



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

Case No. CT-2753

Jonathan D. Moreno, Ph.D.
President, American Society for Bioethics and Humanities
4700 W. Lake Avenue
Glenview, Illinois 60025-1485

MAY 13 2004

RE: Letter dated April 21, 2004

Dear Dr. Moreno:

This is in response to your letter on behalf of the American Society for Bioethics and Humanities concerning scientists and professors that planned to attend the IV Symposium on Coma and Death in Havana, March 9-12, 2004 (the "Conference").

The Cuban Assets Control Regulations, 31 C.F.R. Part 515 (the "Regulations"), administered by the U.S. Department of the Treasury's Office of Foreign Assets Control ("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 in accordance with current licensing policy set forth in § 515.560(a) and the related sections of the Regulations enumerated in § 515.560(a).

OFAC notified the travel service provider in late February that this Conference did not qualify for the general license because it was not organized by an international professional organization, institution, or association that regularly sponsors meetings or conferences in other countries as required by § 515.564(a) of the Regulations. Based on the information available to OFAC, the Conference was merely "endorsed" by the World Federation of Neurology ("WFN") located in London (and other international organizations outside of Cuba), but it was not organized by the WFN. The Conference appears to have been organized solely by a Cuban organization. We further note that this Conference was the fourth of its kind, all of which have been held in Cuba.

Pursuant to § 515.564(b) of the Regulations, specific licenses may be issued on a case-by-case basis authorizing travel-related transactions set forth in § 515.560(c) and such additional transactions as are directly incident to professional research and professional meetings that do not qualify for the general license in § 515.564(a) of the Regulations.

On March 1, 2004, this office received a consolidated application from a travel service provider (the "Application") requesting a specific license authorizing 58 individuals to engage in travel-related transactions involving Cuba for the purpose of attending the Conference. As stated in our *Comprehensive Guidelines for License Applications to Engage in Travel-Related Transactions with Cuba*, which are available on our Internet website at www.treas.gov/ofac, an application must furnish information that fully supports and justifies the issuance of a license. The only substantive information relevant to a licensing determination in the Application was a statement of each individual's occupation or occupational title. At a minimum when we are considering applications for attendance at Cuban-organized conferences, we need a copy of each

individual's curriculum vitae or resume and a statement from each individual explaining the reason why he/she needs to attend the particular conference. In the absence of such information, the application filed by the travel service provider was denied.

I hope you find this information helpful.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. W. Mills", written in a cursive style.

David W. Mills
Chief of Licensing
Office of Foreign Assets Control