

## AIG CUBA TRAVEL CERTIFICATION

### 1. Instructions

AIG may only provide insurance to persons subject to U.S. jurisdiction that are traveling to Cuba if such persons are authorized under U.S. law. Travelers are authorized by the United States Department of the Treasury's Office of Foreign Assets Control (OFAC) through either (a) one of 12 general licenses or (b) issuance of a specific license.

AIG's ability to perform is based on the validity of this certification, if this certification is deemed to be incorrect or false, AIG will not perform under the policy. Please read the criteria for the license under which you plan to travel in the Attachment to this Certification and then confirm in Section 2 below that you meet all requirements. Note that a new Certification is required for each trip to Cuba and a separate Certification is required for each adult traveling.

All completed Certifications must be returned to the AIG business unit writing the policy.

### 2. Certification

*I am a United States citizen, a United States permanent resident, a person currently residing in the United States, or a person physically located in the United States and, as a condition of receiving the travel insurance provided herein, I represent that I am eligible to travel to Cuba under one of the following categories:*

Select applicable category:

Select  
Only One

#### General License:

- Family visits as specified in 31 C.F.R. § 515.561 (includes persons visiting a "close relative" who is a national of Cuba; or accompanying a person with whom you share a common dwelling who is visiting a "close relative" who is a national of Cuba; or visiting a close relative located in Cuba pursuant to or accompanying a close relative traveling to Cuba pursuant to authorizations for: official government business, journalistic activity, professional research, education activities, religious activities, humanitarian projects or activities of private foundations or research/educational institutes)
  - Official business of the U.S. government, foreign governments, and certain intergovernmental organizations as specified in 31 C.F.R. § 515.562
  - Journalistic activity as specified in 31 C.F.R. § 515.563
  - Professional research and professional meetings as specified in 31 C.F.R. § 515.564
  - Educational & Group People-to-People activities as specified in 31 C.F.R. § 515.565. One of the two boxes below also must be checked:
    - I am traveling under the auspices of an accredited academic institution and will maintain a full-time schedule of educational exchange activities OR
    - I am traveling with an organization/group, will maintain a full-time schedule of educational exchange activities and I have completed at least one travel-related transaction (such as purchasing a flight or reserving accommodation) prior to June 5, 2019
  - Religious activities as specified in 31 C.F.R. § 515.566
  - Public performances, clinics, workshops, athletic and other competitions, and exhibitions as specified in 31 C.F.R. § 515.567
  - Support for the Cuban people as specified in 31 C.F.R. § 515.574
  - Humanitarian projects as specified in 31 C.F.R. § 515.575
  - Activities of private foundations or research or educational institutes as specified in 31 C.F.R. § 515.576
  - Exportation, importation, or transmission of information or informational materials as specified in 31 C.F.R. § 515.545
  - Certain export and travel-related transactions consistent with the export or reexport licensing policy of the Department of Commerce as specified in 31 C.F.R. § 515.533 or certain other export transactions as specified in 31 C.F.R. § 515.559
- OR

#### Specific License:

- Specific license (a copy of the license must be provided prior to purchase)



## Attachment to the AIG Cuba Travel Certification

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All persons seeking insurance or other services from AIG in connection with authorized travel to Cuba, whether pursuant to a general or specific license, must provide AIG with an AIG Cuba Travel Certificate corresponding to the specific authorization for which they are authorized. Please read the criteria for the general license under which you plan to travel and then complete the AIG Cuba Travel Certificate.

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Note: Regulations issued on November 8, 2017 generally prohibit persons traveling under these travel authorizations from engaging in direct financial transactions with persons and entities designated on the Cuba Restricted List, available here: <https://www.state.gov/e/eb/tfs/spi/cuba/cubarestrictedlist/275331.htm>. This list includes hotels, stores, marinas and other entities. All authorized individuals traveling to Cuba should review this list and ensure that they are complying with these prohibitions. AIG is generally prohibited from paying claims related to transactions that violate this prohibition.

