



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

Case No. CU-2024-1256225-1

Green Cities Fund, Inc.  
162 Panoramic Way  
Berkeley, CA 94704  
Attn: Tom Miller

Dear Mr. Miller:

This letter responds to your request dated August 15, 2024, to the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), requesting authorization for Green Cities Fund, Inc. to provide funds for community environmental projects administered by Escuela Economía Social in Spain working with non-governmental Cuban Network of Social Solidarity Economy and Business Responsibility (ESCORSE). According to the application, the initial grant would be 10,000 Euros, followed by subsequent grants as additional similar projects proceed. Additionally, you state travel to Cuba is essential to observe the status of projects.

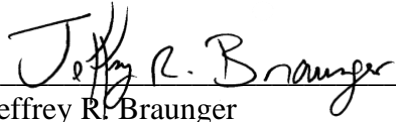
The Cuban Assets Control Regulations, 31 C.F.R. Part 515 (CACR), administered by OFAC, prohibit all persons subject to the jurisdiction of the United States from dealing in property in which Cuba or a Cuban national has any interest of any nature whatsoever, direct or indirect, unless authorized by a general or specific license or exempt from prohibition. *See* 31 C.F.R. §§ 515.201, 515.206.

Section 515.575(a) of the CACR authorizes transactions, including the travel-related transactions set forth in § 515.560(c), 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 § 515.575(b). The list of authorized humanitarian projects set forth in section § 515.575(b) includes projects involving 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 projects, except for loans, extensions of credit, or other financing prohibited by § 515.208; and projects to meet basic human needs. *See* 31 C.F.R. § 515.575. Further, Note 2 to § 515.575(a) refers to the general license authorization set forth in § 515.590(b) for the provision of grants, scholarships, or awards related to humanitarian projects in or related to Cuba that are designed to directly benefit the Cuban people as set forth in § 515.575(b). *See* 31 C.F.R. § 515.590(b).

Based on the information provided in your application, your proposed transactions for environmental projects administered by a Spanish entity in Cuba appear to fall within the scope of the general license provision set forth in section § 515.575(a) of the CACR. Please review the general license provision to determine whether your proposed transactions satisfy the requirements of the general license provisions. Accordingly, OFAC is closing this case without further action.

If you have any questions about the CACR or about the economic sanctions programs administered by OFAC, you may refer to our website at <https://ofac.treasury.gov/> or call the Licensing Division at (202) 622-2480.

Sincerely,



Jeffrey R. Braunger  
Chief, Licensing Division  
Office of Foreign Assets Control

8/20/2024

Date