel-Related Transactions involving Cuba

Case No. CT-2014-313946-1

COMMENT:

This responds to your November 10, 2014, license application submitted on behalf of Oceans for Youth Foundation to the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), requesting authorization to engage in travel-related transactions involving Cuba.

The Cuban Assets Control Regulations, 31 C.F.R. Part 515 (the "Regulations"), administered by OFAC, prohibit all persons subject to the jurisdiction of the United States from dealing in property in which Cuba or a Cuban national has an interest. This prohibition includes all Cuba travel-related transactions unless such transactions are authorized pursuant to the Regulations.

Please be advised that on January 16, 2015, OFAC published amendments to the Regulations to implement changes in Cuba sanctions policy announced by the President on December 17, 2014. 80 FR 2291. As amended, the Regulations contain general licenses authorizing travel-related transactions involving Cuba related to twelve categories of specified activities. *See* 31 C.F.R. § 515.560(a). A "general license" constitutes blanket authorization for those transactions set forth, and subject to the conditions, in the relevant regulation. Individuals wishing to engage in the following activities involving Cuba should first review the general licenses contained in the Regulations to determine whether their travel-related transactions are covered by a general license:

- 1) Family visits (see § 515.561);
- 2) Official business of the U.S. government, foreign governments, and certain intergovernmental organizations (see § 515.562);
- 3) Journalistic activity (see § 515.563);
- 4) Professional research and professional meetings (see § 515.564);
- 5) Educational activities (see § 515.565);

- 6) Religious activities (see § 515.566);
- 7) Public performances, clinics, workshops, athletic and other competitions, and exhibitions (see § 515.567);
- 8) Support for the Cuban people (see § 515.574);
- 9) Humanitarian projects (see § 515.575);
- 10) Activities of private foundations or research or educational institutes (see § 515.576);
- 11) Exportation, importation, or transmission of information or informational materials (see § 515.545); and
- 12) Certain export transactions that may be considered for authorization under existing Department of Commerce regulations and guidelines with respect to Cuba or engaged in by U.S.-owned or -controlled foreign firms (see §§ 515.533 and 515.559).

To the extent that the proposed travel transactions described in your request fall within the scope of one of the above-referenced general license provisions, you may proceed without further authorization from OFAC. Please note that each person relying on a general license must retain specific records related to authorized travel transactions. See 31 C.F.R. §§ 501.601, 501.602.

Should you wish to obtain formal guidance about the scope of a general license or apply for a specific license to engage in travel-related transactions related to one of the above-referenced categories of activities but not covered by a general license, OFAC will consider such requests on a case-by-case basis. If you submit such a request, please provide details regarding the proposed travel sufficient to allow OFAC to determine whether or not the travel falls outside the scope of the general licenses listed under section 515.560 of the Regulations. Please be advised that it is OFAC's policy not to grant specific licenses authorizing transactions for which the provisions of an outstanding general license are applicable. See 31 C.F.R. § 501.801(a).

For further information, including obtaining the links to the Online Application Form, the amended Regulations, or our Answers to Frequently Asked Questions, you may refer to the Cuba Sanctions page on the OFAC website at <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/cuba.aspx>. You may also call our office at (202) 622-2480.