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### **1. Section 515.561 – Family Visits**

Persons subject to the jurisdiction of the United States and persons traveling with them who share a common dwelling as a family with them are authorized to engage in the travel-related transactions ... and such additional transactions as are directly incident to –

- visiting a “close relative” who is
  - a national of Cuba;
  - a person ordinarily resident in Cuba;
- visiting a “close relative” who is a person located in Cuba pursuant to the authorizations in the Cuban Assets Control Regulations for:
  - official government business (§ 515.562);
  - journalistic activity (§ 515.563);
  - professional research (§ 515.564(a));
  - educational activities (31 CFR § 515.565(a)(1));
  - religious activities (§ 515.566);
  - humanitarian projects (§ 515.575); or
  - activities of private foundations or research or educational institutes (§515.576);
- accompanying a “close relative” traveling to Cuba who is an authorized traveler to Cuba pursuant to the authorizations in the Cuban Assets Control Regulations for:
  - official government business (§ 515.562);
  - journalistic activity (§ 515.563);
  - professional research (§ 515.564(a));
  - educational activities (31 CFR § 515.565(a)(1));
  - religious activities (§ 515.566);
  - humanitarian projects (§ 515.575); or
  - activities of private foundations or research or educational institutes (§ 515.576).

For purposes of this certification, the term *close relative* of a person means any individual related to that person by blood, marriage, or adoption who is no more than three generations removed from that person or from a common ancestor with that person.

*Example.* Your mother's first cousin is your close relative for purposes of this part, because you are both no more than three generations removed from your great-grandparents, who are the ancestors you have in common. Similarly, your husband's great-grandson is your close relative for purposes of this part, because he is no more than three generations removed from your husband. Your daughter's father-in-law is not your close relative for purposes of this part, because you have no common ancestor.

An entire group does not qualify ... merely because some members of the group qualify individually.

Nothing in this paragraph authorizes a direct financial transaction with an entity on the Cuba Restricted List.

### **2. Section 515.562 – Official business of the U.S. government, foreign governments, and certain intergovernmental organizations.**

The travel-related transactions ... and such additional transactions as are directly incident to activities in their official capacities by persons who are employees, contractors, or grantees of the United States Government, any foreign government, or any intergovernmental organization of which the United States is a member or holds observer status, and who are traveling on the official business of their government or intergovernmental organization, are authorized.

An entire group does not qualify ... merely because some members of the group qualify individually.

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### **3. Section 515.563 – Journalistic activities in Cuba.**

The travel-related transactions ... and such additional transactions as are directly incident to journalistic activities in Cuba are authorized, provided that:

- (1) The traveler is at least one of the following:
  - (i) Regularly employed as a journalist by a news reporting organization;
  - (ii) Regularly employed as supporting broadcast or technical personnel;
  - (iii) A freelance journalist with a record of previous journalistic experience working on a freelance journalistic project; or
  - (iv) Broadcast or technical personnel with a record of previous broadcast or technical experience, who are supporting a freelance journalist working on a freelance journalistic project;

and

- (2) The traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule.

An entire group does not qualify ... merely because some members of the group qualify individually.

### **4. Section 515.564 – Professional research and professional meetings in Cuba**

(1) *Professional research.* The travel-related transactions ... and such additional transactions as are directly incident to professional research are authorized, provided that:

- (i) The purpose of the research directly relates to the traveler's profession, professional background, or area of expertise, including area of graduate-level full-time study;
- (ii) The traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule of professional research.

Example: The making of a documentary film in Cuba would qualify in this section if it is a vehicle for presentation of the research conducted pursuant to this section.

Note: A person does not qualify as engaging in professional research merely because that person is a professional who plans to travel to Cuba.

(2) *Professional meetings.* The travel-related transactions and such additional transactions as are directly incident to attendance at, or organization of, professional meetings or conferences in Cuba are authorized, provided that:

- (i) For a traveler attending a professional meeting or conference, the purpose of the meeting or conference directly relates to the traveler's profession, professional background, or area of expertise, including area of graduate-level full-time study;
- (ii) For a traveler organizing a professional meeting or conference on behalf of an entity, either the traveler's profession must be related to the organization of professional meetings or conferences or the traveler must be an employee or contractor of an entity that is organizing the professional meeting or conference; and
- (iii) The traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule of attendance at, or organization of, professional meetings or conferences.

An entire group does not qualify merely because some members of the group qualify individually.

Example: A musicologist travels to Cuba to research Cuban music pursuant to the general license for professional research. Others who are simply interested in music may not engage in travel-related transactions with the musicologist in reliance on this general license. For example, an art historian who plays in the same band with the musicologist would not qualify for the general license.

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Nothing in this section authorizes a direct financial transaction with an entity on the Cuba Restricted List.

