



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

Cuban Assets Control Regulations

License No. CU-2015-324810-1

LICENSE

(Granted under the authority one or more of 50 U.S.C. § 4305(b), 22 U.S.C. § 2370(a),  
22 U.S.C. §§ 6001 et seq., Proclamation 3447, and 31 C.F.R. Parts 501 and 515)

To: **Cuba International Network, LLC**  
c/o: **Wilson, Elser, Moskowitz, Edelman & Dicker, LLP**  
**700 11<sup>th</sup> St. Suite 400**  
**Washington, DC 20001**  
Attn: **Mark Materna and Elizabeth Sandza**

1. Pursuant to your request dated **December 22, 2015, and supplemental information provided February 10, 2016, March 15, 2016, and November 21, 2016**, to the Office of Foreign Assets Control (**together, the "Application"**), the following transactions are hereby licensed:

\*\*\*\*\*SEE PAGE 2\*\*\*\*\*

2. This License is granted upon the statements and representations made in the Application, or otherwise filed with or made to the Treasury Department as a supplement to the Application, and is subject to the conditions, among others, that the Licensees comply in all respects with all regulations, rulings, orders and instructions issued by the Secretary of the Treasury or his designees under the authority cited above and the terms of this license.

3. The Licensees shall furnish and make available for inspection any relevant information, records or reports requested by the Secretary of the Treasury or any duly authorized officer or agency of the Secretary.

4. This License expires on **March 31, 2019**, is not transferable, is subject to the provisions of Title 31, Parts 501 and 515 of the Code of Federal Regulations and any regulations and rulings issued pursuant thereto, and may be revoked or modified at any time at the discretion of the Secretary of the Treasury acting directly or through the agency through which the license was issued, or any other agency designated by the Secretary of the Treasury. If this License was issued as a result of willful misrepresentation on the part of the applicant or his duly authorized agent, it may, in the discretion of the Secretary of the Treasury or his designees, be declared void from the date of its issuance, or from any other date.

5. This License does not excuse compliance with any law or regulation (including reporting requirements) administered by the Office of Foreign Assets Control or another agency applicable to the transactions(s) herein licensed, nor does it release the Licensees or third parties from civil or criminal liability for violation of any law or regulation.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By   
**Dayin J. Blackborow**  
Assistant Director for Licensing

March 20, 2017  
Date

**SECTION 1 – AUTHORIZATION:** (a) Subject to the conditions and limitations stated herein, Cuba International Network LLC (the “Licensee”) is hereby authorized to engage in all transactions necessary to establish and maintain a physical presence in Cuba for the purpose of producing broadcasting, television, and digital live and scripted video content in Cuba for television and internet content distributors in the United States and third countries and training Cuban nationals, as described in the Application. The transactions authorized by this License include: (1) leasing physical premises and securing related goods and services; (2) marketing related to the physical presence; (3) employment of Cuban nationals in Cuba; (4) employment of individuals who are persons subject to U.S. jurisdiction; (5) the opening and maintenance of accounts, including the deposit of funds in such accounts by wire transfer at a financial institution in Cuba, provided that such accounts are used only for transactions authorized pursuant to, or exempt from, the CACR; and (6) the closing of an account opened pursuant to this License, provided that any transfer of funds may only be effected by wire transfer to an account maintained at a depository institution, as defined in 31 C.F.R. § 515.333, that is a person subject to U.S. jurisdiction.

(b) Individuals who are persons subject to U.S. jurisdiction and who are employed by the Licensee in Cuba pursuant to the authorization in this License are authorized to engage in all transactions necessary to establish domicile in Cuba, including accessing U.S. assets, for the duration of their employment.

**Authority: 31 C.F.R. § 515.801.**

**SECTION 2 - WARNINGS:** (a) Except as authorized in **SECTION 1** above, this License does not authorize any person subject to the jurisdiction of the United States to engage in any transaction or activity prohibited by the CACR, or by any other laws and regulations administered by the Office of Foreign Assets Control.

(b) Any transfer of funds through the U.S. financial system pursuant to the authorization set forth above should reference the number of this License to avoid the blocking or rejection of the transfer.

(c) No goods, technology, or software controlled by the United States Department of Commerce under the Export Administration Regulations (15 C.F.R. Parts 730 et seq.) may be exported or reexported to Cuba by the Licensees without authorization from the Department of Commerce.

(d) Nothing in this License authorizes any transaction prohibited by 31 C.F.R. § 515.208.

(e) Nothing in this License authorizes transactions in connection with travel to Cuba for tourist activities.

**SECTION 3 – RECORDKEEPING REQUIREMENT:** The Licensee shall keep a record of the transactions under this License. Such records shall be made available for examination upon demand for at least five years from the date of each transaction. See 31 C.F.R. §§ 501.601 and 501.602.

**SECTION 4 – PRECEDENTIAL EFFECT:** The authorization contained in this License is limited to the facts and circumstances specific to the Application.

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