

License No. xxxxxxx

Name

Organization

Address

City, State, Zip Code

Dear xxxxxxxx:

Your organization received a specific license from the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") that was issued pursuant to § 515.566 of the Cuban Assets Control Regulations, 31 C.F.R. Part 515 (the "Regulations"). This license authorizes travel-related transactions set forth in § 515.560(c) and such additional transactions as are directly incident to engaging in religious activities in Cuba by individuals or groups affiliated with your organization.

The United States Government has become aware that some organizations may be abusing their licenses by allowing individuals not affiliated with the organizations to travel under the authority of their licenses. In some cases, non-affiliated individuals have been solicited for purposes of traveling to Cuba through public advertisement, at times targeting individuals who intend to engage primarily or exclusively in non-religious activities (such as family visits) and who are not otherwise eligible for a license to travel to Cuba. This is directly contrary to U.S. policy and the associated purposes for which these licenses were issued, threatens the integrity of the OFAC licensing process, and also serves to undermine the legitimate work of the vast majority of groups that engage in licensed religious activities in Cuba.

OFAC is currently investigating reports of abuse of religious licenses and will take appropriate action against groups and individuals that have engaged in transactions outside the scope of a license. Such action can include the suspension or revocation of licenses, imposition of fines, and criminal penalties. As an OFAC license holder, you are advised that you are required by law to respond to all administrative subpoenas that may be issued to you in a timely and complete manner. Penalties for failing to respond to such subpoenas may include license revocation.

In order to ensure that licensed organizations understand the scope of activities permitted under their licenses, and in particular to ensure that licenses are not used to circumvent prohibitions on travel-related transactions involving Cuba, we are clarifying your license as follows:

**1) The meaning of the term "affiliated."** To be considered "affiliated" with your organization, individuals or groups traveling under your license must be involved in religious activities with your organization apart from their travel to Cuba. This authorization may not be used for soliciting the affiliation of persons for the purpose of their travel to Cuba. For instance, you may not solicit the participation of individuals not affiliated with your organization for purposes of engaging in travel-related transactions involving Cuba through the use of your website or television or radio advertisements. Individuals who associate with your organization primarily for the purpose of traveling to Cuba are not authorized to travel under your license. Such unauthorized use of your license can result in suspension or revocation of the license, fines, and criminal penalties.

**2) Transfer of funds to Cuban nationals and Cuban entities.** The authorization contained in your license does not cover transfers of funds unrelated to the purchase of goods and services personally consumed or used by the traveler. Transfer of additional funds to Cuban nationals and entities must be authorized pursuant to § 515.570 of the Regulations. Transfers of funds without appropriate authorization can result in suspension or revocation of your travel license, fines, and criminal penalties.

**3) Exportation of goods to Cuba.** The exportation of goods to Cuba requires authorization from the U.S. Department of Commerce, including items your group proposes to donate to individuals or groups in Cuba. Exportation of goods without appropriate authorization from the Department of Commerce can result in suspension or revocation of any corresponding OFAC travel-related license, in addition to fines and criminal penalties. For questions relating to the licensing requirements for the exportation of commodities and humanitarian goods from the United States to Cuba, contact the U.S. Department of Commerce's Bureau of Industry and Security at (202) 482-4811. (See also § 515.533 of the Regulations, for information on licensing of travel-related transactions that are directly incident to the accompanied delivery of donated goods.)

Prior to the expiration of your license, you may submit to OFAC a new application pursuant to § 515.566 of the Regulations. The application must contain all of the information required in the enclosed licensing criteria as set forth in our *Comprehensive Guidelines for License Applications to Engage in Travel-Related Transactions Involving Cuba* (the "Application Guidelines"). If you determine that you are not able to provide the certifications and information required in § 515.566(a), you may wish to review the Application Guidelines under § 515.566 (b). For additional information concerning the categories of travel for which licenses may be issued, please refer to the Application Guidelines on our Internet website at [www.treas.gov/ofac](http://www.treas.gov/ofac).

The United States Government is committed to encouraging religious organizations to provide humanitarian assistance and training to Cuban religious organizations and supports legitimate humanitarian activities and the formation of genuine independent civil society entities. We are also strongly committed to rigorous enforcement of restrictions on travel-related transactions involving Cuba and Cuban nationals, including those transactions not within the scope of authorization set forth in religious activities licenses.

Should you have any questions regarding this matter, you may contact OFAC's Licensing Division at (202) 622-2480.

Sincerely,



Robert W. Werner  
Director  
Office of Foreign Assets Control

Enclosure