### **5. Section § 515.565 – Educational Activities**

(a) **Educational activities.** (1) Accredited U.S. undergraduate or graduate degree-granting academic institutions, their students enrolled in an undergraduate or graduate degree program at the institution, and their full-time permanent employees, are authorized to engage, under the auspices of the institutions, in transactions, including the travel-related transactions ... that are directly incident to the following activities:

(i) Participation in a structured educational program in Cuba as part of a course offered at the U.S. institution, provided the program includes a full term, and in no instance includes fewer than 10 weeks, of study in Cuba. An individual planning to engage in such transactions must obtain a letter from the U.S. institution stating that the individual is a student currently enrolled in an undergraduate or graduate degree program at the institution, or is a full-time permanent employee of the institution, and that the Cuba-related travel is part of a structured educational program of the U.S. institution that will be no shorter than 10 weeks in duration;

(ii) Noncommercial academic research in Cuba specifically related to Cuba and for the purpose of obtaining a graduate degree. A student planning to engage in such transactions must obtain a letter from the U.S. institution stating that the individual is a student currently enrolled in a graduate degree program at the U.S. institution and that the research in Cuba will be accepted for credit toward that degree;

(iii) Participation in a formal course of study at a Cuban academic institution, provided the formal course of study in Cuba will be accepted for credit toward the student's graduate or undergraduate degree at the U.S. institution and provided that the course of study is no shorter than 10 weeks in duration. An individual planning to engage in such transactions must obtain a letter from the U.S. institution stating that the individual is a student currently enrolled in an undergraduate or graduate degree program at the U.S. institution and that the study in Cuba will be accepted for credit toward that degree and will be no shorter than 10 weeks in duration;

(iv) Teaching at a Cuban academic institution by an individual regularly employed in a teaching capacity at the U.S. institution, provided the teaching activities are related to an academic program at the Cuban institution and provided that the duration of the teaching will be no shorter than 10 weeks. An individual planning to engage in such transactions must obtain a letter from the U.S. institution stating that the individual is a full-time permanent employee regularly employed in a teaching capacity at the U.S. institution;

(v) Sponsorship of a Cuban scholar to teach or engage in other scholarly activity at the U.S. institution (in addition to those transactions authorized by the general license contained in § 515.571);

(vi) The organization of, and preparation for, the activities described in paragraphs (a)(1)(i) through (a)(1)(v) of this section by a full-time permanent employee of the U.S. institution. An individual engaging in such transactions must obtain a letter from the U.S. institution stating that the individual is a full-time permanent employee of the U.S. institution;

(2) To the extent not authorized in the sections above, persons subject to U.S. jurisdiction, including U.S. academic institutions and their faculty, staff, and students, are authorized to engage in transactions, including the travel-related transactions ... that are directly incident to the following activities, provided that any travel-related transactions pursuant to these authorizations take place under the auspices of an organization that is a person subject to U.S. jurisdiction, and further provided that all such travelers be accompanied by a person subject to U.S. jurisdiction who is an employee, paid consultant, agent, or other representative of the sponsoring organization, except in cases where the traveler is an employee, paid consultant, agent, or other representative traveling individually (not as part of a group) and the individual traveler obtains a letter from the sponsoring organization stating that: the individual is traveling to Cuba as an employee, paid consultant, agent, or other representative (including specifying the responsibilities of the individual that make him or her a representative) of the sponsoring organization; the individual is acting for or on behalf of, or otherwise representing, the sponsoring organization; and the individual's travel to Cuba is related to his or her role at the sponsoring organization:

(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) Noncommercial 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 the formal course of study in Cuba will be accepted for credit toward the student's graduate or undergraduate degree;

(iv) Teaching at a Cuban academic institution related to an academic program at the Cuban institution, provided that the individual is regularly employed by a U.S. or other non-Cuban academic institution;

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(v) Sponsorship of a Cuban scholar to teach or engage in other scholarly activity at the sponsoring U.S. academic institution (in addition to those transactions authorized by the general license contained in § 515.571).

(vi) Educational exchanges sponsored by Cuban or U.S. secondary schools involving secondary school students' participation in a formal course of study or in a structured educational program offered by a secondary school or other academic institution and led by a teacher or other secondary school official. This includes participation by a reasonable number of adult chaperones to accompany the secondary school students to Cuba.

(vii) Sponsorship or co-sponsorship of noncommercial academic seminars, conferences, and workshops related to Cuba or global issues involving Cuba and attendance at such events by faculty, staff, and students of a participating U.S. academic institution;

(viii) Establishment of academic exchanges and joint non-commercial academic research projects with universities or academic institutions in Cuba;

(ix) Provision of standardized testing services, including professional certificate examinations, university entrance examinations, and language examinations, and related preparatory services for such exams, to Cuban nationals, wherever located;

(x) Provision of internet-based courses, including distance learning and Massive Open Online Courses, to Cuban nationals, wherever located, provided that the course content is at the undergraduate level or below; or

(xi) The organization of, and preparation for, activities described in paragraphs (a)(2)(i) through (a)(2)(x) of this section by employees or contractors of the sponsoring organization that is a person subject to U.S. jurisdiction; and

(xii) Facilitation by an organization that is a person subject to U.S. jurisdiction, or a member of the staff of such an 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; and

(B) The organization facilitates educational activities that meet the requirements of one or more of the general licenses set forth in paragraphs (a)(1)(i) through (iii), (a)(2)(i) through (iii), and (a)(2)(vi) of this section.

Note: The authorizations in this paragraph extend to adjunct faculty and part-time staff of U.S. academic institutions. A student enrolled in a U.S. academic institution is authorized pursuant to paragraph (a)(2) of this section to participate in the academic activities in Cuba described above through any sponsoring U.S. academic institution.

Example to paragraph (a)(2): An individual undergraduate student serves as a research assistant at his or her U.S. undergraduate degree-granting academic institution. This individual may travel to Cuba to engage in noncommercial academic research specifically related to Cuba for the purpose of obtaining an undergraduate degree pursuant to paragraph (a)(2)(ii) of this section if the student is either accompanied by an employee, paid consultant, agent, or other representative of the academic institution (either individually or as part of a group), or has obtained a letter from the institution stating that the student is an employee, paid consultant, agent, or other representative (including specifying the responsibilities that make him or her a representative) of the academic institution, that the student is acting for or on behalf of or otherwise representing the academic institution, and that the student's travel to Cuba is related to his or her role at the academic institution.

(b) *General license for certain people-to-people travel and related transactions where certain transactions were completed prior to June 5, 2019.* Persons subject to U.S. jurisdiction are authorized to engage in people-to-people travel and related transactions for a trip consistent with paragraph (b) of this section as those provisions existed on April 17, 2019, provided the traveler completed at least one travel-related transaction (such as purchasing a flight or reserving accommodation) for that particular trip prior to June 5, 2019.

(b) **People-to-people travel** [as those provisions existed on April 17, 2019]. The travel-related transactions and such additional transactions as are directly incident to educational exchanges not involving academic study pursuant to a degree program are authorized, provided that:

(i) The exchanges take place under the auspices of an organization that is a person subject to U.S. jurisdiction and that sponsors such exchanges to promote people-to-people contact;

(ii) Travel-related transactions pursuant to this authorization must be for the purpose of engaging, while in Cuba, 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 Cuban authorities;

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(iii) Each traveler has a full-time schedule of educational exchange activities that will result in meaningful interaction between the traveler and individuals in Cuba;

(iv) A person subject to U.S. jurisdiction who is an employee, paid consultant, agent, or other representative of the sponsoring organization accompanies each group traveling to Cuba to ensure that each traveler has a full-time schedule of educational exchange activities;

(v) The predominant portion of the activities engaged in by individual travelers is not with a prohibited official of the Government of Cuba or a prohibited member of the Cuban Communist Party; and

(vi) In addition to all other recordkeeping requirements, persons relying on the people-to-people authorization, including entities sponsoring people-to-people travel pursuant to this authorization, must retain records sufficient to demonstrate that each individual traveler has engaged in a full-time schedule of activities that satisfy the requirements of paragraphs (b)(1) through (b)(5) of this section. Individuals may rely on the entity sponsoring the travel to satisfy his or her recordkeeping requirements with respect to the requirements of paragraphs (b)(1) through (5) of this section. These records must be furnished to the Office of Foreign Assets Control on demand.

Example 1 to paragraph (b): An organization sponsors and organizes educational exchanges not involving academic study pursuant to a degree program for travelers to learn side-by-side with Cuban individuals in areas such as environmental protection or the arts. Each traveler in the group will have a full-time schedule of educational exchange activities that result in meaningful interaction between the travelers and individuals in Cuba. The group will be accompanied by a person who is subject to U.S. jurisdiction who is a representative of the sponsoring organization for the duration of the trip. The organization's activities qualify for the general license for people-to-people travel. In addition, the individual travelers may rely on the entity sponsoring the travel to satisfy their recordkeeping requirements.

Example 2 to paragraph (b): An individual plans to travel to Cuba to participate in discussions with Cuban artists on community projects, exchanges with the founders of a youth arts program, and extended dialogue with local city planners and architects to learn about historical restoration projects in Old Havana. The individual traveler will have a full-time schedule of such educational exchange activities that result in meaningful interaction between the traveler and individuals in Cuba. The individual's activities do not qualify for the general license for people-to-people travel because the individual is not traveling under the auspices of an organization that is a person subject to U.S. jurisdiction and that sponsors such exchanges to promote people-to-people contact. The individual's travel may qualify for the general license in § 515.574 (Support for the Cuban People) provided the individual meets all of its requirements.

Note to paragraphs (a) and (b): Except as provided in paragraph (b)(6) of this section, each person relying on the general authorizations in these paragraphs, including entities sponsoring travel pursuant to the authorization in paragraph (b) of this section, must retain specific records related to the authorized travel transactions.

(c) Nothing in paragraph (a) or (b) of this section authorizes a direct financial transaction with an entity on the Cuba Restricted List.

**(d) Educational travel and related transactions where certain transactions were completed prior to November 9, 2017.** Persons subject to U.S. jurisdiction are authorized to engage in educational travel and related transactions for a trip consistent with paragraph (a) of this section as those provisions existed on June 16, 2017, provided the traveler completed at least one travel-related transaction (such as purchasing a flight or reserving accommodation) for that particular trip prior to November 9, 2017 and further provided any new travel-related transactions initiated on or after November 9, 2017 do not involve a direct financial transaction with an entity on the Cuba Restricted List.

**(e) People-to-people travel and related transactions where certain transactions were completed prior to June 16, 2017.** Persons subject to U.S. jurisdiction are authorized to engage in people-to-people travel and related transactions for a trip consistent with paragraphs (b)(1)-(3) of this section as those provisions existed on June 16, 2017, provided the traveler completed at least one travel-related transaction (such as purchasing a flight or reserving accommodation) for that particular trip prior to June 16, 2017, and further provided any new travel-related transactions initiated on or after November 9, 2017 do not involve a direct financial transaction with an entity on the Cuba Restricted List.

(f) Transactions related to activities that are primarily tourist-oriented are not authorized pursuant to this section.

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### **6. Section 515.566 – Religious activities in Cuba.**

Persons subject to U.S. jurisdiction, including religious organizations located in the United States and members and staff of such organizations, are authorized to engage in the travel-related transactions ... and such additional transactions as are directly incident to engaging in religious activities in Cuba, provided that the travel-related transactions pursuant to this authorization must be for the purpose of engaging, while in Cuba, in a full-time schedule of religious activities.

Nothing in this paragraph authorizes a direct financial transaction with an entity on the Cuba Restricted List.

### **7. Section 515.567 – Public performances, clinics, workshops, athletic and other competitions, and exhibitions**

(a) **Amateur and semi-professional international sports federation competitions.** The travel-related transactions ... and such other transactions as are directly incident to participation in athletic competitions in Cuba by amateur or semi-professional athletes or athletic teams, or organization of such competitions, are authorized, provided that:

- (i) The athletic competition in Cuba is held under the auspices of the international sports federation for the relevant sport;
- (ii) The U.S. participants in the athletic competition are selected by the U.S. federation for the relevant sport; and
- (iii) The competition is open for attendance, and in relevant situations, participation, by the Cuban public.

(b) **Public performances, clinics, workshops, other athletic or non-athletic competitions, and exhibitions.** The travel-related transactions ... and such other transactions as are directly incident to participation in or organization of a public performance, clinic, workshop, athletic competition not covered by paragraph (a) of this section, non-athletic competition, or exhibition in Cuba by participants in or organizers of such activities are authorized, provided that the event is open for attendance, and in relevant situations participation, by the Cuban public.

Example: An amateur baseball team wishes to travel to Cuba to compete against a Cuban team in a baseball game in Cuba. The game will not be held under the auspices of the international sports federation for baseball. The baseball team's activities therefore would not qualify for the general license in paragraph (a). The game will, however, be open to the Cuban public. The baseball team's activities would qualify for the general license in paragraph (b).

Example: A U.S. concert promoter wishes to organize a musical event in Cuba that would be open to the public and feature U.S. musical groups. The organizing of the musical event in Cuba by the U.S. concert promoter and the participation by U.S. musical groups in the event would qualify for the general license in paragraph (b).

(c) An entire group does not qualify for the general license in paragraph (a) or (b) of this section merely because some members of the group qualify individually.

Nothing in paragraph (a) or (b) of this section authorizes a direct financial transaction with an entity on the Cuba Restricted List.

### **8. Section 515.574 – Support for the Cuban People**

(a) The travel-related transactions ... and other transactions that are intended to provide support for the Cuban people are authorized, provided that:

- (1) The activities are of:
  - (i) Recognized human rights organizations;
  - (ii) Independent organizations designed to promote a rapid, peaceful transition to democracy; or
  - (iii) Individuals and non-governmental organizations that promote independent activity intended to strengthen civil society in Cuba; and
- (2) Each traveler engages in a full-time schedule of activities that:

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- (i) Enhance contact with the Cuban people, support civil society in Cuba, or promote the Cuban people's independence from Cuban authorities; and
- (ii) Result in meaningful interaction with individuals in Cuba.

(b) An entire group does not qualify for the general license in paragraph (a) of this section merely because some members of the group qualify individually.

Note: Staying in a room at a rented accommodation in a private Cuban residence (casa particular), eating at privately-owned Cuban restaurants (paladares), and shopping at privately-owned stores run by self-employed Cubans (cuentapropista) are examples of activities that qualify for this general license. However, in order to meet the requirement for a full-time schedule, a traveler must engage in additional authorized Support for the Cuban People activities.

Nothing in paragraph (a)(1)(iii) of this section authorizes a direct financial transaction with an entity on the Cuba Restricted List, with the exception of transactions on behalf of a non-governmental organization.

Example 1 to § 515.574: An individual plans to travel to Cuba, stay in a room at a rented accommodation in a private Cuban residence (casa particular), eat at privately-owned Cuban restaurants (paladares), and shop at privately-owned stores run by self-employed Cubans (cuentapropista) during his or her four-day trip. While at the casa particular, the individual will have breakfast each morning with the Cuban host and engage with the Cuban host to learn about Cuban culture. In addition, the traveler will complete his or her full-time schedule by supporting Cuban entrepreneurs launching their privately-owned businesses. The traveler's activities promote independent activity intended to strengthen civil society in Cuba. Because the individual's qualifying activities are not limited to staying in a room at a rented accommodation in a private Cuban residence (casa particular), eating at privately-owned Cuban restaurants (paladares), and shopping at privately owned stores run by self-employed Cubans (cuentapropista) and the traveler maintains a full-time schedule that enhances contact with the Cuban people, supports civil society in Cuba, and promotes the Cuban people's independence from Cuban authorities, and that results in meaningful interaction between the traveler and Cuban individuals, the individual's travel qualifies for the general license.

Example 2 to § 515.574: A group of friends plans to travel and maintain a full-time schedule throughout their trip by volunteering with a recognized non-governmental organization to build a school for underserved Cuban children with the local community. In their free time, the travelers plan to rent bicycles to explore the streets of Havana and visit an art museum. The travelers' trip would qualify for the general license because the volunteer activities promote independent activity intended to strengthen civil society in Cuba and constitute a full-time schedule that enhances contact with the Cuban people and supports civil society in Cuba, and results in meaningful interaction between the travelers and individuals in Cuba.

Example 3 to § 515.574: An individual plans to travel to Cuba, rent a bicycle to explore the neighborhoods and beaches, and engage in brief exchanges with local beach vendors. The individual intends to stay at a hotel that does not appear on the Cuba Restricted List (see § 515.209). The traveler's trip does not qualify for this general license because none of these activities promote independent activity intended to strengthen civil society in Cuba.

### **9. Section 515.575 – Humanitarian projects.**

(a) Transactions, including the travel-related transactions... that are related to the humanitarian projects in or related to Cuba that are designed to directly benefit the Cuban people as set forth in paragraph (b) are authorized, provided that the traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule.

(b) Authorized humanitarian projects. The following projects are authorized by paragraph (a) of this section: medical and health-related projects; construction projects intended to benefit legitimately independent civil society groups; disaster preparedness, relief, and response; historical preservation; environmental projects; projects involving formal or non-formal educational training, within Cuba or off-island, on the following topics: entrepreneurship and business, civil education, journalism, advocacy and organizing, adult literacy, or vocational skills; community-based grassroots projects; projects suitable to the development of small-scale private enterprise; projects that are related to agricultural and rural development that promote independent activity; microfinancing

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projects, except for loans, extensions of credit, or other financing prohibited by § 515.208; and projects to meet basic human needs.

Example: A U.S. group of medical professionals that specializes in disease treatment wishes to support a community in Cuba by providing the latest techniques and literature in disease education and prevention directly to the Cuban people. Provided that the medical professionals in the group maintain a full-time schedule related to disease education and prevention, these activities qualify for the general license.

(c) An entire group does not qualify for the general license in paragraph (a) of this section merely because some members of the group qualify individually.

### **10. Section 515.576 – Activities of private foundations or research or educational institutes.**

(a) The travel-related transactions ... and such additional transactions as are directly incident to activities by private foundations or research or educational institutes with an established interest in international relations to collect information related to Cuba for noncommercial purposes are authorized, provided that the traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule.

Example: A private research foundation that produces essays on international relations issues wishes to send a team made up of its employees and consultants to Cuba to collect information for a current study of the relationship that countries in the Western Hemisphere have with European countries. Provided that all of the employees and consultants on the team maintain a full-time schedule of activities relating to the collection of information for the study, these activities qualify for the general license.

Nothing in paragraph (a) authorizes a direct financial transaction with an entity on the Cuba Restricted List.

(b) An entire group does not qualify for the general license in paragraph (a) of this section merely because some members of the group qualify individually.

### **11. Section 515.545 – Transactions related to information and informational materials.**

The travel-related transactions ... and such additional transactions as are directly incident to the exportation, importation, or transmission of information or informational materials as defined in § 515.332 are authorized, provided that the traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule.

The travel-related transactions ... and such additional transactions as are directly incident to professional media or artistic productions of information or informational materials for exportation, importation, or transmission, including the filming or production of media programs (such as movies and television programs), the recording of music, and the creation of artworks in Cuba, are authorized, provided that the traveler is regularly employed in or has demonstrated professional experience in a field relevant to such professional media or artistic productions, and that the traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule.

Nothing in paragraphs (a) or (b) of this section authorizes a direct financial transaction with an entity on the Cuba Restricted List.

### **12. Section 515.533 – Exportations from the United States to Cuba; reexportations of 100% U.S.-origin items to Cuba; negotiation of contracts.**

The travel-related transactions ... and such additional transactions as are directly incident to the conduct of market research, commercial marketing, sales or contract negotiation, accompanied delivery, installation, leasing, servicing, or repair in Cuba of items consistent with the export or reexport licensing policy of the Department of Commerce are authorized, provided that the traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule.

## Attachment to the AIG Cuba Travel Certification

The travel-related transactions ... and such additional transactions as are directly incident to the facilitation of the temporary sojourn of aircraft and vessels as authorized by 15 CFR 740.15 (License Exception Aircraft, Vessels and Spacecraft) or pursuant to other authorization by the Department of Commerce for authorized travel between the United States and Cuba, including travel-related transactions by persons subject to U.S. jurisdiction who are required for normal operation and service aboard a vessel or aircraft, as well as persons subject to U.S. jurisdiction who are required to provide services to a vessel in port or aircraft on the ground, are authorized, provided that:

- (i) Such travel-related transactions are limited to the duration and scope of their duties in relation to the particular authorized temporary sojourn; and
- (ii) The aircraft or vessel must be transporting individuals whose travel between the United States and Cuba is authorized pursuant to any section of this part other than the paragraph above.

### **13. Section 515.559 – Certain export and import transactions by U.S.-owned or -controlled foreign firms.**

Travel-related transactions ... and such other transactions as are directly incident to market research, commercial marketing, sales or contract negotiation, accompanied delivery, installation, leasing, servicing, or repair in Cuba of exports that are consistent with the licensing policy under paragraph (a) of this section are authorized, provided that the traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule.