

Exhibit 1

**The Cuban Electric Company, 1922-1960: from American
Subsidiary to State Owned Enterprise**

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This is a draft of a work in progress, and should not be quoted. Comments are welcome.

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Introduction

When Office Depot merged with OfficeMax in November 2013, the latter company brought an intriguing “asset” with it. The new company, which retained the Office Depot name, now held the single largest claim against the government of Cuba for expropriations that occurred after Fidel Castro seized power. At \$267,568,413.62 (plus 6% interest from August 1960—approximately \$7.4 billion in 2017), this claim represents nearly three times the next largest claim and is 14% of all claims certified by the Foreign Claims Settlement Commission.¹ OfficeMax inherited the claim when Boise Cascade, a paper manufacturer and distributor of office products, purchased OfficeMax for \$1.3 billion in 2003 and adopted the OfficeMax name.² Boise Cascade inherited the claim when it acquired Ebasco Industries for \$560 million in 1969.³ Ebasco Industries traced its heritage to the merger in 1967 of two companies, parent and subsidiary, the Electric Bond and Share Co. (EB&S) and the American & Foreign Power Co. (A&FP). The Cuban Electric Company was a wholly-owned subsidiary of A&FP and was providing 90% of electric utility production in Cuba when it was nationalized in August 1960.⁴

The Obama administration’s move to normalize relations with Cuba raised the issue of these more than half-century old claims (and existing counter claims) that likely will be the subject of intense negotiations between the respective governments.⁵ Our purpose here is to trace the historical antecedents of the largest claim by examining the history of the Cuban Electric Company. We hope to put the claim in perspective by evaluating the performance of the Cuban

¹ Foreign Claims Settlement Commission (FCSC), Claim No. CU-2578; Decision No. CU-4122, <https://www.justice.gov/fcsc/cuba/documents/1501-3000/2578.pdf> (accessed July 5, 2017). Of 8,821 claims filed, 5,913 were certified for a total of \$1.9 billion. <https://www.justice.gov/fcsc/claims-against-cuba> (accessed July 12, 2017). Office Depot also inherited an \$11.7 million claim for Cuban Electric mortgage bonds held by Ebasco Industries. FCSC, Claim No. CU-3548; Decision No. CU-3866.

² Fox Butterfield, “Boise Seeks Lost Shareholders,” *New York Times*, Dec. 26, 1979, D1.

³ OfficeMax sold the paper, forest products, and timberland assets of the company in 2004 to a newly-formed limited partnership that retained the Boise Cascade name. *Mergent Industrial Manual, 2015*, Vol. 1, New York: Mergent, 2015, 399.

⁴ <http://news.officedepot.com/press-release/corporatefinancial-news/office-depot-and-officemax-complete-merger> (accessed July 10, 2017); *Wall Street Journal*, July 24, 1969, 13; Sept. 3, 1969, 3.

⁵ The Trump administration announced a roll back of the new policy on June 16, 2017. It is not known how this will affect relations because the Office of Foreign Assets Control has not yet issued specific regulations. While individual travel may be affected, the Trump administration supposedly is not interested in “negatively impacting American businesses for engaging in lawful commercial opportunities....” <https://www.treasury.gov/resource-center/sanctions/Programs/pages/cuba.aspx> (accessed July 21, 2017).

Electric Company and its parent, A&FP, relative to the performance of electric utilities in several Latin American countries and nearby Caribbean islands.

Early Electrification in Cuba

Within a decade after Thomas Edison opened the Pearl Street station in New York (1882), domestic and foreign investors were establishing electric utilities in Cuba. Many of these early stations were associated with existing railways, gas lighting companies, or urban tramways, enterprises that already had some access to capital. By the turn of the century, Havana, Cárdenas, Camagüey, Cienfuegos, Pinar del Rio, Santa Clara, and Santiago de Cuba had at least rudimentary electric service.⁶ These developments occurred despite disruptions caused by the Cuban War of Independence (1895-98) and Spanish-American War (April – August 1898).⁷ Following the U.S. victory and occupation, the Platt Amendment (1901) and Cuban-American Treaty of Relations (1903) recognized Cuban independence, reserved the right of the United States to guarantee that independence, and permitted the U.S. to oversee, and on occasion to interfere with, Cuban affairs. After these political events, and because of geographical proximity, business relations between Cuba and the United States grew increasingly closer. The United States became the major market for Cuban sugar, and Cuba became a major recipient of U.S. capital investment.

Foreign investment in Cuban electric companies increased in the first decade of the twentieth century. By 1925, total generating capacity of central station electric power in Cuba was 105,000 kilowatts. In addition, sugar refineries had installed over 15,000 kilowatts of generating capacity to power their operations as well as providing electric lighting to surrounding towns.⁸ By 1929, A&FP would control roughly 90% of central station capacity in Cuba and 75% of total generating capacity.⁹

⁶ Jorge R. Piñón, “Cuba’s Energy Challenge: Fueling the Engine of Future Economic Growth,” Institute for Cuban & Cuban-American Studies, Occasional Paper Series, March 2004.

⁷ On the difficulties faced during the war by the Spanish-American Light and Power Company, a U.S. company incorporated in 1883 with plants in Havana and Matanzas, see *New York Times*, Dec. 8, 1896.

⁸ *McGraw Central Station Directory and Data Book, 1925*, New York: McGraw-Hill Co., c. 1925, 954-61.

⁹ *McGraw Central Station Directory, 1929*, New York: McGraw-Hill Catalog and Directory Company, Inc., c.1929, 784-90. Most non-central station capacity was owned by sugar mills.

The Rise of the American & Foreign Power Company

A&FP was a subsidiary holding company of EB&S, a top-level American holding company. Utility holding companies generated no electricity themselves; they held controlling interests in the operating companies that did generate electricity and in sub-holding companies. Holding companies earned revenue from dividends paid by their subsidiaries and from fees charged operating companies for finance, engineering, and managerial services.

The General Electric Co. created EB&S in 1905 and gave it a portfolio of domestic and international stocks and bonds that General Electric had accepted in payment for electrical equipment. EB&S created five second-tier sub-holding companies over the course of the next two decades, including A&FP in 1923. The securities EB&S had received from General Electric were distributed to these companies in return for a controlling share of their stock. The sub-holding companies then acquired local utilities, consolidating them where possible, and modernizing them.¹⁰

World War I was the catalyst for EB&S's interest in purchasing and managing foreign electric utilities.¹¹ The U.S. government was concerned about the war's effects on the Panama Canal and suggested that EB&S purchase the electric utilities in Panama City and Colón, which was done in 1917. In 1920, EB&S acquired utilities that had been seized from Germans by the Guatemalan government. The first Cuban property, Cia. Electrica de Alumbrado y Traccion de Santiago, was acquired in 1922. By the end of the following year, EB&S owned electric utilities in Camagüey, Cienfuegos, Cárdenas, and Santa Clara.¹²

On December 18, 1923, EB&S announced the incorporation of the American & Foreign Power Company in Maine. The purpose of the new company was to "enter the public utility field

¹⁰ The sub-holding companies could issue bonds and non-voting preferred stock to raise capital, which then could be used to purchase sufficient shares of voting common stock in operating companies to gain control. Rates of return on the common stocks held by the promoters could be substantial. The Federal Trade Commission estimated rates of return in 1924 and 1925 ranging from 19% to 55%. United States Federal Trade Commission, *Control of Power Companies*, United States Senate, 69th Congress, 2nd session, Document No. 213, Washington: USGPO, 1927, xxiii-xxiv.

¹¹ This section is taken from William J. Hausman and John L. Neufeld, "U.S. Foreign Direct Investment in Electric Utilities in the 1920s," in Mira Wilkins and Harm Schröter, eds., *The Free-Standing Company in the World Economy, 1830-1996*, Oxford: Oxford University Press, 1998, 372-73, and William J. Hausman and John L. Neufeld, "The Rise and Fall of the American & Foreign Power Company: A Lesson From the Past," *The Electricity Journal*, 10 (Jan./Feb. 1997), 49.

¹² *New York Times*, Dec. 5, 1923, 32.

of Cuba, Central America, and South America.”¹³ Total capital was to be a minimum of \$50 million and EB&S intended to maintain a controlling interest in the company.¹⁴ Other securities were to be marketed to the public, including in New York, London, Paris, and Amsterdam.¹⁵ The next day, the *New York Times* reported that subscriptions for the preferred stock had exceeded the amount available.¹⁶ E.B. Lee, a spokesperson for EB&S, exuded optimism over the new company, noting that the depreciation of foreign exchange rates made it possible for the new company to acquire properties at low prices and that financial returns obtainable from foreign utility investments were larger than those available in the United States. He asserted that, “In fact, the Electric Bond and Share Company expects these foreign utility investments to yield an average return perhaps twice as much as is possible in this country.”¹⁷ While implicitly recognizing the possibility of exchange rate risk, Lee completely missed the possibility of political risk. Both would later bedevil the company.

The American & Foreign Power Company Consolidates its Position in Cuba

In 1924, its various Cuban properties contributed 74% of A&FP’s total operating revenues. By late summer 1925, the company (along with EB&S) was purchasing shares on the open market, at a substantial premium, of the Havana Electric Railway, Light and Power Company, whose capitalization at the time exceeded that of A&FP.¹⁸ In December 1925, A&FP took control of the Havana utility.¹⁹ EB&S transferred its shares in the Havana electricity plants to A&FP, giving A&FP control over nearly all central station utilities in Cuba.²⁰ By the end of

¹³ *New York Times*, Dec. 19, 1923, 29.

¹⁴ This would fall between \$700 million and \$2.4 billion in 2016 dollars using either the consumer price index or labor value to adjust. Samuel H. Williamson, "Seven Ways to Compute the Relative Value of a U.S. Dollar Amount, 1774 to present," MeasuringWorth, 2017, <https://www.measuringworth.com/uscompare/index.php> (accessed July 21, 2017).

¹⁵ *New York Times*, Dec. 19, 1923, 29.

¹⁶ *New York Times*, Dec. 20, 1923, 25. The 400,000 shares of preferred were priced at \$96 a share, thus raising \$38.4 million for the company. Each preferred share came with a share of the common stock. EB&S retained the rest of the common. Both classes of preferred stock carried a cumulative dividend of 7%.

¹⁷ *New York Times*, Dec. 19, 1923, 29.

¹⁸ *New York Times*, Aug. 8, 1925, 13.

¹⁹ The takeover was effected by creation of a new company, the Havana Electric and Utilities Company. The president of Havana Electric Railway, Light and Power Company, Frank Steinhart, remained president of the new company. *New York Times*, Dec. 19, 1925, 30.

²⁰ In 1926, the street railway properties were split, with A&FP retaining ownership of the electric plants but not the railways themselves. *New York Times*, Aug. 12, 1926, 25; Aug. 15, 1926, E10; Oct. 30, 1926, 29; Nov. 26, 1927, 19; Jan. 19, 1928, 47.

1927, A&FP also controlled local electric utilities in Panama, Guatemala, Ecuador, Colombia, Brazil, and Venezuela. Its consolidated assets totaled \$379 million.²¹

A&FP continued to expand its holdings in 1928, adding fourteen utilities, mostly in South America, in the third quarter alone, increasing its total assets to \$543 million. In May 1928, all Cuban holdings were consolidated into one operating company, Compañía Cubana de Electricidad (Cuban Electric Company). A&FP stated in its 1928 annual report that this “simplified and improved operating conditions by eliminating many small companies with the expense incident to maintaining them. It has improved the service and the power generation efficiency and has enabled the operating company to reduce rates. It has simplified and strengthened the capital structure.”²² The Cuban subsidiary contributed 57% of the gross revenue of A&FP in 1928, more than twice the next largest contributor, its Brazilian subsidiaries.²³ In 1929, after acquisition of properties elsewhere (Chile, Mexico, and Shanghai, China), the Cuban subsidiary’s contribution to A&FP’s total revenue fell to 29%, still more than subsidiaries in any other country. A&FP claimed over \$750 million in assets on its consolidated balance sheet for 1929.²⁴

The emerging world-wide Depression began to adversely affect A&FP. Gross revenues of the Cuban Electric Company declined by 1% in 1930, while net revenues rose slightly. Because of exchange rate depreciation in several countries, overall gross dollar revenue of A&FP was down about 3% over the course of the year. The company, nevertheless, continued to acquire properties in 1930, including several small ones in Cuba and India. Total assets of the company grew to \$987 million.²⁵

The years immediately following would prove to be very difficult for Cuban Electric and for A&FP as well. In 1931, total assets of A&FP almost reached \$1 billion but then fell to

²¹ *Moody’s Manual of Investments*, Public Utility Securities, New York: Moody’s Investor Services, 1928, 1653.

²² American & Foreign Power Company Inc., Annual Report for 1928, May 23, 1929, 6.

²³ *New York Times*, Mar. 15, 1929, 40; June 11, 1929, 44.

²⁴ American & Foreign Power Company Inc., Annual Report, 1929, 7, 26; *New York Times*, May 28, 1930, 43.

EB&S maintained a special relationship with A&FP. It was the only sub-holding company in the system in which EB&S had retained majority ownership. In March 1929, EB&S reorganized, creating a new company with the same name. In the process, EB&S increased its investment account instantaneously by \$400 million, all of which was attributed to an increase in the “market value” of A&FP. U.S. Federal Trade Commission, *Utility Corporations*, U. S. Senate, 70th Congress, 1st session, Document 92, parts 23 and 24, Washington: USGPO, 1930, 410.

²⁵ American & Foreign Power Company Inc., Annual Report, 1930. The Cuban peso was pegged to the U.S. dollar at parity. The company also raised \$50 million by selling gold debentures to a bank syndicate and sold a \$20 million debenture of the Cuban Electric Company to its parent company, EB&S.

roughly \$750 million in 1932, where they stayed for the rest of the decade.²⁶ Operating revenues fell by roughly 18% in dollar terms for both Cuban Electric and A&FP overall. The Depression hit Cuba very hard. Between 1929 and 1933 exports fell 70% and imports 80%. Between 1928 and 1933, net national product in current prices fell by 26%.²⁷ These difficulties generated considerable political and labor unrest.

A&FP had a very close relationship with the leader of Cuba at the time, General Gerardo Machado, who had risen to prominence in the Cuban War of Independence. The Cuban Electric Company was considered by many to be almost part of the government of Cuba, even though it was foreign owned. One of the properties EB&S acquired in 1923 was previously owned by Machado. He became mayor of Santa Clara and owned the Compañía Cubana de Electricidad in that city. When EB&S bought the company in 1923, Machado retained the title of vice-president. A&FP supported Machado and invested \$500,000 in his successful campaign for president in 1924. Machado generally favored foreign investment and suppression of labor unions, and clearly looked after the company's interests. The company's close ties, however, may have contributed to consumer and labor unrest. There were periodic local boycotts and municipalities passed numerous resolutions demanding lower lighting rates. Machado vetoed forty-six of these municipal resolutions during his term.²⁸

Troubles, both in Cuba and for A&FP, escalated during 1931-34. In the summer and fall of 1931 there was a nationwide campaign in Cuba against high electric rates, including demands that the company lower average rates from 16 cents to 10 cents per kilowatt hour, that it reduce the minimum flat rate, and that it reduce industrial rates proportionally. Numerous mass meetings were held, boycotts threatened and initiated, and one municipality proposed converting the local electric plant into a cooperative.²⁹ At the protest's peak, the company may have lost as many as 40,000 customers due to boycotts.³⁰ As noted above, operating revenues in Cuba fell by

²⁶ Consolidated assets did not approach \$1 billion again until 1954, by which time the dollar had lost almost half its value in 1931. American & Foreign Power Co., Annual Reports.

²⁷ B.R. Mitchell, *International Historical Statistics: The Americas, 1750-1988*, 2nd edition, New York: Stockton Press, 1993, 189, 279, 424-28, 750.

²⁸ Thomas F. O'Brien, "The Revolutionary Mission: American Enterprise in Cuba," *American Historical Review*, 98 (June 1993), 774-76.

²⁹ *New York Times*, July 5, 1931, 36.

³⁰ O'Brien, "Revolutionary Mission," 776.

18% in 1931, but there was otherwise no mention of the Cuban protests in the company's annual report, and it appeared to be weathering the storm.³¹

The boycott of 1931 gradually subsided, and 1932 was relatively quiet, at least in Cuba. Operating revenues of the Cuban subsidiary, however, fell by another 21% in 1932, and A&FP was forced to suspend dividend payments on its preferred stock.³² The price of sugar was 59% lower in 1932 than it had been in 1929, putting tremendous strain on the nation's sugar industry and its workers.³³

“As the national economy disintegrated, Cuban society rapidly advanced into a state of undeclared civil war.”³⁴ In March 1933, a bomb exploded at the Cuban Electric Company's headquarters in Cienfuegos. No casualties were reported, but the bomb did considerable damage. Patrolmen in different parts of that city and in Havana reportedly came under fire.³⁵ Organized labor was active in protests. In July, bus drivers went on strike. Soldiers fired on demonstrators in Havana on August 1, killing several people. Across the country, more workers joined the strike, including tobacco workers and journalists in Pinar del Rio, and typographers, journalists, and dock workers in Havana. The military took control of Havana on August 9. Machado resigned on August 11 and fled the country.³⁶ By the end of the year, several American-owned sugar mills announced that they were suspending operations due to unreasonable union demands.³⁷ The *Wall Street Journal* reported that there had been little damage to the properties of the Cuban Electric Company, and that it was one of the few organizations whose employees did not join the strike. However, the company had suffered a loss of revenue due to “the revolution.”³⁸

After a brief period of collective leadership, Ramón Grau San Martín was named President of Cuba. Protests and boycotts against the power company continued. With the

³¹ Electric Bond & Share wrote down its investment in A&FP in December 1931 by the same amount, \$400 million, it had written up the investment in 1929. U. S. Federal Trade Commission, *Utility Corporations*, United States Senate, 70th Congress, 1st session, Document 92, part 66, Washington: USGPO, 1934, 1266, 1274.

³² It had never paid dividends on its common stock.

³³ “The Foreign Power System,” New York: American & Foreign Power Company Inc., c. 1953, 41.

³⁴ Thomas F. O'Brien, *The Revolutionary Mission: American Enterprise in Latin America, 1900-1945*, New York: Cambridge University Press, 1996, 231.

³⁵ *New York Times*, March 18, 1933, 30.

³⁶ “Cubans General Strike to Overthrow President, 1933,” Global Nonviolent Action Database, <http://nvdatabase.swarthmore.edu/content/cubans-general-strike-overthrow-president-1933>, accessed June 19, 2017.

³⁷ *New York Times*, Dec. 7, 1933, 10; *Washington Post*, Dec. 7, 1933, 9.

³⁸ *Wall Street Journal*, August 15, 1933, 9.

agreement of A&FP, a commission to study the rate issue was created. It recommended rate cuts averaging 25%. On Dec. 7, 1933, President Grau issued a decree ordering the company to reduce its electric and gas rates by 45% across the country without reducing wages or reducing personnel. The company protested vehemently. Other American-owned firms also faced demands to lower rates. The Cuban Telephone Company, a subsidiary of the International Telephone and Telegraph Company, was ordered to reduce rates for personal and business lines by 40% and 44%, respectively.

On December 16, 1933, employees and managers of the Cuban Electric Company announced that a strike scheduled to have begun that day would be postponed for thirty days. The company had agreed to thirty of forty-one demands, including those for a 48-hour work week and fifteen days of paid vacation, but wanted more time to consider the remaining demands. The company also announced that it was appealing the 45% rate reduction to the Supreme Court.³⁹ The company failed to accept enough of the employee's demands, and negotiations broke down. The strike was to begin on January 14, 1934. The secretary of the Light and Power Workers' Union announced that "It will be a strike of blood and fire."⁴⁰ There were reports of physical intimidation and violence against more moderate employees of the company, and the company's attorney was beaten by employees in the main office building.⁴¹ When the strike indeed began, the Cuban government seized control of the company, and service was reduced but not entirely suspended. The President of the Cuban Electric Company, S. J. Mahoney, immediately protested to the U.S. State Department. The seizure was not considered to be permanent by President Roosevelt's personal envoy in Havana, rather it was thought to be a "provisional intervention."⁴² Union members were put in day-to-day control of the company.⁴³

At the same time the government assumed control of the electric company, army Sergeant Fulgencio Batista led a successful coup. Carlos Mendieta, a revolutionary war veteran and opponent of Machado, was made President of Cuba.⁴⁴ On January 20, it was announced that

³⁹ *New York Times*, Dec. 16, 1933, 11; *Washington Post*, Dec. 16, 1933, 2. The articles also noted that a demonstration of 35,000 people had been held in Havana that day to express gratitude to the Grau administration for a recent decree mandating use of at least 50% Cuban labor in foreign-owned firms.

⁴⁰ *New York Times*, Jan. 14, 1934, 14.

⁴¹ *Ibid.*

⁴² *New York Times*, Jan. 16, 1934, 19; *Wall Street Journal*, Jan. 16, 1934, 2.

⁴³ O'Brien, "Revolutionary Mission," *AHR*, 780.

⁴⁴ Batista became Army Chief of Staff, which gave him control of the Cuban Army.

employees and officials of the Cuban Electric Company were trying to settle the labor dispute.⁴⁵ Several days later, Pres. Mendieta formed a commission to study the problems raised by the recent strike and the decree mandating the 45% rate reduction.⁴⁶ Jesus Corroero, Luis Machado, a cousin of former President Machado, and Eduardo Chibas, Sr. were appointed to the commission.⁴⁷ Within days, managerial control was returned to the company. Electricity, gas, water, and streetcar service workers across the country immediately commenced a strike. Military guards were placed at power plants and main offices of Cuban Electric. It was reported that the company had accepted all the long-standing demands of the union, but employees had balked at replacement of the general manager. President Mendieta issued a stern proclamation asking for cooperation “to free Cuba from a state of chaos and ruin.”⁴⁸ Simultaneously, the government suspended all authorizations for public demonstrations. American officials were reportedly pleased by the actions of the Mendieta government, but tobacco workers and bus drivers remained on strike, and student protests were ongoing.⁴⁹ Chaos continued with intermittent bombings and shootings. Electric power was only partially restored, and the former general manager of the company and strike leaders, were placed under arrest.⁵⁰ The labor dispute finally ended in May when the company capitulated to most of the union demands.⁵¹ But after the brutal repression of another general strike in 1935, Carlos Mendieta lost support, including Batista’s, and was forced to resign in December. Batista remained the power behind a series of puppet Presidents, until he took the office himself in 1940.⁵²

In its 1933 annual report, A&FP for the first time acknowledged the difficulties of its Cuban subsidiary, lamenting the decline in revenues (total revenues by 12.4% and net revenues by 27%), the rate reduction decree, the strike, the temporary government takeover, and the

⁴⁵ *Wall Street Journal*, Jan. 20, 1934, 3.

⁴⁶ *New York Times*, Jan. 26, 1934, 13.

⁴⁷ *Washington Post*, Jan. 29, 1934, 3.

⁴⁸ *New York Times*, Feb. 4, 1934, 21.

⁴⁹ In response to the U.S.-friendly coup, Franklin D. Roosevelt on March 9, 1934, issued an executive order creating the Second Export-Import Bank of Washington (the first bank having never made any loans). Its initial purpose was to facilitate trade with Cuba. The first loan made by the bank was to finance Cuba’s purchase of silver ingots from the U.S. This may have been to bolster the value of the Cuban peso, which was linked one-to-one to the dollar. The two banks were later merged into the Export-Import Bank. <http://www.exim.gov/about/history-exim/historical-timeline/legislative-history>, accessed June 21, 2017.

⁵⁰ *Washington Post*, Feb. 5, 1934, 2.

⁵¹ *Wall Street Journal*, June 1, 1934, 9.

⁵² “Cubans General Strike to Overthrow President, 1935,” Global Nonviolent Action Database, <http://nvdatabase.swarthmore.edu/content/cubans-general-strike-overthrow-president-1935> accessed June 19, 2017.

difficulties the government and municipalities were having in paying their bills. Nonetheless, the company remained hopeful for the future, praising the reduction in the tariff on Cuban sugar of 25% and the establishment of a quota for Cuban sugar imports into the United States.⁵³

Operating revenues of the Cuban Electric Company continued to decline in 1934, finally reaching a trough. They were 18% lower in 1934 than they had been in 1933. Overall, operating revenues declined by 52% from 1929 to 1934.⁵⁴

The Cuban economy began to improve slowly after 1934. Net national product rose by 23% from 1933 to 1940.⁵⁵ Gross operating revenues of the Cuban Electric Company rose from \$10.6 million to \$12.0 million over the same period, a 13% increase. In 1940, the Cuban subsidiary was contributed 20% of the operating income of A&FP, still more than its subsidiaries in other countries.⁵⁶

Aftermath of the Crash and Depression: Company Reorganizations

Holding companies in the U.S. had frequently been accused by progressives of using their excessive power to victimize both utility customers and outside investors. The Depression brought the collapse of several prominent utility holding companies, and most of those that survived suspended dividend payments.⁵⁷ With the New Deal, the critics of holding companies came into power, and they acted swiftly and punitively. The Public Utility Holding Company Act of 1935 (PUHCA) contained a “death sentence” that mandated the dissolution of most holding company systems in the U.S. within three years. The newly-formed Securities and Exchange Commission (SEC) was made responsible for enforcement of PUHCA. All nonexempt holding companies had to register with the SEC. Despite the three-year mandate, full implementation took decades because of litigation initiated by the companies, and the law’s complex requirements.⁵⁸

⁵³ American & Foreign Power Company Inc., Annual Report, 1933.

⁵⁴ American & Foreign Power Company Inc., Annual Report, 1934.

⁵⁵ Net national product figures for Cuba were not available for 1934. Mitchell, *Historical Statistics*, 750.

⁵⁶ American & Foreign Power Co., Annual Reports, 1933-1940.

⁵⁷ The collapse of Samuel Insull’s empire was probably the best known and most widely publicized. Electric Bond & Share survived the crash but was weakened substantially.

⁵⁸ John L. Neufeld, *Selling Power: Economics, Policy, and Electric Utilities Before 1940*, Chicago: University of Chicago Press, 2016, 147-52. The SEC won its case against EB&S in the Supreme Court on Mar. 28, 1938. The court held that the registration provisions of the act were constitutional. This decision essentially ended litigation on

A&FP (but not its parent, EB&S) was exempt from most of the law's severe requirements because none of its subsidiaries operated in the U.S. Although EB&S remained the largest shareholder of A&FP, the two companies had no officers, directors, or employees in common. In December 1939, A&FP resumed paying dividends.⁵⁹ In January 1943, the international division of Ebasco Services, then a subsidiary of EB&S, was transferred to Ebasco International, a subsidiary of A&FP.⁶⁰

Eventually, EB&S divested all its subsidiaries, retaining only its service company, Ebasco Services, Inc. and a controlling interest in A&FP. A&FP was required by the SEC to simplify its financial structure, which then consisted of debentures, serial notes, bank notes, three classes of preferred stock with dividend arrearages of \$410 million, common stock, and option warrants. Difficulty obtaining financing delayed A&FP's financial simplification until 1949, when EB&S transferred debt it held of Cuban Electric to A&FP and restructured AF&P's debt to it.⁶¹ A&FP was then able to obtain bank financing and reorganized its financial structure in February 1952.

Progress and Setbacks in the 1950s

From 1940 to 1952, the operating revenues of the Cuban Electric Co. nearly tripled from \$12 million to \$47.3 million.⁶² In 1952, Cuban Electric contributed 25% of the total operating revenues of A&FP, which had risen from \$61.4 million to \$187.2 million.⁶³ Total assets on the

the constitutionality of the act. *New York Times*, Mar. 29, 1938, 9. U.S. Securities and Exchange Commission, *Tenth Annual Report*, Philadelphia, by the Commission, 1944, 84.

⁵⁹ American & Foreign Power Company, Annual Report, 1939, 8-9. The company subsequently registered as a public utility holding company with the SEC. *Kantor v. American & Foreign Power Co.*, U.S. Court of Appeals for the First Circuit – 197 F.2d 307 (1st cir. 1952), 2.

⁶⁰ *New York Times*, Oct. 23, 1942, 33; Jan. 26, 1943, 27. The SEC did not grant EB&S's request for exemption from provisions of PUHCA until 1959. *New York Times*, June 25, 1959, 39.

⁶¹ U.S. Securities and Exchange Commission, *Sixteenth Annual Report*, Washington: USGPO, 1950, 68-70. *New York Times*, Oct. 27, 1944, 27; *Wall Street Journal*, Dec. 20, 1949, 16. A&FP wrote off its Shanghai property during World War II.

⁶² Adjusting for changes in the U.S. consumer price index, operating revenues slightly more than doubled (a 108% increase). Williamson, MeasuringWorth.

⁶³ In 1951, the International Bank for Reconstruction and Development (World Bank), in collaboration with the government of Cuba, issued a report on a technical and economic mission that had been conducted in 1950. The report noted the relatively high rates for industrial electric power. For non-industrial uses, the report cited the fact that the system owned by the Cuban Electric Co. was operating close to capacity with outdated and inefficient equipment, that expansion was necessary, and that "the true financial position of the Company is hard to assess" (p. 325). The report went on to state that "By standards of other countries, however, rates are high and, as already noted, some big industrial consumers who could buy the Company's power are finding it cheaper to generate their own.

consolidated balance sheet of A&FP rose from \$755 million to \$914 million. In its 1952 annual report, A&FP announced a planned increase in generating capacity in Cuba of 45%, later raised to 63%, by the end of 1955. In addition to two \$12 million loans from the Export-Import Bank, the company was successfully raising funds in Cuba through a consortium of local banks and security sales to the public, about which it was very proud. While frequently expressing concern about the heavy reliance on sugar, A&FP felt that the Cuban economy had untapped potential. Consolidated operating revenues of A&FP in the 1950s remained flat, fluctuating around \$200 million per year, while consolidated assets of the company rose to \$1.2 billion by 1959.⁶⁴ Cuban Electric raised the annual dividends paid to A&FP, which owned 88% of the shares, during the 1950s from \$.50 per share in 1952 to \$1.50 per share in 1956-58.⁶⁵ A&FP's annual reports were filled with optimism during this period. But there remained periodic unrest in Cuba, unacknowledged publicly by the company, and the situation changed dramatically at the end of the decade.

Fidel Castro and the Expropriation of the Cuban Electric Company

After a lengthy, sporadic revolutionary campaign, Fidel Castro took control of the Cuban government on January 1, 1959. The full implications for foreign investors were not immediately clear. Castro clearly had been advocating radical reforms, but opposition to the Batista regime seemed central to his concerns. Some accounts held that after ousting Batista, Castro intended to rule for several years and then hold free elections. Once in power, however, Castro acted to consolidate his power, including naming himself Prime Minister in February. There would be no elections.⁶⁶

There are widespread public complaints, too, about the cost of electric power" (p. 326). The report suggested that Cuban Electric focus on expansion of non-industrial power. International Bank for Reconstruction and Development, "Report on Cuba," Washington, D.C., 1951, 170, 323-27.

⁶⁴ A&FP eventually was compensated for the expropriation of most of its Argentine properties, but the compensation had to be invested in Argentina. American & Foreign Power Company, Annual Reports, 1952-1959.

⁶⁵ *Moody's Public Utility Manual*, August 1965, New York: Moody's Investor Services, 1965, 1548.

⁶⁶ Lily Rothman, "How Fidel Castro Went from Revolutionary to Ruler," Time.com, Nov. 26, 2016, <http://time.com/3666177/fidel-castro-cuba-history/> (accessed June 28, 2017); also see in the left-leaning magazine *Jacobin*, Samuel Farber, "Cuba's Challenge," <https://www.jacobinmag.com/2015/06/cuban-revolution-fidel-che-raul-castro/> (accessed June 28, 2017). In a visit to the United States in April, Castro denied, in a speech to the National Press Club, that his brother Raúl was a Communist and asserted that there were no Communists in his government. R. Hart Phillips, "Reds' Alleged Role in Castro's Regime Alarming Havana," *New York Times*, April 24, 1959, 1.

One of Castro's spokespersons in the U.S., Constantine Kangles, U.S. general counsel for the Republic of Cuba, reassured American investors by maintaining that Castro would use U.S. programs, such as the New Deal and Fair Deal, as templates, and was primarily concerned with improving life in rural villages. He asserted that "the Cuban regime has no intention of nationalizing property, foreign or domestic." Kangles cited Manuel Urrutia, Castro's choice for Provisional President, as the source of these positive statements.⁶⁷ Other news from the new regime was not so reassuring. The *New York Times* reported that there had been "widespread reports" that Castro favored nationalization of all utilities, including the properties of A&FP and International Telephone and Telegraph (IT&T).⁶⁸ In late February, the government announced the creation of a commission to investigate the operations and rates of both Cuban Telephone (an IT&T subsidiary) and Cuban Electric. The Minister of Communications, Enrique Oltuski, an American-trained engineer, headed the commission. Oltuski asserted that the study would be thorough and that he expected to be able to lower rates, but that there would be no government intervention in the operation of the companies.⁶⁹

The commission released its report on Cuban Electric in late June, but A&FP claimed not to have been given a copy until August, after a rate reduction already had been ordered.⁷⁰ The report criticized the company for its perceived inefficiencies and was particularly harsh regarding what it claimed were its "excess profits" and "overvaluation" of assets. It noted the critical importance of access to electricity as a component of modern life and asserted that strict regulation or state ownership was necessary in order to reduce inefficiencies.⁷¹ The Agrarian Reform Law of May 17, 1959 had shocked the sugar interests (with its prohibition of foreign ownership) and ranchers (with its dismantling of large land holdings), but mining, petroleum, hotel, and utility interests "seemed a little bit more hopeful than they did even a few months ago." The regime was perceived to be more honest than previous ones, and "economists...feel

⁶⁷ *New York Times*, Jan. 4, 1959, 8. Urrutia (Manuel Urrutia Lleó) lasted six months before being accused of treason by Castro. After years of house arrest and asylum in the Venezuelan and Mexican Embassies in Havana, he received a safe conduct pass to the U.S. and became a leader of vehemently anti-Castro organizations and a professor. See his obituary in the *New York Times*, July 6, 1981, D7.

⁶⁸ Gene Smith, "Utilities in Cuba Await Their Fate," *New York Times*, Jan. 18, 1959, F1.

⁶⁹ *New York Times*, Feb. 24, 1959, 12; *The Militant*, March 2, 1959, 1.

⁷⁰ American & Foreign Power Co., Annual Report, 1959, 18.

⁷¹ Russell M. Tremayne, "The Cuban Electric Company: A Study of Expropriation," M.A. Thesis, Boise State University, 1982, 8-9. The company had been subject to a maximum rate of 9.3 cents per kilowatt-hour for the first 100 kilowatts of use since 1933, but by the 1950s this would have been non-binding. Tremayne, "Cuban Electric," 12.

that Dr. Castro is slowly learning that, if he is to succeed, he must be much more considerate of foreign investors, particularly Americans.”⁷² That was the last positive bit of news the owners of the Cuban Electric Co. received.

On August 20, 1959 Cuban Electric was ordered to cut its basic rate from 9 cents to 6 cents per kilowatt-hour, and its overall rates by 30.5%, retroactive to Aug. 1. Castro and his cabinet cited the commission report, highlighting excessive engineering service fees, excessive fuel costs, and inadequate administrative procedures. The company also was ordered to continue its expansion program.⁷³ The President of A&FP, Henry Sargeant, immediately returned to New York from Argentina, where Argentine properties taken over by the government were being appraised, to discuss the situation.⁷⁴ The timing of the announcement was unfortunate for the company. It occurred a day after an issue of \$15 million of A&FP 6% convertible debentures, due in 1984, had been oversubscribed in the bond market but not yet delivered by a consortium of investment banks led by First Boston. The price of A&FP’s stock immediately fell 17% to a level 25% below the exercise price provided by the debentures, sharply reducing their value to investors. The next day, “in a financial move without parallel in recent memory,” the issue (which came to be known as the “Castro convertibles”) was cancelled. Henry Sargeant vowed to go to Cuba to discuss the situation, hoping to bring back the bond issue soon.⁷⁵ This never happened.

In September, Roberto Acosta, head of the government’s rate investigation commission, asserted that the government had no intention of “confiscating or destroying” the Cuban Electric Company, wishing only to regulate it. The commission recommended reducing the book value of the “inflated assets” of the company from \$292 million (as of Dec. 1958) by \$86 million. An additional \$46 million of “accumulated reserves” was also removed from the value of assets, leaving a figure of \$160 million, on which the company was to be allowed a 7% return, which would sharply reduce revenue. The company strenuously objected to the reductions and requested that it be allowed to send “a group of experts to work with the investigating committee.” Acosta welcomed the idea and stated that “we are willing to reconsider our decision

⁷² Gene Smith, “Castro Believed More Amenable,” *New York Times*, Aug. 9, 1959, F1.

⁷³ *New York Times*, Aug. 21, 1959, 5; *Wall Street Journal*, Aug. 21, 1959, 2. A&FP, in its 1959 Annual Report, indicated that the overall rate reduction amounted to 22%.

⁷⁴ *New York Times*, Aug. 26, 1959, 47.

⁷⁵ *New York Times*, Aug. 26, 1959, 39; Aug. 27, 1959, 37.

if the company can prove to us that we are wrong.”⁷⁶ In October, Communications Minister Oltuski reiterated that the company had not yet demonstrated a sufficient reason to justify suspension of the decree reducing rates but claimed that he remained ready to discuss the matter further.⁷⁷ Nothing came from this. In November, A&FP cut its dividend by half, to 12.5 cents per share and opened negotiations for a \$10 million loan from the Cuban government. The loan was to partially replace the \$15 million bond issue that had been cancelled when the rate reduction was announced. It was to be used for expansion of the electrical system in Cuba. Cuban Electric executives remained “optimistic about prospects for negotiating a revision of the rate cuts.” They had submitted a 108-page answer to the order cutting rates and felt that they had “a good case.”⁷⁸

Cuban Electric had stopped making dividend payments, most of which went to A&FP, in September 1959. The company defaulted on an \$8 million bank loan due in November, and suspended payments on its Export-Import Bank construction loan.⁷⁹ In March 1960, A&FP announced that its net earnings for 1959 had declined by 31%, due mostly to the reduction of electricity rates in Cuba. Negotiations between A&FP and the government regarding rates had reached an impasse by early 1960 and it was clear that A&FP was preparing for a potentially more disturbing intervention.⁸⁰

Relations between the U.S. and Cuba deteriorated through the first half of 1960, as Cuba moved closer politically to the Soviet Union, and the U.S. responded. On July 6, 1960, Cuba passed Law No. 851 (the Nationalization Law), a direct response to President Eisenhower’s decision to cut Cuba’s 1960 sugar quota, essentially completely shutting off the U.S. market for the rest of the year, leaving Cuba with huge inventory of unsold sugar that had little prospect of being purchased by other countries.⁸¹ This law set up the legal means for the seizure of American-owned properties.⁸² On August 6, 1960, Cuba nationalized the Cuban Electric

⁷⁶ *New York Times*, Sept. 12, 1959, 25. The A&FP Annual Report, 1958 (p. 28), states that the capitalization of the Cuban subsidiary was \$272 million in 1958. The 1960 Annual Report (p. 7) noted that when Cuban Electric was expropriated, there were approximately \$280 million in outstanding securities.

⁷⁷ *New York Times*, Oct. 14, 1959, 16.

⁷⁸ *Wall Street Journal*, Nov. 2, 1959, 12; Nov. 6, 1959, 25; *New York Times*, Mar. 10, 1960, 43.

⁷⁹ American & Foreign Power, Annual Report, 1959, 32.

⁸⁰ Tremayne, “Cuban Electric,” 30-32.

⁸¹ *New York Times*, July 7, 1960, 1

⁸² Tad Szulc, “Havana Is Ready to Seize More American Property,” *New York Times*, July 7, 1960, 1. For the text of the law, see “Cuba Nationalization Law,” *American Journal of International Law*, 55 (July 1961), 822-24. The law contained a provision for compensating the owners of seized properties with government bonds. Payments were tied to sugar purchases made by the United States in excess of 3 million tons annually, a completely unrealistic provision. Alan Dye and Richard Sicotte, “The U.S. Sugar Program and the Cuban Revolution,” *Journal of*

Company, the Cuban Telephone Company, three American-owned oil refineries, and thirty-six American-owned sugar mills “in retaliation for the ‘economic aggression’ of the United States.” The properties were immediately seized by the military and civilian militia.⁸³ Relations continued to deteriorate. A U.S. embargo on shipments of material to Cuba in October 1960 led to the nationalization of remaining American-owned businesses in Cuba.⁸⁴

The Aftermath of Nationalization

In its 1960 Annual Report, A&FP acknowledged the loss of its Cuban properties, for which it was not expecting to be compensated. It stated that the amount of securities of Cuban Electric outstanding was approximately \$280 million, 72% of which were held by U.S. interests: 60% by A&FP and 12% by the Export-Import Bank, other U.S. banks, and mutual investment funds.⁸⁵ In January 1961, two New York banks charged off loans they had made to Cuban Electric.⁸⁶

In 1962, the U.S. Internal Revenue Service (IRS) ruled that U.S. citizens and corporations could claim tax deductions for certain losses of property seized in Cuba. The Commerce Department had estimated total losses to have a book value of roughly \$1 billion.⁸⁷ The Cuban government’s compensation offers were recognized as completely unrealistic. A&FP wrote off its entire investment in Cuban Electric (listed for tax purposes as \$168 million) in 1960, which wiped out the company’s tax liabilities into the mid-1960s. The IRS cautioned, however, that should any of these losses eventually be recovered, such compensation would be considered taxable income when received.⁸⁸

A&FP would struggle after the loss of its largest property and gradually withdraw from the business of operating foreign electric utilities.⁸⁹ In its 1961 Annual Report, the company

Economic History, 64 (Sept. 2004), 673-704, explore the relationship between U.S. sugar quota policies in the 1950s and the coming of the revolution.

⁸³ *New York Times*, Aug. 8, 1960, 1. Compensation was set according to the Nationalization Law.

⁸⁴ R. Hart Phillips, “Cubans Expect Quick Seizure of American-Owned Property,” *New York Times*, Oct. 20, 1960, 9.

⁸⁵ American & Foreign Power, Annual Report, 1960, 7.

⁸⁶ Manufacturers Trust charged off \$1.5 million and Irving Trust \$750,000. *Wall Street Journal*, Jan. 26, 1961, 4.

⁸⁷ The FCSC later raised this figure to \$1.9 billion. See “Introduction” above.

⁸⁸ *Wall Street Journal*, Nov. 7, 1962, 2.

⁸⁹ In addition to the confiscation of its Cuban properties, in 1959 A&FP had been forced to sell its Mexican properties to the government. It already had lost its Argentine properties. American & Foreign Power Co., Annual Report, 1959.

noted that it was by then receiving over one-third of its income from a diversified portfolio of non-utility direct investments and foreign government bonds and that it intended to increase this percentage.⁹⁰ A&FP, still a subsidiary of EB&S, became a registered investment company in February 1961 and continued to shed, or be shorn of, its utility properties. As noted above, EB&S and A&FP merged in April 1967, adopting the name Ebasco Industries, which then merged with Boise Cascade in 1969.⁹¹ Ebasco Industries at this time was described as “a closed-end investment company with subsidiaries engaged in engineering design, construction, and consultation in the utility, chemical and construction fields throughout the world.”⁹² There was no mention of foreign utilities, but the company still owned several South American utilities and other properties and investments it had purchased with compensation it received for other expropriations in South American countries. In 1973, Boise Cascade sold Ebasco Services, the engineering division of Ebasco Industries, to Halliburton.⁹³ By 1976, Boise Cascade had shed all its Latin American investments not related to forest products, leaving the Cuba claim as the only remaining asset from its merger with Ebasco Industries.⁹⁴ This is the claim that passed through OfficeMax to Office Depot.

Claims under the Foreign Claims Settlement Act

In 1964, the U.S. Congress directed the Foreign Claims Settlement Commission (FCSC) to evaluate and certify claims of U.S. citizens against Cuba based on losses due to expropriations and other takings from the date of Castro’s takeover until the program’s authorization.”⁹⁵ The

⁹⁰ The SEC recognized the changing nature of the company by exempting EB&S from PUHCA in August 1960. U.S. Securities and Exchange Commission, *27th Annual Report, fiscal year ended June 30, 1961*, 87th Congress, 2nd Session, House Document No. 269 (Washington: USGPO, 1962), 100-01.

⁹¹ *Wall Street Journal*, Feb. 28, 1967, 4; Mar. 1, 1967, 25. *New York Times*, July 15, 1968, 43.

⁹² *Wall Street Journal*, July 24, 1969, 13.

⁹³ After the U.S. Justice Department filed an antitrust suit, Halliburton sold the division to Enserch (previously Lone Star Gas) in 1976. Raytheon then purchased the division in 1993. From there the company begins to fade into obscurity. It was mentioned as a “legacy” company of Washington Group International in an article on the World Trade Center terrorist attack, in which the company lost 18 employees. Washington Group was later purchased by URS Corp, itself purchased in 2014 by AECOM, a Fortune 500 company. Ebasco Services, however, is no longer specifically identified as a subsidiary on the company’s web page;

<http://siteselection.com/ssinsider/special/sp010917b.ed3.htm>; https://en.wikipedia.org/wiki/URS_Corporation; <https://en.wikipedia.org/wiki/AECOM> (accessed July 5, 2017).

⁹⁴ *New York Times*, Nov. 17, 1972, 67; *Wall Street Journal*, April 25, 1973, 2; May 13, 1976, 12.

⁹⁵ Richard E. Feinberg, “Reconciling U.S. Property Claims in Cuba: Transforming Trauma into Opportunity,” Brookings Institution Latin America Initiative, December 2015, 16-17. For information on the Foreign Claims Settlement Commission see <https://www.justice.gov/fcsc> (accessed July 5, 2017).

Cuban Electric Company clearly was covered by this action and a claim was duly filed in its name.⁹⁶ Ebasco Industries filed a separate claim in its own name. Both claims later were assigned to Boise Cascade and now are held by Office Depot.⁹⁷

Ebasco's claim in its own name included the value of land (\$114,000), mortgage bonds issued by the Cuban Electric Co. held by Ebasco (\$11.3 million, plus interest), and contractual rights to receive bonds to be issued by Cuban Electric to replace collateral (\$29.9 million), for a total claim of \$42.7 million. The Commission found the claims for land and the mortgage bonds to be valid, but denied the claims for the contractual rights to receive bonds in the future.⁹⁸ The total certified claim was \$11.75 million.

The original claim on behalf of the Cuban Electric Co. was for \$323.6 million. It included the loss of utility plants (\$285.3 million), other current assets (\$30.2 million), other investments, losses on equipment sales, liability to suppliers, deferred debits, retirement plan funding, resettlement of employees, and preservation of assets (which together summed to \$8.1 million). The Commission agreed on the value of the utility plants, but denied many of the other claims, including that for stocks or bonds in tennis, country, and yacht clubs, and most claims relating to employee resettlement and retirement funding. The total loss was set at \$319.4 million, from which was deducted debts owed to agencies of the government of Cuba (\$41.1 million, including that owed to the Cuban bank, Financiera Nacional de Cuba). The Commission also deducted the \$11.75 million already certified as a loss to Ebasco, making the total certified loss \$266.5 million. Boise Cascade's lawyer filed an objection to the denied claims. A hearing was held and a final decision was issued on August 19, 1970. The Commission agreed to add \$1.05 million to the original claim, making the final certified loss \$267.6 million.⁹⁹

⁹⁶ Foreign Claims Settlement Commission (FCSC), Claim No. CU-2578; Decision No. CU-4122, <https://www.justice.gov/fcsc/cuba/documents/1501-3000/2578.pdf> (accessed July 5, 2017).

⁹⁷ Foreign Claims Settlement Commission, Claim No. CU-3548; Decision No. CU-3866, <https://www.justice.gov/fcsc/cuba/documents/3001-4500/3548.pdf> (accessed July 5, 2017). There is no market for these claims; it is illegal to sell them.

⁹⁸ The decision was issued on Sept. 11, 1969. The Commission held that the holder of the collateral for the bonds, the Export-Import Bank, would be the proper claimant, but that as an agency of the U.S. government the Bank was not eligible to make a claim under the Act. FCSC, Decision No. CU-3866, 6.

⁹⁹ FCSC, Claim No. 2578. From Aug. 6, 1960 until the time of settlement of the claim, 6% annual interest was to be added to the claim. No funds have yet been paid out. Boise Cascade also inherited from Ebasco the largest claim in the China Claims Program due to the loss of A&FP's Shanghai Power Co. Its certified claim was \$54 million. The China Program was completed when China agreed to a payment of \$80.5 million to the U.S. government (roughly the amount of Chinese assets frozen in the U.S.). There were 381 certified claims totaling \$197 million. Payments amounted to \$1,000 plus 39.03% of the claim. It does not appear that interest was paid. This forced Boise Cascade to initiate a campaign to find private Shanghai residents who owned shares of the company in 1949. *New York*

Next Steps

We have outlined here the fraught history of the Cuban Electric Company, a foreign-owned company intimately linked to the political history of both Cuba and the United States. The next step in this project is to collect and prepare comparative data on performance. How does the electricity sector in Cuba compare to that in similarly situated countries with different ownership structures? Data will be presented at the conference.

Times, Jan. 28, 1979, A22; Fox Butterfield, “Boise Seeks Lost Shareholders,” *New York Times*, Dec. 26, 1979, D1; FCSC, Completed Programs – China, <https://www.justice.gov/fcsc/completed-programs-china> (accessed July 7, 2017). A spokesperson for Boise Cascade acknowledged receiving partial compensation for the loss of A&FP’s China property but expressed skepticism that people would be buying Boise Cascade stock because of the outstanding Cuba claim. In addition, given the potential tax consequences, a company lawyer “said it was unclear whether the claim is, in fact, ‘a potential liability or a potential asset.’” *New York Times*, Oct. 6, 1991, F15.

Exhibit 2

DIPLOMATIC MEMO

In Talks Over Seized U.S. Property, Havana Counters With Own Claim

By Frances Robles

Dec. 13, 2015

MIAMI — Some of the thorniest conversations in the long road toward full relations between Cuba and the United States have only just begun in recent days: The two sides are sitting down for the first time to discuss the American properties Cuba confiscated decades ago.

The very idea of compensation for property and businesses seized in the wake of the Cuban revolution sent a quiver of excitement down the backs of the thousands of people who lost everything from sugar mills to family homes to oil refineries.

People started dusting off yellowing deeds. Lawyers were called.

But what if Cuba approaches these historic talks with a rather different unsettled claim in mind?

In 1999, a Cuban court found the United States government liable for deaths and damages caused by America's "aggressive policies" against the island — namely, the Bay of Pigs invasion and the trade embargo prohibiting American citizens and companies from doing business in Cuba.

Arguing that the United States had strangled Cuba's economy and caused irreparable harm, the court ordered the United States to pay \$181 billion in damages.

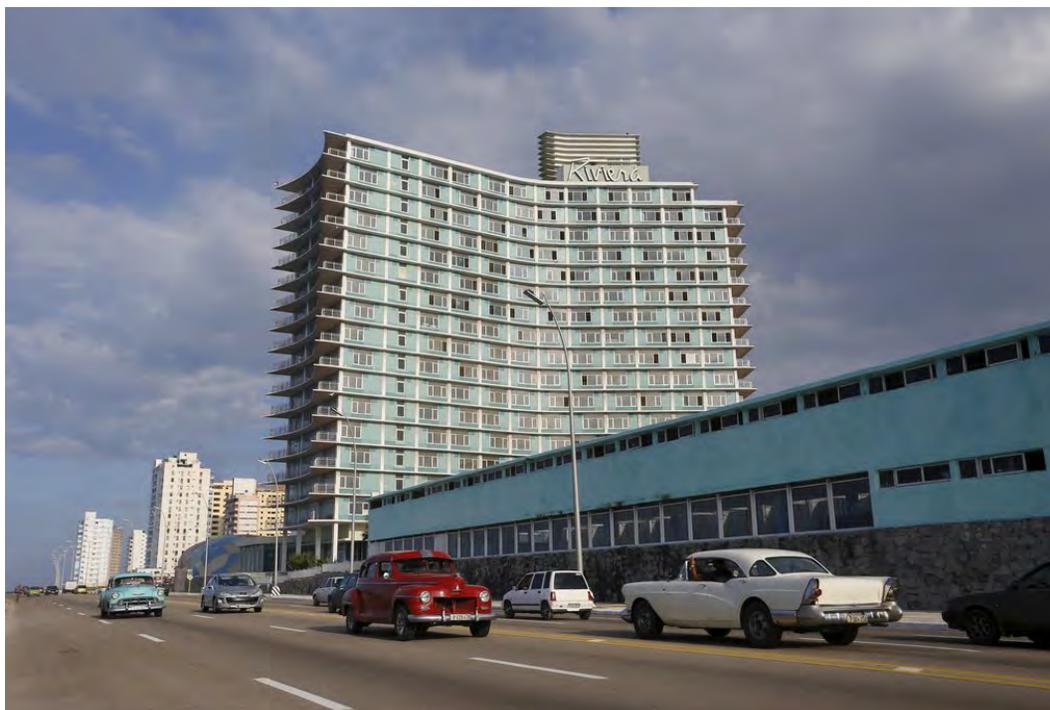
So while legal representatives from the State Department flew to Havana last week to make the case for American claims against Cuba, the Cubans made a presentation of their own.

"We know that they believe that they have billions of dollars of claims relating to human damage and economic damage resulting from the embargo," said a State Department official who briefed reporters on the condition that she not be named. "And I think we can expect that we will hear more about that as we proceed with these discussions."

The official would not say whether the Cubans demanded an exact figure in reparations. It is unclear how the Cuban government arrived at any of the many damage estimates bandied about.

At the United Nations this year, Cuba said it was owed about \$121 billion. The Cuban government-run news media says the amount owed is \$833.75 billion.

“This is an extremely complicated subject,” Josefina Vidal, head of United States affairs in the Cuban Foreign Ministry, told The Associated Press after the first meeting of the bilateral commission this fall. “I imagine that when the two countries begin to meet, one of the first things we will have to do is to clarify all the accounts.”



An American mobster's grandson is interested in compensation for the Riviera hotel in Havana. Reuters

(She noted that the Cuban court verdict was 15 years old, suggesting there were fresh numbers to crunch.)

The State Department official said last week's meeting was both preliminary and professional, but she emphasized that the issue of compensation for the confiscated properties was crucial. More meetings are expected in the coming months.

“This meeting is the first step in a complex process that may take some time, but the United States views the resolution of outstanding claims as a top priority for normalization,” the American official said.

In Havana, the American delegation detailed how the Foreign Settlement Claims Commission arrived at the \$1.9 billion in 5,913 certified American claims, which are estimated to be worth \$8 billion with interest. Most of the money is owed to American companies, experts say. The claims do not include any from the many thousands of Cubans who lost property before leaving the island and becoming American citizens.

The State Department also laid out the 10 state and federal court judgments American courts have levied against the Cuban government, totaling another \$2 billion or so, as well as “some claims of the U.S. government against Cuba,” the official said.

Experts said that American claimants should not be too worried about Cuba’s daunting counter-demands.

“Those are the opening positions,” said Richard E. Feinberg, a Latin America adviser during the Clinton administration who published a study on the claims issue this month for the Brookings Institution. “This is a negotiation.”

Mr. Feinberg noted that Cuban officials should be motivated to make a deal because they had no doubt paid close attention to the legislative elections last weekend in Venezuela, where the leftist government that keeps Cuba afloat financially took a beating at the polls for the first time in 17 years.

Cuba needs the United States to lift the trade embargo, and the best way to get that done is by settling the property claims, he said. The embargo was put in place in 1962 after a dispute that began precisely because Fidel Castro expropriated American oil companies that had refused to process Russian crude.

With an end to Venezuela’s financial aid a greater possibility, Cuba needs a new revenue stream. Soon.

“The fuse has been lit,” Mr. Feinberg said. “Time is running out.”

Mauricio J. Tamargo, a Washington lawyer who chaired the Foreign Settlement Claims Commission for eight years, said the two sides must come up with a bargain that is fair, or Congress would not vote to lift the embargo.

The claims have also been a stumbling block to re-establishing direct air travel between the two countries, because Cuba fears its planes could be seized to satisfy court judgments, Mr. Feinberg said.



Hundreds of Cubans lined up outside the United States embassy in Havana to apply for visas on July 20, the day the embassy reopened after more than a half-century of Cold War estrangement. Meridith Kohut for The New York Times

Should the talks advance, there are plenty of models negotiators could look at.

Past examples of such settlements have varied considerably, with claimants receiving as little as 10 percent of their claims, with no interest. When the Berlin Wall fell, American claimants got 100 percent of the value of their properties, plus interest.

In Latvia, Estonia, Lithuania, the Czech Republic and Slovakia, confiscated properties were sometimes returned to their original owners.

Poland, Hungary, Bulgaria and Romania offered compensation, “usually inadequate, and often symbolic and not necessarily monetary,” said Nicolás J. Gutiérrez, a consultant in Miami who has worked on the issue for decades after his family lost a \$35 million empire in Cuba.

The Cuban case is trickier: Not only does the government have its own counterclaim, but the people who did the confiscating are still in power.

In that sense, Cuba’s situation is more parallel with Vietnam and China.

In 1979, China agreed to pay \$80 million to a China Claims Fund, which allowed American claimants 39 percent of the value of their lost properties, according to the Brookings study. Vietnam, to normalize relations with the United States, agreed in 1995 to apply its assets frozen by the United States government to pay claimants 100 percent of the principal and 80 percent of the interest they were owed.

Mr. Gutiérrez believes the claims should have been settled before the embassies were opened. He now fears that the two lists of demands are so lopsided that the American claimants will walk away with nothing.

The State Department negotiates on behalf of American claimants and does not have to seek their approval before reaching an accord.

“You can almost imagine Obama negotiators saying: ‘Look, we got them to drop the fantasy \$120 billion!’” Mr. Gutiérrez said. “We drop the \$8 billion, and no one gets anything.”

The George W. Bush administration paid the Creighton University School of Law in Nebraska \$375,000 to come up with proposals. The university recommended creating a special tribunal — as President Jimmy Carter did in Iran. Cuba could pay with development rights, tax incentives encouraging foreign investment in Cuba, or in a lump settlement, which could be financed by the international community, said Michael J. Kelly, who co-wrote the report.

Mr. Kelly said the Cuban counterclaim for reparations should not be taken seriously.

“Those claims are not supported by international law,” he said in an email. “The property claims are.”

More are sure to surface. Already, a Tampa resident, Gary Rapoport, has publicly inquired about compensation for the Riviera, a 352-room waterfront hotel in Havana that was inaugurated in 1957 by Ginger Rogers. It was owned by Mr. Rapoport’s grandfather Meyer Lansky, the organized-crime figure. .

In an interview with The Tampa Tribune, the mobster’s grandson put it like this: “Cuba owes my family money.”

Exhibit 3

THE DEPARTMENT OF STATE

Bulletin



Vol. XLIII, No. 1097

July 4, 1960

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RECORD
STATES
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1960
AUG 4 '61



Bulletin

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July 4, 1960

The Department of State BULLETIN, a weekly publication issued by the Office of Public Services, Bureau of Public Affairs, provides the public and interested agencies of the Government with information on developments in the field of foreign relations and on the work of the Department of State and the Foreign Service. The BULLETIN includes selected press releases on foreign policy, issued by the White House and the Department, and statements and addresses made by the President and by the Secretary of State and other officers of the Department, as well as special articles on various phases of international affairs and the functions of the Department. Information is included concerning treaties and international agreements to which the United States is or may become a party and treaties of general international interest.

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to regulations issued by the Secretary of Agriculture (7 CFR 817), leaving 739,752 short tons, raw value, not yet certified; and

2. WHEREAS section 408(b)(1) of the Sugar Act of 1948, as amended by the act of July 6, 1960, entitled "An Act to Amend the Sugar Act of 1948, as Amended", provides that the President shall determine, notwithstanding any other provision of Title II of the Sugar Act of 1948, as amended, the quota for Cuba for the balance of calendar year 1960 and for the three-month period ending March 31, 1961, in such amount or amounts as he shall find from time to time to be in the national interest: *Provided*, however, That in no event shall such quota exceed such amount as would be provided for Cuba under the terms of Title II of the Sugar Act of 1948, as amended, in the absence of section 408(b); and

3. WHEREAS section 408(b)(1) of the Sugar Act of 1948, as amended, further provides that determinations made by the President thereunder shall become effective immediately upon publication in the Federal Register; and

4. WHEREAS, pursuant to section 408(b)(1) of the Sugar Act of 1948, as amended, I find it to be in the national interest that the quota for Cuba under the Sugar Act of 1948, as amended, for the balance of calendar year 1960 shall be 39,752 short tons, raw value, plus the sugar certified prior to July 3, 1960, for entry but not yet entered, or withdrawn from warehouse, for consumption:

Now, THEREFORE, I, DWIGHT D. EISENHOWER, President of the United States of America, acting under and by virtue of the authority vested in me by section 408(b) of the Sugar Act of 1948, as amended, and section 301 of title 3 of the United States Code, and as President of the United States:

1. Do hereby determine that in the national interest the quota for Cuba pursuant to the Sugar Act of 1948, as amended, for the balance of calendar year 1960 shall be 39,752 short tons, raw value, plus the sugar certified prior to July 3, 1960, for entry but not yet entered, or withdrawn from warehouse, for consumption; and

2. Do hereby delegate to the Secretary of Agriculture the authority vested in the President by section 408(b)(2) and section 408(b)(3) of the Sugar Act of 1948, as amended, such authority to be exercised with the concurrence of the Secretary of State.

This proclamation shall become effective immediately upon publication in the Federal Register.

IN WITNESS WHEREOF, I have hereunto set my hand and caused the Seal of the United States of America to be affixed.

DONE at the City of Washington this sixth day of July in the year of our Lord nineteen hundred and sixty, [SEAL] and of the Independence of the United States of America the one hundred and eighty-fifth.



By the President:
DOUGLAS DILLON,
Acting Secretary of State.

Digitized by Google
July 25, 1960

U.S. Protests Cuban Seizure of American Oil Refineries

Press release 381 dated July 5

The U.S. Ambassador to Cuba, Philip W. Bonsal, on July 5 delivered to the Cuban Ministry of Foreign Relations the following note protesting the seizure of U.S.-owned oil refineries by that Government.

I have the honor to refer to the recent intervention and seizure by the Government of Cuba of the American-owned Texaco and Esso Standard Oil Company refineries in Cuba on the grounds that these companies, in refusing to refine crude oil not obtained from their own sources of supply, had violated Cuban law. The Government of the United States vigorously protests the actions of the Government of Cuba in issuing the orders to these companies to refine such crude oil and in intervening the companies thereafter. The Government of the United States deems these actions to be arbitrary and inequitable, without authority under Cuban law, and contrary to commitments made to these companies. It is the earnest hope of the Government of the United States that the Government of Cuba will, in justice and equity, promptly reconsider and rescind the actions which it has taken against these American companies and permit them to continue to operate their businesses under fair and reasonable conditions.

As Your Excellency is aware, these two American-owned oil companies, in which thousands of investors have interests, have operated in Cuba for over fifty years as law-abiding entities and have made a valuable contribution to the growth and development of the Cuban economy. The modern refineries which have been seized represent the investment of many millions of dollars of new capital and re-investment of earnings, and reflect responsible and careful planning for the future as well as the present fuel needs of Cuba. Moreover, despite the fact that the Government of Cuba has refused to release more than a small percentage of the dollars required to pay for the crude oil imported since the revolution, the companies, nevertheless, have continued voluntarily to provide crude oil by financing it on their own account, thus insuring normal supplies of petroleum products for the Cuban people. The backlog of dollar remittances due these companies is now in excess of fifty million dollars even though

the Government of Cuba expressly undertook with these companies to provide payment on a more current basis. I must state to Your Excellency that, in viewing the history and record of these companies, and apart from legal considerations, my Government regards the actions taken against them as a violation of accepted standards of ethics and morality in the free world.

I have been informed of the assertion made to the companies by the President of the National Bank of Cuba, Dr. Ernesto Guevara, that the companies are legally obligated to refine petroleum from the USSR as demanded by the Government of Cuba under the terms of the Mineral Fuel Law of 1938. I have also been informed of the threat made that these refineries would be seized if they failed to comply with the order to refine such petroleum. However a careful reading of the whole of this law of 1938 and a review of experience in the years ensuing since its passage, make clearly evident that the article cited by Dr. Guevara was intended to apply solely to the refining of petroleum drawn from Cuban soil.

The Government of the United States has noted, in any event, that the refineries which have been intervened and seized were constructed or enlarged under the provisions of the Law Decree No. 1758 of November 2, 1954, which established a special, non-alterable 20-year regime for the refineries qualifying under this law and expressly provided that such refineries were to be exclusively governed by its provisions. Your Excellency's attention is called to the fact that nowhere in these provisions or in the regulations issued thereunder is there any requirement that these refineries process Government crude oil of any kind. Furthermore, events and circumstances leading to the passing of the law of 1954 and the construction of the Texaco refinery in 1957 and the enlargement of the refinery of the Esso Standard Oil Company in the same year establish that such actions were undertaken with the understanding that the companies had the right to supply and refine their own crude oil. Otherwise, one of the principal purposes in the establishment and enlargement of their refineries would be defeated. In the view of the Government of the United States, therefore, the 1954 law constitutes a commitment to the companies binding on the Government of Cuba, and any order of the Government of Cuba such as was transmitted to them is inconsistent with the basic

concept of the 1954 law and in breach of the Cuban Government's commitment to the companies.

Nor is there any legal basis in the Mineral Fuel Law of 1938 or in Law Decree No. 1758, or in any other Cuban law to our knowledge, for this act of intervention and seizure which has been perpetrated by officials of the Government of Cuba. Therefore, it is the opinion of the Government of the United States that this act is without sanction in Cuban law; that it constitutes a further breach of the Cuban Government's commitment to the refineries; and that it is a violation of the operating rights of these companies as provided by Cuban law. Even if the intervention were otherwise lawful, which the Government of the United States does not consider to be the case, it was clearly improper to use the intervention as a device to enforce compliance with an illegal order, and any subsequent intervention must be considered as tainted with illegality.

The Government of the United States cannot but feel, with profound regret, that the intervention and seizure of these refineries is further evidence and confirmation of a pattern of relentless economic aggression by the Government of Cuba designed to destroy Cuba's traditional investment and trade relations with the free world.

U.S. Sends Wheat to Jordan for Drought Relief

The Department of State announced on July 7 (press release 384) that in response to a request from the Government of Jordan, the United States on July 7 made available 25,000 tons of wheat for free distribution in drought-stricken Jordan.

Shipment of the grain, one-half as soon as possible and the remainder before the end of the year, was authorized with the signing of an acceptance document by Dr. Yusuf Haikal, the Ambassador of Jordan.

The document was signed at the offices of the International Cooperation Administration, which will supply the wheat under the emergency provisions of the Agricultural Trade Development and Assistance Act (Title II, P.L. 480).

Because of severe drought, Jordan's current wheat crop is only slightly larger than the amount needed for seed next year. The 25,000 tons of U.S. wheat will help to meet the immediate food needs of the country.

Exhibit 4

A Cuban fight against Exxon Mobil

On May 2, 2019, Exxon Mobil Corporation filed a lawsuit against Cuban companies Cimex S.A. and the Cuba Petroleum Union (Cupet) for "illegal traffic of goods confiscated in violation of Title III of the Law of Freedom and Democratic Solidarity with Cuba."

By Elaine Díaz Rodríguez for La\$ Cuenta\$ Pendiente\$*

On January 1st, 1959, five telegrams were sent from the US Embassy in Havana. Normally, eight were sent in a month.

That day, at 10 a.m., Ambassador Earl E.T. Smith met with representatives in Cuba of several companies: Electric Company, Moa Bay Mining, Bank of Boston, Woolworth Company, Portland Cement, Esso, among others. They talked about the rebels, and the ambassador distributed private property protection posters to be placed by the companies.

In Havana, there were reports of looting in the buildings of two ministries, destruction of the paper plant for the newspaper *Tiempo*, damage to hotels and casinos, and robberies in several shops and bars. "Both political prisoners and common criminals had been released from Príncipe's prison," read one of the telegrams. National and international air operations were suspended. All transport, with the exception of private cars, were paralyzed. In Santiago de Cuba, "the rebels controlled the town

hall, the headquarters of the military district, the airport, and all the main facilities." Most of the armed forces cooperated with the July 26 movement and the situation was calm, although there was "tension and expectation."

The July 26 movement demanded the "unconditional surrender of the army and the appointment of Urrutia as provisional president." Urrutia was a Cuban politician that, as a judge in the East Court, had cast a favorable vote for the accused during the *expedicionarios del yate Granma*. His whereabouts, as well as Fidel Castro's, were unknown. "They are not in Havana," wrote Smith.

Embassy officials met again with the businessmen on January 6. Representatives of the most important companies in the United States and Cuba asked that the provisional government, established on January 2, be recognized "as quickly as possible." This would allow a climate that was "more favorable to conduct business." On January 7, Secretary of State Dwight D. Eisenhower requested authorization "to take the necessary measures to recognize the current Provisional Government of Cuba."

Read more: *The "biggest investment of the Cuban Revolution" has not yet set sail*
(<https://www.connectas.org/biggest-investment-cuban-revolution-not-yet-set-sail/>)

On January 10, Smith presented his resignation at the suggestion of the Department of State. Smith had been sent to Havana to "maintain satisfactory relations with Batista" and he had done so well that the Department of State considered it impossible to negotiate with the new government without a change of ambassadors.

Philip W. Bonsal arrived to Havana to occupy his place and he would be the last US ambassador in Cuba until they re-established diplomatic relations in 2015. The problems with the American government began shortly: first, because of the trials and convictions of courts convicting revolutionaries to war criminals; later by the agrarian reform that would cause "dismay in American circles that had sugar properties"; and in the middle of everything, because of the threat of the possible conversion of Cuba into a communist state.

Representatives of 30 out of 34 US sugar mills on the island met at the embassy on May 30, 1959, to discuss the effects of the Agrarian Reform Law on their businesses. In a conversation at the State Department, on June 22, 1959, where Raúl Roa participated, then Cuban Minister of State; C. Douglas Dillion, Undersecretary of State for Economic Affairs, said that "agrarian reform in Cuba is, of course, basically an internal Cuban issue and a question entirely of sovereignty."

However, on the effect of the Reform on private foreign investment in Cuba, the Undersecretary warned that the way in which the Government of Cuba handled the issue of compensation for expropriated lands would be extremely important. "If US private investors [...], whose properties may be affected by the Agrarian Reform Law, receive what they consider fair treatment, public opinion in the United States will be influenced as a consequence." Roa ratified what he had already said in an official note on June 15, that the Cuban government was willing to negotiate expropriations and that they could not pay in cash as stipulated in the 1940 Constitution because when they came to power, the new government found "empty coffers."

They would have to keep negotiating.

The sugar power plants were followed by questioning of American property over public services such as electricity and telephone services. The Moa Bay Company contract was revised. On September 24, 1959, the main owners of sugar mills returned to the State Department. There were months left before it was decided to completely cut the sugar quota to Cuba, before conflicts with foreign oil refining companies began, culminating in the expropriation of the American Esso and Texaco and the British Shell.

Fifty-nine years later, on May 2, 2019, the Exxon Mobil Corporation (formerly Standard Oil, owner of Esso) filed a lawsuit against Cuban companies Cimex S.A. and the Cuba Petroleum Union (Cupet) for “illegal traffic of goods confiscated in violation of Title III of the Law of Freedom and Democratic Solidarity with Cuba (Libertad or Helms Burton).”

The law had been passed by the then president of the United States, Bill Clinton, in March of 1996 and presented by Senator Jesse Helms and representative Dan Burton. Title III, however, had been temporarily suspended for 6 months during each administration until 2019. On April 17, 2019, Secretary of State Mike Pompeo announced that the Trump administration would not suspend Title III. “Implementing Title III in its entirety means an opportunity for justice for Cuban Americans,” said Pompeo, and warned that “any person or company that did business in Cuba “should pay attention to this announcement.”

Ñico López refinery, what used to be Belot. Image: Joyme Cuan.

When Exxon filed its lawsuit, the very first day that legal action could be taken, it added the certified claim of the Foreign Claims Liquidation Commission for more than 71 million dollars, with 6% annual interest from July 1, 1960. Exxon sought compensation for the expropriation of an oil refinery, service stations, and certain terminals and plants that were used in refinery operations. In order to file an action under Title III, Exxon paid \$6,458, a special rate approved in September 2018 by the United States Judicial Conference.

Known today as Ñico López, in 1960 it was called Belot Refinery and it belonged to the Standard Oil Company, the latter created under the laws of the state of New Jersey since 1882. Standard Oil changed its name to Exxon Corporation in 1972. In 1999, Exxon Corporation was renamed Exxon Mobil Corporation.

Cimex S.A. is a Cuban corporation established in 1979 that imports, exports, and markets goods and services, including more than 600 service stations (fuel stations) in cooperation with the Cupet oil company. The latter operates Cuba's oil refineries and supplies domestic needs for petroleum products.

According to the lawsuit filed in the District Court of Columbia, Exxon Mobil "has never settled pending certified claims or received any payment from any entity with respect to the capital or interest owed on its certified claim." Article 302 of the Helms Burton Law establishes responsibility

for traffic to any person, agency or entity, whether Cuban or foreign, that “traffics goods that were confiscated by the Cuban government, starting on January 1, 1959.” Trafficking, according to the Law, is to sell, transfer, distribute, manage, or buy any of the confiscated goods.

Exxon Mobil asks that Cuban corporations pay the certified amount in the claim, interest and costs incurred in legal representation by the US company; a figure that would be around 280 million dollars, according to reports from the Reuters agency.

After three months of waiting, the New York-based Rabinowitz, Boudin, Standard, and Krinsky & Lieberman law firm reported that it would represent the two Cuban companies.

On October 8, 2019, Cimex and Cupet must respond to the lawsuit in US courts.

Neither the lawyers of the Cuban corporations nor the lawyers of Exxon Mobil responded to several requests for interviews from *Periodismo de Barrio* (a journalism non-profit in Cuba).

First page of the account statements of Esso in Cuba (Image obtained under a FOIA request).

At 11:30 a.m. on July 1, 1960, Osvaldo Pino Izquierdo arrived to number 56 on O Street, between 19th and 21st, in the El Vedado neighborhood. He came as an “auditor” to comply with Resolution 190 of June 30, 1960, which Fidel Castro had issued. The resolution basically said that if the US company Esso Standard Oil did not process the Soviet crude negotiated by the government, it would be intervened.

The resolution was based on the Fuel Minerals Act of 1938, which gave the government responsibility to place the necessary quantities of crude oil in the refineries “so that public services and industrial and transportation activities in the country were not [affected].”

The Belot refinery was intervened. O Street offices too. That morning the boxes were checked and it was established that the company had more than 7 million Cuban pesos (at a rate of one to one to the dollar) and US \$5,000 in current bank accounts in both Havana and in the inner parts of the country. Winfred Clark Bernes, general manager of the company, said he “was dissatisfied with the intervention” and that it “injured the rights” of the company.

That same day, two hours earlier, Cuban engineer Ricardo González Abreu, deputy administrator of the Belot refinery, also accepted the intervention “under protest.” They arrived to the Belot refinery with 15,000 barrels of oil for processing. “When this supply was not accepted, a group of armed men took possession of the refinery,” says one of the documents in the case file kept by the Commission for the Liquidation of Foreign Claims and to which *Periodismo de Barrio* was able to access through a petition under the Freedom of Information Act (FOIA).

The Cuban Petroleum Institute sent the Soviet crude to the refinery. Until that moment, according to Fidel Castro, the oil that was refined in Cuba was bought abroad by the companies that own the refineries at prices higher than those of the international market. The Cuban government, in this context, tried to buy the oil directly in the international market, from a US company in Venezuela and, finally, from the Soviet Union. “Cuba has the right to buy the oil at the cheapest price it can in the world market, and then deliver it to the refineries for its processing in Cuba,” said Fidel. But foreign companies do not resign themselves to losing the resale negotiation of the parent company to its subsidiary in Cuba. And when we inform you that a part of the four million tons of oil, which is the consumption of Cuba, would be bought in another market, [...] they send us three joint communications saying that they will not refine the oil of the Soviet Union.”

Almost a month before the intervention, on Saturday, June 4, Ted Brewer, representative of Standard Oil (owner of Esso) in Cuba, called the US ambassador to his residence. The ambassador offered to show him the memo that had been delivered to the Cuban government in Havana. The memo was a statement by the United States government condemning the “slander campaign” of representatives of the Cuban government against the United States. He had a list of facts that included statements from the Cuban President Osvaldo Dorticós in Montevideo saying that American owners had been reimbursed for expropriations (when they hadn’t), and even the words of Fidel Castro blaming the US government for the blasting of the *La Coubre* ship on March 7, 1960.

Brewer and Bonsal discussed the possibility of Esso refusing to refine Soviet oil. And Brewer also added that “his company’s policy had been, under the assumption that the United States government did not take a stand in the matter, that it would be inevitable to refine Russian crude as the Cuban government wanted.” Both knew from a meeting held days before in the State Department, that the US government suggested the refusal, and even believed that it “would be consistent with the general policy of the United States towards the Cuban government.”

Brewer showed him the letter that his company intended to send to Ernesto Che Guevara, then director of the National Bank of Cuba, rejecting Soviet crude. On May 17, Guevara had sent a message to Brewer informing him that the Cuban government would reimburse up to \$20 million for imported oil during 1959 in a single payment and during the year 1960 the remaining refunds would be analyzed. He also announced that “under the agreement concluded by the Cuban State with the USSR, it is expected that oil will be imported for the rest of the current year” and it would be supplied to the refineries “at a price that is agreed at each opportunity at an estimated rate of about 300,000 tons for each refinery in operation.”

The answer to Guevara would be sent only in case the three fundamental foreign companies refused to refine the oil. The American Texaco had already accepted, but the position of the British Shell that "was being discussed at high levels in London, with the British government presumably involved," was missing, according to Brewer. If the three companies accepted, they would communicate their decision to the government on the same day, June 6. If not, then the whole matter would have to be reconsidered. "We can anticipate drastic measures since in the current state of mind of the Cuban government you will not hear moderate voices," said Bonsal.

"I think companies will be intervened," he added.

Intervention document of Belot refinery from the Cuban Petroleum Institute (Image obtained under a FOIA request).

After the intervention, on July 25, 1960, Enrique Rodríguez Pulgares, representative of Esso Standard Oil S.A., established an appeal for unconstitutionality against Resolution 190 and Resolution 33. From that moment the corporation would spend more than 30 years in the courts on this issue: first in Cuba, then in the US. Pulgares wanted to demonstrate several things. Esso's decision to refine its own oil did not violate the Cuban Fuel Minerals Law because refineries could use oil of foreign origin

“when it does not cause damage to national interests” and Soviet oil was not “from the Cuban state,” that is, it was not produced on national soil. For the company, it was about two foreign oils regardless of who bought it and the company had the right to decide.

Fidel Castro, as Prime Minister, had no power to intervene in a company according to the Fundamental Law of the Republic “unless he did so in compliance with a specific Law on the matter.” If the Prime Minister had no powers to intervene, Resolution 190 was unconstitutional and, therefore, Resolution 33 of the Cuban Petroleum Institute, would also be. If these resolutions were accepted, then the ongoing correspondence reviewing the company’s private documents and address had also been violated.

“In the absence of a legislative precept that provides for the intervention of a company, [this can only occur] through a judicial process in which Esso Standard Oil S.A. had been part [of the process] since no one can be convicted without having been previously tried,” says one of the documents in the case file. “The intervention could have been decreed, had there been legal remedies for such a measure,” he adds.

On September 2, 1960, Dorticós argued that the company had put national oil reserves at risk by canceling “ships that were supposed to bring crude oil” and that the Prime Minister could exercise “directive functions in general policy of the Government”, making use of that dictated in Resolution 190.

With this explanation, he declared the appeal.

On May 16, 1927, the American company White Dental appeared before the United States Claims Court with the objective of obtaining a sentence that allowed the recovery of income taxes paid in 1918. White Dental, dedicated to the manufacturing and selling dental supplies, wanted to deduct income that had invested in a German subsidiary, whose property had been seized by the German government in that year for establishing “a property of the enemy.”

The investment in the White Dental in Berlin amounted to \$ 130,000.

Eight months before the end of World War I, the German authorities appointed an official to take over the administration of the business. Two years after the end of the war, in March 1920, the property was returned, but the mismanagement of the company during the time it was expropriated and the investments of its funds in German war loans caused the fall in the value of its shares.

In 1922 the company was sold for just \$ 6,000.

When White Dental paid the 1918 taxes, they tried to deduct the total investment value of the subsidiary in Berlin. The Internal Revenue Commission rejected the deduction and the company had to pay, under protest, the taxes.

IN 1927, the Claims Court ruled in favor of White Dental. The company did not even have to prove that there was no possibility of eventual recovery of the loss. “It would require a high degree of optimism to recover a property confiscated by the German government in 1918,” says the ruling, “and

the Tax Law does not require the taxpayer to be an incorrigible optimist.”

Fifty-eight years later, Exxon Corporation (formerly Standard Oil Corporation) appealed a partial ruling by the United States Claims Court that dismissed a similar claim. Just as White Dental owned a subsidiary in Germany, Standard owned a subsidiary with its assets in Cuba. If in 1918 the German government had confiscated the property of the White Dental subsidiary, in 1960 the Cuban government had expropriated the assets of the Standard subsidiary. Both companies had filed claims for deduction of income taxes on nationalized properties and claims before commissions dedicated to this purpose in the United States.

Exxon should not have gone through the same if one takes into account the suggestions made by the US Secretary of the Treasury, Robert B. Anderson, in June 1960. If the three companies refused to refine Soviet oil and acted in unison, if this refusal led to a process of definitive expropriation, “the United States government would support the payment of adequate, fast and effective compensation.”

In 1990, after several appeals by the US government, Exxon got a tax refund of \$ 27 million plus interest for the tax payments they made after the loss of property in Cuba.

Read this story at Periodismo de Barrio (<https://www.periodismodebarrio.org/especiales/lascuentaspendientes/2019/09/23/una-pelea-cubana-contra-exxon-mobil/>)

*La\$ Cuenta\$ Pendiente\$ is a journalistic investigation made by Elaine Díaz Rodríguez and Jesús Jank Curbelo for Periodismo de Barrio (<https://www.periodismodebarrio.org/especiales/lascuentaspendientes/acerca-de/>) in alliance with CONNECTAS, with the support of the International Center for Journalists.

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Revista digital cubana de periodismo de investigación sobre cambio climático y sus efectos en poblaciones vulnerables.

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Exhibit 5

and crimes against the individual rights guaranteed by this Fundamental Law. Those who commit these crimes shall be subject to the penalties and qualifications imposed by the law in force at the time of the offense. In cases of crimes committed in the service of the tyranny overthrown on December 31, 1958, the perpetrators may be tried in accordance with penal laws promulgated for this purpose.

Article 22. No other laws shall have retroactive effect, unless the law itself so specifies for reasons of public order, of social utility, or national necessity, expressly stated in the law, approved by a vote of two thirds of the total number of members of the Council of Ministers. If the grounds for retroactivity are impugned as unconstitutional, the Court of Constitutional and Social Guarantees shall decide thereon, and it cannot for technical reasons or any other motive whatever, refrain from doing so.

In every case, the law itself must establish the degree, manner, and form in which indemnity shall be paid for damages, if any, which the retroactivity causes to rights legitimately acquired in accordance with previous legislation.

A law approved in accordance with this article shall not be valid if it produces effects contrary to the provisions of Article 24 of this Fundamental Law.

Article 23. Obligations of a civil character arising from contracts or other acts or omissions producing them cannot be annulled or altered by either the Legislative Power or the Executive Power, and consequently laws cannot have retroactive effect with respect to such obligations. The exercise of the rights of action derived from them may be suspended in the event of serious national crisis, for such time as is reasonably necessary, by virtue of the same requirements and subject to opposition as referred to in the first paragraph of the preceding article.

Article 24. Confiscation of property is prohibited, but it is authorized for the property of the Tyrant deposed on December 31, 1958 and of his collaborators, of natural or juridical persons responsible for crimes committed against the national economy or the public treasury, and those who are enriched or have been enriched unlawfully under the protection of the public power. No other natural or juridical person can be deprived of his property except by competent judicial authority and for a justifiable reason of public benefit or social interest and always after payment of appropriate compensation in cash, fixed by court action. Non-compliance with these requirements shall give the person whose property has been expropriated the right to protection by the courts and, if the case warrants, to restitution of his property.

Exhibit 6

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ESSO IN CUBA
1882 to Expropriation

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On August 6, 1960, the Cuban properties of Esso Standard Oil, S.A. – a wholly-owned affiliate of Standard Oil Company (New Jersey) – were expropriated by the Revolutionary Government of Cuba. Company operations had been under government management since July 1, 1960, at which time they were intervened.

Standard Oil operations began in Cuba 78 years ago with a small refinery near Havana. Output was about 60 barrels a day, largely kerosene. In 1895 the original refinery was moved to its present site in the Belot area of Havana, where by 1911 it was running 3,000 barrels a day.

Over the years the Company expanded its facilities consistently, anticipating the needs of the island for petroleum products and services on the principle that economic advancement of Cuba was to mutual advantage. In the 1920's when Cuba was planning to build its Central Highway, Esso began construction of an asphalt plant at the Belot refinery. The highway was designed to link the main agricultural, industrial and mining centers, and to facilitate motor transportation from one end of Cuba to the other. When the construction stage was reached, asphalt from the Belot refinery was supplied in sufficient quantities to meet the requirements of the highway and all other road projects.

As Cuban agriculture became more mechanized, and therefore capable of greater production, new types of fuels, greases and lubricating oils were needed. Establishment of new industries on the island and expansion of old ones brought new demands for liquid fuels and for lubricants. The Esso Belot refinery kept pace with this growth.

A few years ago a point was reached where further – and major – expansion of the Esso refinery became essential. Within a 20-year period, for example, fuel consumption by electric power plants had nearly quintupled. Overall, the annual demand for petroleum products had risen from 5.3 million barrels to 19.5 million barrels within a 10-year period.

Esso Standard Oil, S.A. – or Essosa as it is usually referred to – began a program which was to cost more than \$30 million and increase the refining capacity from 9,300 to 35,000 barrels a day. Six contracting firms and 2,000 Cuban workers were employed to do the job. By the time the program was completed in 1957, the Belot refinery had been equipped with the latest technical facilities and was capable of supplying practically every type of high quality petroleum products that would be required by Cuba in the years ahead. In 1959, the Company invested another \$1 million in new facilities to blend lubricating oils and manufacture greases.

With these and other investments, the average earnings of Essosa's Cuba division over the past four years did not exceed 4% on its total investment. The Company, moreover, accounted for about 6% of the government's tax receipts. As a purchaser of Cuban products and services, it contributed directly or indirectly to the permanent employment of more than 10,000 Cubans.

The modernization of the refinery was accompanied by an accelerated and more extensive program of employee training. Existing programs were redesigned to develop expert electricians, machinists, chemists, and other industrial specialists. More than \$400,000 was spent on training Cubans to take over new responsibilities in the enlarged refinery. Advancement of nationals reached the point last year where out of the more than 1,000 persons employed in Essosa's Cuban division, all but two were citizens of Cuba. Thirty-three Cubans had worked for the Company more than 40 years, 149 for more than 30 years and 360 for more than 20 years. Of the remainder, the average Cuban employee had been with the Company for more than 10 years.

The refinery employed more than 500 people. Its annual payroll, including employee benefits, was between \$2.5 and \$3 million. Marketing operations gave employment to about the same number of people, with a payroll in excess of \$2.5 million.

The Company's wages were among the highest and its benefits among the best in Cuba. The average *weekly* wage, including benefits, for Essosa employees in Cuba far exceeded the minimum *monthly* wage established by law. Benefit plans included Company reimbursement for educational costs, sickness and accident benefits, two years salary in the event of death, one-month vacation, double payment for overtime, five-day week working schedule, pensions for annuitants, preventative medical assistance and a bonus of 50% of a month's salary at Christmas.

The Company's working conditions were so highly regarded that it was continually receiving applications from Cubans for employment. Many of them were already employed, yet willing to accept lower rated positions in order to join Essosa and take part in its long-range wage and benefits programs. Applications for employment over the past ten years averaged more than 100 a month.

The Company has always enjoyed favorable public opinion throughout Cuba, at all levels of the population. It won this good opinion over the years not only by being a reliable supplier of oil products and services, but by actively assisting in the economic and social betterment of the nation. Representatives of the Company worked closely in the field with industry and agriculture in order to contribute specialized knowledge where it would be useful. These programs frequently resulted in increased efficiency in industrial plants and soil and crop improvements. Essosa also was an active participant in Cuban cultural affairs, art and sports, and it contributed to the maintenance of social clubs wherever it had major installations.

During 1959 and into 1960 the Company responded to requests by ministries of the Revolutionary Government for assistance in organizing their activities. Essosa technicians were loaned to government agencies for extended periods to give advice in matters such as accounting, organization,

employment plans, training, etc. This brought letters of commendation from the Revolutionary Government.

In April, 1960, the total asset value of the investments of Essosa in Cuba was approximately \$75 million. In addition to its refining operations, the Company had the most extensive product distribution system in Cuba, including four ocean terminals and six bulk storage and package plants. It also operated a fleet of 28 tank trucks, 254 tank cars, and 94 company-owned service stations. In recent years it had supplied just under one-half of the country's petroleum requirements.

Despite a vigorous exploration effort by foreign oil companies over the last 20 years – the drilling of 2,000 wells and the expenditure of more than \$60 million – indigenous oil production in Cuba amounted to only about 500 barrels a day (Practically all drilling stopped in 1959 after the Revolutionary Government seized and copied files of the exploration companies and passed severely restrictive oil legislation.)

Although Cuban oil production was low, Essosa recognized its responsibility to utilize whatever was available locally from the time the first barrel flowed. The Company signed a contract in 1954 to take production from the Jatibonico field in Camaguiy Province, and a year later it made a similar arrangement to refine production from the Cruz Verde Field in Havana Province. During the years 1955 through 1959 and the first six months of 1960, until intervention, Essosa purchased 1,235,000 barrels of Cuban crude production.

The Company cooperated in the establishment of the refinery at Cabaiguan, owned and financed by private Cuban capital, and continued over the years to provide administrative and technical assistance whenever requested.

Cuba consumes approximately 65,000 barrels of oil products a day, and its supplies, except for the very small local production, must be imported. Texaco, Shell, and Esso – the three foreign companies which operated refineries in Cuba – imported their crude supplies exclusively from producing countries in the Western Hemisphere.

For the past quarter of a century or more, Cuba's imports of crude oil and products have been an important factor in its trade with other Latin American areas, principally Venezuela. Companies affiliated with Essosa have made large investments in Venezuela and elsewhere to develop reliable crude reserves. These other Latin America areas, relying as they do on export of petroleum for foreign exchange earnings, have depended on Cuba as a traditional Hemisphere customer. By investing both in the development of raw material sources and in processing and distribution facilities, private capital has provided a balanced commercial relationship whereby the trade of petroleum and its products has been mutually beneficial to the Latin countries.

The Revolutionary Government came into power January 1, 1959. In the course of the year Essosa began to encounter difficulties in obtaining from the government the foreign exchange necessary to pay for the crude oil it imported. Nevertheless, Creole Petroleum Corporation and other affiliated suppliers maintained shipment while, for a period of over nine months, Essosa attempted to negotiate

satisfactory payment arrangements with the Cuban authorities.

Also, as a result of studies made by the Company, Essosa decided to request from its suppliers a different quality of crude oil that was not only less expensive but better adapted to the changing needs of the Cuban market. This was possible because of the wide range of crude oils available from suppliers in Venezuela, and because of the flexibility built into the new, expanded Belot refinery to handle different crudes according to Cuba's changing needs for petroleum products.

On May 5, 1960, Creole agreed to supply Essosa with the new type of crude that cost 32¢ less per barrel. Its composition provided a better balance of products for the current requirements of the Cuban market. Combined with an earlier reduction in ocean freight costs, this brought the price of crude oil delivered to Havana from \$2.57½ to \$2.19½ per barrel, a total net reduction of 38¢ per barrel. It represented to Cuba a saving in dollar exchange of more than \$4 million a year.

Adjustments of this type designed to meet the Cuban market requirements were not unusual.

Until the time of intervention on July 1, Essosa's supplies of crude oil to the island had never broken down, even in periods of wars, the Suez crisis, tanker shortages or other difficulties.

Following is a chronology of events leading to the intervention of the foreign refineries:

February 13, 1960. — The Revolutionary Government of Cuba signed a pact with the U.S.S.R. which provided for the importation of Soviet goods, including oil, in exchange for Cuban sugar.

March 18, 1960. — Mr. L. J. Brewer, President of Essosa, wrote a letter to Major Ernesto Guevara, President of the National Bank of Cuba, noting in detail the various meetings which Essosa officials had had with officials of the Bank and the Money Stabilization Fund concerning the problem of obtaining remittances from the government. He quoted a cable from Essosa's suppliers which asked Essosa to let them know urgently the reason for the delay in making remittances and the date on which the total in arrears could be expected.

April 4, 1960. — Sr. Alfonso Gutierrez, Director of the Cuban Petroleum Institute, which had been established in 1959 to regulate the production, refining and marketing of petroleum products and to compete in this commercial area, announced that the Institute would market Soviet refined products through an island-wide chain of service stations. He also announced that a new terminal was being made ready in Havana to receive the first shipment of Soviet crude.

April 12, 1960. — Essosa received a letter from the director of the Money Stabilization Fund, with respect to current imports. It stated that dollar remittances would be authorized approximately 90 days after the arrival of cargoes at Cuban ports for petroleum imports subsequent to January 1, 1960.

May 17, 1960. — Essosa received from Major Guevara a letter dealing chiefly with negotiations that had been under way concerning balance of foreign exchange due on crude oil previously imported into Cuba. In general, the letter proposed that the National Bank of Cuba would make available up to \$20 million of dollar exchange to be paid over the balance of 1960 to the three companies, Esso, Texaco

and Shell, against their unpaid backlog of petroleum imports during 1959. (This amount of exchange would have been sufficient to cover less than half of the accumulated total for 1959). Major Guevara also reiterated the proposal in the letter of April 12 that dollar exchange would be provided for current imports approximately 90 days after the arrival of cargoes at Cuban ports. Consideration of the government's providing exchange for the Company to amortize loans and investments, obtained outside Cuba for refinery improvements, was postponed to 1961.

The Guevara letter also made reference to the trade agreement entered into in February by Cuba and the U.S.S.R., as one result of which the Revolutionary Government expected to import crude oil from Russia. It was stated that each of the major refineries established in the country - Esso, Texaco and Shell - would be furnished 300,000 tons of this Russian crude over the rest of this year at a price to be agreed on. The amount stated - equivalent to about 11,000 barrels a day for each company - would be approximately half of Cuba's petroleum consumption.

May 23, 1960. - The Revolutionary Government issued a decree canceling all exclusive contracts of local gasoline stations, fuel dealers and major consumers with foreign oil company owners. The preamble of the decree stated that this was being done to break the "monopoly" of the American and British oil companies in Cuba. (At this time there were 164 private wholesalers and distributors of petroleum products in Cuba, including the independent Cuban companies, Jasa, Reca and Peerless, as well as four international companies, Sinclair, Shell, Texaco and Esso. Rather than "monopolistic", petroleum marketing in Cuba was highly competitive.)

June 1, 1960. - Sr. Alfonso Gutierrez, Director of the Cuban Petroleum Institute, informed Essosa that crude petroleum deliveries from the U.S.S.R. would start being received in Cuba in July and that it would be necessary to make arrangements immediately for Essosa's handling of its 300,000-ton quota.

June 6, 1960. - Essosa replied to Major Guevara's letter of May 17, accepting the proposed arrangements for providing foreign exchange, but stating that the Company was not in a position to accept the proposal that it purchase crude oil imported by the Cuban government. An oil company, Essosa explained, normally makes the large investments necessary to build a refinery in the expectation of processing its own crude oil. The letter further pointed out that cutting off the customary supply source by the amount of Russian crude, would work hardship upon countries such as Venezuela, whose economies depend heavily upon a ready market for their raw material.

June 8, 1960. - Sr. Alfonso Gutierrez announced that the foreign oil companies had refused Major Guevara's request to refine Russian crude oil. He went on to say that he doubted that retaliatory measures would be taken against these companies. (He was shortly to be proved wrong.)

June 10, 1960. - Cuban Prime Minister Fidel Castro, in a television broadcast, called upon Essosa together with the other two oil companies, to reconsider the decision not to refine Soviet crude. He warned that their refineries would be seized if they persisted in their refusal. He contended that the

American companies and the U.S. State Department had entered into a conspiracy against Cuba, and that its existence was proved by, among other things, the fact that U.S. oil companies refine Russian crude in Argentina. (This is not true).

June 24, 1960. – The Revolutionary Government cited the Law of Combustible Minerals of May 9, 1938, and noted that according to this law, refineries in Cuba “are obligated to refine petroleum of the State when the Government so decides.” Actually, when read in its full context, it is clear the law refers to oil produced in Cuba itself, if oil were to be discovered there in commercial quantities – not to oil imported by the government.

Furthermore, under the provisions of a more recent Cuban petroleum law – Law Decree No. 1758 of November 2, 1954 – it is nowhere stated that foreign refineries in Cuba must process government crude oil of any kind. Essosa’s heavy investment in enlarging its refinery three years previously was undertaken on the assumption that this law would constitute a commitment to foreign refining companies binding on the government of Cuba.

On June 24, Essosa received a cable from its crude oil supplier, the Creole Petroleum Corporation, expressing Creole’s concern over the inability of Essosa to make payments in dollars for its imports of crude. Creole noted that in spite of the Cuban government’s agreement – as expressed in Major Guevara’s letter of May 17 – to authorize dollar remittances for 1960 imports on a 90-day basis, payment on four such crude oil cargoes was overdue. To receive more oil from Creole, Essosa would either have to bring payments up to date on the 90-day agreement, or pay in advance, in dollars, for any future cargoes of crude.

June 29, 1960. – The Revolutionary Government of Cuba took over the Texaco Refinery in Santiago de Cuba after plant officials had refused to process a shipment of crude oil from Russia.

July 1, 1960. – A token supply of 1,500 barrels of Russian crude oil in a barge was offered to the Belot refinery for running. When the offer was rejected, armed guards took over the plant and formal intervention of both Essosa’s refining and marketing facilities was effected in accordance with a decree issued by the Revolutionary Government the previous day. The operations of Shell were intervened the same day.

At the time of the intervention, exchange totalling more than (U.S.) \$26 million was owed to Essosa’s suppliers, over half of this sum for deliveries made in 1959. Moreover, even since the April agreement to make foreign exchange for payment of current shipments available on a 90-day basis, some \$4 million of these payments were defaulted on and remained unsatisfied.

Directly after the intervention, Essosa initiated legal actions against the Revolutionary Government because of seizure of its operations. The United States government filed a protest with Cuba and asked the Revolutionary Government to rescind its action.

August 7, 1960. — Prime Minister Castro announced the "forcible expropriation" of the company's properties, along with those of 25 other United States concerns, under a decree dated August 6, 1960.

Esso Standard Oil, S.A.
299 Alhambra Circle
Coral Gables, Florida

August, 1960

Exhibit 7

FIDEL CASTRO RUZ, Chairman of the Council of State of the Republic of Cuba.

I HEREBY STATE: That the Council of State has agreed as follows:

WHEREAS: In the Republic of Cuba, the economic system governs based on the socialist state ownership of all of the people governs over the fundamental means of production, listing in Article 15 of the Constitution of the Republic the assets subject to the aforesaid system, those that can not be transmitted in ownership to real persons or legal entities, except in exceptional cases in which the partial or full transmission of any economic objective is allocated for the purposes of the development of the country and does not affect the political, social and economic foundations of the State, for which the prior approval of the Council of Ministers or its Executive Committee will be required.

WHEREAS: The constitutional text itself in its Article 17 establishes that the State directly administers the assets that make up the socialist state property of all of the people or may create and organize companies and other entities to be responsible for the administration of the aforesaid assets, establishing the limits of the responsibilities of the State and of the aforesaid entities regarding the obligations taken on under contract.

WHEREAS: Legal principles and legal rules must be established that regulate the assets and rights that make up the state's wealth and the forms of registration and control that must be exercised over them and which complement the civil legislation in force.

WHEREAS: Furthermore, the attributions and functions of the bodies and agencies of the State, as well as the obligations and duties of the state entities should be determined, on which the administration of those assets is conferred and to establish, in particular, the attributions of the Ministries of Finance and Prices and Justice in their organization and control.

WHEREAS: Furthermore, modification of the civil procedural legislation should also be provided in correspondence with what is provided by this Decree-Law regarding the property subject to the socialist state property system of all of the people.

THEREFORE: The Council of State, in use of the powers conferred upon it by subsection c) of Article 90 of the Constitution of the Republic, adopts the following:

DECREE LAW No. 227
OF THE STATE'S WEALTH
Chapter I
General Points

Article 1.1. – The state's wealth is the body of goods and rights subject to the system of socialist state ownership of all of the people and those acquired, built or created by the State.

2. The assets and rights that are not owned by some other person are also part of the state's wealth.

3. The actions of the State for claiming its assets and rights do not prescribe.

Article 2.1. – The assets that make up the state's wealth are:

- a) for public use, which by their nature or purpose allow free access and enjoyment of all persons in the national territory;
- b) for public services, which by their nature or use serve in the performance of the functions of the State.

2. In addition, assets of the state's wealth are those allocated to national defense and security and public order, regardless of their nature, subject to special arrangements in accordance with current legislation.

3. In the complementary provisions to this Decree Law, the system of the assets shall be set forth that are listed in subsections a) and b) of the preceding section.

Article 3.1 – The assets and rights of the state's wealth are acquired by:

- a) in return for payment or free of charge in favor of the Cuban State;
- b) seizure and forfeiture;
- c) nationalization;
- d) expropriation;
- e) confiscation;
- f) usucaption; and
- g) any other means provided by law.

2. No person can acquire assets by usucaption from the state's wealth.

Article 4. – The administrative provision that creates a state entity must allocate the wealth assigned to it in accordance with what is established in this regard.

Article 5. – Any person who has, in administration or by any other means, assigned an asset of the state's wealth is obliged to handle its maintenance, conservation and control in accordance with the provisions and regulations in force.

Article 6.1. – The acts of transfer of ownership or other rights over assets of the state’s wealth to persons authorized by current legislation are carried out by public document.

2- In the case of acts of transfer of ownership over these assets in accordance with the provisions in Article 15 of the Constitution of the Republic, they are formalized in a public instrument.

Article 7. – State entities and their agencies, institutions financed by the central budget, as well as companies and any other entities that are allocated, under administration, the assets of the state’s wealth are obliged to provide the information requested from them by the Ministry of Finance and Prices in relation to what is established in this Decree-Law, with the periodicity that is determined, for the purposes of valuation and financial control.

Chapter II

Regarding the registration and control of assets and rights of state’s wealth

Article 8.1. – Any person who has, under his or her administration or by any other means, an asset of the state’s wealth, is obliged to register it in the corresponding official registries and keep the recorded information updated when it is modified for any reason.

2. The real estate that makes up the state’s wealth is registered in the Property Registry under the responsibility of the Ministry of Justice, in which all the acts and circumstances established in the legislation on the matter are also registered.

Article 9.1. – The assets and rights of the state’s wealth that are transmitted as a contribution to the different forms of international economic association with foreign capital or for setting up other non-state entities, must be previously registered in the corresponding registries.

2. Once formalized the transfer of the assets and rights referred to in the preceding section, the Ministry of Finance and Prices, whereby it transmits, is then informed of the amount or value thereof, so as to state for the record the corresponding decrease or impairment of the State’s Wealth.

Article 10. – The financial control and accounting information of assets and rights of the state’s wealth are governed by generally accepted accounting principles and by the exposure and valuation standards in force in the country.

Chapter III

Regarding the assets administered directly by the State

Article 11.1. – The assets and rights administered directly by the State are those allocated to the bodies, agencies and their dependencies and other state institutions financed from the central budget.

2. These assets and rights are not attachable, cannot be encumbered, nor offered as collateral.

3. The State is not responsible for the obligations contracted by companies, other state entities or third parties.

Article 12.1. – The heads of the bodies and agencies of the State that directly administer assets and rights of the state's wealth have, with respect to these, the following attributions and functions:

- a) to demand and, where appropriate, guarantee the protection, integrity, care, maintenance, and conservation of the state's wealth under its responsibility;
- b) evaluate the economic and financial results of the administration and activities of the subordinate entities, in accordance with the approved policies and the defined objectives;
- c) monitor the efficient use of resources of the state's wealth under their responsibility;
- d) carry out, in accordance with the legal provisions in force, transferring acts of ownership over the assets of the state's wealth under its responsibility;
- e) authorize the heads of entities to be subordinate in order to perform acts of ownership of assets of the state's wealth assigned to them;
- f) represent the State in the allocation and reallocation processes and before the corresponding Registries to carry out the proceedings established in the current legislation; and
- g) others that this Decree-Law and legislation may provide.

2. In the event that these assets are administered directly by a collegiate state body, the powers expressed in the preceding section correspond to the body as a whole.

3. The heads of any other state entities financed by the budget have the powers provided in subsections a), b), c), and d) of section 1 of this article, except in the case of transferring acts of ownership over real estate or movable property that requires authorization from the body or head of the body to which they are subordinated.

Chapter IV

Regarding the assets administered by companies and other state entities

Article 13.1. – The State creates and organizes companies and other state entities to which they are assigned in administration assets and rights of the state’s wealth.

2. These companies and state entities are responsible for the obligations contracted with their financial resources, being understood as such, their monetary resources, the monetary income obtained from accounts receivable, as well as the bills and any other accounts receivable, to cover the total of the amount due; except as provided in the corresponding special legislation.

3. These companies and state entities are not responsible with their assets for the obligations contracted by the State, unless when they expressly assume them.

Article 14.1. – The heads of the companies and state entities that administer assets and rights of the state’s wealth, have, in relation to these, in addition to the attributions and functions established in subsections a), b) and c) of Article 12.1 of this Decree-Law, the following:

- a) give and receive under lease assets, by means of a contract entered into in accordance with the provisions in force;
- b) sell and purchase assets in accordance with established regulations;
- c) promote, in regards to what is of their competency, the increase and development of the state’s wealth under their administration; and
- d) others that this Decree-Law and the legislation may provide.

2. The powers established in subparagraphs a) and b) of the preceding section regarding real estate and certain movable property, require the express authorization of the body or of the head of the body to which the corresponding company or entity is subordinated. In the case of collegiate bodies, the corresponding agreement of said body is required.

3. The exercise of the powers set forth in subsection b) of the first section does not include the power to transfer assets and rights of the state’s wealth to other forms of ownership.

Chapter V

Regarding the governing bodies of the State’s Wealth

Article 15.1. – The Ministry of Finance and Prices, for the purposes and effects of this Decree-Law, has the following attributions and functions:

- a) to financially control the allocation of the assets and rights of the state’s wealth attending to the functions assigned to it;

- b) to provide for the allocation of assets and rights of the state's wealth, as well as those that may be transferred by other persons in favor of the State, when they have not been previously allocated to state entities;
- c) to establish coordination with the official Registries in which assets and rights of the state's wealth are registered in order to receive or transmit the necessary information for their organization, valuation and financial control;
- d) to request, from the bodies, agencies and other state entities or entities financed from the Central budget, that they have allocated assets and rights from the state's wealth, the necessary information for their financial supervision and control;
- e) to carry out on its own or coordinate with other bodies, agencies and any other entity the realization of inventories, appraisals, investigations, and verifications of any asset of the state's wealth;
- f) to preserve and occupy, when necessary, the information required for the purposes expressed in the preceding paragraph;
- g) to record in accounting the allocation of real estate in administration to the bodies, agencies, and other state entities;
- h) to decide on the delimitation between state-owned real estate;
- i) to establish, in coordination with who may be appropriate, systems and special conditions of use, administration and control over the state entities to which state's wealth have been allocated in administration;
- j) to receive notification from the official or acting authority that authorizes, grants, dictates, or adopts a notarial instrument, judicial or administrative resolution, as well as any other document that contains an act whereby an asset or a right is adjudicated in favor of the Cuban State, with the periodicity that may be established, for the purposes of their financial control and valuation; and
- k) others that this Decree-Law and legislation may provide.

2. The bodies and agencies of the State which, in accordance with the legal provisions in force, also hold the powers referred to in subsection a) of the preceding section, must report on the what these assets and rights have been allocated for, to the Ministry of Finance and Prices with the periodicity and in the manner established for the purposes of their financial control.

Article 16. – The bodies and agencies of the State that grant authorizations to remove from Cuban territory movable property or rights of the state's wealth, must communicate, for the purposes of the financial control, regarding the decisions adopted in this regard, with the form and the periodicity to be established by the Ministry of Finance and Prices.

Article 17. – The movable property or rights of the state's wealth that are not allocated to any body, agency or state entity require, in order to be removed from national territory,

the authorization of the Ministry of Finance and Prices, and the enforcement of what has been provided in the special legislation, taking into account the nature of the asset.

Article 18. – The Ministry of Finance and Prices, on behalf of the Cuban State, may carry out all actions aimed at safeguarding the assets and rights of the state’s wealth that are not allocated to another state body, agency or entity.

Article 19.1. – The Ministry of Justice, on behalf of the Cuban State, participates in the process of transferring ownership of real estate and other rights over these assets of the state’s wealth, when they are used as contributions to sign international economic association contracts.

2. Furthermore, it represents the Cuban State in the acts of transmission to state companies or other authorized entities, of other rights over real estate that require the prior approval of the Council of Ministers or of its Executive Committee for the fulfillment of its purposes.

Article 20.1. – It is the responsibility of the Ministry of Justice on behalf of the Cuban State to exercise the action to claim the assets and rights of the state’s wealth.

2. Furthermore, it can exercise the rights of first refusal and retraction, in accordance with the legal provisions in force, to acquire assets and rights in favor of the wealth of the Cuban State.

3. In addition, it represents the State, when the latter becomes a donor or heir, in the transfer of assets and rights in its favor, in accordance with the provisions in current legislation.

SPECIAL PROVISIONS

ONE: The Ministries of the Revolutionary Armed Forces and of the Interior shall adapt their own regimes relating to the administration, registration and control of the assets of the state’s wealth to this Decree-Law, for which purpose they shall dictate the provisions that may apply.

TWO: Precious metals, coins, jewelry, and other valuables that are abandoned in territorial sea, territorial waters and the maritime economic zone belong to the state’s wealth.

THREE: The National Office of Hydrography and Geodesy guarantees the necessary cadastral information on the real estate of the state’s wealth for the bodies and agencies of the State that may require it for the purposes of enforcement of this Decree-Law.

FOUR: The assets and rights of the state’s wealth that are declared as national heritage are governed by the pertinent provisions, without prejudice to the provisions in this Decree-Law.

TRANSITIONAL PROVISION:

SOLE PROVISION: Matters related to the matters which are covered by this Decree-Law, which at the time of its entry into force are being substantiated, will continue to be processed under the legislation, and therefore they will be filed until their final resolution.

FINAL PROVISIONS

ONE: Section 1 of Article 138 of the Civil Code is amended, which becomes worded as follows:

“**Article 138.1.** – The assets of the state’s wealth cannot be transmitted in ownership to real persons or legal entities except in exceptional cases in which the partial or full transmission of some economic objective is aimed at the development of the country and does not affect the political, social and economic foundations of the State, with prior approval of the competent bodies or as expressly provided in the special legislation.”

TWO: Ordinal number 1) of Article 463 of the Civil, Administrative and Labor Procedure Law is amended, which becomes worded as follows:

“**Article 463.** – All kinds of assets and rights may be subject to embargo, precautionary or seizure measures, except those expressed below:

1. The assets of state’s wealth administered directly by the State and those administered by companies and state entities, except for the financial resources thereof and those so authorized by special legislation.”

THREE: The Ministers of Finance and Prices and Justice are authorized to issue the complementary provisions that are necessary for the best enforcement of this Decree-Law.

FOUR: Any legal or regulatory provisions that contradict the provisions of this Decree Law are repealed, which will begin to take effect as of 180 days from their publication in the Official Gazette of the Republic.

EXECUTED in the city of Havana, on January 8, 2002. “Year of the Hero Prisoners of the Empire.”

FIDEL CASTRO RUZ
Chairman of the Council
of State

Exhibit 8

Refining

For decades, three foreign companies (ESSO, Texaco and Shell) assumed the import, refining and supply of fuel in Cuba. They transported the oil in their boats from wells of their property and sold it to the Cuban State to almost three dollars a barrel. Then, the state paid them for the refining and the production of derivatives, which were then sold, in the network of gas stations of these transnationals. Currently the country has 4 refineries: Níco Lopez, Sergio Soto, Camilo Cienfuegos and Hermanos Diaz.

In 1960 the nationalization of the companies began and at the beginning of that year the revolutionary government intervened in the Sergio Soto refinery known as the RECA Refinery, located on the outskirts of the City of Cabaiguán, Santi Spíritus province. Then, on June 28, 1960, according to Resolution 166 of the revolutionary government, the Texaco plant was intervened in Santiago de Cuba. Three days later, the same luck happened in Havana, the ESSO facilities and the Anglo-Dutch Shell.

The main objective of refineries is to maximize the supply of domestic demand for petroleum products.

As part of the projection of the refining branch up to 2030, a series of projects aimed at increasing the processing capacity to meet the projected demand for oil derivatives in the Cuban market are included, to bring the quality of the products obtained to international market standards, improving efficiency in the production process, minimizing the impact on the environment and obtaining positive refining margins that allow the economic sustainability of the system.

From the refining of crude oil the following products are obtained:

Refining products obtained in Cuba:

- Refinery Gas
- LPG or LPG
- The Naftes
- The Turbo Fuel
- Waxes
- Asphalt
- The Diesel Oil
- The gas
- The Kerosene.
- Lubricating oils
- Fuel Oil or Fuel Oil.
- Oil Coke.

Share :

 (<https://www.facebook.com/sharer/sharer.php?u=https://www.cupet.cu/operaciones/refinacion/>)

 (<https://twitter.com/intent/tweet?url=https://www.cupet.cu/operaciones/refinacion/>)

SEE ALSO

Exhibit 9





Cuban Oil Industry

The Union Cuba-Petroleo (CUPET) is the organization that will effectively satisfy the supply of fuel and lubricant to the national market, maximizing the value of the national fuels with competitive products in the Caribbean area, based on the application of top technology and a highly qualified human potential, and involved in the development of the country.

About CUPET (<https://www.cupet.cu/industria-petrolera-en-cuba/?lang=en>)



Exploration-Production

Attractive possibilities to be the next discoverer of the region.

(<https://www.cupet.cu/operaciones/exploracion-produccion/?lang=en>)



Refining

We maximize the supply of the national demand of oil derivatives

(<https://www.cupet.cu/operaciones/refinacion/?lang=en>)



Trade and Supply

To ensure the supply of fuels and lubricants to our main customers .

(<https://www.cupet.cu/operaciones/comercializacion/?lang=en>)

CUPET in numbers

The oil industry is already an important element of the Cuban economy. The Union Cuba-Petroleo is committed with the increasing production, expanding industry, and fuel quality and savings.

OIL AND GAS PRODUCTION

Equivalente Oil

Approximately 4 million tons per year (25 million barrels per year)

Crude Oil

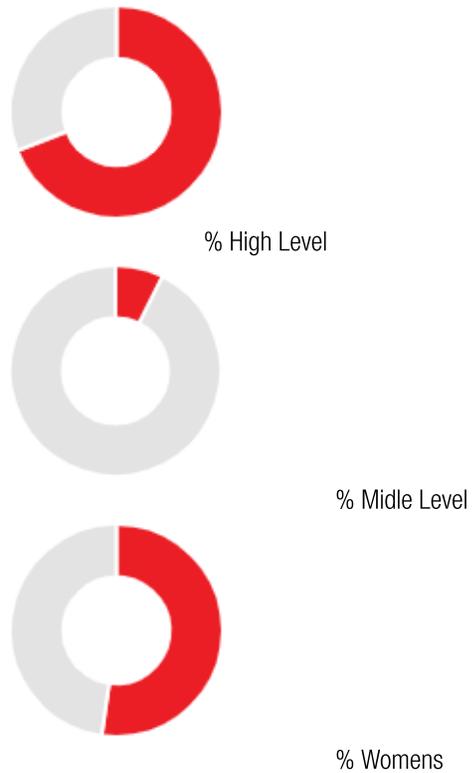
Approximately 3 million tons per year (19 million barrels per year)

Natural gas

Approximately 1 100 million cubic meters per year.

Human Capital

More than 24 000 employees:

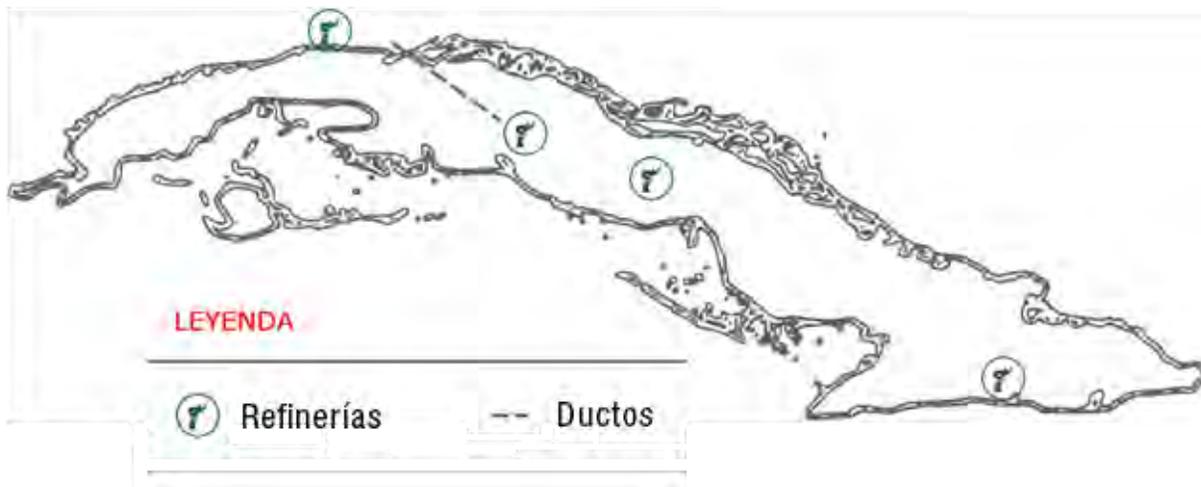




% Men

Refining

135 mil barrels per day



Ñico López

Medium Conversion

Procesos

MBPD

Atmospheric distillation

36.4

Vacuum distillation	18.0
Cathalytic cracking	12.5
Reformer	2.7
Hydrofination distillates	3.2

Sergio Soto

Hydroskimming

Processes	MBPD
Atmospheric distillation	2.8
Vacuum distillation	1.4

Cienfuegos

Medium Conversion

Processes	MBPD
Atmospheric distillation	65.0
Reformer	9.6
Hydrofination distillades	25.0

Hermanos Diaz

Medium Conversion

Processes	MBPD
Atmospheric distillation	30.0
Vacuum distillation	18.0
Reformer	2.7
Hydrofination distillates	7.0

Category Exploration-Production

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They meet part of the country's energy needs as a result of exploration, development of the exploitation of oil gas deposits and specialized services, either directly or in return for foreign firms, representing CUPET.

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Province	La Habana	▼
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Commercial houses

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Exhibit 10

U.S. DEPARTMENT OF THE TREASURY

Press Center

Treasury Designates & Blocks 10 Entities for Cuban Embargo Violations

2/9/2004

FROM THE OFFICE OF PUBLIC AFFAIRS

js-1161

MIAMI--Today Treasury Secretary John Snow announced that Treasury's Office of Foreign Assets Control ("OFAC") is identifying ten entities, listed below, that it has determined are owned or controlled by the Government of Cuba or Cuban nationals. These ten include entities organized and located in Cuba as well as entities located in Argentina, the Bahamas, Canada, Chile, the Netherlands, and England. Nine of the ten are travel companies specializing in Cuba travel, and one is a gift forwarder to Cuba.

All property of these entities that is in the possession of persons subject to U.S. jurisdiction is blocked and no persons subject to U.S. jurisdiction may engage in any transactions with these entities unless authorized by OFAC.

OFAC is taking action today in furtherance of President Bush's October 2003 initiative to strengthen enforcement of U.S. laws prohibiting transactions related to travel to Cuba and to hasten the arrival of a new, free, democratic Cuba. The foreign travel companies identified today provide easy access to Cuba to those U.S. individuals who choose to break the law. Many of these entities use the Internet to advertise and sell Cuban tourism to the U.S. public. U.S. law enforcement officials have intercepted a number of unauthorized travelers whose tour packages were purchased through one of these entities.

ENTITIES PROPOSED FOR DESIGNATION

Cimex Companies (6):

1. 2904977 CANADA INC.

Montréal, Québec, Canada

(<http://www.caribesol.ca>)

2904977 CANADA INC., a.k.a. Caribe Sol, a.k.a. Havanatur Canada Inc., is a travel agency owned by Cimex, a holding company of the Government of Cuba.

2. CORPORACION CIMEX S.A.

Havana, Cuba (and all other locations worldwide)

(<http://www.cimexweb.com>)

CORPORACION CIMEX S.A., a.k.a. Cimex, a.k.a. Cimex Cuba, a.k.a. Comercio Interior, Mercado Exterior, has approximately 107 offices throughout Cuba. A holding company, CIMEX S.A., is owned by the Government of Cuba and owns travel service providers. It was organized to promote new products and services in Cuba.

3. HAVANATUR S.A.

Havana, Cuba (and other cities in Cuba)

(<http://www.havanatur.cu>)

HAVANATUR S.A. is the leading tour operator in Cuba, with offices throughout Cuba. Its corporate parent is CIMEX.

4. HAVANATUR S.A.

Buenos Aires, Argentina

HAVANATUR S.A. is a travel agency specializing in trips to Cuba. It is owned by Cimex.

5. HAVANATUR BAHAMAS LTD.

Nassau, Bahamas

HAVANATUR BAHAMAS LTD. is a travel agency specializing in trips to Cuba. It is controlled by the Government of Cuba.

6. HAVANATUR CHILE S.A.

Santiago, Chile

HAVANATUR CHILE S.A., f.k.a. Guamatur S.A., is a travel operation specializing in trips to Cuba. It is controlled by Cimex.

Exhibit 11

High on Cuba policy proposal: Restricting U.S. Business Deals with Cuba's Military-Run Entities

By Nora Gámez Torres

Miami Herald

JUNE 12, 2017 06:51 PM, UPDATED JUNE 12, 2017 07:00 PM

<https://www.miamiherald.com/news/nation-world/world/americas/cuba/article155772469.html>

Cuban-American members of Congress have been pushing the Trump administration to restrict deals between U.S. companies and Cuban firms controlled by the island's military, as part of the new Trump policy toward Cuba expected to be announced this week in Miami.

White House spokeswoman Helen Aguirre Ferré confirmed Monday that the proposal is under consideration, but added that it was "one of the many possibilities under discussion."

The possibility of restrictions put a spotlight on the military-run companies, which are just about everywhere on the island.

If you're a U.S. traveler in Cuba and you buy a bottle of water in the supermarket or a souvenir in a store, or you rent a car or a hotel room, it's very likely that you're putting money into the pockets of the military-run GAESA, which experts say controls nearly 60 percent of the Cuban economy.

GAESA, the Spanish acronym for Grupo de Administración Empresarial S.A., is the business conglomerate owned by the Revolutionary Armed Forces and controls more than 50 enterprises, although the exact details are difficult to establish.

GAESA operates in virtually every profitable area of the Cuban economy, controlling hotel chains, car rental agencies and sales companies, banks, credit card and remittance services, supermarkets, clothing shops, real estate development companies, gasoline stations, import and export companies, shipping and construction companies, warehouses and even an airline.

Heading the conglomerate is army Gen. Luis Alberto Rodríguez López Calleja, who, according to various reports, is married or was married to a daughter of Cuban ruler Raúl Castro.

One of the best known companies of GAESA is the Gaviota hotel chain, which owns nearly 29,000 rooms around the country and serves an estimated 40 percent of all the island's foreign tourism.

Gaviota has signed management contracts for 83 percent of its rooms with international hotel chains like Spain's Meliá and the Swiss-based Kempinski. It also has a deal with Sheraton's Starwood chain to administer the Four Points Hotel in Havana, a contract that was allowed by policy changes under the Obama administration.

Gaviota also owns the Gran Hotel Manzana in Havana, Cuba's first luxury hotel, managed by the Kempinski group. Exclusive hotel shops that sell Montblanc, Versace and Armani goods are owned by CIMEX, a Cuban business conglomerate taken over by GAESA in 2010. CIMEX, founded by the Ministry of the Interior, includes financial services, a chain of shops and import and export agencies.

Restrictions by the Trump administration on doing business with Cuba's military-run companies, if imposed, would impact more than tourism because GAESA operates in virtually every sector of the island's economy — with the exception of telecommunications and agriculture.

GAESA's Almacenes Universales S.A., for example, controls the container terminal in the Port of Mariel, which receives most of the cargo that once arrived at the port of Havana. The terminal was built by Brazil's Odebrecht company, with funding from President Dilma Rousseff's government.

Western Union has said that its operations in Cuba use the infrastructure of FINCIMEX (Financiera Cimex) to send remittances to Cuba. FINCIMEX also processes VISA and MASTERCARD transactions on the island. FINCIMEX also handles remittances sent to Cuba through companies like VaCuba.

And the room-rental company Airbnb, which saw its Cuba operations boom after the Obama Administration approved it, may be affected by any change because it pays home and apartment owners through VaCuba. Airbnb declined to comment for this story.

The birth of GAESA goes back to the 1980s. But when Raúl Castro, who was in charge of the military for more than five decades, replaced his brother Fidel in 2006, military officers began taking more control of the economy under the argument that they were more efficient than Cuban bureaucrats.

GAESA expanded even further in 2016 when it took over Cuba's International Financial Bank (BFI) as well as Habaguanex, a corporation that Fidel Castro had favored with a special license to run hotels, shops and restaurants in Old Havana.

Miami Herald staff writer Patricia Mazzei contributed to this report.

Exhibit 12

The economic empire of the Armed Forces

Taken from Cubanet

By Osmar Laffita Rojas

The most recent expansionist moves of the Business Administration Group (GAE), belonging to the Revolutionary Armed Forces, and which is the largest business holding company in Cuba, respond to a meticulously designed plan so that the military can direct the main and most profitable activities of the national economy.

In a meeting held on July 30, in the Del Monte room, located on the first floor of the Ambos Mundos hotel, in Old Havana, which was presided over by General Leonardo Ramón Andollo Valdés, Second Chief of the General Staff. of the FAR, and Second Head of the Permanent Commission for the Implementation of the Economic Guidelines, the government's decision to [transfer Habaguanex to the GAE](http://www.martinoticias.com/a/conquista-militar-imperio-eusebio-leal/123975.html) [http://www.martinoticias.com/a/conquista-militar-imperio-eusebio-leal/123975.html] was communicated .

In this meeting, the Office of the Historian of Havana, which until that moment administered Habaguanex, was represented by its deputy director, Perlas Rosales Aguirreureta, daughter of General Ulises Rodales del Toro. Also present were the directors of the Habaguanex SA Tourist Company and the managers of hotels, hostels, shops, restaurants, cafeterias and bars.

Next October 30, Habaguanex will be completely absorbed by the GAE. It will become part of Gaviota Tur.

In order not to leave loose ends in the strategy that the military control and direct the national economy, since January the GAE absorbed the International Financial Bank (BFI), founded on November 3, 1984. This absorption resulted in the aforementioned January Bank has left the control of the Central Bank of Cuba. Its operations are now independent and secretly controlled by division general Luis Alberto Rodríguez López-Callejas, president of the GAE.

In 2012, President Raúl Castro made the decision to transfer the CIMEX Corporation to the GAE, which for more than three decades was directed by officials who responded directly to Fidel Castro. With the absorption of CIMEX, the GAE doubled its dimensions.

The GAE is made up of at least 57 companies that operate under the rules of common capital that seek to maximize their economic resources, and that are governed by a set of decidedly capitalist financial references, developed from the time of its founding and that have remained unchanged. .

In the last five years, President Raul Castro has made the GAE grow enormously. Many of the state companies are managed by this business emporium, which reports about 65% of the income generated in Cuba.

GAE owns more than 2,000 Foreign Currency Collection Stores (TRD).

GAE belongs to the Gaviota hotel group, [the largest in Cuba](http://www.granma.cu/Feria-Internacional-de-Turismo-2016/2016-05-05/vortices-de-una-feria-con-pasaporte-al-futuro-05-05-2016-23-05-44) [http://www.granma.cu/Feria-Internacional-de-Turismo-2016/2016-05-05/vortices-de-una-feria-con-pasaporte-al-futuro-05-05-2016-23-05-44] , with 62 hotels and more than 26,752 rooms, representing one third of the country's hotel capacity.

Many of these Gaviota hotels have an administration contract with hotels in Europe, Canada and the United States.

Along with the hotels, GAE manages the marinas that operate in Cuba, among which the one in Varadero stands out with more than a thousand yacht berths.

GAE also manages a national network of gas stations, car rental agencies, wholesale import companies for its stores and general hotel and extra-hotel service.

The GAE has the responsibility, through Almacenes Universales, to direct the container terminal and the Mariel Special Development Zone (ZEDM).

The Tri-Star Caribbean company, of the Armenian-Canadian entrepreneur Sarkis Yacoubian, sold cars, trucks and industrial equipment to the GAE. On July 13, 2011, State Security sealed the offices of Tri-Stat Caribbean and Yacoubian was arrested. He remained incarcerated for two years. He was accused of tax evasion, corruption and espionage. After a two-day trial in May 2013, Yacoubian was sentenced to nine years in prison and a \$ 7.5 million fine on charges of bribery, tax evasion, bribery and economic damage. In February 2014 he was released and sent to Canada. The Cuban government proceeded to expropriate the assets of Tri-Star Caribbean, valued at 20 million dollars. Most of them were awarded to Almacenes Universales, a company belonging to the GAE.

The GAE director, division general [Luis Alberto Rodríguez López-Callejas](http://www.elfinanciero.com.mx/mundo/quiere-invertir-en-cuba-le-presento-a-su-socio-el-yerno-de-raul-castro.html) [http://www.elfinanciero.com.mx/mundo/quiere-invertir-en-cuba-le-presento-a-su-socio-el-yerno-de-raul-castro.html] is the son of the recently deceased reserve general Guillermo Rodríguez Pozo. In his beginnings, three decades ago, he worked under the direct orders of General Raúl Castro, who was his father-in-law.

When Raúl Castro was serving as Minister of the Revolutionary Armed Forces, he entrusted General Julio Casas Regueiro, for his organizational skills and control of commercial activity, with the task of founding the GAE. For this he placed him as his principal assistant to Rodríguez López-Callejas.

They say that in the meetings of the group where General Raúl Castro was present, Rodríguez López-López Callejas sat in silence and spoke only when his opinion was required.

With abundant money and property and military assets, General Julio Casas built the GAE with the advice of Rodríguez López-Callejas.

The companies that were part of the future holding began to apply the System of Business Improvement, in which commercial operations were governed by the laws of the market and not by centralized planning.

Today, the power of Rodríguez López-Callejas is such that he gives the go-ahead to the majority of foreign businessmen interested in investing in Cuba, to which he suggests that they do business with their holding company if they really want to make a good profit.

In spite of bearing the weight of the direction of the national economy, the official media do not report on the GAE and the ordinary Cuban is oblivious to these important economic moves, which have become the exclusive patrimony of the select circle that surrounds the president Raúl Castro.

Posted 5th September 2016 by [Landy](#)

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Exhibit 13



WORLD NEWS

SEPTEMBER 27, 2010 / 4:11 PM / 8 YEARS AGO

Military man to head Cuba's biggest company

Marc Frank



HAVANA (Reuters) - President Raul Castro has put a military officer in charge of Cuba's largest commercial corporation as part of a drive to increase efficiency and reduce corruption in the country's major foreign exchange companies.

Colonel Hector Oroza Busutin arrived at the headquarters of the Cuban Export-Import Corporation (CIMEX) earlier this month, replacing its long-time President Eduardo Bencomo, according to various company employees.

"Since then, there have been a lot of military people running around here," one of them said, asking that her name not be used.

Since taking over the presidency from older brother Fidel Castro in 2008, Raul Castro has taken steps to boost Cuba's troubled state-run economy and weed out corruption.

He reportedly wants to bring some of the country's independent companies under government ministries and views consolidation, which has already begun, as the best path forward.

In many cases, he has entrusted the task to military officers, with whom he is said to feel more comfortable after almost five decades as Cuba's defense minister.

At least 10 military men hold positions in his cabinet or as deputy ministers and heads of key agencies.

RELATED COVERAGE

[Factbox: Cimex, Cuba's largest commercial corporation](#)

Oroza Busutin moved to CIMEX from his position as No. 2 in the military-run Administrative Group of Businesses (GAE.SA), a holding company which also operates numerous foreign exchange businesses including the country's largest tourism corporation and real estate firm, a chain of warehouses and hundreds of retail outlets selling everything from groceries to domestic appliances.

Castro's son-in-law, Colonel Luis Alberto Rodriguez, is the chief executive of GAE.SA.

CIMEX's new deputy director, Ana Maria Oretaga, held a similar position at the military's retail chain, TRD-Caribe, according to the company sources.

"I'm not surprised. It follows the trend under Raul," said a Western diplomat in Havana.

The appointment has not been announced despite CIMEX's relations with hundreds of foreign suppliers and significant role in Cuba's everyday life.

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Replay

CONSOLIDATION UNDER WAY

CIMEX, with annual revenues of more than \$1 billion, is an independent state-run conglomerate that operates exclusively in foreign exchange and the local equivalent called the convertible peso, valued at \$1.08 per unit.

It runs its own shipping line and bank, clears foreign credit card transactions, controls remittance wire transfers, operates a real estate business and the country's largest travel agency and owns more than 2,500 commercial outlets including department stores, fast food spots and gas stations.

The change in command at CIMEX follows the liquidation last year of CUBALSE, Cuba's second-largest foreign exchange company. Its numerous businesses were spun off mainly to military-run companies and CIMEX.

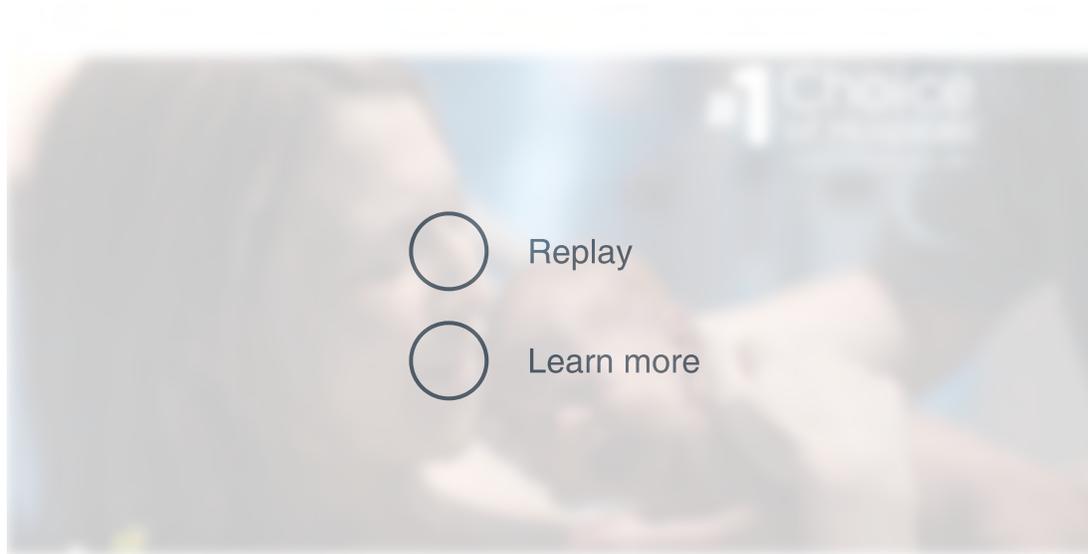
The dissolution of CUBALSE, Cuban authorities said at the time, would "reduce expenses, increase negotiating power, concentrate the administration of service-providing entities, and carry these out with greater efficiency."

In the 1990s, after the fall of the Soviet Union, Cuba's chief benefactor, the elder Castro opened the door to international tourism and investment, legalized the dollar and later the convertible peso and welcomed family remittances.

The military along with CIMEX and CUBALSE were given the task of absorbing the influx of cash by establishing retail and other businesses in what the government viewed as an experiment in state-managed competition.

But Raul Castro reportedly has come to view the competitive model in state-run foreign exchange operations as redundant and rife with corruption.

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Theft at their gas stations has been estimated at up to 50 percent by the official media and much of Cuba's prolific black market is said to be fed by warehouses under the various companies' control.

It is still not clear what will happen to CIMEX, but many believe some of its operations will be spun off, with, for example tourism businesses going to the Tourism Ministry.

There is also talk that a single chain of retail establishments operating in convertible pesos is planned.

Exhibit 14

LE MONDE *diplomatique*

> March 2018

'BEANS ARE MORE IMPORTANT THAN CANNON'

Cuba's businessmen in battledress

The armed forces of Cuba have paid their own way since the economic shock of the 1990s. They are creating revenue through food production and tourism.

BY RENAUD LAMBERT



Those were the days: Cuban rebel soldiers guard the Hilton Hotel, Havana, in 1959

Lester · Cole Corbis · Getty

ONLY months after becoming president, Donald Trump cancelled the ‘completely one-sided’ Barack Obama had made with Cuba in December 2014. Obama had decided the US policy of strangulation (military aggression, embargo and suspension of diplomatic relations) was ineffective, and felt it was better to normalise relations and encourage Cuba to open up (1). But Trump claimed the flood of American tourists encouraged by Obama’s approach had strengthened the position of Cuba’s armed forces and worsened repression. Cuba would soon be under a military junta: after all, there were eight generals among the 17 members of the Communist Party politburo.

The US has had mixed reactions to Latin Americans in battledress. It was pleased when they ousted Manuel Zelaya in Honduras (2009) and enthused when they shelled the presidential palace in Chile (1973). It was indignant when they wore red berets in Venezuela or smoked cigars in Cuba; in cases like these, the US is quick to point out that armed coups do not always lead to democracy and that guns originally intended to keep the enemy at bay can also be turned on the people.

The Cuban armed forces are discreet yet rigid, pragmatic but determined. Raúl Castro, president since Fidel stepped down in 2008, is an army general. As defence minister, from 1959 until 2008, he shaped the army in his own image, drawing on his experience of guerrilla warfare in the Sierra Maestra. When the *barbudos* (bearded rebels) landed in Cuba in 1956, Fidel put Raúl in charge of a column of armed rebels in a remote part of eastern Cuba; the zone became known as the ‘Frank País second eastern front’, after the student leader and revolutionary.

Journalist Fernando Ravsberg says: ‘Fidel, in his zone, talked a great deal about his ambitions and his big ideas; Raúl got on with organising his own zone. For instance, he set up a shoe repair unit, so that his men would have decent boots.’ Raúl toured the zone organising recruitment and supplies, decreeing agricultural reforms and establishing schools and clinics, which he financed through taxes.

Fidel, in his zone, talked a great deal of his ambitions and his big ideas; Raúl set up a shoe repair unit, so that his men would have decent boots

Fernando Ravsberg

In September 1958 Raúl, then 27, convened a congress of smallholder farmers, at which the local population were invited to present their grievances. Researcher Hal Klepak writes: ‘Raul had by late 1958 functioning elements of government not only for his troops but for the public in his

zone, including departments of war, justice, propaganda, health, finance, public works and communications, and education, as well as agrarian and labour bureaus' (2).

Cuban-style socialism

Cuba's armed forces, officially founded in December 1961, were the product of a guerrilla war, and so became the Revolutionary Armed Forces (FAR). They were designed not to defend against attack but to free the people from a dictatorship, and this political vocation endured even when the original project changed from nationalism to Cuban-style socialism. The FAR command great respect among those who lived through the fall of the US-backed dictator Fulgencio Batista; in their eyes, the military are still the guerrillas who gave them their first shoes, books and victory.

The FAR's internationalism has also won the respect of a population that is highly politicised and has endured hardships in resisting the US. The FAR fought alongside Latin American guerrillas in Algeria, Ethiopia and especially Angola, where tens of thousands of Cuban soldiers faced the troops of South Africa's apartheid regime. Cuban law stipulates that at least half of those entering the military academy must be children of factory workers or smallholder farmers, who are poorer (and more likely to be black) (3).

The FAR's image has also been formed by a more recent episode, the 'special period' after the collapse of the eastern bloc in Europe. Between 1991 and 1994, Cuba's GDP fell by around 35%. The violence of this shock was intoxicating to anti-Castrists, and Andrés Oppenheimer, a favourite Miami press columnist, published a book *Castro's Final Hour* (4) (which he firmly believed had come).

'From one day to the next,' says Ravensberg, 'Fidel told Raúl: "I don't have any money for you. The army will have to get by as best it can".' Klepak writes: 'Within a little over a year, Raúl was obliged to cut the [armed] forces in half, their budget was left a shadow of itself (a drop from [1,149m to 736m Cuban pesos, which were moreover] only a fraction of their former value).' While the Cuban state seemed paralysed by the economic crisis, and Fidel continued to promise dignity, pride and honour to hungry people, the FAR proved adaptable. A *New York Times* report in 1995 said they were 'the only thing that works' in Cuba (5).

'Defence includes everything'

The FAR were short of money, fuel and spare parts, which had been supplied by the Soviet Union. Raúl said: 'Our specific task is defence, but defence includes everything. Right now it involves providing food for our people ... Beans are more important than cannon' (6). From 1980 the FAR moved into tourism, through the state-owned enterprise Gaviota, which managed leisure centres for Soviet visitors. The FAR established a chain of stores for foreign visitors, which allowed them to scoop up US dollars circulating in Cuba. Soldiers swapped battledress for a

guayabera, the pleated shirt regarded as formal wear. Some went overseas to take MBAs; others worked in hotels. Fighter pilots became airline pilots, while admirals captained chartered yachts.

In the mid-1990s the FAR were probably producing between a third and half of all the food in Cuba. While the education and health budgets were rising, the defence budget continued to fall, forcing the military to become financially independent. 'The ballet schools stayed open,' says Ravensberg, who was already living in Cuba at the time (7). The US stepped up its sanctions, but the FAR managed to show that they were still protecting the nation in their own way: four years after Oppenheimer's book, Raúl Castro presided over a military parade in which advanced surface-to-air missiles were pulled by soldiers on bicycles.

Our specific task is defence, but defence includes everything. Right now it involves providing food for our people

Raúl Castro

The FAR have trialled the reforms that Raúl has tried to implement since becoming president, including productivity-based pay (8). Some changes have been spectacular: Fidel thought that no Cuban should enjoy hotels if only the rich could afford them; Raúl, who criticised the excesses of egalitarianism, decided that they should be open to all and that market mechanisms should be allowed to operate. It then became apparent that some Cubans had considerable savings. Allowing them to spend this money in (FAR-run) hotels reduced the demand for B&Bs, whose prices plunged.

FAR-run enterprises

Does this mean Cuba has abandoned socialism? Though Raúl has promised in every speech to carry on Fidel's vision, he has turned away from the utopian notion that only ideas can move the people. Many find it ironic that Raúl, a former member of the Communist Youth (which Fidel was not), is discreetly burying Fidel's project. Raúl seems more willing to accept that objective economic analysis can serve the political struggle. The economic and geopolitical situation is not favourable to the building of 'socialism in a single island' and it seems that the FAR are less worried than the Communist Party about capitalism and profit.

Though no official figures are available, it is estimated that the FAR currently number around 80,000 men and women, compared with 200,000 in the 1980s. The enterprises they control, including Gaviota, Cimex and TRD, are owned by the holding company GAE (Grupo de

Administración Empresarial), headed by Raúl's former son-in-law, Luis Alberto Rodríguez López-Callejas. Gaviota controls 40% of all hotel rooms in Cuba.

US academic William LeoGrande (not often thought to hold Castrist sympathies) deconstructs the fantasy numbers suggested by the Miami press, and estimates Gaviota had a revenue of around \$1.7bn in 2015, while Cimex (retail chainstores, car rental) made around \$1.3bn and TRD (retailer) \$440m. This adds up to \$3.4bn for GAE, 20% of Cuba's hard currency income and around 4% of its GDP in 2015 (9). It has not escaped the Trump government's attention that the income of enterprises managed by the FAR fluctuates according to that of the tourist sector.

Under these conditions, it would not be wrong to suggest that normalising relations with Cuba made life easier for the military, but to suggest that it worsened repression is another matter. After each hurricane, foreign observers ask why Cuba seems to fare better than other Caribbean countries. Cubans know the answer is partly solidarity, which leads the better off to shelter less fortunate neighbours, and partly the organisational capability of the FAR, in charge of civil defence.

The FAR are not immune from the corruption rife in most Cuban institutions, though their image is better than that of the police. The money GAE is making could be a temptation, as it has proved in other countries, such as Vietnam. But for the moment, it is not unusual to see a Cuban army colonel thumbing a lift when elsewhere he might be riding in an air-conditioned car.

Image captions and credits * Cuban rebels [caption] Those were the days: Cuban rebel soldiers guard the Hilton Hotel, Havana, in 1959 [credit] Lester · Cole Corbis · Getty

RENAUD LAMBERT

Renaud Lambert is deputy editor of *Le Monde diplomatique*.

Translated by Charles Goulden

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- (1) See Patrick Howlett-Martin, '[Handshake for Havana](#)', *Le Monde diplomatique*, English edition, October 2014.
- (2) Hal Klepak, *Raúl Castro and Cuba: a Military Story*, Palgrave Macmillan, New York, 2012.
- (3) Military service (two years) is compulsory for men; women can volunteer for it.
- (4) Andrés Oppenheimer, *Castro's Final Hour*, Touchstone, New York, 1992.
- (5) Larry Rother, '[In Cuba, army takes on party jobs, and may be only thing that works](http://www.nytimes.com/1995/06/08/world/in-cuba-army-takes-on-party-jobs-and-may-be-only-thing-that-works.html?pagewanted=all)' [<http://www.nytimes.com/1995/06/08/world/in-cuba-army-takes-on-party-jobs-and-may-be-only-thing-that-works.html?pagewanted=all>], *The New York Times*, 8 June 1995.
- (6) Quoted in Larry Rother, op cit.
- (7) Fernando Ravsberg, '¿Quién paga la salud y la educación en Cuba?', *Cartasdecuba.com*, 30 March 2017.
- (8) See Renaud Lambert, '[Cuba on the verge of inequality](#)', *Le Monde diplomatique*, English edition, November 2017.
- (9) William LeoGrande, '[Does the Cuban military really control sixty percent of the economy?](https://www.huffingtonpost.com/entry/does-the-cuban-military-really-control-sixty-percent-us_59530b0ee4b0f078efd985d8)' [https://www.huffingtonpost.com/entry/does-the-cuban-military-really-control-sixty-percent-us_59530b0ee4b0f078efd985d8], *Huffington Post*, 28 June 2017.

Exhibit 15



**DIRECTORIO COMERCIAL
DE LA REPÚBLICA DE CUBA**

**BUSINESS DIRECTORY
OF THE REPUBLIC OF CUBA**

2015-2017

Siglas Acronym

Organismos de la Administración Central del Estado (OACEs) Agencies of the Central State Administration (OACEs)

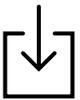
ANEC	- Asociación Nacional de Economistas de Cuba / <i>National Association of Economists of Cuba</i>
BCC	- Banco Central de Cuba / <i>Central Bank of Cuba</i>
CAP	- Consejo de la Administración Provincial / <i>Council of the Provincial Administration</i>
CITMA	- Ministerio de Ciencia, Tecnología y Medio Ambiente / <i>Ministry of Science, Technology and Environment</i>
GAE	- Grupo de Administración Empresarial / <i>Business Management Group</i>
ICRT	- Instituto Cubano de Radio y Televisión / <i>Cuban Institute of Radio and Television</i>
INRH	- Instituto Nacional de Recursos Hidráulicos / <i>National Institute of Water Resources</i>
MES	- Ministerio de Educación Superior / <i>Ministry of Higher Education</i>
MFP	- Ministerio de Finanzas y Precios / <i>Ministry of Finance and Prices</i>
MICONS	- Ministerio de la Construcción / <i>Ministry of Construction</i>
MINAG	- Ministerio de la Agricultura / <i>Ministry of Agriculture</i>
MINAL	- Ministerio de la Industria Alimenticia / <i>Ministry of Food Industry</i>
MINCEX	- Ministerio del Comercio Exterior y la Inversión Extranjera / <i>Ministry of Foreign Trade and Foreign Investment</i>
MINCIN	- Ministerio de Comercio Interior / <i>Ministry of Internal Trade</i>
MINCOM	- Ministerio de Comunicaciones / <i>Ministry of Communications</i>
MINCULT	- Ministerio de Cultura / <i>Ministry of Culture</i>
MINDUS	- Ministerio de Industrias / <i>Ministry of Industries</i>
MINED	- Ministerio de Educación / <i>Ministry of Education</i>
MINEM	- Ministerio de Energía y Minas / <i>Ministry of Energy and Mines</i>
MINFAR	- Ministerio de las Fuerzas Armadas Revolucionarias / <i>Ministry of the Revolutionary Armed Forces</i>
MININT	- Ministerio del Interior / <i>Interior Ministry</i>
MINJUS	- Ministerio de Justicia / <i>Ministry of Justice</i>
MINSAP	- Ministerio de Salud Pública / <i>Ministry of Public Health</i>
MINTUR	- Ministerio de Turismo / <i>Ministry of Tourism</i>
MITRANS	- Ministerio del Transporte / <i>Ministry of Transport</i>

Organización Superior de Dirección Empresarial (OSDE) Higher Organization of Business Management

AZCUBA	- Grupo Azucarero / <i>Sugar Group</i>
CACSA	- Corporación de la Aviación Civil de Cuba / <i>Corporation of the Cuban Civil Aviation</i>
CAUDAL	- Grupo de Seguros y Servicios Financieros de Cuba / <i>Group of Insurance and Financial Services of Cuba</i>
CORALSA	- Corporación Alimentaria S.A. / <i>Food Corporation</i>
Cubaníquel	- Grupo Empresarial Cubaníquel / <i>Business Group Cubaníquel</i>
CUBASOL	- Grupo Empresarial Extrahotelero / <i>Extrahotel Services Business Group</i>
CUPET	- Unión Cuba Petróleo / <i>Cuba Oil Union</i>
DASLE	- Dirección de Atención de Servicios Legales Especializados / <i>Direction of Attention of Specialized Legal Services</i>
GAE	- Grupo de Administración Empresarial / <i>Business Management Group</i>
GAF	- Grupo Agro Forestal / <i>Agro Forestry Group</i>
GEA	- Grupo Empresarial de Servicios Automotor / <i>Business Group of Automotive Services</i>
GECC	- Grupo Empresarial de la Construcción Cienfuegos / <i>Cienfuegos Construction Business Group</i>
GECOMEX	- Grupo Empresarial de Comercio Exterior / <i>Business Group of Foreign Trade</i>
GEDIC	- Grupo Empresarial de Diseño e Ingeniería de la Construcción / <i>Business Group of Design and Engineering of the Building</i>
GEIA	- Grupo Empresarial Industria Alimentaria / <i>Food Industry Business Group</i>
GEIC	- Grupo Empresarial de la Informática y las Comunicaciones / <i>Business Group of the Informatics and Communications</i>
GEICON	- Grupo Empresarial Industrial de la Construcción / <i>Industrial Business Group of the Construction</i>
GEIQ	- Grupo Empresarial de la industria Química / <i>Business Group of Chemical Industry</i>
GELECT	- Grupo de la Electrónica / <i>Group of the Electronic</i>
GEMAR	- Grupo Empresarial del Transporte Marítimo Portuario / <i>Maritime Port Transport Business Group</i>
GEMPIL	- Grupo Empresarial de la Industria Ligera / <i>BUSINESS GROUP OF LIGHT INDUSTRY</i>
GESCONS	- Grupo Empresarial de Suministros de la Construcción / <i>Construction Supplies Business Group</i>
GESIME	- Grupo Empresarial de la Industria Sideromecánica / <i>Business Group of the Siderurgical Industry</i>
INNOMAX	- Grupo Empresarial de la Ciencia la Tecnología y el Medio Ambiente / <i>Business Group of Science Technology and the Environment</i>
PALCO	- Grupo Empresarial PALCO / <i>PALCO Business Group</i>
TABACUBA	- Grupo Empresarial de Tabaco de Cuba / <i>Business Group of Tobacco of Cuba</i>
UIM	- Unión de Industria Militar / <i>Union Military Industry</i>
UNE	- Unión Eléctrica / <i>Electrical Union</i>

PRODUCTOS DE LA EMPRESA *PRODUCTS OF THE COMPANY*

Productos	<i>Products</i>	CPCU v1.2 ONEI	Comercializadora <i>Trading company</i>
MATERIALES DE LA CONSTRUCCIÓN	<i>THE CONSTRUCTION'S MATERIALS</i>	3	EMPRESAS DE COMERCIO MINCIN
PINTURA	<i>PAINTS</i>	3	GRUPO INDUSTRIAL MINCIN
TANQUES PLÁSTICOS	<i>PLASTIC TANKS</i>	3	GRUPO INDUSTRIAL MINCIN
COLCHONES DE ESPUMA DE POLIURETANO	<i>FOAM MATTRESSES OF POLYURETHANE</i>	3	GRUPO INDUSTRIAL MINCIN
CONFECCIONES	<i>CONFECTIONS</i>	2	GRUPO INDUSTRIAL MINCIN
PRODUCCIONES METÁLICAS	<i>METALLIC PRODUCTIONS</i>	4	GRUPO INDUSTRIAL MINCIN
CALZADO	<i>FOOTWEAR</i>	2	GRUPO INDUSTRIAL MINCIN
AEROSOLES	<i>AEROSOLS</i>	3	GRUPO INDUSTRIAL MINCIN
VELAS	<i>SEE THEM</i>	3	GRUPO INDUSTRIAL MINCIN
MUEBLES DE MADERA	<i>WOODEN FURNITURE</i>	3	GRUPO INDUSTRIAL MINCIN

Tipo de Empresa <i>Type of Company</i>	Nombre de la Empresa <i>Company name</i>	Organismo <i>Organism</i>	Siglas <i>Acronym</i>	Sector <i>Sector</i>
  EXPORTADORA IMPORTADORA <small>EXPORTER</small> <small>IMPORTER</small>	<h1>GRUPO EMPRESARIAL CIMEX</h1>			
OSDE ASBM <i>(Agency Superior of business management)</i>				
Grupo de Administración Empresarial (GAE)	MINFAR	CIMEX	Comercio Interior	



	Director(a) Director Héctor Oroza Busutil	Contacto Contact Héctor Oroza Busutil
Dirección Address	Cód. postal P.O. Box	Municipio Municipality
Calle 1ra entre 0 y 2 Edificio Sierra Maestra	11306	Playa
Ciudad City	Teléfono Phone	
La Habana	(+53) 7 203 9845	

Somos una sociedad mercantil económica socialista cubana que importa, exporta, comercializa y produce bienes y servicios que generan divisas frescas para el país, orientada a satisfacer, de manera innovadora, las crecientes necesidades del cliente con soportes tecnológicos de avanzada, alta credibilidad nacional e internacional y una calidad renovada brindada por mujeres y hombres que se distinguen por su disciplina, profesionalidad, honradez y responsabilidad social. Somos CIMEX. *We are a mercantile, economic and socialist Cuban holding that import, export, commercialize and produces goods and services that generate fresh convertible currency for the country, oriented to satisfy, in an innovated way, the growing needs of our clients with advance technological supports, high national and international credibility and a renovated quality given by women and men whom are distinguished by her discipline, professionalism, honesty and social responsibility. We are CIMEX.*

PRODUCTOS Y/O SERVICIOS QUE EXPORTA PRODUCTS AND/OR SERVICES THAT IT EXPORTS

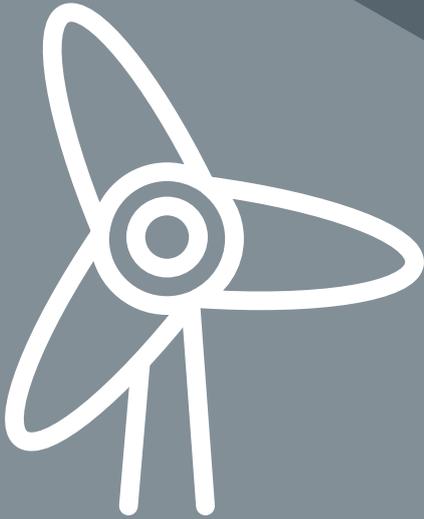
Productos	Código S.A. S.A. Code	Clasificación Classification
CUBAPACK/SERVICIOS DE ENTREGA DE ENCOMIENDAS A DOMICILIO		6
MELFI MARINE/SERVICIOS DE TRANSPORTE DE MERCANCÍAS VÍA MARÍTIMA		9
RESIDENCIAL TARARA/SERVICIOS DE TURISMO		10
TELECABLE/TRASMISIÓN DE SEÑALES DE TV, VÍA SATELITAL		11
INMOBILIARIA CIMEX/ARRENDAMIENTO DE APARTAMENTOS		12
ZELCOM/ARRENDAMIENTO DE ÁREAS DE ALMACENES EN ZF BERROA		12



Productos	Código S.A. S.A. Code	Clasificación Classification
FINCIMEX/ B. SERVICIOS BANCARIOS Y OTROS SERVICIOS FINANCIEROS (EXCLUIDOS LOS SEGUROS) /CLASIFICADOR MTN.GNS/W/120 DE LA ORGANIZACIÓN MUNDIAL DE COMERCIO OMC.		15
RONES VARADERO Y CANEY	28.08.4000	
CARBÓN VEGETAL	44.02.0000	
CAFÉ CUBITA	09.01.2110	
SEMILLAS DE PAPAYA MARADOL	12.09.9900	

PRODUCTOS Y/O SERVICIOS QUE IMPORTA *PRODUCTS AND/OR SERVICES THAT IT IMPORTS*

Productos
ALIMENTOS
ARTÍCULOS DE FERRETERÍA
CONFECCIONES Y CALZADO
ÚTILES DEL HOGAR
ARTÍCULOS DE ELECTRÓNICA Y ELECTRODOMÉSTICOS
CENTRO COMERCIAL DE INFORMÁTICA Y COMUNICACIONES
CENTRO COMERCIAL DE CONTROL ECONÓMICO Y SEGURIDAD MONÉTICA
CENTRO COMERCIAL DE REFRIGERACIÓN, CLIMATIZACIÓN Y ELECTROMECAÁNICA
CENTRO COMERCIAL DE INGENIERÍA Y RECREACIÓN
CENTRO COMERCIAL CANON Y AUDIO VIDEO PROFESIONAL
DIVISIÓN DE TRANSPORTE AUTOMOTOR
DIVISIÓN PUBLICITARIA IMAGENES

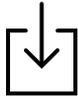


Sector Energía
Energy Sector



Tipo de Empresa
Type of Company

Nombre de la Empresa
Company name



IMPORTADORA
IMPORTER

CASTROL CUBA S.A.

OSDE ASBM
*(Agency Superior
of business management)*

Organismo
Organism

Siglas Acronym

Sector Sector

CUPET

MINEM

CCSA

Energía



Director(a) Director

Contacto Contact

Ing. Reinaldo Blanco Benítez

Lic. Jesús Viera González

Dirección Address

Cód. postal P.O. Box

Municipio Municipality

Calle 6 No. 319 esquina a 5ta ave. Mi-
ramar

11300

Playa

Ciudad City

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Correo E-mail

viera@castrol.cu

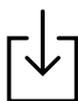
PRODUCTOS Y/O SERVICIOS QUE IMPORTA PRODUCTS AND/OR SERVICES THAT IT IMPORTS

Productos	Products	Código S.A. S.A. Code
ACEITES LUBRICANTES CASTROL	CASTROL LUBRICANT OILS	2710 19 72
GRASAS LUBRICANTES CASTROL	CASTROL LUBRICANT GREASES	2710 19 73
LIQUIDOSREFRIGERANRES	COOLINGFLUIDS	3820 00 00
LIQUIDOS DE FRENOS	BRAKEFLUIDS	3819 00 00
SOLVENTES Y LIMPIADORES	SOLVENTS AND CLEANERS	3814 00 00
ADITIVOS PARA LUBRICANTES	LUBRICANTADDITIVES	2811 21 00



Productos	Products	Código S.A. S.A. Code
PREPARACIONES LUBRICANTES	LUBRICANTINGPREPARATIONS	3408 11 00
PREPARACIONES LUBRICANTES	LUBRICANTINGPREPARATIONS	3403 19 00
DESMOLDOANTES	MOULDINGPRODUCTS	2710 19 41

Tipo de Empresa Type of Company	Nombre de la Empresa Company name
------------------------------------	--------------------------------------



IMPORTADORA
IMPORTER

COMERCIAL CUPET S.A.

OSDE ASBM (Agency Superior of business management)	Organismo Organism	Siglas Acronym	Sector Sector
Unión Cuba Petróleo	MINEM	CCSA	Energía

Director(a) Director	Contacto Contact
Pedro Arturo Sorzano Urquiza	Virginia Hernández Portuondo

Dirección Address	Cód. postal P.O. Box	Municipio Municipality
Calle 11 No. 511 entre E y D, Vedado	10400	Plaza de la Revolución

Ciudad City	Teléfono Phone	Fax Fax
La Habana	(+53) 7 831 47447 al 50 Ext. 111/116/132	(+53) 7 831 4751

Correo E-mail	Sitio Web Web site
psorzano@cupetsa.co.cu; vhernandez@cupetsa.co.cu	www.cupet.cu



Comercial Cupet S.A. fue creada en el año 1991 con el objetivo fundamental de ser el interlocutor cubano en las negociaciones de la UNION CUPET con las compañías extranjeras interesadas en invertir en la Industria Petrolera en Cuba. Su misión es captar capital extranjero para la inversión en la Industria Petrolera Cubana en correspondencia con los intereses estratégicos de CUPET. *Commercial Cupet SA. It was created in 1991, with the ultimate goal being the Cuban partner in negotiations UNION Cupet with foreign companies interested in investing in the oil industry in Cuba. Its mission is to attract foreign capital for investment in the Cuban oil industry in line with the strategic interests of Cupet.*

PRODUCTOS Y/O SERVICIOS QUE IMPORTA *PRODUCTS AND/OR SERVICES THAT IT IMPORTS*

Productos	Products	Clasificación Classification
SERVICIOS DE EXPLORACIÓN Y PRODUCCIÓN	EXPLORATION AND PRODUCTION OF OIL & NATURAL GAS	15
SERVICIOS DE REFINACIÓN	REFINING SERVICES	15
SERVICIOS DE ENTRENAMIENTO Y CAPACITACIÓN	ENGINEERING RESEARCH AND TRAINING	2
SERVICIOS TÉCNICOS ASOCIADOS A LA INDUSTRIA DEL PETRÓLEO	TECHNICAL SERVICES ASSOCIATED TO THE OIL INDUSTRY	15
SERVICIOS DE LODOS	FLUID MUD SERVICES	15
SERVICIO DE REGISTRO	WIRE LINE SERVICES	15
SERVICIO PARA EL CONTROL DE LOS PARÁMETROS EN TIEMPO REAL	MUD LOGGING EQUIPMENT AND SERVICE FEE	15
SERVICIO DEL REGISTRO ELÉCTRICO	WIRE LOGGING	15
PAGO POR SERVICIOS DE LODOS	MUD MATERIAL AND SERVICE FEE	15

Tipo de Empresa
Type of Company

Nombre de la Empresa
Company name



PRODUCTORA
PRODUCER

CUVENPETROL, S.A.

Exhibit 16

DIRECTORIO COMERCIAL
DE LA REPÚBLICA DE CUBA
*BUSINESS DIRECTORY
OF THE REPUBLIC OF CUBA*

2017-2019

SIGLAS/ACRONYM

ORGANISMOS DE LA ADMINISTRACIÓN CENTRAL DEL ESTADO (OACES) / AGENCIES OF THE CENTRAL STATE ADMINISTRATION (OACES)

MINAG	Ministerio de la Agricultura / Ministry of Agriculture
MINAL	Ministerio de la Industria Alimenticia / Ministry of Food Industry
MES	Ministerio de Educación Superior / Ministry of Higher Education
MITRANS	Ministerio del Transporte / Ministry of Transport
MINFAR	Ministerio de las Fuerzas Armadas Revolucionarias / Ministry of the Revolutionary Armed Forces
MINCEX	Ministerio del Comercio Exterior y la Inversión Extranjera / Ministry of Foreign Trade and Foreign Investment
CAP	Consejo de la Administración Provincial / Council of the Provincial Administration
CITMA	Ministerio de Ciencia, Tecnología y Medio Ambiente / Ministry of Science, Technology and Environment
MINCOM	Ministerio de Comunicaciones / Ministry of Communications
MICONS	Ministerio de la Construcción / Ministry of Construction
MININT	Ministerio del Interior / Interior Ministry
MINTUR	Ministerio de Turismo / Ministry of Tourism
MINCIN	Ministerio de Comercio Interior / Ministry of Internal Trade
MINCULT	Ministerio de Cultura / Ministry of Culture
ICRT	Instituto Cubano de Radio y Televisión / Cuban Institute of Radio and Television

MINED	Ministerio de Educación / Ministry of Education
MINDUS	Ministerio de Industrias / Ministry of Industries
MINEM	Ministerio de Energía y Minas / Ministry of Energy and Mines
INRH	Instituto Nacional de Recursos Hidráulicos / National Institute of Water Resources
MINSAP	Ministerio de Salud Pública / Ministry of Public Health
MFP	Ministerio de Finanzas y Precios / Ministry of Finance and Prices
BCC	Banco Central de Cuba / Central Bank of Cuba
MINJUS	Ministerio de Justicia / Ministry of Justice

ORGANIZACIÓN SUPERIOR DE DIRECCIÓN EMPRESARIAL (OSDE) / HIGHER ORGANIZATION OF BUSINESS MANAGEMENT

CACSA	Corporación de la Aviación Civil de Cuba / Corporation of the Cuban Civil Aviation	GESCONS	Grupo Empresarial de Suministros de la Construcción / Construction Supplies Business Group
GEIA	Grupo Empresarial Industria Alimentaria / Food Industry Business Group	GEICON	Grupo Empresarial Industrial de la Construcción / Industrial Business Group of the Construction
GECOMEX	Grupo Empresarial de Comercio Exterior / Business Group of Foreign Trade	UIM	Unión de Industria Militar / Union Military Industry
TABACUBA	Grupo Empresarial de Tabaco de Cuba / Business Group of Tobacco of Cuba	GELECT	Grupo de la Electrónica / Group of the Electronic
GAF	Grupo Agro Forestal / Agro Forestry Group	CUPET	Unión Cuba Petróleo / Cuba Oil Union
CORALSA	Corporación Alimentaria S.A. / Food Corporation	UNE	Unión Eléctrica / Electrical Union
AZCUBA	Grupo Azucarero / Sugar Group	GEMPIL	Grupo Empresarial De La Industria Ligera / Business Group Of Light Industry
GEIC	Grupo Empresarial de la Informática y las Comunicaciones / Business Group of the Informatics and Communications	CUBANÍQUEL	Grupo Empresarial Cubaniquel / Business Group Cubaniquel
INNOMAX	Grupo Empresarial de la Ciencia la Tecnología y el Medio Ambiente / Business Group of Science Technology and the Environment	GEIQ	Grupo Empresarial de la industria Química / Business Group of Chemical Industry
GEDIC	Grupo Empresarial de Diseño e Ingeniería de la Construcción / Business Group of Design and Engineering of the Building	CAUDAL	Grupo de Seguros y Servicios Financieros de Cuba / Group of Insurance and Financial Services of Cuba
CUBASOL	Grupo Empresarial Extrahotelero / Extrahotel Services Business Group	DASLE	Dirección de Atención de Servicios Legales Especializados / Direction of Attention of Specialized Legal Services
GAE	Grupo de Administración Empresarial / Business Management Group	GESIME	Grupo Empresarial de la Industria Sideromecánica / Business Group of the Siderurgical Industry
GECC	Grupo Empresarial de la Construcción Cienfuegos / Cienfuegos Construction Business Group	GEMAR	Grupo Empresarial del Transporte Marítimo Portuario / Maritime Port Transport Business Group
		GEA	Grupo Empresarial de Servicios Automotor / Business Group of Automotive Services
		PALCO	Grupo Empresarial PALCO / PALCO Business Group
		GAG	Grupo Agrícola / Agriculture Group

Nombre de la Empresa. *Company name.*

▶ Cadena de Tiendas TRD Caribe

Importadora
Importer

OSDE. <i>ASBM (Agency Superior of business management).</i> Grupo de Administración Empresarial. GAE	Organismo. <i>Organism</i> MINFAR	Sector. <i>Sector</i> Comercio Interior	Siglas. <i>Acronym</i> TRD CARIBE.
Director(a). <i>Director.</i> Ana María Ortega Tamayo	Contacto. <i>Contact</i> Mariela Castillo Mustelier / Marta Cicero San		
Dirección. <i>Address.</i> Edificio «La Puntilla», Ave 3ra y final, Miramar, Código Postal: 11300	Municipio. <i>Municipality</i> Playa	Ciudad. <i>City</i> La Habana	
Teléfono. <i>Phone</i> Secretaría: (+53) 7 201 2241 Dirección de Mercadotecnia: (+53) 7 201 2249	Correo. <i>E-mail</i> marielac@trdcaribe.co.cu / martag@trdcaribe.co.cu		

TRD Caribe es una Cadena cubana de tiendas minorista presente en todo el país con más de 2,000 puntos de venta, un área total de más de 164 mil m2 y una fuerza de venta de más de 20 mil trabajadores. Comercializamos mercancía de línea económica, media alta y alta (Boutique) en las familias de Alimentos, Bebidas y Licores, Artículos de Higiene Personal, Aseo y Cuidado de la Piel, Perfumería, Confecciones, Peletería, Bisutería, Ajuares de Casa, Canastilla, Juguetes, Tejidos y Mercería, Útiles del Hogar, Artesanía, Souvenirs, Muebles, Electrónica y Electrodomésticos y Ferretería entre otros. / *TRD Caribe is a Cuban chain of retail stores present throughout the country with more than 2,000 points of sale, a total area of more than 164 thousand m2 and a sales force of more than 20 thousand workers. We commercialize merchandise of economic line, high and high average (Boutique) in the families of Food, Beverage and Liquors, Articles of Personal Hygiene, Cleanliness and Skin Care, Perfumery, Confections, Furs, Costume Jewellery, Household Goods, Basket, Toys, Knits and Haberdashery, Household Tools, Crafts, Souvenirs, Furniture, Electronics and Appliances and Hardware among others.*

Productos y/o servicios que importa. *Products and/or services that it imports*

Productos	<i>Products</i>
Alimentos	<i>Foods</i>
Confecciones	<i>Clothing</i>
Peletería	<i>Hairdressing</i>
Ferretería	<i>Hardware store</i>
Tejido y Mercería	<i>Fabric and Haberdashery</i>
Juguetes	<i>Toys</i>
Artículos de Higiene Personal	<i>Articles of Personal Hygiene</i>
Químicos del Hogar	<i>Home Chemists</i>
Canastilla y Bebitos	<i>Baby clothes</i>
Útiles del Hogar	<i>Home Tools</i>

Nombre de la Empresa. *Company name.*

▶ Corporación CIMEX S.A.

Exportadora de bienes
Assets exporter Exportadora de servicios
Services exporter Importadora
Importer

OSDE. <i>ASBM (Agency Superior of business management).</i> GAE	Organismo. <i>Organism</i> GAE	Sector. <i>Sector</i> Comercio Interior	Siglas. <i>Acronym</i> CIMEX
Director(a). <i>Director.</i> Héctor Oroza Busutií	Contacto. <i>Contact</i> Pelayo N. Terry (Dirección de Importaciones y exportaciones) / Juan Yurian Petrus (Dirección de Mercadotecnia, Grupo de Comunicación y Relaciones Públicas)		
Dirección. <i>Address.</i> Edificio Sierra Maestra, Calle 1ra e/ 0 y 2, Miramar	Municipio. <i>Municipality</i> Playa	Ciudad. <i>City</i> La Habana	
Teléfono. <i>Phone</i> (+53) 7 203 9815 / 7 203 9845 7 203 9607 / 7 203 9293	Correo. <i>E-mail</i> terry@cimex.com.cu / petrus@cimex.com.cu	Sitio web. <i>Website</i> www.cimexweb.com	

CIMEX una Sociedad Mercantil jurídicamente privada de capital 100% cubano. Forman parte de la misma 18 sucursales para la ejecución de la actividad comercial, 10 divisiones especializadas, para cumplimentar objeto social de CIMEX y 9 empresas que realizan diferentes actividades de importación, exportación y comercialización de bienes y servicios. / *Cimex is a Mercantile Company, it has 18 branches for the execution of the commercial activity, 10 specialized divisions, to fulfill CIMEX's corporate purpose and 9 companies that carry out different activities of import, export and commercialization of goods and services.*

Productos y/o servicios que exporta. *Products and/or services that it exports*

Productos	<i>Products</i>	Clasificación <i>Classification</i>
Ron Caney	<i>Caney Rum</i>	
Ron Varadero	<i>Varadero Rum</i>	
Café Cubita	<i>Cubita Coffee</i>	
Café Caracolillo	<i>Caracolillo Coffee</i>	
Carbón vegetal	<i>Charcoal</i>	
Semilla de Papaya Maradol	<i>Papaya Maradol seed</i>	
Pasta de Guayaba	<i>Guava Paste</i>	
Licor de Café	<i>Coffee liquor</i>	
Tazas de Café	<i>Cups of coffee</i>	
Estuches de Ron	<i>Rum cases</i>	
Zelcom S.A.: Servicio de arrendamiento de almacenes y locales.	<i>Rental service of warehouses and premises.</i>	15
Fincimex S.A.: Servicios financieros.	<i>Financial services.</i>	15
Cubapack S.A.: Entregas a domicilio de paquetería y mensajería.	<i>Delivery of parcels and courier.</i>	6
Residencial Tarrará S.A.: Servicio de Alojamiento, Gastronomía y Recreación.	<i>Service of Lodging, Gastronomy and Recreation.</i>	12

Nombre de la Empresa. *Company name.***Comercial Cupet S.A.**Importadora
Importer

OSDE. <i>ASBM (Agency Superior of business management).</i> CUPET	Organismo. <i>Organism</i> MINEM	Sector. <i>Sector</i> Energía / Minería	Siglas. <i>Acronym</i> CCSA
Director(a). <i>Director.</i> Pedro Arturo Sorzano Urquiza	Contacto. <i>Contact</i> Virginia Hernandez Portuondo / Nina Almeida Paramonova		
Dirección. <i>Address.</i> Calle 11, No. 511, e/ D y E, Vedado		Municipio. <i>Municipality</i> Plaza de la Revolución	Ciudad. <i>City</i> La Habana
Teléfono. <i>Phone</i> (+53) 7 831 4747 al 50 ext. 132, 111,116	Correo. <i>E-mail</i> business@cupetsa.co.cu	Sitio web. <i>Website</i> www.cupet.cu	

Comercial Cupet S.A. fue creada en el año 1991 con el objetivo fundamental de ser una organización altamente competitiva en la gestión del mercado relacionado con la industria de los hidrocarburos y sus derivados mediante la participación conjunta de firmas extranjeras en diferentes formas de asociaciones económicas; así como, en la prestación de servicios en las actividades de exploración, desarrollo, explotación y refinación de hidrocarburos y sus derivados, tanto en la República de Cuba como en el exterior. / *Comercial Cupet S.A. Was created in 1991 with the fundamental objective of being a highly competitive organization in the management of the market related to the industry of hydrocarbons and their derivatives through the joint participation of foreign firms in different forms of economic associations; As well as in the rendering of services in the exploration, development, exploitation and refining of hydrocarbons and their derivatives, both in the Republic of Cuba and abroad.*

Productos y/o servicios que importa. *Products and/or services that it imports*

Productos	<i>Products</i>	Clasificación
Servicios Petroleros	<i>Oil and Gas Services</i>	15
Servicios de refinación	<i>Refining services</i>	15
Capacitación	<i>Training</i>	2

Nombre de la Empresa. *Company name.***Empresa Central de Laboratorios «José Isaac del Corra»**Productora
Producer

OSDE. <i>ASBM (Agency Superior of business management).</i> GEOMINSAL	Organismo. <i>Organism</i> MINEM	Sector. <i>Sector</i> Minería	Siglas. <i>Acronym</i> LACEMI
Director(a). <i>Director.</i> Juan Antonio Delgado Lara	Contacto. <i>Contact</i> Miriam Morales Aparicio		
Dirección. <i>Address.</i> Prolongación de Vía Blanca, s/n, e/ Virgen del Camino y Línea del Ferrocarril		Municipio. <i>Municipality</i> San Miguel del Padrón	Ciudad. <i>City</i> La Habana

Teléfono. *Phone***(+53) 7 698 0779 / 7 698 0778**Correo. *E-mail***miriam@lacemi.cu / chico@lacemi.cu**Sitio web. *Website***www.lacemi.cubaindustria.cu**

LACEMI presta servicios analíticos dirigidos a la minería, la geología y al desarrollo de estudios medioambientales, coordina ensayos de actitud, elabora materiales de referencias y desarrolla controles internos. Adicionalmente, produce y comercializa productos dermocosméticos elaborados a partir de Fangos minero medicinales y otros a partir de materias primas minerales. / *LACEMI provides analytical services directed to the mining, the geology and to the development of environmental studies, it coordinates rehearsals of attitude, it elaborates materials of references and it develops internal controls. Additionally, it takes place and it markets dermatological cosmetics elaborated based on miner - medicinal Mires and others starting from matters cousins minerals.*

Productos de la empresa. *Products of the company*

Productos	<i>Products</i>	Comercializadora
Servicios Científico-Técnicos	<i>Services Scientist Technicians</i>	Empresa Central de Laboratorios «José Isaac del Corra» (LACEMI)
Fango Minero Medicinal	<i>Medicinal Mining Mire</i>	Empresa Central de Laboratorios «José Isaac del Corra» (LACEMI), FARMACUBA
Fango Ecológico Termal (Frascos de 240 ml)	<i>Thermal Ecological Mire (Flasks 240 ml)</i>	Empresa Provincial de Comercio
Máscara Nutritiva (Frascos 240 ml)	<i>Face Mask Nutritious (Flasks 240 ml)</i>	Logística Agropecuaria Habana, Empresa Provincial de Comercio
Máscara Astrigente Natural (Contenido 240 ml)	<i>Natural Astringent Mask (Content 240 ml)</i>	Logística Agropecuaria Habana, Empresa Provincial de Comercio
Lodo anticelulítico, (Frascos 240 ml)	<i>Mud Anticelulítico, (Flasks 240 ml)</i>	Logística Agropecuaria Habana, Empresa Provincial de Comercio
Podosal, (Contenido 500 y 250 g)	<i>Podosal, (Content 500 y 250 g)</i>	Logística Agropecuaria Habana, Empresa Provincial de Comercio
Loción para después de afeitar (Content 240 ml)	<i>Lotion after shaving (Content 240 ml)</i>	Logística Agropecuaria Habana, Empresa Provincial de Comercio
Geolimp (Contenido 100 g)	<i>Geolimp (Content 240 ml)</i>	Logística Agropecuaria Habana, Empresa Provincial de Comercio
Talco Zeolita (Contenido 100 g)	<i>Talc Zeolite (Content 240 ml)</i>	Empresa Provincial de Comercio, Logística Agropecuaria Habana
Loción revitalizante (Contenido 240 ml)	<i>Lotion revitalising, (Content 240 ml)</i>	Empresa Provincial de Comercio, Logística Agropecuaria Habana
Tónico facial (Contenido 240 ml)	<i>Facial Tonic (Content 240 ml)</i>	Empresa Provincial de Comercio, Logística Agropecuaria Habana

Nombre de la Empresa. *Company name.***Empresa de la Sal**Productora
Producer

OSDE. <i>ASBM (Agency Superior of business management).</i> GEOMINSAL	Organismo. <i>Organism</i> MINEM	Sector. <i>Sector</i> Minería	Siglas. <i>Acronym</i> ENSAL
Director(a). <i>Director.</i> Jorge Luis Bell Alvarez	Contacto. <i>Contact</i> Francisco Alvaro Fonseca Rodriguez		



Exhibit 17



constituteproject.org

Cuba's Constitution of 2019

Draft of 2018 with amendments resulting from the popular consultation, published on January 5, 2019; approved by the public in a national referendum on February 24, 2019

This complete constitution has been generated from excerpts of texts from the repository of the Comparative Constitutions Project, and distributed on constituteproject.org.

- Reference to fraternity/solidarity

n. Bases its relationships with countries that edify socialism on fraternal friendship, cooperation, and mutual assistance;

- Customary international law
- International law

ñ. Maintains and fosters friendly relations with countries that, despite having a different political, social, and economic system, respect our sovereignty, observe the norms of coexistence between States, and adopt a reciprocal attitude with our country, in accordance with the principles of International Law, and

o. Promotes multilateralism and multipolarity in international relations, as alternatives to the domination and political, financial, and military hegemony or any other manifestation that threatens peace, independence, and the sovereignty of peoples.

- Protection of stateless persons

Article 17

The Republic of Cuba may concede asylum, in accordance with the law, to those who are persecuted because of their ideals or their fights for national liberation, progressive activities, socialism and peace, democratic rights and its assertions, as well as to those who fight against imperialism, fascism, colonialism, neocolonialism, and any other form of domination, discrimination, or racism.

Title II: Economic Foundations

Article 18

The Republic of Cuba is governed by a socialist economic system based on ownership by all people of the fundamental means of production as the primary form of property as well as the planned direction of the economy, which considers, regulates, and monitors the economy according to the interests of the society.

Article 19

The State directs, regulates, and monitors economic activity, reconciling national, territorial, collective, and individual interests for the benefit of society.

Socialist planning constitutes the central component of the system of governance for economic and social development. Its essential function is to design and conduct strategic development, planning for relevant balances between resources and needs.

Article 20

Workers participate in the processes of economic planning, regulation, management, and monitoring.

The law regulates the participation of labor collectives in the administration and management of state-governed business entities and budgetary units.

Article 21

- Reference to science
- Right to enjoy the benefits of science

The State promotes the advance of science, technology, and innovation as indispensable elements of economic and social development.

It also implements forms of organization, financing, and management of scientific activity, and fosters the systematic and accelerated introduction of its results into service and production processes, within the appropriate institutional and regulatory framework.

Article 22

The following are recognized as forms of property:

- a. Socialist property of the entire population: in which the State acts as a representative and beneficiary of the people as property owner.
- b. Cooperative property: that which is sustained through the collective labor of partner owners and through the effective exercise of the principles of cooperativism.
- c. Property of political, social, and mass organizations: ownership that they exercise over their goods designed to fulfill their roles.
- d. Private ownership: that which is exercised over specific means of production by natural or legal persons, Cubans or foreigners; with a complementary role in the economy.
- e. Mixed property: that which is formed through the combination of two or more forms of ownership.
- f. Institutional and associative property: that which these groups exercise over their goods for non-profit purposes.
- g. Personal property: that which is exercised over one's belongings that, without constituting means of production, contribute to the satisfaction of the material and spiritual necessities of their owner.

All forms of ownership over means of production interact in similar ways; the State regulates and monitors the way in which they contribute to economic and social development.

The exercise and attainment of these forms of ownership are regulated by the law.

Article 23

The following are socialist property of the people: the lands that do not belong to individuals or cooperatives composed of these individuals, the subterranean areas, mineral deposits, the mines, the forests, the waters, the beaches, the means of communication, and the natural resources both living as well as nonliving within the exclusive economic zone of the Republic.

These goods may not be transferred as property to natural or legal persons and are governed by principles that render them unalienable, imprescriptible, and unseizable.

• Right to own property

• Ownership of natural resources

• Standing committees

The transfer of other rights not involving the transfer of property of these goods must have prior approval of the Council of State, according to that which is prescribed by law and provided that it is for the purpose of the country's economic and social development and does not affect the political, economic, or social foundations of the State.

• Right to transfer property

Article 24

Socialist property that belongs to the entire population includes other goods, such as general interest infrastructure, key industries, and economic and social facilities, as well as other goods that are strategic for the country's economic and social development.

These goods may not be seized and may be transferred as property only in exceptional cases, provided that it is for the purpose of the country's economic and social development and does not affect the political, economic, and social foundations of the State. They require the prior approval of the Council of Ministers.

The transmission of other rights over these goods and their management will take place according to that which is prescribed by law.

Budgeted institutions and state-governed business entities possess other goods that are socialist property of the entire population, over which the rights that correspond and accord with the provisions of the law are exercised.

Article 25

The state creates budgeted institutions to accomplish essentially state and social functions.

Article 26

The State creates and organizes state-governed business entities with the objective of developing economic activities, such as production or the provision of services.

These entities act in response to the obligations incurred by their patrimony, which are consistent with the limits determined by the law.

The State does not respond to the obligations within the contracts of state-governed business entities, and these entities do not act in response to those of the State.

Article 27

A socialist state business is the primary subject of the national economy. They have autonomy in their administration and management, perform the primary role in the production of goods and services, and comply with their social responsibilities.

The law regulates the principles of their organization and operation.

Article 28

The State promotes and provides guarantees to foreign investment as an important element for the economic development of the country, which is based upon the protection and the rational use of the natural and human resources as well as respect for national sovereignty and independence.

The law establishes regulations with respect to foreign investment within the national territory.

Exhibit 18



constituteproject.org

Cuba's Constitution of 1976 with Amendments through 2002

Historical

© Oxford University Press, Inc.

Translated by Pam Falk, Milagros M. Gavilan and Anna I. Vellve Torras

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- i. maintains relations of friendship with the countries which, possessing a different political, social and economic regime, respect its sovereignty, observe the rules of coexistence among the States, adhere to the principles of mutual advantage, and adopt a reciprocal attitude with our country.

ARTICLE 13

The Republic of Cuba grants asylum to those persecuted for their ideals or struggles for democratic rights against imperialism, fascism, colonialism and neocolonialism; against discrimination and racism; for national liberation; for the rights and demands of the workers, peasants, and students; for their progressive political, scientific, artistic, and literary activities; and for socialism and peace.

ARTICLE 14

In the Republic of Cuba, the system of economy based on socialist ownership of the means of production by all the people prevails, and the suppression of exploitation of man by man.

Also in effect is the principle of socialist distribution: "from each according to his ability, to each according to his work." The law stipulates the regulations which guarantee the effective fulfillment of this principle.

ARTICLE 15

The following are the socialist State property of all the people:

- a. the land that does not belong to small farmers or cooperatives comprised of them, the subsoil, mines, natural resources, both living and nonliving, within the maritime economic zone of the Republic, and the forests, waters, and routes of communication;
- b. the sugar mills, factories, fundamental means of transportation, and all enterprises, banks, and installations that have been nationalized and expropriated from imperialists, large estate owners, and the bourgeoisie; as well as factories, economic installations, and scientific, social, cultural and sports centers constructed, promoted, or acquired by the State, including those that it may construct, promote, or acquire in the future.

These assets may not be transferred as property to natural or juridical persons, except in the special cases wherein the partial or total transfer of any economic end is intended for purposes of the country's development, and does not affect the political, social, and economic foundations of the State, with prior approval from the Council of Ministers or its Executive Committee.

As for the transfer of other rights over such assets to State enterprises and other authorized entities, action shall be taken in conformity with that provided in the law.

ARTICLE 16

The State organizes, directs and controls the national economic activity according to a plan that guarantees the programmed development of the country, with the aim of strengthening the socialist system; satisfying the material and cultural needs of the society and its citizens with constant improvement; and promoting the development of the human being and his dignity, [and] the country's progress and security.

• Reference to art
• Protection of stateless persons

• National motto

• Ownership of natural resources

• Right to culture
• Economic plans

• Human dignity

In the preparation and execution of the programs of production and development, an active, conscious role is played by the workers in all branches of the economy, and of those in the other areas of social life.

ARTICLE 17

The State directly administers the assets comprising the socialist property of all the people; or will be able to create and organize enterprises and entities to administer them, of which the structure, attributions, functions, and regime of relations are regulated by the law.

These enterprises and entities meet their obligations solely with their financial resources, within the limitations established by the law. The State is not responsible for the obligations contracted by the enterprises, entities, or other juridical persons; nor are the latter responsible for those of the former.

ARTICLE 18

The State directs and controls foreign commerce.

The law establishes the State institutions and authorities empowered to:

- create foreign commerce enterprises;
- standardize and regulate export and import operations; and
- determine the natural or juridical persons with the legal capacity to engage in said export and import operations, and to negotiate commercial agreements.

ARTICLE 19

The State recognizes the ownership by small farmers of land that legally belongs to them, and of any other real estate, landed property and moveable properties that they may need for the operation in which they are engaged, in conformity with what the law establishes.

Small farmers, with prior authorization from the competent State agency, and in compliance with the other legal requirements, may incorporate their land only into agricultural-livestock cooperatives of production. They also may sell, exchange, or transfer it, through another title, to the State and to agricultural-livestock production cooperatives, or to small farmers, in the instances, forms and conditions that the law establishes without prejudice to the State's preferential right to its purchase, through payment of its fair price.

It is prohibited to engage in leasing, sharecropping, mortgage loans, and any act entailing a lien or assignment to private persons of the rights emanating from the small farmers' ownership of their land.

The State supports the individual production of small farmers who contribute to the national economy.

ARTICLE 20

Small farmers have the right to become associated with one another, in the manner and with the requirements that the law establishes, both for purposes of agricultural-livestock production and for the procurement of State loans and services.

The organization of agricultural-livestock production cooperatives is authorized in the instances and manner that the law establishes. This cooperative ownership is

• Right to own property

• Protection from expropriation
• Right to transfer property

• Right to own property

Exhibit 19

SIXTH CONGRESS OF THE COMMUNIST PARTY OF CUBA

RESOLUTION ON THE GUIDELINES OF THE ECONOMIC AND SOCIAL POLICY OF THE PARTY
AND THE REVOLUTIONAdopted on April 18th, 2011“Year 53rd of the Revolution”

"Revolution means to understand each moment in history; it means changing everything that ought to be changed; it means full equality and freedom; it means being treated and treating others like human beings; it means achieving emancipation by ourselves and through our own efforts; it means challenging powerful dominant forces from within and without our social and national contexts; it means defending the values we believe in at the cost of any sacrifice; it means modesty, selflessness, altruism, solidarity and heroism; it means fighting with audacity, intelligence and realism; it means to never tell a lie or violate ethical principles; it is a profound conviction that there is no force in the world that can crush the power of truth and ideas. Revolution means unity; it is independence, it means fighting for our dreams of justice for Cuba and for the world, which is the foundation of our patriotism, our socialism and our internationalism"

FIDEL CASTRO RUZ
May 1, 2000

"Today, more than ever, the economic battle is the main task and the focus of the ideological work of the cadres, because the sustainability and preservation of our social system depend on that."

ARMY GENERAL RAÚL CASTRO RUZ
Closing session of the Ninth Congress of the Cuban Young Communist League
April 4, 2010

RESOLUTION ON THE GUIDELINES OF THE ECONOMIC AND SOCIAL POLICY OF THE PARTY
AND THE REVOLUTION.....6

INTRODUCTION....7

GUIDELINES OF THE ECONOMIC AND SOCIAL POLICY OF THE PARTY AND THE
REVOLUTION....10

These objectives require the promotion of an economic culture in the entire population, the training of cadres and the preservation of ethical principles, combined with a sense of duty and revolutionary sensitivity as critical characteristics of day-to-day behavior.

The recommended economic policy is guided by the principle that socialism is about equal rights and opportunities for all citizens, rather than egalitarianism. -Work is a right and a duty, as well as a source of motivation for every citizen's self-accomplishment, and must be remunerated in accordance to its quantity and quality.

Given the present conditions and the foreseeable international situation, the economic policy shall be aimed at addressing economic problems through two types of solutions that require mutual coherence:

- Short-term solutions that eradicate the deficit in the balance of payments, maximize export earnings and substitute imports, while eliminating the issues that immediately impact economic efficiency, motivation to work, and income distribution and creating the necessary infrastructural and productive conditions that facilitate the transit to a higher stage development.
- Longer term sustainable development solutions that provide for a high level of food and energy self-sufficiency, an efficient use of the human potential and a high competitiveness in traditional productions, as well as the development of new goods and services of high value added.

The update of the Cuban economic model and the implementation of its related measures will be guided by the principle that no one will be left unprotected in the Cuban society.

In view of the above, the following guidelines for each and every economic sector have been identified.

The Guidelines of the Economic and Social Policy express the people's will, as enshrined in the policy of the Party, the State and Government of the Republic of Cuba, to update the Cuban economic model in order to guarantee the continuous and irreversible nature of Socialism, support the country's economic development and improve the living standards of the population, combined with the necessary creation of ethical and political values in our citizens.

The design of these guidelines has taken into consideration past experiences, the world's present and foreseeable political and economic picture and the situation of the Cuban economy in this context, and has been supported by the results from the mid-term projections.

I ECONOMIC MANAGEMENT MODEL

GENERAL GUIDELINES

1. The socialist planning system will continue to be the main national management tool of the national economy. Its methodology and organization and control must be modified. Economic planning will influence on the market and take into account its characteristics.
2. The management model recognizes and encourages socialist State-owned companies – the main national economic modality - as well as the foreign investment forms described in the law (e.g., joint ventures and international association contracts), cooperatives, small farming, usufruct, franchisement, self-employment and other economic forms that may altogether contribute to increased efficiency.
3. In the forms of non-State management, the concentration of property in the hands of any natural or legal person shall not be allowed.

4. The structural, functional, organizational and economic changes in the business sector, State-funded entities and the entire State administrative apparatus will be introduced on the basis of a schedule, in an orderly and disciplined way and in compliance with the policy that has been approved. Workers shall be informed of the process and their recommendations shall be listened to, all of which will require training at every level to facilitate their implementation.
5. Planning shall include State-owned companies, the Government funded entities, the international economic associations, and also regulate other applicable forms of non-State management. Planning shall be more objective at all levels. The new planning methods will modify economic control methods. Territorial planning shall take into consideration these transformations.
6. The separation between State and business functions shall be a gradual and orderly process. The definition of standards is key to the satisfaction of the proposed targets.
7. It is necessary that the country's business system be made up of efficient, effective and well organized firms and new oversight business management organizations be established. Intercompany cooperation shall be promoted for higher efficiency and better quality. Legal instruments shall be defined to regulate the above.
8. The increase in the powers vested upon entity managers shall be associated with their higher responsibility for efficiency, effectiveness and for their control of labor utilization, financial and material resources, coupled with the requirement on the executives to account for their decisions, actions and omissions that lead to economic damages.
9. Markets shall be created for the wholesale provision and lease of equipment, supplies and implements without subsidies to enterprises, State-funded entities and non-State organizations.
10. The business relations between companies, State-funded entities and non-State organizations shall be formalized in economic contracts. The quality of the negotiation, drafting, execution and operation of these contracts, as well as the claims arising from their terms and the oversight of their compliance shall be a requirement and an essential tool for economic management.

BUSINESS SECTOR

11. The external oversight of the management of any entity will be mainly based on economic and financial mechanisms, without excluding the administrative mechanisms. The current burden meant by such supervision activities will be reduced and the reporting systems will be more rational.
12. Increased powers and obligations make it indispensable to require that the entities and their managers act ethically and that entities' internal controls are strengthened in order to achieve the expected results in the performance of their plans and satisfaction of their goals with efficiency, order, discipline and strict adherence to the laws.
13. The powers and financial instruments that enterprises shall use in the management of their production of goods and services shall be clearly defined. The corporate objects will be more flexible to make sure that each entity may maximize its potential within the existing regulations.
14. The internal finances of companies shall not be intervened by any unrelated entity. This intervention shall only occur in compliance with legally established procedures.

Exhibit 20

Travelers

← LIST OF RESTRICTED ENTITIES AND SUBENTITIES ASSOCIATED WITH CUBA
EFFECTIVE JUNE 12, 2020

★ ★ ★

List of Restricted Entities and Subentities Associated With Cuba Effective June 12, 2020

BUREAU OF ECONOMIC AND BUSINESS AFFAIRS

CUBA SANCTIONS

Share 

Below is the U.S. Department of State’s list of entities and subentities under the control of, or acting for or on behalf of, the Cuban military, intelligence, or security services or personnel with which direct financial transactions would disproportionately benefit such services or personnel at the expense of the Cuban people or private enterprise in Cuba. For information regarding the prohibition on direct financial transactions with these entities, please see 31 CFR 515.209. All entities and subentities were listed effective November 9, 2017, unless otherwise indicated.

**** Entities or subentities owned or controlled by another entity or subentity on this list are not treated as restricted unless also specified by name on the list. ****

Ministries

MINFAR — Ministerio de las Fuerzas Armadas Revolucionarias

MININT — Ministerio del Interior

Holding Companies

CIMEX — Corporación CIMEX S.A.

Compañía Turística Habaguanex S.A.

GAESA — Grupo de Administración Empresarial S.A.

Gaviota — Grupo de Turismo Gaviota

UIM — Unión de Industria Militar

Hotels in Havana and Old Havana

Aparthotel Montehabana

Gran Hotel Bristol Kempinski *Effective November 19, 2019*

Gran Hotel Manzana Kempinski

H10 Habana Panorama

Hostal Valencia

Hotel Ambos Mundos

Hotel Armadores de Santander

Hotel Beltrán de Santa Cruz

Hotel Conde de Villanueva

Hotel del Tejadillo

Hotel el Bosque

Hotel el Comendador

Hotel el Mesón de la Flota

Hotel Florida

Hotel Habana 612

Hotel Kohly

Hotel Los Frailes

Hotel Marqués de Prado Ameno

Hotel Marqués de Cardenas de Montehermoso *Effective June 12, 2020*

Hotel Palacio Cueto *Effective July 26, 2019*

Hotel Palacio del Marqués de San Felipe y Santiago de Bejucal

Hotel Palacio O'Farrill

Hotel Park View

Hotel Raquel

Hotel Regis *Effective June 12, 2020*

Hotel San Miguel

Hotel Telégrafo

Hotel Terral

Iberostar Grand Packard Hotel *Effective November 15, 2018*

Memories Miramar Havana

Memories Miramar Montehabana

SO/ Havana Paseo del Prado *Effective November 15, 2018*

Hotel Santa Isabel *Effective April 24, 2019*

Hotels in Santiago de Cuba

Villa Gaviota Santiago

Hotels in Varadero

Blau Marina Varadero Resort

also Fiesta Americana Punta Varadero *Effective November 15, 2018*

also Fiesta Club Adults Only *Effective March 12, 2019*

Grand Aston Varadero Resort *Effective November 19, 2019*

Grand Memories Varadero

Hotel Las Nubes *Effective November 15, 2018*

Hotel Oasis *Effective November 15, 2018*

Iberostar Bella Vista *Effective November 15, 2018*

Iberostar Laguna Azul

Iberostar Playa Alameda

Meliá Marina Varadero

Meliá Peninsula Varadero

Memories Varadero

Naviti Varadero

Ocean Varadero El Patriarca

Ocean Vista Azul

Paradisus Princesa del Mar

Paradisus Varadero

Sol Sirenas Coral

Hotel Meliá Marina Varadero Apartments *Effective April 24, 2019*

Hotel El Caney Varadero *Effective April 24, 2019*

Hotels in Pinar del Rio

Hotel Villa Cabo de San Antonio

Hotel Villa Maria La Gorda y Centro Internacional de Buceo

Hotels in Baracoa

Hostal 1511

Hostal La Habanera

Hostal La Rusa

Hostal Rio Miel

Hotel El Castillo

Hotel Porto Santo

Villa Maguana

Hotels in Cayos de Villa Clara

Angsana Cayo Santa María *Effective November 15, 2018*

Dhawa Cayo Santa María

Golden Tulip Aguas Claras *Effective November 15, 2018*

Grand Aston Cayo Las Brujas Beach Resort & Spa *Effective November 19, 2019*

Hotel Cayo Santa María

Hotel Playa Cayo Santa María

Iberostar Ensenachos

Las Salinas Plana & Spa *Effective November 15, 2018*

La Salina Noreste *Effective November 15, 2018*

La Salina Suroeste *Effective November 15, 2018*

Meliá Buenavista

Meliá Cayo Santa María

Meliá Las Dunas

Memories Azul

Memories Flamenco

Memories Paraíso

Ocean Casa del Mar

Paradisus Los Cayos *Effective November 15, 2018*

Royalton Cayo Santa María

Sercotel Experience Cayo Santa María *Effective November 15, 2018*

Sol Cayo Santa María

Starfish Cayo Santa María *Effective November 15, 2018*

Valentín Perla Blanca *Effective November 15, 2018*

Villa Las Brujas

Warwick Cayo Santa María

also Labranda Cayo Santa María Hotel *Effective November 15, 2018*

Hotels in Holguín

Blau Costa Verde Beach & Resort

also Fiesta Americana Holguín Costa Verde *Effective November 15, 2018*

Hotel Playa Costa Verde

Hotel Playa Pesquero

Memories Holguín

Paradisus Río de Oro Resort & Spa

Playa Costa Verde

Playa Pesquero Premium Service

Sol Río de Luna y Mares

Villa Cayo Naranja

Villa Cayo Saetia

Villa Pinares de Mayari

Hotels in Jardines del Rey

Cayo Guillermo Resort Kempinski *Effective July 26, 2019*

Grand Muthu Cayo Guillermo *Effective November 15, 2018*

Gran Muthu Imperial Hotel *Effective November 19, 2019*

Gran Muthu Rainbow Hotel *Effective November 19, 2019*

Hotel Playa Coco Plus

Iberostar Playa Pilar

Meliá Jardines del Rey

Memories Caribe

Pestana Cayo Coco

also Hotel Playa Paraiso *Effective June 12, 2020*

Hotels in Topes de Collantes

Hostal Los Helechos

Kurhotel Escambray *Effective November 15, 2018*

Los Helechos

Villa Caburni

Tourist Agencies

Crucero del Sol

Gaviota Tours

Marinas

Marina Gaviota Cabo de San Antonio (Pinar del Rio)

Marina Gaviota Cayo Coco (Jardines del Rey)

Marina Gaviota Las Brujas (Cayos de Villa Clara)

Marina Gaviota Puerto Vita (Holguín)

Marina Gaviota Varadero (Varadero)

Stores in Old Havana

Casa del Abanico

Colección Habana

Florería Jardín Wagner

Joyería Coral Negro – Additional locations throughout Cuba

La Casa del Regalo

San Ignacio 415

Soldadito de Plomo

Tienda El Navegante

Tienda Muñecos de Leyenda

Tienda Museo El Reloj Cuervo y Sobrinos

Entities Directly Serving the Defense and Security Sectors

ACERPROT — Agencia de Certificación y Consultoría de Seguridad y Protección

alias Empresa de Certificación de Sistemas de Seguridad y Protección *Effective November 15, 2018*

AGROMIN — Grupo Empresarial Agropecuario del Ministerio del Interior

APCI — Agencia de Protección Contra Incendios

CAHOMA — Empresa Militar Industrial Comandante Ernesto Che Guevara

Casa Editorial Verde Olivo *Effective July 26, 2019*

CASEG — Empresa Militar Industrial Transporte Occidente

CID NAV — Centro de Investigación y Desarrollo Naval

CIDAI — Centro de Investigación y Desarrollo de Armamento de Infantería

CIDAO — Centro de Investigación y Desarrollo del Armamento de Artillería e Instrumentos Ópticos y Ópticos Electrónicos

CORCEL — Empresa Militar Industrial Emilio Barcenas Pier

CUBAGRO — Empresa Comercializadora y Exportadora de Productos Agropecuarios y Agroindustriales

DATYS — Empresa Para El Desarrollo De Aplicaciones, Tecnologías Y Sistemas

DCM TRANS — Centro de Investigación y Desarrollo del Transporte

DEGOR — Empresa Militar Industrial Desembarco Del Granma

DSE — Departamento de Seguridad del Estado

Editorial Capitán San Luis *Effective July 26, 2019*

EMIAT — Empresa Importadora Exportadora de Abastecimientos Técnicos

Empresa Militar Industrial Astilleros Astimar

Empresa Militar Industrial Astilleros Centro

Empresa Militar Industrial Yuri Gagarin

ETASE — Empresa de Transporte y Aseguramiento

Ferretería TRASVAL

GELCOM — Centro de Investigación y Desarrollo Grito de Baire

Impresos de Seguridad

MECATRONICS — Centro de Investigación y Desarrollo de Electrónica y Mecánica

NAZCA — Empresa Militar Industrial Granma

OIBS — Organización Integración para el Bienestar Social

PLAMEC — Empresa Militar Industrial Ignacio Agramonte

PNR — Policía Nacional Revolucionaria

PROVARI — Empresa de Producciones Varias

SEPSA — Servicios Especializados de Protección

SERTOD — Servicios de Telecomunicaciones a los Órganos de la Defensa ***Effective November 15, 2018***

SIMPRO — Centro de Investigación y Desarrollo de Simuladores

TECAL — Empresa de Tecnologías Alternativas

TECNOPRO — Empresa Militar Industrial “G.B. Francisco Cruz Bourzac”

TECNOTEX — Empresa Cubana Exportadora e Importadora de Servicios, Artículos y Productos Técnicos Especializados

TGF — Tropas de Guardiafronteras

UAM — Unión Agropecuaria Militar

ULAEX — Unión Latinoamericana de Explosivos

XETID — Empresa de Tecnologías de la Información Para La Defensa

YABO — Empresa Militar Industrial Coronel Francisco Aguiar Rodríguez

Additional Subentities of CIMEX

ADESA/ASAT — Agencia Servicios Aduanales (Customs Services)

Cachito (Beverage Manufacturer)

Contex (Fashion)

Datacimex

ECUSE — Empresa Cubana de Servicios

FINCIMEX *Effective June 19, 2020*

Inmobiliaria CIMEX (Real Estate)

Inversiones CIMEX

Jupiña (Beverage Manufacturer)

La Maison (Fashion)

Najita (Beverage Manufacturer)

Publicitaria Imagen (Advertising)

Residencial Tarara S.A. (Real Estate / Property Rental) *Effective November 15, 2018*

Ron Caney (Rum Production)

Ron Varadero (Rum Production)

Telecable (Satellite Television)

Tropicola (Beverage Manufacturer)

Zona Especializada de Logística y Comercio (ZELCOM)

Additional Subentities of GAESA

Almacenes Universales (AUSA)

ANTEX — Corporación Antillana Exportadora

Compañía Inmobiliaria Aurea S.A. *Effective November 15, 2018*

Dirección Integrada Proyecto Mariel (DIP)

Empresa Inmobiliaria Almest (Real Estate)

GRAFOS (Advertising)

RAFIN S.A. (Financial Services)

Sociedad Mercantín Inmobiliaria Caribe (Real Estate)

TECNOIMPORT

Terminal de Contenedores de la Habana (TCH)

Terminal de Contenedores de Mariel, S.A.

UCM — Unión de Construcciones Militares

Zona Especial de Desarrollo Mariel (ZEDM)

Zona Especial de Desarrollo y Actividades Logísticas (ZEDAL)

Aerogaviota *Effective April 24, 2019*

Additional Subentities of Gaviota

AT Comercial

Centro de Buceo Varadero *Effective June 12, 2020*

Centro Internacional de Buceo Gaviota Las Molas *Effective June 12, 2020*

Delfinario Cayo Naranjo *Effective June 12, 2020*

Diving Center – Marina Gaviota *Effective April 24, 2019*

Gaviota Hoteles Cuba *Effective March 12, 2019*

Hoteles Habaguanex *Effective March 12, 2019*

Hoteles Playa Gaviota *Effective March 12, 2019*

Manzana de Gomez

Marinas Gaviota Cuba *Effective March 12, 2019*

PhotoService

Plaza La Estrella *Effective November 15, 2018*

Plaza Las Dunas *Effective November 15, 2018*

Plaza Las Morlas *Effective November 15, 2018*

Plaza Las Salinas *Effective November 15, 2018*

Plaza Las Terrazas del Atardecer *Effective November 15, 2018*

Plaza Los Flamencos *Effective November 15, 2018*

Plaza Pesquero *Effective November 15, 2018*

Producciones TRIMAGEN S.A. (Tiendas Trimagen)

Additional Subentities of Habaguanex

Sociedad Mercantil Cubana Inmobiliaria Fenix S.A. (Real Estate)

Activities in parentheses are intended to aid in identification, but are only representative. All activities of listed entities and sub-entities are subject to the applicable prohibitions.

TAGS

Bureau of Economic and Business Affairs

Bureau of Western Hemisphere Affairs

Cuba

Division for Counter Threat Finance and Sanctions

Sanctions

★ ★ ★

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Exhibit 21

ISSN 1682-7511

[coat of arms]
**OFFICIAL GAZETTE
OF THE REPUBLIC OF CUBA
MINISTRY OF JUSTICE**

Information in this issue

Official Gazette Extraordinary Issue No. 28, May 25, 2018

BANCO CENTRAL DE CUBA [CENTRAL BANK OF CUBA]

Resolution No. 119 / 2018 (GOC-2018-309-EX28)

**BANCO CENTRAL DE CUBA
GOC-2018-309-EX28**

RESOLUTION No. 119 / 2018

WHEREAS: FINANCIERA CIMEX S.A., incorporated by Notarial Instrument No. 172, of May 15, 1995, and which for all legal purposes is called FINCIMEX S.A., is a non-banking financial institution with powers to conduct financial brokerage activities, in accordance with the license granted by Resolution No. 86, of June 15, 2017, by the chairperson / president of the Banco Central de Cuba.

WHEREAS: In Article 13 of Decree Law No. 173, On Banks and Non-Banking Financial Institutions, dated May 28, 1997, it is established that the Banco Central de Cuba sets, in the licenses granted, the scope and the operations that the financial institution can perform.

WHEREAS: In Resolution No. 64 of July 9, 1999, by the chairperson / president of the Banco Central de Cuba, the rules for issuing and operating plastic cards are established as a means of payment and the types of licenses issued by the Banco Central de Cuba in that regards.

WHEREAS: Based on the experience acquired by FINCIMEX S.A. in the provision of payment services for leasing housing, contracted from abroad, it has been decided to repeal the aforementioned Resolution No. 86 of 2017, granted with temporary character, and consequently issue a new license.

THEREFORE: In the exercise of the powers conferred in Article 36 of Decree Law No. 172 of May 28, 1997, Regarding the Banco Central de Cuba,

I so resolve:

ONE: Cancel the license granted by Resolution No. 86 of June 15, 2017, by the chairperson / president of the Banco Central de Cuba, to the non-banking financial institution FINANCIERA CIMEX S.A., hereinafter FINCIMEX S.A., and void the aforementioned legal provision.

TWO: Grant new license to FINCIMEX S.A., according to the terms of the text which is annexed to this Resolution, and which is an integral part thereof.

THREE: As of the entry into force of this Resolution, the official registration is cancelled recorded in the General Registry of Banks and Non-Banking Financial Institutions in Entry No. 84, Sheets 184 and 185, and a new one will be made, according to the terms provided in the license granted to FINCIMEX S.A. with this Resolution.

BE SO NOTIFIED the chairperson of the Corporation CIMEX S.A. and the general manager of FINCIMEX S.A.

BE IT SO PUBLISHED in the Official Gazette of the Republic of Cuba.

SO FILE the original in the Secretariat of the Banco Central de Cuba.

EXECUTED in Havana, on March 27, 2018.

Irma Margarita Martínez Castrillón
Chairperson / President
Banco Central de Cuba

SPECIFIC LICENSE

This Specific License, hereinafter "License," is granted in favor of the non-banking financial institution FINANCIERA CIMEX S.A., hereinafter FINCIMEX S.A., with

headquarters in the city of Havana, to engage in non-banking financial activity in the Republic of Cuba, on the terms provided below:

1. Manage and process family remittances from abroad to Cuba.
2. Provide payment services through its infrastructure for duly authorized leasing of homes, according to current legislation, contracted from abroad. Furthermore, the following licenses are granted to FINCIMEX S.A.:

LICENSE TYPE A: Recognizes and authorizes FINCIMEX S.A. to issue and operate any kind of plastic card, in accordance with the provisions in Resolution No. 64, Rules for the issuance and operation of plastic cards as a means of payment, of July 9, 1999, by the Chairperson / President of the Banco Central de Cuba.

All issuance of plastic cards by FINCIMEX S.A. must be previously approved by the Banco Central de Cuba.

The plastic cards issued by FINCIMEX S.A. will be used exclusively in Cuban territory, and only the Banco Central de Cuba may authorize their inclusion on the international markets.

LICENSE: Recognizes and authorizes FINCIMEX S.A. to serve as an acquiring client and as a plastic card processing center, in accordance with the stipulations in the aforementioned Resolution No. 64 of 1999.

For its capital adequacy, FINCIMEX S.A. will comply with what is provided by the Banco Central de Cuba in this regard.

FINCIMEX SA will not be able to conduct operations in which it commits its equity to provide financing to any counterparty, as well as to conduct operations reserved exclusively for banks, unless expressly authorized by the Banco Central de Cuba.

The Banco Central de Cuba may cancel or modify this License at the request of FINCIMEX S.A., or when the provisions in this License, or in Decree Law No. 173, On Banks and Non-Banking Financial Institutions, of May 28, 1997, the provisions of the Banco Central de Cuba or other legal applicable provisions in force are infringed.

EXECUTED in Havana, on March 27, 2018.

Exhibit 22

Folio / Finca / Ficha (MERCANTIL) Folio N° 209034 (S)
 Fecha de Inscripción 29/04/1988

Datos Sistema Registral Antiguo

Tomo

Folio / Finca / Ficha

Asiento

Rollo 23634

Imagen 76

Ficha 209034

Documento REDI

Identificación de la Persona AMERICAN INTERNATIONAL SERVICES S.A.
 Tipo de Organización SOCIEDAD ANONIMA
 Status VIGENTE
 Tipo de Moneda Dólares americanos
 Capital Social 50,000.00
 Vigencia PERPETUA
 Domicilio PROVINCIA PANAMÁ
 Observaciones

Registro Previo Inactivo

Elementos Activos

Derechos/Actos/Otras Operaciones	Fecha de Inscripción	Asiento
Asiento Electrónico N° 1 (Migración a Folio Electrónico)	04/10/2017	Ver
Asiento Electrónico N° 2 (CORRECCIÓN) Entrada 431765/2017 (0)	13/10/2017	Ver
Asiento Electrónico N° 3 (INSCRIPCIÓN DE OTRAS OPERACIONES REGISTRALES) Entrada 295616/2018 (0)	31/08/2018	Ver
Asiento Electrónico N° 4 (INSCRIPCIÓN DE OTRAS OPERACIONES REGISTRALES) Entrada 478533/2018 (0)	30/11/2018	Ver

Prelación

N° de Entrada / N° de Asiento	Tipo de entrada	Tipo de Trámite	Estado
11146/191 (0)	Registro		Sin estado en Emulador.
6211/194 (0)	Registro	ACTA, Derechos de Calificación	Marcada como finalizada en Emulador
851/232 (0)	Registro	ACTA, Derechos de Calificación	Entregado como Salida sin Registro
56483/279 (0)	Registro		

		COPIAS, Derechos de Calificación	Entregado como Salida sin Registro	
70392/279 (0)	Registro	COPIAS, Derechos de Calificación	Entregado como Salida sin Registro	
83854/2002 (0)	Registro	ACTA, Derechos de Calificación	Listo para entrega como Trámite Agotado	
198033/2005 (0)	Registro	ACTA, Derechos de Calificación	Marcada como finalizada en Emulador	
36536/2006 (0)	Registro	ACTA, Derechos de Calificación	Listo para entrega como Trámite Agotado	
225052/2010 (0)	Registro	ACTA, Derechos de Calificación	Listo para entrega como Trámite Agotado	
168611/2013 (0)	Registro	MODIFICACION A LA CONSTITUCION DE SOCIEDAD O FUNDACION, Derechos de Calificación	Listo para entrega como Trámite Agotado	
214273/2013 (0)	Registro	MODIFICACION A LA CONSTITUCION DE SOCIEDAD O FUNDACION, Derechos de Calificación	Entregado como Salida sin Registro	
225368/2013 (0)	Registro	MODIFICACION A LA CONSTITUCION DE SOCIEDAD O FUNDACION, Derechos de Calificación	Listo para entrega como Trámite Agotado	
431765/2017 (0)	Trámite Jurídico	Corrección de Generales	Trámite Agotado	
59055/2018 (0)	Registro	Acta de Sociedad Mercantil, Derechos de Calificación	Entregado como Salida sin Registro a Petición de Parte Con Calificación	
69470/2018 (0)	Registro	Derechos de Calificación	Entregado como Salida sin Registro a Petición de Parte Con Calificación	
295616/2018 (0)	Registro	Derechos de Calificación	Entregado como Trámite Agotado	
478533/2018 (0)	Registro	Acta de Sociedad Mercantil, Derechos de Calificación	Entregado como Trámite Agotado	

Miembros Relacionados

Cargo	Miembro
Secretario	MALI SURIS VALMAÑA
Director	LETICIA MORALES GONZALEZ
Presidente	HECTOR OROZA BUSUTIL

Tesorero	NO CONSTA
Suscriptor	JOSE LUTTRELL
Suscriptor	DOLORES GAEZ DE DIAZ
Director	HECTOR OROZA BUSUTIL
Director	MALI SURIS VALMAÑA
Vicepresidente	LETICIA MORALES GONZALEZ
Agente Residente	MORGAN Y MORGAN
Apoderado	FERNANDO GARCIA SMITH
REPRESENTANTE	EL PRESIDENTE.

Apoderados

Apoderado
FERNANDO GARCIA SMITH

Exhibit 23



Public Register of Panama

[logo:] Panama Public Registry

TEACHER INFORMATION

TAB: 39447
NO DOCUMENT: COMPANY NAME: CORPORACION CIMEX, S.A.
REGISTRATION DATE: 17/05/1979 00:00:00
SINGLE RATE PERIOD: 9192

DEED INFORMATION

DATE: 08/05/1979 00:00:00
NUMBER: 5412
NOTARY'S OFFICE: 05
PROVINCE: PANAMA
NOTARY DESCRIPTION: FIFTH NOTARY OF THE CIRCUIT

DATA OF 1 UNIQUE RATE

PAYMENT DATE: 08/14/08/1991 00:00:00
RESIDENT AGENT: MORGAN Y MORGAN

MICROFILM DATA

ROLL: 2210
IMAGE: 105

CURRENCY: SHARES WITHOUT NOMINAL VALUE.

CAPITAL

FIVE HUNDRED SHARES WITHOUT NOMINAL VALUE.

LEGAL REPRESENTATIVE

THE PRESIDENT, BUT IN HIS ABSENCE OR INCAPACITY HE MAY BE REPRESENTED BY THE VICE-PRESIDENT, AND IF THERE IS MORE ONE BY ORDER OF SENIORITY, AND IN LIEU OF THE VICE-PRESIDENT, BY THE TREASURER, AND IN LIEU OF ALL OF THEM BY THE SECRETARY, THE BOARD OF DIRECTORS BEING ABLE TO CONFER THE REPRESENTATION ON ANOTHER OFFICER OR PERSON.

OFFICERS

- (PRESIDENT) HECTOR OROZA BUSUTIL
- (VICE-PRESIDENT) LETICIA MORALES GONZALEZ (ECONOMY AND FINANCES)
- (VICE-PRESIDENT) JANET BASNUEVO ANDREU (HUMAN RESOURCES)
- (VICE-PRESIDENT) BARBARA ROSA SOTO SANCHEZ (COMMERCIAL)
- (VICE-PRESIDENT) ISET MARITZA VAZQUEZ BRIZUELA (FIRST)
- (VICE-PRESIDENT) TUREY ABRAHAM VECIANO TRUJILLO/LOGISTICS
- (MANAGER) JUAN EVARISTO PEDRAJA LEMAS/INVESTMENTS
- (TREASURER) NOT INCLUDED.
- (SECRETARY) MALI SURIS VALMAÑA
- (DIRECTOR) EDILBERTO GOMEZ VIGUERA
- (DIRECTOR) HECTOR OROZA BUSUTIL
- (DIRECTOR) LETICIA MORALES GONZALEZ
- (DIRECTOR) ISET MARITZA VAZQUEZ BRIZUELA
- (DIRECTOR) BARBARA ROSA SOTO SANCHEZ
- (DIRECTOR) MAXIMINO MARTINEZ FORNELLS/TREASURY
- (DIRECTOR) JANET BASNUEVO ANDREU
- (DIRECTOR) JUAN EVARISTO PEDRAJA LEMAS
- (DIRECTOR) REINA GOMEZ HERRERA/INFORMATION TECHNOLOGY AND COMMUNICATIONS
- (DIRECTOR) MALI SURIS VALMAÑA
- (DIRECTOR) JUAN CARLOS GONZALEZ EHEMENDIA/ADJUNCT
- (DIRECTOR) TUREY ABRAHAM VECIANO TRUJILLO
- (DIRECTOR) BARTOLO SAN MARTIN DELGADO/ECONOMY
- (SUBSCRIBER) PABLO JAVIER ESPINO
- (SUBSCRIBER) ADELINA MERCEDES CHAVARRIA DE ESTRIBI

(GENERAL MANAGER) EDILBERTO GOMEZ VIGUERA/DATACIMEX DIVISION

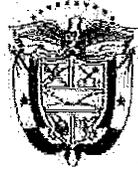
MARGINAL OFFICE

RIGHT TO SIGN

LIMITATIONS

DETAILS OF THE POWER OF ATTORNEY

[signature]
[hw:] D-5-11



REPUBLIC OF PANAMA
PROVINCE OF PANAMA

EIGHTH OF THE PANAMA CIRCUIT

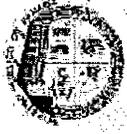
Manuel Aldana Aparicio

EIGHTH NOTARY PUBLIC



197832/2017 (0)

[illegible]



[logo:] [illegible]

[illegible]

Plaza Building [illegible]
Office 108
Ave. Samuel Lewis
Urb. Obarrio

[stamp:] URGENT

Tel.: 264-6270
264-3676
213-8028
Email: notari[illegible]@cwpanama.net

COPY

DEED No. 6.536 OF 10 OF May 2017

BY WHICH:

the document containing the Minutes of the Extraordinary General Meeting of the Shareholders of the **CORPORACION CIMEX, S.A.** company is notarized, held on the 14th of March, 2017, which modifies the members of the Board of Directors and Officers of the Company.

[stamp:] [illegible]

[hw:] *Several 811164 [illegible]*
[stamp:] URGENT

[stamp:] uf.registro@morimor.com

[seal:] REPUBLIC OF PANAMA EIGHTH
NOTARY'S OFFICE OF THE CIRCUIT

REPUBLIC OF PANAMA
NOTARIAL PAPER

[stamp:] 8TH NOTARY'S OFFICE PANAMA
REPUBLIC OF PANAMA Stamp [illegible]
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201-2540 of 27 [illegible] 11 / 5 / 17 B/8.00
080653611051700001503077



EIGHTH NOTARY'S OFFICE OF THE PANAMA CIRCUIT

PUBLIC DEED NUMBER SIX THOUSAND. FIVE HUNDRED THIRTY SIX -----

----- (6,536)-----ig-----

By which the document authorizing the Minutes of the Extraordinary General Meeting of Shareholders of the Company: **CIMEX CORPORATION**, S.A. is notarized, meeting held on March 14, 2017, by which the members of the Board of Directors, and Officers of the Company are modified. -----

----- Panama, 10 May 2017.-----

In Panama City, Capital of the Republic and Head of the Notarial Circuit of the same name, on the tenth (10) day of the month of May of the year two thousand seventeen (2017), before me, VICTOR MANUEL ALDANA APARICIO; Eighth Public Notary of the Circuit of Panama, with personal identity card number, four - one hundred and seven - six hundred and twenty-seven (4-107-627), personally appeared, MARIO AQUILINO TEJERA ARIAS, male, of legal age, Panamanian, lawyer, married, resident of this city, with personal identity card number eight - two hundred twenty-nine - two thousand six hundred and sixty-eight (8-229-2668), person whom I know and acting on behalf of the legal firm MORGAN Y MORGAN, located at. Pacific Avenue and Avenida Paseo del Mar. Costa del Este, MMG Tower, Pico twenty-three (23), Panama City, Republic of Panama, duly authorized for this act, as recorded in the Minutes of the Extraordinary Meeting of Shareholders of the Company **CORPORACION CIMEX, S.A.**, limited company; registered in the Commercial Section of the Public Registry on Folio three nine four four seven (39447), presented to me for notarization and which I indeed notarize the Minutes of the Extraordinary Meeting of Shareholders of the Company **CORPORACION CIMEX, S.A** held on March fourteenth (14) of two thousand [illegible] (2017), by which the members of the Board of Directors and Officers of the Company are amended. -----

This document consisted of two (2) typed sheets and its contents are transcribed in the copy of this Deed. ----

The requested notarization is made and copies requested by Interested Parties will be issued-----

The Notary notes that a copy of this instrument must be registered and read as it was to the person appearing in the presence of the instrumental witnesses SELIDETH DE LEON, female, with personal identity card number six - fifty-nine - one hundred-forty-seven (6-59-147), and JACINTO HIDALGO FIGUEROA, male; with personal identity card number two - sixty-four - six hundred and fifty-six, (2-64-656) both Panamanian citizens and residents of this city, whom I know and who are qualified to carry out the role; found it compliant, gave it their approval, and all signed in witness before me the Notary I attest. -----

THIS DEED HAS THE NUMBER SIX THOUSAND FIVE HUNDRED AND THIRTY-SIX-----

(6,536)

(Signed.) Mario Tejeira. ----- Selideth De Leon,-----Jacinto Hidalgo Figueroa,-----

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VICTOR MANUEL ALCANA APARICIO, EIGHTH NOTARY PUBLIC of the Circuit of Panama.-----

-----MINUTES OF THE EXTRAORDINARY GENERAL MEETING OF SHAREHOLDERS OF THE
----- **CORPORACION CIMEX, S.A** PANAMANIAN COMPANY.-----

In Havana, at ten a.m. of the fourteenth of March 2017, in the offices of the company, a meeting was held that did not require prior convocation, because all the shareholders of the issued and outstanding shares of the company were present.-----

Having confirmed the existence of the regulatory quorum, the meeting was declared open, which was chaired by Héctor Oroza Busutil, in his capacity as President and the Msc. Mali Suris Valmaña, in her capacity as Secretary, took the minutes.-----

The President reported that the object of the meeting was to modify the members of the Board of Directors and Officers of the Company.-----

After exchanging opinions, under a motion that was duly raised and seconded, there was unanimous adoption of the following.-----

----- **AGREEMENT**-----

-

FIRST: Amend the members of the Board of Directors and Officers appointed previously and appoint a new Board of Directors and Officers, composed as follows.-----

Directors:

Héctor Oroza Busutil -----

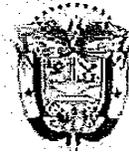
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[seal:] REPUBLIC OF PANAMA EIGHTH NOTARY'S OFFICE OF THE CIRCUIT

REPUBLIC OF PANAMA NOTARIAL PAPER

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EIGHTH NOTARY'S OFFICE OF THE PANAMA CIRCUIT

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Iset Maritza Vázquez Brizuela
Leticia Morales González
Turey Abraham Veciano Trujillo
Janet Basnuevo Andreu
Maximino Martínez Fornells
Mali Suris Vulmaña
Officers:
Hector Oroso Busulil President
Iset Maritza Vazquez Brizuela First Vice-President
Leticia Morales Gonzalez Vice-President Economics and Finance
Janet Basnuevo Andreu Vice President Human-Resources
Turey Abraham Veciano Trujillo Commercial Vice-President
Maximino Martínez Fornells Treasury Director
Mali Suris Valmaña Secretary

Then, the appointed persons being present for their positions, they acknowledged the respective appointments subject to them, accepting the positions and taking possession of these.

It was further resolved to empower the firm MORGAN y MORGAN, to carry out the notarization of a copy of these Minutes and their registration in the Panamanian Public Registry.

And with no other matter to deal with, the meeting was terminated, at eleven a.m. on the above mentioned date.

(Signed:) Illegible - Hector Oaza Husutil, President

(Signed.) Illegible - Msc. Mali Suris Valmaña, Secretary of the meeting.

Minutes, endorsed by the legal firm Morgan y Morgan-(Signed.) Tejeira Mafia,

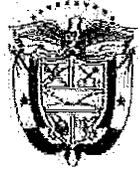
It matches its original copy that I issued, signed and stamped in Panama City, Republic of Panama, at ten (10) days of May two thousand seventeen (2017)

[seal:] REPUBLIC OF PANAMA EIGHTH NOTARY'S OFFICE OF THE CIRCUIT

[signature]

[Illegible]

[signature]
[hw:] [illegible]



REPUBLIC OF PANAMA
PROVINCE OF PANAMA

**EIGHTH NOTARY'S OFFICE OF THE PANAMA
CIRCUIT**

Victor Manuel Aldana Aparicio

EIGHTH NOTARY PUBLIC

Plaza Building [illegible]
Office 108
Ave. Samuel Lewis
Urb. Obarrio

Tel.: 264-6270
264-3676
213-8028
Email: notari[illegible]@ewpanama.net

COPY

DEED No. 7,616 OF 29 OF May 20 17

BY WHICH:

the documents notarized, which contain the Minutes of the
Extraordinary General Meeting of Shareholders of the following:
CORPORATION CIMEX, S.A., company, held on April 26,
2017.

[hw:] Several 812744 Patricia [illegible]

[stamp:] uf.registro@morimor.com

[stamp:] José Silva MORGAN & MORGAN Identity Card No. 8-225-1020

231666/2017 (0)

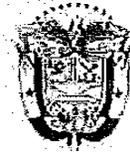


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REPUBLIC OF PANAMA NOTARIAL PAPER



EIGHTH NOTARY'S OFFICE OF THE PANAMA CIRCUIT

PUBLIC DEED NUMBER SEVEN THOUSAND SIX HUNDRED AND SIXTEEN -----

----- (7.616) ----- da-

Which notarizes the document that contains the minutes of the Extraordinary General Meeting of Shareholders of the **CORPORATION CIMEX, S.A.**, company, held on April 26, 2017. -----

----- Panama, 29 May 2017.-----

In Panama City, Capital of the Republic and Head of the Notarial Circuit of the same name, on the twenty-ninth (29) day of the month of May of the year two thousand seventeen (2017), before me, VICTOR MANUEL ALDANA APARICIO, Eighth Notary Public of the Circuit of Panama, with personal identity number four - one hundred and seven - six hundred and twenty-seven (4-107-627), personally appeared ALEXIS MEDINA ACHON, male, of legal age, Panamanian, lawyer, married, resident of this city, with personal identity card number eight -five hundred and two - one hundred and ninety-one (8-502-191), a person I know and who acting on behalf of the legal firm MORGAN Y MORGAN, domiciled in, Avenida del Pacifico and Avenida Paseo del Mar, Costa del Este, MMG Tower, Piso veintitres (23), Panama City, Republic of Panama duly authorized for this act as recorded in the Minutes of the Extraordinary General Meeting of Shareholders of the **CORPORATION CIMEX, S.A.**, company, limited company duly registered in the Commercial Section of the Public Registry at Folio three nine four four seven (39447), presented to me for notarization and I in effect notarize the Minutes of the Extraordinary General Meeting of Shareholders of the **CORPORATION CIMEX, S.A.**, company held on the twenty-six (26) of April of two thousand seventeen (2017).-----

This document consists of one (1) typed sheet and its contents are transcribed in the copy of this Deed -----

The requested notarization is made and the copies requested by the interested parties will be issued. -----

The Notary notes that a copy of this instrument must be registered and read as it was to the person appearing in the presence of the instrumental witnesses SELIDETH DE LEON, woman, with personal identity card number six - fifty-nine - one hundred-forty-seven (6-59-147), and JACINTO HIDALGO FIGUEROA, male; with personal identity card number two - sixty-four - six hundred and fifty-six, (2-64-656) both Panamanian citizens and residents of this city, whom I know and who are qualified to carry out the role; found it compliant, gave it their approval, and all signed in witness before me the Notary I attest. -----

THIS DEED HAS THE NUMBER SEVEN THOUSAND SIX HUNDRED AND SIXTEEN -----

----- (7.616) -----

(Signed.) Alexis Medina Achon----- Selideth De León.-----Jacinto Hidalgo Figueroa.-----

VICTOR MANUEL ALCANA APARICIO, Eighth Public Notary of the Circuit of Panama.-----

-----MINUTES OF THE EXTRAORDINARY GENERAL MEETING OF SHAREHOLDERS-----

----- **OF THE PANAMANIAN COMPANY CORPORACION CIMEX, S.A.** -----

In Havana, at eight a.m. of April 26, 2017, the Extraordinary General Meeting of Shareholders was held. ----

All the shares issued and in circulation of the company were present or represented.

The meeting was chaired by its holder, Héctor Oroza Busutil, acting as Secretary the MSc. Mali Suris Valmaña.

The President stated that as all shareholders were present, the notice of prior call could be waived, informing that the purpose of the meeting was to appoint the representatives of the Panamanian **Corporación Cimex S.A.**, in the TREVISO TRADING CORPORATION S.A. company as the former is its sole shareholder. ----

After exchanging opinions, under a motion that was duly raised and seconded, there was unanimous adoption of the following.-----

----- **AGREEMENT** -----

-

SOLE: Appoint Leticia, Morales González, Maximino Martinez Fornells and Mali Suris Valmaña as representatives of the Panamanian **Corporación Cimex S.A.**, in the TREVISO TRADING CORPORATION S.A.-----

Subsequently the appointed persons being present, they acknowledged this and accepted the respective appointments which they were subject to -----

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[seal:] REPUBLIC OF PANAMA EIGHTH
NOTARY'S OFFICE OF THE CIRCUIT

REPUBLIC OF PANAMA
NOTARIAL PAPER

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EIGHTH NOTARY'S OFFICE OF THE PANAMA CIRCUIT

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It was further decided to empower the law firm MORGAN y MORGAN to notarize a copy of these minutes and to register it in the Public Registry of Panama.---

And with no other matter to deal with, the meeting was terminated, at eleven thirty a.m. on the above mentioned date. -----

(Signed.) Illegible - Hector Oroza Busutil - President-----

(Signed.) Illegible MSc. Mali Suris Valmaña - Secretary-----

Minutes endorsed by the legal firm Morgan y Morgan.---(Signed) Alexis Medina Achon-----

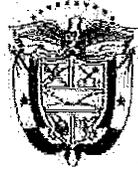
It matches its original copy that I issued, signed and stamped in Panama City, Republic of Panama, on the twenty-ninth (29) day of May of the year two thousand seventeen (2017).

[seal:] REPUBLIC OF PANAMA EIGHTH NOTARY'S OFFICE OF THE CIRCUIT

[signature]

[Illegible]

[signature]
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REPUBLIC OF PANAMA
PROVINCE OF PANAMA

EIGHTH OF THE PANAMA CIRCUIT

Manuel Aldana Aparicio

EIGHTH NOTARY PUBLIC



9845/2017 (0)

[illegible]



[logo:] [illegible]

[illegible]

Plaza Building [illegible]
Office 108
Ave. Samuel Lewis
Urb. Obarrio

Tel.: 264-6270
264-3676
213-8028
Email: notari[illegible]@cwpanama.net

COPY

DEED No. 17,043 OF 27 OF December 20 16

BY WHICH: the document containing the minutes, from a meeting of the Board of Directors of the company **CORPORACION CIMEX, S.A** is notarized, held on 18 October 2016, in which the General Power, conferred by Public Deed No. 8,852, of 29 October 1992, is revoked in favor of **Mr. BERTO PEREZ ORAMA**

[hw:] Several [illegible] 799879

[stamp:] uf.registro@morimor.com

[stamp:] José Silva MORGAN & MORGAN Identity Card No. 8-225-1020

[seal:] REPUBLIC OF PANAMA EIGHTH NOTARY'S OFFICE OF THE CIRCUIT

REPUBLIC OF PANAMA NOTARIAL PAPER

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EIGHTH NOTARY'S OFFICE OF THE PANAMA CIRCUIT

PUBLIC DEED NUMBER SEVENTEEN THOUSAND FORTY AND THREE -----
----- (17,043) -----ms-

Which notarizes the document containing the Minutes of a Meeting of the Board of Directors of the Board of Directors of the CIMEX CORPORATION, S.A. company, held on October 18, 2016, in which the General Power is revoked; conferred by Public Deed No. 8,852, of October 29, 1992, in favor of Mr. BERTO PEREZ ORAMA.

----- Panama, 27 December 2016.-----

In Panama City, Capital of the Republic and Head of the Notarial Circuit of the same name, on the twenty-seventh (27) day of the month of December of the year two thousand sixteen (2016), before me, VICTOR MANUEL ALDANA APARICIO, Eighth Notary Public of the Circuit of Panama, with personal identity card number four - one hundred and seven - six hundred twenty-seven (4-107-627), personally appeared, NESTOR JAVIER BROCE JAEN, male, of legal age, lawyer, unmarried, Panamanian, resident of this city, with personal identity card number eight - seven hundred and sixteen - two hundred and twenty-one (8-716-221), person whom I know and acting on behalf of the legal firm MORGAN Y MORGAN, with [illegible] in Avenida del Pacifico and Avenida Paseo del Mar, Costo del Este, MMG Tower, Piso veintitres (23), City of Panama, Republic of Panama, in the capacity of Resident Agent and duly authorized for this act as recorded in the Minutes of a Meeting of the Board of Directors of the company CORPORACION CIMEX, S.A., registered in the Commercial Section of the Public Register on Folio three nine four four seven (39447), presented me for notarization as I indeed notarize, the Minutes of a Meeting of the Board of Directors of the CORPORACION CIMEX, S.A., company, held on October eighteenth (18) of two thousand sixteen (2016), by which the General Power granted by Public Deed number eight thousand and eight hundred and fifty-two (8,852) of the twenty-ninth (29) of October of one thousand nine hundred and ninety-two (1992) is revoked, to favor of Mr. BERTO PEREZ ORAMA.

This document consists of one (1) typed sheet and its contents are transcribed in the copy of this Deed. -----

The requested notarization is made and copies requested by the interested parties will be issued.-----

The Notary notes that a copy of this instrument must be registered and read as it was to the person appearing in the presence of the instrumental witnesses SELIDETH DE LEON, female, with personal identity card number six - fifty-nine - one hundred forty-seven (6-59-147), and JACINTO HIDALGO FIGUEROA, male; with personal identity card number two - sixty-four - six hundred and fifty-six, (2-64-656) both of legal age, both Panamanian citizens and residents of this city, whom I know and who are qualified to carry out the role; found it compliant, gave it their approval, and all signed in witness before me the Notary I attest.-----

THIS DEED HAS THE NUMBER SEVENTEEN THOUSAND FORTY-THREE -----
----- (17,043) -----

(Signed.) Nestor Broce-----Selideth De León-----Jacinto Hidalgo Figueroa-----

VICTOR MANUEL ALCANA APARICIO, Eighth Public Notary of the Circuit of Panama. -----

-----**MINUTES OF A MEETING OF THE BOARD OF THE DIRECTORS OF THE COMPANY-**

-----**CORPORACION CIMEX, S.A.**-----

In Havana, on October 18 of 2016, a meeting of the Board of Directors of **CORPORACION CIMEX, S.A.** was held in which there was at all times active and present quorum. -----

All the directors of the company were present, thus renouncing the notice of [illegible] the meeting. -----

The meeting was chaired by Mr. HECTOR OROZA BUSUTIL, President of the Company and Ms. MALI SURIS VALMAÑA, Secretary of Company, took the minutes.-----

The President further announced that the purpose of the meeting was to revoke the General Power of Attorney granted in favor of **Mr. BERTO PEREZ ORAMA**-----

A motion was duly made, supported and approved and unanimously resolved the following.-----

----- **IT IS RESOLVED TO:**-----

Revoke as in effect the General Power of Attorney is revoked granted in favor of **Mr. BERTO PEREZ ORAMA** by E.P. 8,852 of 29 October 1992, which was registered under file 39447, Rol 37553 and Image 0093 on 13 January 1993; registered in the Public Registry.-----

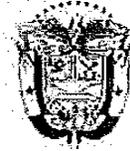
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[seal:] REPUBLIC OF PANAMA EIGHTH
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REPUBLIC OF PANAMA
NOTARIAL PAPER

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EIGHTH NOTARY'S OFFICE OF THE PANAMA CIRCUIT

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It was further decided to empower the law firm MORGAN Y MORGAN to proceed with the notarization of a copy of these Minutes and its registration in the Public Registry of Panama.

With nothing further to deal with, the session was ended.-----

(Signed.) Illegible - HECTOR OROZA BUSUTIL ----- President -----

(Signed.) Illegible - MALI SURIS VALMAÑA ----- Secretary

Minutes endorsed by the legal firm Morgan y Morgan.------(Signed) Nestor Broce.-----

It matches its original copy that I issued, signed and stamped in Panama City, Republic of Panama, on the twenty-seventh (27) day of December of the year two thousand sixteen (2016).

[seal:] REPUBLIC OF PANAMA EIGHTH NOTARY'S OFFICE OF THE CIRCUIT

[signature]

[illegible]

REGISTRATION DUTIES



No.1401142225

To [illegible] in the Count

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Date: 01/10/2017
 [illegible] JOSE [illegible] (8-225-1020)

[illegible]
 [illegible]
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 [illegible]

EIGHTH NOTARY'S OFFICE OF THE PANAMA CIRCUIT
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 [illegible] 12/27/2010

[illegible]

Signature [illegible] _____ [signature]

METHOD OF PAYMENT	USA	DOLLARS CTS
Cash	\$	0.00
Checks	\$	65.00
TOTAL	\$	65.00

ORIGINAL CONTRIBUTOR

REGISTRATION DUTIES

1401317551

N° 1401317551

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Date: 06/02/2017
 [illegible] JOSE SR. VA RITTER (8-225-1020)

[illegible]
 [illegible]
 [illegible]
 [illegible]
 [illegible]
 [illegible]

EIGHTH NOTARY'S OFFICE OF THE PANAMA CIRCUIT
 [illegible] 7616
 [illegible] 05/29/2017

[illegible]

Signature [illegible] _____ [signature]

METHOD OF PAYMENT	USA	DOLLARS CTS
Cash	\$	0.00
Checks	\$	65.00
TOTAL	\$	65.00

ORIGINAL CONTRIBUTOR

[emblem]

Panama Public Registry

SIGNED BY: ZUGEY MEILYN
AGREDO PLANETA
Date: 09/08/2015 16:58:02 -05:00
REASON: LOCATION ADVERTISING REQUEST PANAMA,
PANAMA [signature]

No. 314805

LEGAL ENTITY CERTIFICATE

RELATING TO THE APPLICATION

395151/2015 (0) DATED 09/08/2015

THAT THE COMPANY

CORPORACION CIMEX, S.A.
TYPE OF COMPANY, LIMITED COMPANY
IS REGISTERED IN (COMMERCIAL FOLIO No. 39447 IS) FROM THURSDAY, MAY 17, 1979
• THAT THE COMPANY IS IN FORCE

-THAT ITS OFFICERS ARE:

- DIRECTOR ISET MARITZA VAZQUEZ BRIZUELA [hw:] ✓
- SECRETARY MALI SURIS VALMAÑA [hw:] ✓
- PRESIDENT HECTOR OROZA BUSUTIL [hw:] ✓
- VICE-PRESIDENT LETICIA MORALES GONZALEZ (ECONOMY AND FINANCES) [hw:] ✓
- DIRECTOR HECTOR OROZA BUSUTIL [hw:] ✓
- DIRECTOR LETICIA MORALES GONZALEZ [hw:] ✓
- JANET BASNUEVO ANDREU DIRECTOR [hw:] ✓
- [hw:] * DIRECTOR JUAN EVARISTO PEDRAJA LEMAS
- VICE-PRESIDENT ISET MARITZA VAZQUEZ BRIZUELA (FIRST) [hw:] ✓
- [hw:] * DIRECTOR BARBARA ROSA SOTO SANCHEZ
- VICE-PRESIDENT JANET BASNUEVO ANDREU (HUMAN RESOURCES) [hw:] ✓
- [hw:] * VICE-PRESIDENT BARBARA ROSA SOTO SANCHEZ (COMMERCIAL)
- DIRECTOR MALI SURIS VALMAÑA [hw:] ✓
- [hw:] * DIRECTOR EDILBERTO GOMEZ VIGUERA
- [hw:] * MANAGER JUAN EVARISTO PEDRAJA LEMAS/INVESTMENTS
- [hw:] * GENERAL MANAGER EDILBERTO GOMEZ VIGUERA/DATACIMEX DIVISION
- DIRECTOR TUREY ABRAHAM VECIANO TRUJILLO [hw:] ✓
- VICE-PRESIDENT TUREY ABRAHAM VECIANO TRUJILLO/LOGISTICS [hw:] [illegible]
- RESIDENT AGENT MORGAN Y MORGAN
- [hw:] * DIRECTOR BARTOLO SAN MARTIN DELGADO (ECONOMY)
- DIRECTOR MAXIMINO MARTINEZ FORNELLS (TREASURY) [hw:] ✓
- [hw:] * DIRECTOR ELENA [illegible]
- [hw:] * DIRECTOR JUAN CARLOS GONZALEZ ECHEMENDIA (ASSISTANT)
- OTHER CARLOS [illegible] ECONOMIC DIRECTION
- TREASURER: MAXIMINO MARTINEZ [illegible] [hw:] ✓

- THAT ITS CAPITAL IS OF [illegible] NOMINAL VALUE [hw:] 500

- THAT ITS DURATION [illegible]

- THAT ITS DOMICILE IS PANAMA, PANAMA PROVINCE

ISSUED IN PANAMA PROVINCE ON TUESDAY, 08 DE SEPTEMBER 2015 AT 04:57 PM

NOTE: THIS CERTIFICATION PAID DUTIES WORTH 30.00 BALBOAS WITH THE NUMBER OF PAYMENT 14005S7273

[illegible]

REGISTRATION DUTIES



N° 1401291109

To [illegible] in the Tale

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Date: 05/12/2017
 [illegible] JOSE SR. VA RITTER (8-225-1020)
 EIGHTH NOTARY'S OFFICE OF THE PANAMA CIRCUIT
 [illegible] 6536
 [illegible] 05/10/2017

[illegible]
 [illegible]
 [illegible]
 [illegible]
 [illegible]
 [illegible]

[illegible]

Signature [illegible] _____ [signature]

METHOD OF PAYMENT	USA	DOLLARS	CTS
Cash	\$		0.00
Checks	\$		65.00
TOTAL	\$		65.00

ORIGINAL CONTRIBUTOR

[stamp:] GENERAL DIRECTORATE OF INCOME No. 116 2001 MAY 21 16 11:22 AUTHORIZED SIGNATURE [signature]

[signature] [hw:] 51574/200



REPUBLIC OF PANAMA

EIGHTH OF THE PANAMA CIRCUIT

PROVINCE OF PANAMA

Mr. Sudon. Boris Jucre Benjamin

NOTARY

Plaza Obarrio Building
Office 108
Ave. Samuel Lewis
Urb. Obarrio

Tel.: 264-6270
264-3676
213-8028
Fax.: 264-3506
Cell: 618-2550

E-mail: notaocta@cableonda.net

COPY

DEED N° 4,483 OF 9 OF May OF 2001.

BY WHICH:

The document is notarized containing the Authentic Copy of Public Deed No. 2955 of July 28, 1999 of the CORPORACION CIMEX, S.A., company granted before the Notary's Office of Havana, Cuba and authenticated by the Consul of Panama in Havana, Cuba, which contains the Minutes of the Extraordinary General Meeting of Shareholders of the Company.

[stamp:] Papei [illegible: Peace and
[illegible] inmuebia: [illegible]

[stamp:] José Silva MORGAN & MORGAN Identity Card No. 8-225-1020

REPUBLIC OF PANAMA
NOTARIAL PAPER



EIGHTH NOTARY'S OFFICE OF THE PANAMA CIRCUIT

PUBLIC DEED NUMBER FOUR THOUSAND FOUR HUNDRED AND EIGHTY-THREE -(4,483)-

Which notarizes the document containing the authentic Copy of Public Deed No. 2955 of July 28, 1999 of the company CORPORACION CIMEX, S.A., granted before the Notary's Office of Havana, Cuba and authenticated by the Consul of Panama in Havana, Cuba, which contains the Minutes of the Extraordinary General Meeting of Shareholders of the Company.

Panama, May 9, 2001.

In Panama City, Capital of the Republic and Head of the Notarial Circuit of the same name, on the ninth (9) day of the month of May of the year two thousand one (2001), before me, Mr. BORIS SUCRE BENJAMIN, Eighth Notary Public, of the Circuit of Panama, with identity card number eight - ninety-three -eight hundred and fifty-seven (8-93-857), appeared personally, ROBERTO LEWIS MORGAN, male, of legal age, Panamanian, lawyer, married, resident of this city, with personal identity card number eight - two hundred thirty-seven - four hundred (8-237-400), a person whom I know and who acting on behalf of the legal firm MORGAN Y MORGAN, with address in Calle fifty-three (53), Urbanization Obarrio, Swiss Tower, sixteenth floor (16) of Panama City, acting in his capacity as resident agent of the CORPORACION CIMEX, S.A., company, a public limited company duly registered in the Section of Commercial Microfilm of the Public Registry on Sheet zero three nine four four seven (039447), Roll two two one zero (2210), Image one zero five (105), presented to me for its notarization and for which purpose I notarize an authentic copy of public deed number two thousand nine hundred and fifty-five (2955) of the twenty-eighth (28) of July of one thousand nine hundred and ninety-nine (1999), which contains the Minutes of the Extraordinary General Meeting of Shareholders of the CORPORACION CIMEX, S.A., company, held on the seventeenth (17th) of June one nineteen hundred and ninety nine (1999), by which new Directors and Officers of company are appointed.- This document is transcribed in the copy of this Deed.- The requested notarization is made and the copies requested by the interested persons issued.-- -- The Notary notes that a copy of this instrument must be registered and read as it was to the persons appearing in the presence of instrumental witnesses JACINTO HIDALGO FIGUEROA, male, with personal identity card number two - sixty four - six hundred and fifty-six (2-64-656) and IDALMIS ALEIDA DE VALLARINO, female, with personal identity card number eight - one hundred and sixty-four -three hundred and thirty-seven (8-164-337), both of legal age, Panamanians and residents of this city whom I know and are able to act as such found it correct, gave it their approval and they all sign for the record before me, the Notary I attest.-----

THIS PUBLIC DEED HAS THE NUMBER FOUR THOUSAND FOUR HUNDRED AND EIGHTY-THREE -

(4,483)-

(Signed.) Roberto Lewis M.- Jacinto Hidalgo Figueroa.- Idalmis Aleida de Vallarino BORIS SUCRE BENJAMIN, Eighth Public Notary of the Circuit of Panama.----- International Legal Consultancy NOTARY - Deed No.2955 - MINUTES OF NOTARIZATION - NOTARY: ATTORNEY BARBARA RODRIGUEZ GANDARA -DATE: JULY 20, 1999- GRANTORS: ATTY. MAGALY RODRIGUEZ GARCIA - **NUMBER:** TWO THOUSAND NINE HUNDRED FIFTY-FIVE -- **NOTARIZATION ACT** -- In the City of Havana, Republic of Cuba, July 28, 1999.--- **BEFORE ME:** ATTORNEY BARBARA RODRÍGUEZ GANDARA, Notary of the International Legal Consultancy, with competence and headquarters in Havana City. --- **APPEAR:** MAGALY RODRIGUEZ GARCIA, attorney attached to the International Legal Consultancy, with permanent identity number 64111915679. -- **ATTENDS** in the name and on behalf of the CORPORACION CIMEX, S.A. company, and in her role as a lawyer.--- **ASSERTS THAT SHE HAS** and in my opinion has the necessary legal capacity for this act and STATES: - - **FIRST:** That she instructs me, the Notary, to notarize after this Act, the **MINUTES OF THE EXTRAORDINARY GENERAL MEETING OF SHAREHOLDERS OF THE PANAMANIAN COMPANY CORPORACION CIMEX, S.A.**, carried out in Havana, Republic of Cuba on June 17 of this year- I, the Notary, proceed to the notarization in question of this Act, the related document, which I have examined and consists of 1 folio written in the Spanish language,----- **SECOND:** That for the pertinent legal effects she declares not to be an interested party in the notarization of the aforementioned document, since it is by mandate* that it is authentic and that the data it contains is true, responding to third parties for the damages that her false statement could result in, -----**HAVING READ** this document in full and in one act, in accordance with its content, ratifies and signs before me.--- OF ALL OF WHICH, and the identity of the applicant, I the notary, ATTEST.----- **SIGNED:** ATTORNEY MAGALY RODRIGUEZ GARCIA.- ATTORNEY BARBARA RODRIGUEZ GANDARA-- SEAL OF THE NOTARY'S OFFICE #8931.- MINUTES OF THE EXTRAORDINARY GENERAL MEETING OF SHAREHOLDERS OF THE PANAMANIAN COMPANY CORPORACION CIMEX, S.A.,.--- In the city of Havana, Republic of Cuba, at nine thirty a.m. of the seventeenth day of June of one thousand nine hundred and ninety-nine, in the offices of the branch of the company, a meeting was held that did not require a call as all of the company's shareholders were present,--- having verified the existence of the regulatory quorum, the session was declared open, which was chaired by Dr. Eduardo Andrés Bencomo Zurdos, in his capacity, as President and the Attorney Andrés Perdono Guache, in his capacity as Secretary. - - After exchanges of opinions, after a motion was duly raised and supported, the following unanimous SOLE AGREEMENT was made: That the members of the Board of Directors appointed previously cease in their posts and appoint a new Board of Directors, which shall be composed of the following persons, who shall be the new

[seal:] REPUBLIC OF PANAMA EIGHTH
NOTARY'S OFFICE OF THE CIRCUIT

REPUBLIC OF PANAMA
NOTARIAL PAPER

[stamp:] [illegible]



EIGHTH NOTARY'S OFFICE OF THE PANAMA CIRCUIT

officers of the company:-----

----- Eduardo Andrés Bencomo Zurdos ----- President -----

----- Orlando Pérez Rodríguez ----- First Vice-President--

----- Manuel Sanz Farrás ----- Vice-President-----

----- Digna Hierro Rodriguez ----- Comptroller -----

----- Maximino Martínez Fornell ----- Treasurer -----

----- Andrés Perdomo Guache ----- Secretary -----

Then, the persons appointed for the positions being present, they acknowledged the respective designations to which they were subject, accepting said offices and taking possession of them.--- It was also agreed to empower Attorney Magaly Rodriguez García, in order to proceed with the notarization of a copy of this Act.-- And there not being any other matter to deal with, the meeting was concluded at ten a.m. on the date indicated above.----- (Signed.) Dr. Eduardo Andrés Bencomo Zurdos ----- President----- (Signed.) Atty. Andrés Perdomo Guache - Secretary - CERTIFICATION: I, Attorney Andrés Perdomo Guache, Secretary of company, CERTIFY that this act is a faithful copy of that contained in the Book of Acts of company.----- (signed) Atty. Andrés Perdomo Guache ---Secretary -----

MATCHES ITS ORIGINAL which under the order number in its heading and in the Records of this Notary's Office under my charge, to which I refer; leaving the corresponding stamps fixed and cancelled. And for the person appearing I issue a literal copy of this instrument on 1 sheet of paper printed in an automated form.-----

City of Havana, Republic of Cuba, on the date of its authorization, I ATTEST (Signed) illegible - STAMP - International Legal Consultancy - Notary's Office #8931 REPUBLIC OF CUBA - MINISTRY OF EXTERNAL RELATIONS - DEPARTMENT OF CONSULAR AFFAIRS AND CUBANS RESIDENTS ABROAD - José R. Cabañas Rodríguez, /or Manuel Capaz Ruiz, /or Mercedes de Armas García, /or Jesús Fernández Ponce, /or María Silvia Fernández Villar, /or Eduardo Valido García-'.- Officials authorized to certify Signature Authentications in Documents issued to take effect abroad.-CERTIFY; THAT IN THE OPINION OF THE AUTHORIZING OFFICER, THE PRECEDING SIGNATURE APPEARS TO BE AUTHENTIC BECAUSE OF ITS SIMILARITY WITH THE ONE THAT IS FOUND REGISTERED IN THIS CENTER AND THE ONE HE USES BY CUSTOM IN HIS OFFICIAL ACTS.- IN WITNESS THEREOF I AUTHORIZE THIS DOCUMENT WITH THE SIGN AND THE STAMP OF THIS MINISTRY.. HABANA AUG 02 1999 (Signature] Illegible.-- SEAL Republic of Cuba-Ministry of Foreign Affairs-Stamp -- REPUBLIC OF PANAMA - Ministry of Foreign Affairs-- Consular Department and Legalizations CERTIFICATE OF AUTHENTICITY -- Official Receipt 998184 The undersigned JUAN RAMON DE ROUX DE LA GUARDIA, AMBASSADOR OF THE REPUBLIC OF PANAMA IN CUBA - CERTIFIES: that the signature that appears in the attached document that

states: MARIA SILVIA FERNANDEZ VILLAR is authentic and corresponds to the one she usually uses in the documents that she authorizes as a SPECIALIST of THE MINISTRY OF EXTERIOR RELATIONS OF CUBA.--- Executed in the City of HABANA on the 5th day of the month of AUGUST 1999.---(Signed) JUAN RAMON DE ROUX - AMBASSADOR OF PANAMA -- SEAL CONSULATE OF PANAMA, HABANA, CUBA.-----

The undersigned official of Legalizations of the Ministry - of Foreign Affairs duly authorized for this act CERTIFIES: That the above signature says: JUAN RAMON DE ROUX DE LA GUARDIA, belongs to the official who on August 5th year 1999 held the position of AMBASSADOR OF THE REPUBLIC OF PANAMA IN HABANA CUBA - Panama, May 8, year 2001.-----

Authentication No. 132/mc --- Signature of the official JUAN J. CHAVARRIA G.- ASSISTANT HEAD OF LEGALIZATIONS AND AUTHENTICATIONS - MINISTRY OF EXTERNAL RELATIONS.-----

This Ministry assumes no responsibility on the content of the document.-- Agrees with BU original this copy that I issued, sign and stamp in Panama City, Republic of Panama, at nine (9) days of the month of May of the year two thousand one (2001).

[signature]

[seal:] REPUBLIC OF PANAMA EIGHTH NOTARY'S OFFICE OF THE CIRCUIT

[stamp:] Mr. Boris Sucre B. Eighth Notary Public

Registered in the Public Registry of Panama

Province:	Panama	Date and Time:	2001/05/21 11:48:44:4
Volume:	2001	Entry:	51574
Applicant:	JOSE SILVA	Identity Card:	8-225-1020
Payment No.:	8186953	Total Duties:	50.00
entered By:	ESIS		

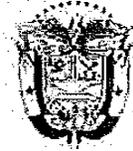
[signature]

[seal:] REPUBLIC OF PANAMA EIGHTH NOTARY'S OFFICE OF THE CIRCUIT

[seal:] REPUBLIC OF PANAMA EIGHTH
NOTARY'S OFFICE OF THE CIRCUIT

REPUBLIC OF PANAMA
NOTARIAL PAPER

[stamp:] [illegible]



EIGHTH NOTARY'S OFFICE OF THE PANAMA CIRCUIT

REGISTERED THE ABOVE DOCUMENT IN THE PUBLIC REGISTRY OF PANAMA

Department of _____ ([illegible]) _____

Tab [hw:] 39447 _____

Document [hw:] 735767 _____

Duties [hw:] 50,00 _____

Panama. [hw:] 30 *illegible* _____

[seal:] REPUBLIC OF PANAMA EIGHTH NOTARY'S OFFICE OF THE CIRCUIT

[signature]

Exhibit 24

Factbox: Cimex, Cuba's largest commercial corporation



(Reuters) - President Raul Castro has put Colonel Hector Oroza Busutin in charge of Cuban Export-Import Corporation, or CIMEX, Cuba's largest commercial corporation, as part of his campaign to increase efficiency and reduce corruption.

The state-owned company that Oroza will run has operations ranging from banking to jewelry stores, but there is little detailed information available on its more than 80 companies and 25,000 employees.

What follows comes from the CIMEX web page, www.cimexweb.com, and the last annual information released by the company covering 2006, when revenues were \$1.3 billion, with 48 percent of that coming from retail operations and the rest from its other businesses.

* FINANCE - The company operates the Banco Financiera Internacional, one of the three most important state-run banks in Cuba, which specializes in financing trade operations. Its financial division, FINCIMEX, clears all foreign credit card transactions in Cuba and manages all remittance wire transfers from the United States and most other countries, operating for example more than 100 outlets with Western Union.

* INTERNATIONAL TRADE - CIMEX accounts for between 6 percent and 10 percent of all foreign trade and operates the Melfi Marine container shipping company, Zelcom free trade zone and two companies that handle customs and other logistics, ADESA and AISA. The company maintains numerous offices abroad and exports specialty products such as rum, coffee, cigars, ice cream, perfume, soda, fruit juice, seeds, jewelry and commemorative items.

* TOURISM - The company's travel agency, Havanatur, is the country's oldest and largest with a monopoly on travel from the United States, while Havanauto is the largest rent-a-car agency and also provides taxi service.

ADVERTISEMENT

* DOMESTIC TRADE - The company operates around a dozen wholesale outlets and a similar number of factories to process food for its outlets. In 2006, CIMEX operated 2,747 retail outlets, including 1,188 Panamericanas all-purpose stores, 363 gas stations (Servi-Cupet), 1,128 eateries from fast food to full service restaurants, 49 photo shops and 14 video stores, some of which were located in its numerous commercial centers. The company reported it accounted for 46.1 percent of foreign exchange retail sales in 2006 and 70 percent of gas station revenues.

* REAL ESTATE - In 2006 the company owned 13 office buildings and condominiums, but the number has increased since then.

* OTHER BUSINESSES - Cimex operates businesses in almost every sector of the economy. The following are some of the most important:

Coral Negro - Jewelry and sale of international brand watches in Cuba.

Casa de la Moneda - Mints commemorative coins and medals.

ADVERTISEMENT

Contex - Cuban fashion and uniforms.

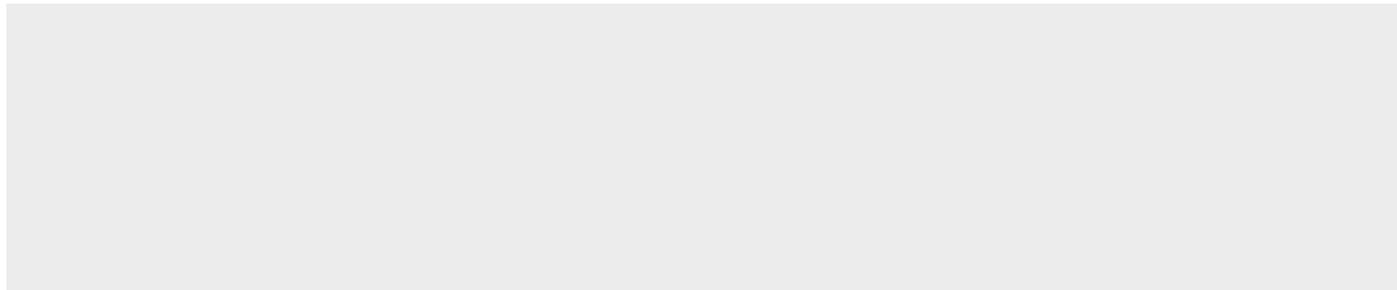
Imagines - Advertising and operates the only satellite television service.

Ecuse - Construction and automotive service.

Cubapack - International package and messenger service and online shopping for delivery inside Cuba.

Producciones Abdala S.A. - Recording studio and Unicorn record label.

Tecun - Importation, assembly and sale and service of computer technology.



Venezuela's Guaido heads home to lead protests
La Cerrajería Integral - Security systems.

La Maison - fashion

Reporting by Marc Frank in Havana; Editing by Jeff Franks and Cynthia Osterman

Our Standards: The Thomson Reuters Trust Principles.

Exhibit 25

GRUPO GAESA, the business emporium of the armed forces

3 January 2018

(<https://twitter.com/targetemilio>)

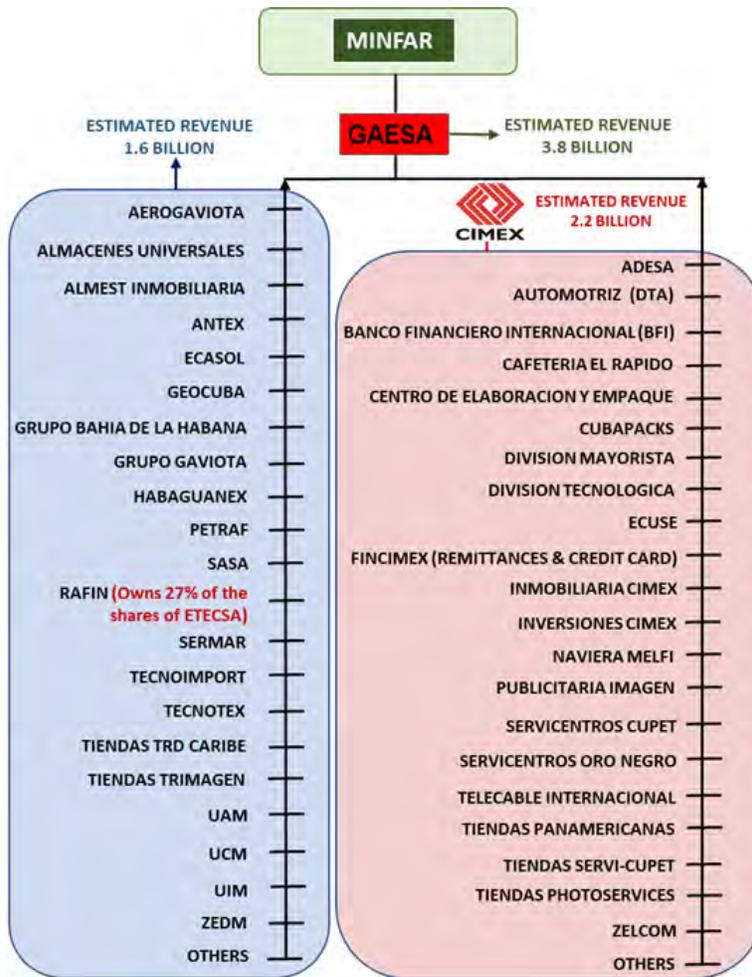
(<https://www.youtube.com/user/THCG123/feed>)

By HCG BUSINESS INTELLIGENCE UNIT Economic (/en-?categoryId=4)

It is essential for any foreign investor, executive or company interested in exploring business opportunities in the Cuban market to know GRUPO GAESA, an entity owned by the Ministry of the Armed Forces (MINFAR) and be aware of the scope and power that GRUPO GAESA has within the Cuban economy, given the strategic positioning of its companies in many strategic sectors of the Cuban market.

Currently GAESA is the leader within certain strategic sectors of the country's economy, such as the retail market, the tourism sector, the Mariel Special Development Zone (ZEDM), telecommunications, finance, the automotive market and the real estate sector, among others. Its business structure is made up of dozens of companies, which operate in the dollarized market.

Figure 1. GRUPO GAESA business structure, 2016



Source: Havana Consulting Group.

Scope of GAESA

In the history of the Cuban revolution, the armed forces had never concentrated as much economic power on their hands as they do today. During the times that Fidel Castro governed, GAESA played a relatively minor role in the Cuban economy. Its business model was geared at raising funds to finance the activities of the armed forces and reduce their financial burden on the state. The situation is different today: GAESA has become an entrepreneurial octopus that has gradually gathered the most lucrative sectors of the Cuban economy. It is estimated that its operations in 2016 amounted to about 3.8 billion dollars.

Among its most notable acquisitions in recent years are CIMEX Corporation, Habaguanex SA and Banco Financiero Internacional (BFI). Undoubtedly, these three acquisitions have made GAESA one of the most lucrative and powerful companies not only on the island but in the Caribbean region.

The reestablishment of diplomatic relations between Cuba and the US is one of the factors that contributed to the growth of GAESA as a business holding unparalleled in the Cuban economy. The domino effect caused by the thaw generated an unprecedented interest in exploring Cuba as an investment destination not only by American entrepreneurs but also by those from all over the world. Thus, GAESA positioned itself rapidly in sectors where foreign investment was anticipated. Examples are the Mariel Special Development Zone (ZEDM), the location designed to become the country's industrial and technological locomotive; the mega tourist project of the port of Havana and the development of the the historical center of the country's capital, the most emblematic and visited area of the island by foreign tourists populated by museums and historical-cultural locations, hotels, bars, and shops; 85% of the dollarized retail market, commanding the largest networks of convenience stores, gas stations, fast food chains, etc., which are the main points where a large part of the remittances sent by Cuban exiles are spent; 27% of the shares of ETECSA, the country's telecommunications monopoly that controls a growing market for cellular telephony users (4.3 million users) and the distribution of Internet access; the tourist sector with two powerful hotel chains (Gaviota S.A and Habaguanex S.A) that have the majority of the 5- and 4-star hotels in the most strategic tourist poles of the country; and part of the financial sector, through the International Finance Bank (BFI) and the non-bank entity FINCIMEX, which is in charge of the receipt of remittances and controls the magnetic cards for the purchase fuel and credit cards used by tourists.

With this broad presence in the Cuban economy, it is easy to see that a good part of the businesses where the greatest investment opportunities lie are in the hands of the Cuban Armed Forces. That is why the new measures announced by the Trump Administration are aimed at preventing business with these entities controlled by the military, which would be very strong competitors to US companies that are exploring with interest the sale of their products and services in the Cuban market.

CIMEX is the largest and most powerful holding company under the GAESA umbrella. In Figure 2 we show a group of the most important companies affiliated with CIMEX.

Figure 2. Description of some of the companies belonging to CIMEX S.A., 2017

Main companies operating under the umbrella of GAESA GROUP		
COMPANY	DESCRIPTION	ENTITIES
	Import and Export Company, legally known as Corporación CIMEX. It is dedicated to importing, exporting and marketing a wide range of products. Operates in both wholesale and retail trade. In its retail network it has 1,558 stores of different categories. It also has real estate, financial, and logistics businesses. In the last 10 years, the annual rate of growth of income has been 9.8% and that of the profit of 6.0%, with a good recovery of the invested capital. In 2016, its income exceeded 2,600 million pesos.	Belongs to the GAESA Group of the Armed Forces
	Tiendas Panamericanas. Retail chain specialized in the sale of a wide range of products. It has 39 department stores, 178 mixed stores, 177 specialty stores, 8 Duty Free stores, 1,160 local stores (551 sales outlets and 502 kiosks).	CIMEX. Belongs to the GAESA Group of the Armed Forces
	CUPET-CIMEX Gas Station Network. It sells fuel of different octane and sell parts and spare parts for the automotive market, as well as a large number of miscellaneous. It has a network of 450 units in every province of the country. Belongs to CIMEX Corporation.	CIMEX. Belongs to the GAESA Group of the Armed Forces
	Gas Station Network ORO NEGRO. It sells fuel of different octane and sell parts and spare parts for the automotive market, as well as a large number of miscellaneous. It has a network of 217 units in every province of the country. It is a company of the CIMEX Corporation.	CIMEX. Belongs to the GAESA Group of the Armed Forces
	PHOTOSERVICE. Store chains specializing in photo services and print jobs. It has a network of 38 units. It is a company of the CIMEX Corporation.	CIMEX. Belongs to the GAESA Group of the Armed Forces
	EL RAPIDO. Fast food chain with 241 units across the country. Belongs to CIMEX Corporation.	CIMEX. Belongs to the GAESA Group of the Armed Forces
	FINCIMEX. Non-bank entity that has the only Electronic Card Processing Center in Cuba, backed by a leading foreign bank. It operates the international cards VISA, MASTERCARD and CABAL. It emits and operates all domestic cards and their diverse benefits. It manages most of the family remittances that are received through official channels. It is an exclusive agent of Western Union and has 527 outlets for the payment of remittances throughout the country. Belongs to CIMEX Corporation.	CIMEX. Belongs to the GAESA Group of the Armed Forces
	MELFI MARINE CORP. It is a 100% Cuban owned container shipping company, operating from and to ports in the Mediterranean, Portugal, Canada, Central America, South America and the Caribbean. It operates an average of 6 ships per year and carries an average of 45,900 containers annually. Belongs to CIMEX Corporation.	CIMEX. Belongs to the GAESA Group of the Armed Forces
	INMOBILIARIA CIMEX. Manages buildings and commercialization in leasing of apartments, homes, commercial premises and offices in the national territory. Controls the shareholding in 6 mixed real estate companies. It has 15 buildings, 8 of which are owned by Inmobiliaria CIMEX and 7 mixed; with a housing project of 610 apartments. Belongs to CIMEX Corporation.	CIMEX. Belongs to the GAESA Group of the Armed Forces
	CUBAPACK. Company specialized in the distribution and shipping of international parcels and courier services. Belongs to CIMEX Corporation.	CIMEX. Belongs to the GAESA Group of the Armed Forces

Source: Havana Consulting Group.

Apart from CIMEX, GAESA has other companies that serve other sectors of the Cuban economy such as tourism, retail, automotive and logistics; some of them are included in Figure 3.

Figure 3. Description of some of the companies belonging to the GAESA Group, 2017

Main companies operating under the umbrella of GAE GROUP		
COMPANY	DESCRIPTION	ENTITIES
	Servicio Automotriz S.A. Servicio Automotriz S.A. It is a company dedicated to the automotive sector with specialized workshops for repair and maintenance of light and heavy equipment. It has service and maintenance workshops, in all provinces of the country. Represent the car brands Peugeot, Renault, Fiat, Hyundai and Mercedes Benz.	Belongs to the GAE Group of the Armed Forces
	TRD CARIBE. Retail chain specialized in the sale of a wide range of products. It has 1,646 units divided into: 9 Shopping Centers, 8 Hardware Stores, 2 Confectionery Stores, 40 Kiosks, 4 Markets, 7 Minisupermarkets, 617 Selling Points, 368 Stores, 553 Mixed Stores, 15 Specialty Stores and 20 Technical Service Shops.	Belongs to the GAE Group of the Armed Forces
	GAVIOTA S.A. It is the largest hotel company in Cuba, with hotels in the main tourist centers of the country. It has 56 hotels, owns about 40% of the rooms in the hotel sector. It manages 57.3% of the 4 and 5-star hotel rooms across the country. It makes about 800 million dollars annually. It also has 5 marinas, 26 restaurants, 18 recreational centers, a domestic charter company, travel agency, taxi agency, a tourist transport company and an importing company of supplies for the tourist sector.	Belongs to the GAE Group of the Armed Forces
	HABAGUANEX S.A. It is the hotel company that manages most of the hotels in Havana's Historical Center. It has 14 hotels, 3 of them are 5 stars and 11 are 4 stars.	Belongs to the GAE Group of the Armed Forces
	ALMACENES UNIVERSALES. Logistics company dedicated to the transportation and storage of goods. It is the largest logistics company in the country, operates in all provinces and in the Mariel Special Development Zone (ZEDM). It offers a great variety of services, among them the rental of warehouses for the sale of products on consignment, the leasing of dry and refrigerated containers, loading and unloading of containers, etc.	Belongs to the GAE Group of the Armed Forces

Source: Havana Consulting Group.

Also, under the umbrella of the GAE Group there are other companies and strategic projects with great investment potential for the future. They are listed in Figure 4.

Figure 4. Description of some of the companies belonging to the GAE Group, 2017

Main companies operating under the umbrella of GAE GROUP		
COMPANY	DESCRIPTION	ENTITIES
	RAFIN S.A. It is a non-bank entity that owns 3,276 class B shares, equivalent to 27.003% of the share capital of ETECSA, for which it paid \$ 706 million dollars in 2011. Rafin SA was created in 1997 and is considered the financial arm of GAE belonging to the Ministry of the Revolutionary Armed Forces (MINFAR). The company is dedicated to the financing of imports, exports and investments. It also administers monetary funds in freely convertible currency corresponding to reserves and centralized funds of companies and Cuban organizations. It provides financial leasing services and debt refinancing operations, among other activities.	Belongs to the GAE Group of the Armed Forces
ANTEX	ANTEX. Company that is dedicated to the export of products and services abroad. Among the most prominent businesses are the export of labor abroad (doctors, builders, teachers, etc.). Its main market is the African continent, specifically Angola, where about 4,000 people are hired.	Belongs to the GAE Group of the Armed Forces
GRUPO BAHIA DE LA HABANA	GRUPO BAHIA DE LA HABANA. It is the business group that is in charge of the tourist megaproject of the port of Havana. A project estimated to have investments worth US \$ 30 billion in Havana's port area, which are divided into a diverse range of works: terminal to serve 8 cruise ships, ferry terminal, hotels, buildings office, apartments, a golf course, shops theaters, bars, entertainment centers, real estate businesses, marinas, theme parks, etc.	Belongs to the GAE Group of the Armed Forces
	Zona Especial de Desarrollo Mariel. It is a zone destined to attract foreign investment and technological innovation and promote industrial concentration. It has an area of 465.4 km² and is located to the west at a distance of 45 km from Havana. It is intended to become the industrial, technological and financial heart of the country in the coming years.	Belongs to the GAE Group of the Armed Forces

Source: Havana Consulting Group.

Current importance of GAE in the Cuban economy

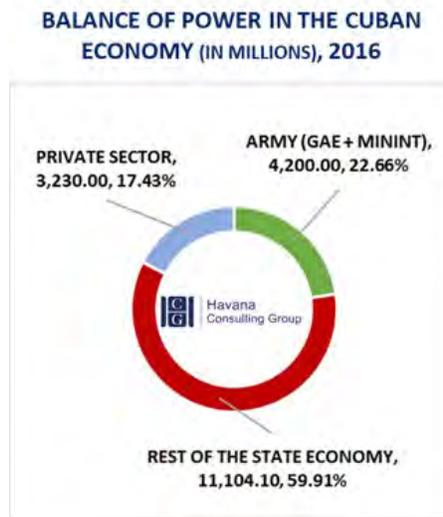
In 2016 it was estimated that GAE's business operations generated 21% of the gross income of the Cuban economy.

In recent years the structure of the Cuban economy has undergone notable changes, especially as a result of the reforms undertaken by Raúl Castro and the impact of the thaw in relations with the United States government. In this new scenario, two key developments have occurred: first, the growth of GAE and its expansion throughout the economy and second, the growth of the private sector despite its limitations and the very limited space where its development is allowed.

The former has become a corporate superstructure with enormous economic power and has positioned itself in several of the most strategic sectors of the dollarized economy. In addition, GAE has placed under his control the most strategic investment projects of the next 30 years, such as the ZEDM and the tourist megaproject of the port of Havana, among others. In this way, GAE guarantees its future growth, practically without any type of competition.

The private sector has been innovative, persevering and successful. Despite the limitations it faces by virtue of not being legally recognized as companies, not having a wholesale market for the purchase of its inputs, burdened by a 50% tax rate and limited to some 201 modalities, the private sector competes with the state sector and bests it in several sectors and territories of the country. As a result of its growth, 535,000 people have become independent of the state and this sector currently generates 17.8% of the gross income of the economy. See Figure 5.

Figure 5. New balance of power in the Cuban economy, 2017.



Source: Havana Consulting Group.

CONCLUSIONS

In almost 60 years of socialist economy never had a government company concentrated as much power in its hands as has GAE. Nor had the non-state sector reached such high importance within the island's economy.

Two new forces have emerged in the midst of the reforms undertaken by the government. GAE, with a lot of power behind it, is unencumbered in decision-making as to where, in what, and how to invest and with whom to associate. In contrast, the private sector is limited in the scope of its activities, burdened by high taxes and lack of legal personality, constrained in its ability to associate with others and make investments, and pursues the sole purpose of succeeding, generating wealth, and being able to expand its activities to improve its economic situation and contribute to the development of the country.

The economic future of the island will be closely linked to the development of both forces. At the moment, an economic opening process is not visualized, where both forces could compete as equals. On the contrary, in the midst of this new scenario, what has emerged is a process of castration of the nascent private sector and empowerment of the forces that represent a monopolistic state capitalism, concentrated mainly in the military forces. Left behind is the inefficient rest of the state sector, populated by some successful conglomerates (e.g., those operating as joint ventures with the government, in the tobacco sector, tourism, biotechnology, and food industry, among others) and thousands of inefficient and unproductive companies, weighted down by bureaucracy, technological backwardness and mediocrity, and constituting a tremendous fiscal burden on the country.

This inoperative third force in the country's economy employs a workforce of more than 4 million people. In the future, the state will have to decide if it maintains this sector or it reassigns it to the octopus GAE or to the private sector. If it decides to reassign the current state sector, this process will have two possible paths: the absorption by GAE of the most lucrative sectors that are still in the hands of the state bureaucracy or the enactment of new laws that would liberalize the productive forces. Unless the latter occurs, the Cuban economy will continue in its never-ending stagnation.

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[Publications \(\(X\(1\)S \(llvmgqidzfojs0g0hhckq5pn\)\)/en-/Publications/Publications\)](#)

[Our teams \(\(X\(1\)S \(llvmgqidzfojs0g0hhckq5pn\)\)/en-/OurTeams/OurTeams\)](#)

[Contact \(\(X\(1\)S \(llvmgqidzfojs0g0hhckq5pn\)\)/en-/Contact/Contact](#)

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[Mision & Vision \(\(X\(1\)S \(llvmgqidzfojs0g0hhckq5pn\)\)/en-/Index/MisionAndVision\)](#)

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- 8** Broad Legal Brushstrokes for Potential Investors in Cuba.
(/en-/Articles/Article/9)
- 9** Launch of new book about the non-state sector in Cuba
(/en-/Articles/Article/24)

Exhibit 26

This company name is the same as, or similar to, a risk relevant name in the LexisNexis WorldCompliance database.

Havana, Cuba

BvD ID number
Latest account date

CU0000022605
 12/31/2017

The Global Ultimate Owner of this controlled subsidiary is STATE OF CUBA

Contact information

Edificio Sierra Maestra, Calle 1 E/ 0 y 2, La Puntilla, Miramar
 Havana
 Cuba

Telephone number
Fax number
Website address
E-mail address

+53 72039274
 +53 72042163
 www.cimexweb.com
 emaceda@cimex.com.cu

Beneficial owners

Beneficial owner status:

No beneficial owner.
 1 other ultimate beneficiary which is a public authority (CU).

Current definition of the BO:

Path of min 10.00% at first level, minimum 10.01% at further levels, incl. top level individuals with unknown percentage or with min 10.00% (10.01% at each level)

List of other ultimate beneficiaries	Country	Distance	Type	Indep. Ind.
1. State of Cuba HABANA	CU	3	Public authority, state, government	-



Path to the beneficial owners and other ultimate beneficiaries

	Country	Direct %	Total %	Source	Date
1. <u>State of Cuba</u>	CU	MO	n.a.	WW	01/2019
<u>MINISTERIO DE LAS FUERZAS ARMADAS REVOLUCIONARIAS</u>	CU	MO	n.a.	WW	06/2017
<u>Grupo de Administracion Empresarial, S.A.</u>	CU	MO	n.a.	WW	03/2018
<u>Corporacion CIMEX S.A.</u>	CU				

Controlling shareholders

BvD Independence Indicator: D

Current definition of the UO: path of min 50.01% of control, known or unknown shareholders, any entities.

The companies underlined and displayed in bold blue are available on [ORBIS](#)

Shareholder name	Country	Type	Ownership		Source		Company information		
			Direct (%)	Total (%)	Since ident.	Last app. info.	Op. Revenue (m USD)*	No. of employees	
STATE OF CUBA (Domestic and Global UO)	CU	S	MO	n.a.	WW	01/2019	-	-	
MINISTERIO DE LAS FUERZAS ARMADAS REVOLUCIONARIAS	CU	S	MO	n.a.	WW	06/2017	-	-	
GRUPO DE ADMINISTRACION EMPRESARIAL, S.A.	CU	C	MO	n.a.	WW	03/2018	n.a.	1,520	
CORPORACION CIMEX S.A.	CU	C					1	25,000	

= Name is the same as, or similar to, a PEP's name or a risk relevant name in the LexisNexis WorldCompliance database.

* = For an insurance company the corresponding value is the Gross Premium Written and for a bank it is the Operating Income (memo)

Corporate group - by level

Current definition of the UO: path of min 50.01% of control, known or unknown shareholders, any entities.

Current filter: No filter

The companies underlined and displayed in bold blue are available on **ORBIS**

No of companies in corporate group: 93 companies

Name	Country	Direct (%)	Ownership Total (%)	Level of own.	Source ident.	Date of info.
Global Ultimate Owner:						
STATE OF CUBA	CU					
Ultimately owned subsidiaries:						
1. BANCO CENTRAL DE CUBA	CU	100.00	100.00	1	WW	02/2014
1.1. HAVIN BANK LIMITED	GB	95.60	n.a.	2	RT	09/2018
2. BANCO EXTERIOR DE CUBA	CU	100.00	100.00	1	RS	12/2012
3. COMMERCIAL CARIBBEAN NICKEL, S.A.	CU	100.00	100.00	1	WB	02/2019
3.1. RECUPERACION DE METALES SA	CU	51.00	n.a.	2	WB	02/2019
4. CORPORACION DE TURISMO Y COMERCIO INTERNACIONAL CUBANACAN, S.A.	CU	100.00	100.00	1	WB	02/2019
5. EMPRESA COMERCIAL GEOMINERA	CU	100.00	100.00	1	WB	02/2019
6. UNION CUBA-PETROLEO, S.A.	CU	100.00	100.00	1	WB	02/2019
7. ALMACENES UNIVERSALES, S.A.	CU	-	100.00	1	WB	02/2019
8. BANCO FINANCIERO INTERNACIONAL, S.A.	CU	-	100.00	1	WB	02/2019
9. EMPRESA COMERCIAL CARACOL S.A.	CU	-	100.00	1	WB	02/2019
10. EMPRESA COMERCIALIZADORA DE ARTICULOS EN GENERAL	CU	-	100.00	1	WB	02/2019
11. EMPRESA COMERCIALIZADORA DE OBJETIVOS INDUSTRIALES, MAQUINARIAS, EQUIPOS Y ARTICULOS DE FERRETERIA	CU	-	100.00	1	WB	02/2019
12. EMPRESA COMERCIALIZADORA DIVEP	CU	-	100.00	1	WB	02/2019
13. EMPRESA CUBANA COMERCIALIZADORA DE MATERIAS PRIMAS Y PRODUCTOS INTERMEDIOS	CU	-	100.00	1	WB	02/2019
14. EMPRESA CUBANA EXPORTADORA DE ALIMENTOS Y PRODUCTOS VARIOS	CU	-	100.00	1	WB	02/2019
15. EMPRESA IMPORTADORA DE LA AGROINDUSTRIA AZUCARERA	CU	-	100.00	1	WB	02/2019
16. EMPRESA IMPORTADORA-EXPORTADORA DEL MINAL, ALIMPEX	CU	-	100.00	1	WB	02/2019
17. FRANCUBA S.A.	CU	51.00	n.a.	1	WB	02/2019
18. ALTAMAR PESQUERIA	CU	MO	n.a.	1	HS	01/2019
19. AMBLESEA	VC	MO	n.a.	1	HS	01/2019
20. ANIMEX SHIPPING	CU	MO	n.a.	1	HS	01/2019
21. ARCTIC LADY SHIPPING	CU	MO	n.a.	1	HS	01/2019
22. BANCO POPULAR DE AHORRO	CU	MO	n.a.	1	WW	07/2014
22.1. HAVIN BANK LIMITED	GB	2.20	n.a.	2	RT	09/2018
23. BESTA TRANSPORTACIONES	CU	MO	n.a.	1	HS	01/2019
24. BLACK SWAN SHIPPING	MT	MO	n.a.	1	HS	01/2019
25. BLUE NEXUS SHIPPING	BS	MO	n.a.	1	HS	01/2019
26. BOYMAR SHIPPING	CU	MO	n.a.	1	HS	01/2019
27. CAMP SHIPPING COMPANY LIMITED	CY	MO	n.a.	1	HS	01/2019
28. CENTRO DE INVESTIGACIONES PESQUERAS	CU	MO	n.a.	1	HS	01/2019
29. CONSTRUCTORA DEL MICON S	CU	MO	n.a.	1	HS	01/2019

Case No.	Name	Country	Direct (%)	Ownership		Level of own.	Source	
				09/20/20	10/20		Source Ident.	Date of info.
30.	CORAL CONTAINER LINES	CU	MO	n.a.	1	HS	01/2019	
31.	CUBA GOVT CAMERONERA CARIBE	CU	MO	n.a.	1	HS	01/2019	
32.	CUBA GOVT CAMERONERA DEL SUR	CU	MO	n.a.	1	HS	01/2019	
33.	CUBA GOVT EMPRESA ANTILLANA	CU	MO	n.a.	1	HS	01/2019	
34.	CUBA GOVT EMPRESA NACIONAL	CU	MO	n.a.	1	HS	01/2019	
35.	CUBA GOVT EMPRESA TERMINALES	CU	MO	n.a.	1	HS	01/2019	
36.	CUBA GOVT FLOTA ATUNERA	CU	MO	n.a.	1	HS	01/2019	
37.	CUBA GOVT INSTITUTO CUBANO	CU	MO	n.a.	1	HS	01/2019	
38.	CUBA GOVT UNIDAD PROVINCIAL	CU	MO	n.a.	1	HS	01/2019	
39.	DIEZMAR SHIPPING	CU	MO	n.a.	1	HS	01/2019	
40.	DRAGNETS	CU	MO	n.a.	1	HS	01/2019	
41.	EMPRESA CUBANA IMPORTADORA Y EXPORTADORA DE PRODUCTOS TECNICOS	CU	-	MO	1	WB	02/2019	
42.	EMPRESA DE NAVEGACION CARIBE	CU	MO	n.a.	1	HS	01/2019	
43.	EMPRESA DE NAVEGACION MAMBISA	CU	MO	n.a.	1	HS	01/2019	
44.	EMPRESA LABORATORIOS AICA	CU	-	MO	1	WB	02/2019	
45.	EPAMAC SHIPPING	MT	MO	n.a.	1	HS	01/2019	
46.	ESPLA SHIPPING CORP	CU	MO	n.a.	1	HS	01/2019	
47.	FRIGORIFICA MARITIMA	CU	MO	n.a.	1	HS	01/2019	
48.	GALAXIA AZUL NAVEGACION SA	CU	MO	n.a.	1	HS	01/2019	
49.	GEMMENS NAVEGACION	CU	MO	n.a.	1	HS	01/2019	
50.	GRUPO COMERCIAL MARITIMO	CU	MO	n.a.	1	HS	01/2019	
51.	GUYAGUA PESQUERA	CU	MO	n.a.	1	HS	01/2019	
52.	HUNTSVILLE NAVIGATION	MT	MO	n.a.	1	HS	01/2019	
53.	LATINO AMERICANO PESQUERA	CU	MO	n.a.	1	HS	01/2019	
54.	LISMAR SHIPPING	CU	MO	n.a.	1	HS	01/2019	
55.	MAR AMERICA NAVIERA	CU	MO	n.a.	1	HS	01/2019	
56.	MINISTERIO DE LAS FUERZAS ARMADAS REVOLUCIONARIAS	CU	MO	n.a.	1	WW	01/2019	
56.1.	GRUPO DE ADMINISTRACION EMPRESARIAL, S.A.	CU	MO	n.a.	2	WW	06/2017	
56.1.1.	EMPRESA CADENAS DE TIENDAS TRD CARIBE S.A.	CU	100.00	100.00	3	WB	02/2019	
56.1.2.	ALMACENES UNIVERSALES, S.A.	CU	MO	n.a.	3	WW	06/2017	
56.1.3.	BANCO FINANCIERO INTERNACIONAL, S.A.	CU	MO	n.a.	3	WW	06/2017	
56.1.4.	COMPANIA TURISTICA HABAGUANEX S.A.	CU	MO	n.a.	3	WW	06/2017	
56.1.5.	CORPORACION CIMEX S.A.	CU	MO	n.a.	3	WW	03/2018	
56.1.5.1	DISTRIBUIDORA CIMEX S.A.	CU	100.00	100.00	4	WB	02/2019	
56.1.5.2	DIVISION DATA CIMEX	CU	100.00	100.00	4	WB	02/2019	
56.1.5.3	DIVISION TECNOLOGICA	CU	100.00	100.00	4	WB	02/2019	
56.1.5.4	FINANCIERA CIMEX S.A	CU	100.00	100.00	4	WB	02/2019	
56.1.5.5	INMOBILIARIA CIMEX, S.A.	CU	100.00	100.00	4	WB	02/2019	
56.1.6.	EMPRESA INMOBILIARIA ALMEST	CU	MO	n.a.	3	WW	06/2017	
56.1.7.	GRUPO DE TURISMO GAVIOTA, S.A.	CU	MO	n.a.	3	WW	06/2017	
56.1.8.	RAFIN, S.A.	CU	MO	n.a.	3	WW	06/2017	
56.1.9.	TECNOIMPORT	CU	MO	n.a.	3	WW	06/2017	
56.1.10.	TECNOTEX	CU	MO	n.a.	3	WW	06/2017	
56.1.11.	UNION DE CONSTRUCCIONES MILITARES	CU	MO	n.a.	3	WW	06/2017	
56.1.12.	ZONA DE DESARROLLO INTEGRAL MARIEL	CU	MO	n.a.	3	WW	06/2017	
57.	MIRSEA NAVIERA	CU	MO	n.a.	1	HS	01/2019	
58.	NAVECARIBE HABANA	CU	MO	n.a.	1	HS	01/2019	
59.	NEPTUNE SKY SHIPPING INC	CU	MO	n.a.	1	HS	01/2019	
60.	NEXUS MANAGEMENT	CU	MO	n.a.	1	HS	01/2019	
61.	NEXUS REEFER	CU	MO	n.a.	1	HS	01/2019	
61.1.	PEZMARES SA	CU	MO	n.a.	2	HS	01/2019	
62.	NORTH ISLAND SHIPPING-CYPRUS	CY	MO	n.a.	1	HS	01/2019	
63.	NOVECO TRANSPORTE	CU	MO	n.a.	1	HS	01/2019	
64.	OLD GRACE MARITIME CORP	CU	MO	n.a.	1	HS	01/2019	
65.	PAN PACIFIC SHIPPING & TRADING	HK	MO	n.a.	1	HS	01/2019	
66.	PESCAMAR SA-CUBA	CU	MO	n.a.	1	HS	01/2019	
67.	PETROCOST NAVIERA	CU	MO	n.a.	1	HS	01/2019	
68.	PLAMAR SHIPPING	CU	MO	n.a.	1	HS	01/2019	
69.	POSEIDON NAVIERA	CU	MO	n.a.	1	HS	01/2019	
70.	RILOS MARITIME	MT	MO	n.a.	1	HS	01/2019	
71.	UNECA	CU	MO	n.a.	1	HS	01/2019	
72.	WALFI NAVEGACION	CU	MO	n.a.	1	HS	01/2019	
73.	WIN FAR MARINE INC	PA	MO	n.a.	1	HS	01/2019	

Current Directors / Managers / Contacts

Sources that rely on informal research and social networking are **shown**.

Boards & committees

 = Name is the same as, or similar to, a PEP's name or a risk relevant name in the LexisNexis WorldCompliance database

	Name	Original job title	Body	Source
1.	Mr Arthur Alvarez Nelson P416988312	- Member	BoD	WB

Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

2.	Mr Eduardo Bencomo P416988313	- Member	BoD	WB
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Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

3.	Ms Mayra Castaneda Calzadilla P416988317	- Director	BoD	WB
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Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

4.	Mr Efrain Diaz Agudo P416988314	- Member	BoD	WB
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Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

5.	Mr Mabel Moreira Ceballos P416988315	- Member	BoD	WB
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Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

6.	Mr Hortensia Muniz P416988316	- Member	BoD	WB
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Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

7.	 Mr Hector Oroza Busutil P216453189	- Director	BoD	WB
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Worldbox (Cuba) (received on 02/03/2019)

Current director positions are held in 7 companies.

8.	Ms Ana Maria Ortega Tamayo P244567362	- Deputy Director	BoD	WB
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Worldbox (Cuba) (received on 02/03/2019)

Current director positions are held in 2 companies.

9.	Mr Yurian Petrus P435968915	- Director	BoD	WB
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Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

10.	Mr Leonardo Santurio P216453188	- Member	BoD	WB
-----	------------------------------------	----------	-----	----

Worldbox (Cuba) (received on 02/03/2019)

Current director positions are held in 2 companies.

Management & staff

 = Name is the same as, or similar to, a PEP's name or a risk relevant name in the LexisNexis WorldCompliance database

	Name	Original job title	Dept	Source
1.	 Mr Hector Oroza Busutil P216453189	- Administrator	SenMan	WB

Worldbox (Cuba) (received on 02/03/2019)

Current director positions are held in 7 companies.

2. Ms Leticia Morales González - Chief Financial Officer - FinAcc WB
P381469890 Worldbox (Cuba) (received on 02/03/2019)

Current director positions are held in 2 companies.

3. Mr Edilberto Gomez Viguera - Chief Administration Officer - AdmDep WB
P450158848 Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

4. Mr Roberto Santiesteban Hdez - Chief Technical Officer - R&D WB
P450158847 Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

5. Mr Gladys Castro Sotolongo - Chief Information Officer - OthDep WB
P460724769 Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

6. Mr Pelayo N. Terry - Chief Import Officer - OthDep WB
P435968916 Worldbox (Cuba) (received on 02/03/2019)
- Chief Export Officer - OthDep WB
Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

7. Mr Yohandra Blanco - Manager - OthDep WB
P460724768 Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

8. Mr Danay Padron - Key Account Manager - OthDep WB
P450158846 Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

9. Ms Adriana Santos - Manager - OthDep WB
P460724767 Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

10. Mr Zaitel Suarez Rodriguez - Key Account Manager - OthDep WB
P460724773 Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

11. Mr Roberto Vizcaino Martinez - Manager - OthDep WB
P460724766 Worldbox (Cuba) (received on 02/03/2019)

Current director positions are only held in this company.

Mergers & acquisitions deals

Merger & acquisition deals related to the subject company

No mergers & acquisitions deals are available for this entity.

Merger & acquisition deals related to the linked companies

Legal & account information

Status	Active	Last available year	2017 (in Orbis since 04/2018)
National legal form	Limited company	No. of available years	8
Date of incorporation	01/01/1978	Account published in	USD
Type of entity	Corporate	Available accounts	Limited financial data
Information provider	Worldbox	Filing type	Local registry filing
		Accounting template	Industrial company

Size & group information

BvD major sector	Wholesale & retail trade		
Category of the company	Small company	BvD Independence Indicator	D
Operating revenue (2017)	1,300,000 USD	No of companies in corporate group	93
Number of employees (2017)	25,000	No of recorded shareholders	1
		No of recorded subsidiaries	6
		No of recorded branches	0

Industry & activities

Type of entity	Corporate
BvD major sector	Wholesale & retail trade
NACE Rev. 2 main section	G - Wholesale and retail trade; repair of motor vehicles and motorcycles

Trade description

The subject is engaged in import, export and wholesale of different types of products. Operations as a private company in the main lines of the economy in Cuba: Retail Network: - Pan American Stores Company, Servi-Cupet (gas stations), cafes The Fast, shops and photographic Videocentros Photoservice and Shopping Centers (galleries, shops and gastronomic), and small shops in neighborhoods - Melfi Marine shipping company, with multiple marine transportation services on scheduled routes and itineraries to the Caribbean, Canada and South America - ZELCOM, the largest free zone in the country, with storage capacity exceeding 400 containers, an industrial park, bonded warehouses, in Havana and Santiago de Cuba - A Central Purchasing for the activity of purchase and wholesale distribution - Havanatur International Group Tour Operators and Travel Agencies, the largest in the country, for handling tourists to Cuba and from the island to other destinations in the Caribbean - Havanautos, the Rent a Car market leader and unique support services throughout the country. In addition, taxis and Recreation - Black Coral Jewelry (black coral, gold, silver and precious stones), a distributor as well as watches and jewelry - Contex, the design and production of uniforms and fashion collections - Coinage and mint, with coins of high numismatic value and legal - Adesa, broker - Images, Advertising and Video production - ECU for the repair and maintenance of automotive and construction of buildings - CIMEX estate buildings and construction projects for office rent - Financiera CIMEX with Credit Card Center and Financial Services - BFI (Banco Financiero Internacional) Operations & Branches At the address, Edificio Sierra Maestra, Calle 1a E/ 0 y 2, La Puntilla, Miramar, Havana, La Havana, we find the subject's head office.

Products and services

Grocery products [source: Bureau van Dijk]

Industry classification codes**NACE Rev. 2 code(s)****Core code:**

4690 - Non-specialised wholesale trade

Primary code(s):

4690 - Non-specialised wholesale trade

Secondary code(s):

6420 - Activities of holding companies

NAICS 2017 code(s) {derived from NACE Rev. 2 codes}**Core code:**

4239 - Miscellaneous Durable Goods Merchant Wholesalers

Primary code(s):

423990 - Other Miscellaneous Durable Goods Merchant Wholesalers

424990 - Other Miscellaneous Nondurable Goods Merchant Wholesalers

Secondary code(s):

551111 - Offices of Bank Holding Companies

551112 - Offices of Other Holding Companies

Core code(s):

508 Machinery, equipment, and supplies wholesale dealing in

Primary code(s):

- 5085 - Industrial supplies wholesale dealing in
- 5099 - Durable goods, not elsewhere classified wholesale dealing in
- 5199 - Nondurable goods, not elsewhere classified

Secondary code(s):

- 6712 - Offices of bank holding companies
- 6719 - Offices of holding companies, not elsewhere classified
- 6722 - Management investment offices, open-end

Exhibit 27

U.S. DEPARTMENT OF THE TREASURY

Press Center

Treasury Designates & Blocks 10 Entities for Cuban Embargo Violations

2/9/2004

FROM THE OFFICE OF PUBLIC AFFAIRS

js-1161

MIAMI--Today Treasury Secretary John Snow announced that Treasury's Office of Foreign Assets Control ("OFAC") is identifying ten entities, listed below, that it has determined are owned or controlled by the Government of Cuba or Cuban nationals. These ten include entities organized and located in Cuba as well as entities located in Argentina, the Bahamas, Canada, Chile, the Netherlands, and England. Nine of the ten are travel companies specializing in Cuba travel, and one is a gift forwarder to Cuba.

All property of these entities that is in the possession of persons subject to U.S. jurisdiction is blocked and no persons subject to U.S. jurisdiction may engage in any transactions with these entities unless authorized by OFAC.

OFAC is taking action today in furtherance of President Bush's October 2003 initiative to strengthen enforcement of U.S. laws prohibiting transactions related to travel to Cuba and to hasten the arrival of a new, free, democratic Cuba. The foreign travel companies identified today provide easy access to Cuba to those U.S. individuals who choose to break the law. Many of these entities use the Internet to advertise and sell Cuban tourism to the U.S. public. U.S. law enforcement officials have intercepted a number of unauthorized travelers whose tour packages were purchased through one of these entities.

ENTITIES PROPOSED FOR DESIGNATION

Cimex Companies (6):

1. 2904977 CANADA INC.

Montréal, Québec, Canada

(<http://www.caribesol.ca>)

2904977 CANADA INC., a.k.a. Caribe Sol, a.k.a. Havanatur Canada Inc., is a travel agency owned by Cimex, a holding company of the Government of Cuba.

2. CORPORACION CIMEX S.A.

Havana, Cuba (and all other locations worldwide)

(<http://www.cimexweb.com>)

CORPORACION CIMEX S.A., a.k.a. Cimex, a.k.a. Cimex Cuba, a.k.a. Comercio Interior, Mercado Exterior, has approximately 107 offices throughout Cuba. A holding company, CIMEX S.A., is owned by the Government of Cuba and owns travel service providers. It was organized to promote new products and services in Cuba.

3. HAVANATUR S.A.

Havana, Cuba (and other cities in Cuba)

(<http://www.havanatur.cu>)

HAVANATUR S.A. is the leading tour operator in Cuba, with offices throughout Cuba. Its corporate parent is CIMEX.

4. HAVANATUR S.A.

Buenos Aires, Argentina

HAVANATUR S.A. is a travel agency specializing in trips to Cuba. It is owned by Cimex.

5. HAVANATUR BAHAMAS LTD.

Nassau, Bahamas

HAVANATUR BAHAMAS LTD. is a travel agency specializing in trips to Cuba. It is controlled by the Government of Cuba.

6. HAVANATUR CHILE S.A.

Santiago, Chile

HAVANATUR CHILE S.A., f.k.a. Guamatur S.A., is a travel operation specializing in trips to Cuba. It is controlled by Cimex.

Cubanacan Companies (4):

1. LA COMPAÑÍA TIENDAS UNIVERSO S.A.

Cuba

(<http://www.cuba-shop.net>)

LA COMPAÑÍA TIENDAS UNIVERSO S.A, which is owned by the Cubanacan Group, operates the e-commerce portal CUBA-SHOP.NET.

Through CUBA-SHOP.NET, U.S. persons may purchase a wide range of products, including but not limited to televisions, refrigerators, ovens, food, perfume, cosmetics and bicycles for friends and family in Cuba. Prices are in U.S. dollars.

2. CUBANACAN GROUP

Havana, Cuba

CUBANACAN GROUP, owned by the Government of Cuba, is a tourism and trading business, hosting approximately 40% of all visitors to Cuba.

3. CUBANACAN INTERNATIONAL B.V.

Zevenhuizen, Netherlands

CUBANACAN INTERNATIONAL B.V. specializes in organizing trips and accommodations for travel to Cuba.

4. CUBANACAN U.K. LIMITED

London, England, United Kingdom

CUBANACAN U.K. LIMITED is a travel agency specializing in travel to Cuba and is a promoter and representative of CUBANACAN GROUP.

OFFICE OF FOREIGN ASSETS CONTROL STATUS REPORT ON IMPLEMENTATION OF ENHANCED CUBA TRAVEL ENFORCEMENT

Date: February 9, 2004

On October 10, 2003, President Bush directed the Departments of Treasury and Homeland Security ("DHS") to step-up enforcement of Cuba embargo travel restrictions by increasing inspections of travelers and shipments to and from Cuba, and by targeting those who travel to Cuba illegally through third countries and by private vessel for illegal business or tourism purposes or to carry unlicensed currency to Cuba.

The Office of Foreign Assets Control ("OFAC") reports the following actions and progress to date to fully implement and enforce the President's initiative.

Inspection of Cuba Flights

- DHS committed Bureau of Customs and Border Patrol ("Customs") to inspecting up to 100% of direct flights at Miami, JFK and LAX for a 90-day period. After 90 days, the level of future inspections will be reviewed and evaluated.
- OFAC's staff in Miami, augmented by staff from Washington, worked hand-in-hand with Customs inspectors in Miami during the first 90-day period to provide daily post-October 10 coverage of direct charter flights that depart several times each day for Cuba.
- Since October 10, OFAC has participated with Customs to inspect the weekly charter flights at LAX and JFK twice at each port and we are in direct communication with DHS as questions arise.
- Inspection Activity to Date:

569 aircraft with passengers destined for Cuba, mostly direct charter flights, were targeted for outbound inspection. Over **44,000** passengers were screened as they departed the United States for Cuba and over **50,915** passengers were screened on their return to the United States on charter flights.

275 travelers were denied travel on charter flights after examination revealed they did not qualify under any OFAC license category.

1007 aircraft with passengers returning to the United States from Cuba were targeted for inbound inspections. This number includes returning charter flights and other flights arriving in the United States from third countries. Over **50,915** passengers and crew were subjected to extensive examination.

376 OFAC-related seizures were accomplished, most of which related to the unlicensed importation of Cuban cigars and alcohol.

Training

- Since October 10, OFAC has provided on-site training on Cuba embargo travel restrictions to over **500** DHS Customs inspectors. We have accomplished this training on-site in Miami, Los Angeles and JFK, the ports of departure for direct charter flights, and we are now expanding our training efforts to reach Customs inspectors stationed at U.S. Customs Preclearance Facilities in the Caribbean and Canada. This training will assist inspectors in their efforts to detect illegal U.S. tourist travelers to Cuba. OFAC has already completed training in Bermuda, Nassau and Aruba. In the next few weeks, OFAC will provide training to inspectors at **6** Preclearance Facilities in Canada.

In addition to these training sessions, OFAC provides training to Customs inspectors on a monthly basis at the Federal Law Enforcement Training Center in Brunswick, GA.

OFAC's Miami Office is working with the Coast Guard to provide Cuba embargo travel training for its personnel.

OFAC fully expects that these training initiatives will result in a significant number of travel referrals from Customs to OFAC for civil penalties.

Travel Enforcement Investigations

Civil -

- **264** cases have been opened to date by OFAC's Enforcement Division for investigation of alleged post October 10, 2003, travel to Cuba.

Criminal -

- **3** cases have been referred for criminal investigation by OFAC Enforcement directly to federal law enforcement agencies, primarily the Bureau of Immigration and Customs Enforcement. OFAC is working with special agents and Assistant U.S. Attorneys on a number of potential criminal cases.

- On December 4, 2003, OFAC hosted a highly successful meeting in Miami with the U.S. Attorney for the Southern District of Florida, Commander of the 7th U.S. Coast Guard District, DHS (ICE and Bureau of Customs and Border Patrol), and Department of Commerce, to coordinate efforts to implement the President's initiative. The U.S. Attorney voiced the support of his Office. It was agreed that working groups from participant agencies will meet quarterly, beginning in March 2004, to review promising criminal cases. The Commander, USCG 7th District, stated that his organization will (1) redraft the Security Zone Permit to capture the OFAC and Commerce licensing category of the applicant, and will (2) step-up their boarding of pleasure vessels going to and from Cuba. OFAC agreed to provide Cuba travel training to USCG personnel in South Florida and to implement a feedback program for Customs and USCG to report the status of Cuba travel cases those agencies refer to OFAC for civil penalties.

Penalties

- OFAC's Civil Penalties Division plans to expedite action on those violations occurring after the President's Rose Garden directive to increase enforcement while continuing to issue penalties on currently ongoing cases.

-- OFAC's Civil Penalties Division currently has a docket of nearly 2,000 actions relating to Cuban embargo violations, the majority of which will likely result in monetary penalties paid to OFAC.

- Increased Initiation of New Penalty Actions - Since the President's announcement on October 10th, the Civil Penalties Division has accelerated the issuance of Prepenalty Notices initiating OFAC's civil penalty cases. By the end of November, all prepenalty notices in the pipeline were issued. Between October 10 and November 30, 2003, OFAC issued a total of approximately **348** new notices opening penalty actions.

- Implementation of Expedited Penalty Process - OFAC's Civil Penalties Division has implemented an expedited civil penalty process. For all post-Rose Garden announcement violations detected by DHS and referred to OFAC, OFAC's Civil Penalties Division will initiate appropriate civil penalty action within 60 days of the division's receipt of DHS' evidence of violation. Given the cumulative effect of the enhanced multi-agency enforcement strategy, we anticipate that at least initially an increase of cases by several orders of magnitude will be received in the Civil Penalties Division.

-- Major Case Squad Set Up for Cuban Commercial Cases -- OFAC's Civil Penalties Division has set up a Major Case Squad targeting Cuban commercial cases in response to the President's Rose Garden directive for increased Cuban embargo enforcement. The Major Case Squad identified cases awaiting OFAC Civil Penalties Division action against banks, companies and other entities involved in commerce with Cuba. The Squad has contacted more than **60** violators and informed the majority of them of OFAC's pending penalty actions against them. Settlements totaling nearly **\$200,000** have already been reached in **20** of the Major Cases.

-- OFAC's Civil Penalties Division publishes details of penalty settlements and assessments on OFAC's website. This information is updated each month. Penalties settled by and assessed against Cuban travel ban violators appear in the aggregate for informational purposes on the website.

• Administrative Law Judges - OFAC now has 3 ALJs in place to hear civil penalty cases and the ALJs have begun issuing orders of hearing to violators. To date, OFAC has initiated action in cases by forwarding them to the 3 ALJs residing at the Justice Department and the Federal Mine Safety and Health Commission. Twelve cases are on the ALJs' docket as the balance has settled their cases with OFAC with penalty payments. One hundred eleven violators have been given acknowledgments of timely hearing requests along with advisories that orders instituting proceedings before the ALJs will be forthcoming in short order absent settlement of the case.

Of these 111 ALJ hearing-noticed cases, 63 violators have already sent in settlement payments with the deadline to pay in the other cases to run in 2 weeks. Additional settlements are expected.

Other OFAC Actions

• Licensing Actions –

- OFAC Licensing and Enforcement Divisions have established internal procedures to quickly suspend and investigate allegations of abuse of licenses issued to humanitarian and religious organizations.

- Using information derived from charter flight inspections, OFAC has suspended licenses issued to **2** organizations previously authorized to engage in travel transactions related to humanitarian or religious activities in Cuba. OFAC is investigating allegations that the licensees may have engaged in activities outside the scope of their licenses. Four other organizational licenses are under review for possible suspension and investigation.

- OFAC has taken action to limit the number of travel days in Cuba for licenses issued for humanitarian purposes, such as for the delivery of donated goods in Cuba.

• Regulatory / Policy Changes:

- OFAC is working with the State Department to review the current authorization which allows licensed travelers to import up to \$100 worth of Cuban origin goods, including cigars and rum, as accompanied baggage. A revocation of this authorization would result in a significant decrease in U.S. dollars going directly to the state-owned tobacco and alcohol industry. Revocation would also serve to reinforce the seriousness of the U.S. Government's Cuba travel enforcement efforts.

Public Support

• Calls are regularly received at the OFAC hotline in Miami at **(305) 810- 5170** to report embargo violations.

Exhibit 28

Cuba

US tightens sanctions on Cuba's military

Curbs makes it harder for Americans to travel and do business with communist island



The measures against Cuba are an attempt to reverse a two-year thaw initiated by the Obama administration © Reuters

Katrina Manson in Washington NOVEMBER 8, 2017

The US has made it harder for Americans to travel and do business in Cuba, issuing regulations that clamp down on transactions tied to the Cuban military, intelligence and security services.

Donald Trump, US president, ordered a policy reversal on Cuba in June, [rolling back](#) a two-year rapprochement initiated under the Obama administration that sought to unpick a long-running embargo and move towards a permanent thaw in relations.

Steven Mnuchin, Treasury secretary, said: “We have strengthened our Cuba policies to channel economic activity away from the Cuban military and to encourage the government to move toward greater political and economic freedom for the Cuban people.”

The regulations, which come into effect on Thursday, revolve around a list of banned entities but stop short of barring all business and tourism, and include several exceptions.

US travellers to Cuba will need to take trips sponsored under the auspices of a US organisation and be accompanied by someone from that organisation, putting a stop to solo visits. Americans can still travel to Cuba to “support the private, small business sector” but under stricter rules.

The rules require such travellers to “engage in a full-time schedule of activities that result in meaningful interaction with individuals in Cuba”.

A senior Treasury official said: “You should plan on additional activities that would support the Cuban people.” Trips that had already been arranged could go ahead if flights or hotel had been booked.

Such activities must “enhance” contact, support civil society or “promote the Cuban people’s independence from Cuban authorities”.

People under US jurisdiction will also be barred from engaging in certain direct financial transactions with entities and sub-entities on the list.

Commercial engagements already in place will not be affected to avoid what the US Treasury called “negative impacts” on US business and travellers.

Banned entities include the Ministry of the Interior, military suppliers and several companies including Gaesa, a conglomerate owned by Cuba’s armed forces and run by General Luis Alberto Rodríguez, former son-in-law of Raúl Castro, the president.

It extends to hotels, fashion houses and advertising agencies that the US says fall under Cimex, a state-owned trading company that is Cuba’s largest commercial corporation.

FT Engage

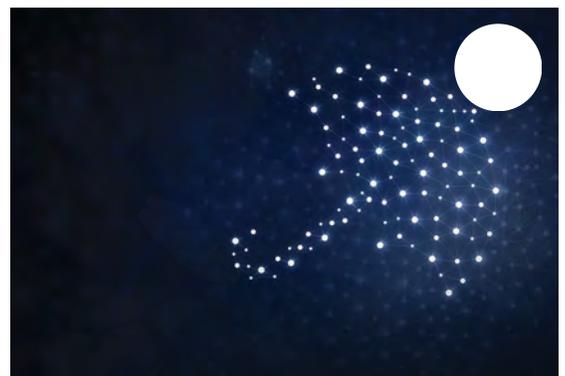
Relations have worsened in recent months as US diplomats stationed in Cuba suffered mysterious [hearing losses](#) that the state department attributed to deliberate actions. The US told Cuba to [recall 15 diplomats](#) in October — representing about 60 per cent of its Washington mission — after it withdrew 60 per cent of its own diplomatic personnel due to the sonic attacks. Cuba denies any involvement in the matter. US officials said the new regulations are not related to the attacks.

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Oil

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For Sustainable Development

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OIL **MISSION**

Mission
Functions
Directory
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Policies

Direct, coordinate, execute, and control fulfillment of the policy approved by the State and the Government for the sustainable development of the activities of the oil and gas sector in the country and serving its business system.

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Oil

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The Ministry
Subscribed Entities
Subordinate Entities
Legal Framework
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Policies, Projects and Programs

[image]

Renewable energies, natural source of energy

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OIL

FUNCTIONS

Mission
Functions
Directory
Regulations
Policies

1. Guarantee the preparation of drafts of enforcement policies in the Oil and Gas sector, in coordination with the National Energy Policy and Strategy Directorate, for submission for the approval of the Government, as well as its periodic update and control its implementation, once approved.
2. Guarantee the preparation of the drafts for the development programs of the Oil and Gas sector, in the medium- and long-term, in coordination with the National Energy Policy and Strategy Directorate, for submission for approval by the Government, as well as their periodic update and their implementation, once approved.
3. Ensure the development and update of policies and programs for the development of domestic fuels, in coordination with the National Energy Policy and Strategy Directorate for submission for the approval by the Government, Ensure their implementation, once approved.
4. Control fulfillment of state and government policy regarding research, prospecting and geological exploration of oil and gas.
5. Control fulfillment of state and government policy regarding processing policy, as well as the commercialization of oil and gas and their derivatives.
6. Collaborate, together with the National Energy Policy and Strategy Directorate and the MEP (Ministry of Economy and Planning), in the process of preparing fuel and lubricant consumption plans for all sectors of the country.
7. Advise, together with the National Energy Policy and Strategy Directorate and the MEP, in preparing the national balance of fuels and lubricants and their updating.
8. Collaborate, together with the MEP, in the preparation of the directives for preparing short- and medium-term plans and determining of their leading indicators, in the sphere of their competence.
9. Prepare report on approval of short- and medium-term plans, presented by CUBAPETROLEO (CUPET), ensuring fulfillment of directives in this regard.
10. Advise the minister and the Government Board on the leadership and control of the business system of the CUPET Union.
11. Establish indicators to evaluate the results of the activities of the CUBAPETROLEO Union and its business system, monitoring their fulfillment periodically.
12. Prepare report on the performance of the CUPET Union, for the quarterly financial economic analyses of the Ministry with the aforesaid organization, as well as for the annual balance.
13. Investigate jointly with the Cubapetróleo Union business opportunities with foreign capital in this area.

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Oil

14. Issue draft negotiation directives, in this area to set up AEI (International Economic Association), for submission for the approval of the corresponding instance.
15. Check the fulfillment, by the designated negotiating team, of the negotiating directives approved for setting up each AEI, in this area.
16. Prepare report on the proposals of the Constitutive Documents of the AEI, and the economic technical foundations of the business in this area, together with the other areas of the Ministry.
17. Control the results of the AEIs in operation in this area.
18. Execute, together with the CUPET Union, the directives of the Cuban party, to be evaluated in the Boards of Directors and Shareholders that ensure fulfillment of state policy.
19. Prepare report on requests for renewal and dissolution of the AEIs set up.
20. Control the rational use of foreign technical assistance by CUPET.
21. Collaborate, jointly with the Organization, Planning and Information Directorate, in preparing drafts of policies and strategies of collaboration and technical scientific cooperation of the oil and gas activity.
22. Control, together with the Organization, Planning and Information Directorate, in the control of fulfillment of the collaboration programs of the sector or activity it serves, signed with countries and International Institutions.
23. Prepare report of the economic technical feasibility studies and preparatory documentation of new investments in its area of service.
24. Prepare report on drafts of Investment Plans in short- and medium-term, in area of service.
25. Control CUPET's investment process, in particular the selected investments under execution.
26. Advise the Directorate of the Ministry on the authorization for initiating start-up of new investments, if applicable.
27. Evaluate results of selected investments, once concluded, reporting whether they met the objective for which the investment was conceived.
28. Control strategic projection in the oil and gas sector, for the development of quality systems, environmental management, science and technology, investments, and maintenance.
29. Control program for shutdowns of main plants and industrial facilities of CUPET for their maintenance and capital repairs.
30. Promote introduction of research results, technology transfer and technological advances in the oil and gas sector, controlling their inclusion in the short-, medium- and long-term plans.
31. Promote collaborative relationships with universities and research centers in the oil and gas sector.
32. Control development research program of Oil and Gas Sector, as well as application of results.
33. Control application of occupational health and safety standards in sphere of competence.
34. Prepare report on export policy, including coverage, and import substitution in area of service.
35. Control fulfillment, by CUPET, of export and import policy approved by the Ministry, promoting and controlling the development of products and services that create exportable funds and / or substitution imports.
36. Control execution of plans and programs for export and import substitution of CUPET.
37. Control ONURE (National Office for the Control of Rational Energy Use) in fulfilling its functions of regulation, inspection and control of the consumption of fuels and lubricants in all entities of the country.
38. Control CUBAPETROLEO in correct application of rules and regulations for the rational and efficient use of fuels, fuels and electricity, which includes proposing approval of projects aimed at increasing efficiency in their use.
39. Control, in coordination with the ONRM (National Office of Mineral Resources), fulfillment of regulations established for the exploitation and production of oil and gas, both in state-owned companies and in the AEIs.

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Oil

40. Prepare report on rules and regulations for the rational and efficient use of fuels and lubricants, which includes those for their consumption by imported and nationally produced equipment.
41. Promote the dissemination by mass media of actions aimed at saving fuels and lubricants.
42. Direct the performance of inspections within the scope of their competence.
43. Direct the process of preparing proposals for wholesale and retail prices of fuels to be applied in the economy.
44. Contribute to the updating of studies on the country's energy matrix, proposing the introduction of new, more efficient and cleaner fuels, to the extent permitted by economic and commercial conditions, in coordination with the National Energy Policy and Strategy Directorate.
45. Establish policies and objectives for creating new oil facilities, service centers, fuel tanking.
46. Direct the preparation and updating, together with the corresponding agencies, of the technical standards in the handling, transportation and storage of fuels and lubricants to all sectors of the country, proposing their approval and monitoring their fulfillment.
47. Advise the Directorate of the Ministry in the preparation and analysis of proposals for legal provisions, rules and regulations of the sectors or activities of its competence.
48. Handle, at the request of the Directorate of the Ministry, productive technical agreements, work plans and protocols, preparing evaluative reports with recommendations for decision-making at the appropriate level, related to matters within its competence.

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Exhibit 30

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[coat of arms]
**OFFICIAL GAZETTE
OF THE REPUBLIC OF CUBA
MINISTRY OF JUSTICE**

Information in this issue

Official Gazette Extraordinary Issue No. 58 of December 13, 2017

COUNCIL OF STATE

Decree Law No. 334/17 (GOC-2017-839-EX58)

COUNCIL OF MINISTERS

Decree Law No. 334/17 (GOC-2017-840-EX58)

Decree Law No. 335/17 (GOC-2017-841-EX58)

Decree Law No. 336/17 (GOC-2017-842-EX58)

FIVE: This Decree becomes effective ninety (90) business days after its publication in the Official Gazette of the Republic of Cuba.

BE IT HEREBY PUBLISHED in the Official Gazette of the Republic of Cuba.

RENDERED in the Palace of the Revolution, in Havana, on September 5, 2017.

Raúl Castro Ruz
Chairman of the councils
of State and of Ministers

GOC-2017-842-EX58

DECREE No. 336

WHEREAS: As part of the update of the Cuban economic model, the relationships of the senior business management organizations with the Council of Ministers, the national state bodies, and the Central State Administration agencies and other state institutions, should be regulated, so that the functions that correspond to each one can be exercised with greater rigor and, in particular, contribute to the strengthening of the governing powers of the organizations by unlinking them from the administration or direct management of the business system, so that the latter increases its autonomy, efficiency, effectiveness, and control of resources.

THEREFORE: The Council of Ministers in the exercise of the powers conferred on it by subsection k) of Article 98 of the Constitution of the Republic of Cuba, decrees the following:

**REGARDING THE SYSTEM OF RELATIONSHIPS OF THE SENIOR BUSINESS
MANAGEMENT ORGANIZATIONS**

CHAPTER I

GENERAL POINTS

ARTICLE 1.1. This Decree regulates the relationships of senior business management organizations with the Council of Ministers, national state bodies, Central State Administration agencies and state institutions.

2. This Decree applies to senior business management organizations served by a Vice Chairman of the Council of Ministers or a Minister, or other cadre appointed by the Council of Ministers.

3. Senior business management organizations that are not included in the preceding numeral, including those of a local nature, are not subject to regulation in this Decree.

ARTICLE 2.1. The Council of Ministers creates the senior business management organizations that are subordinate to it and provides for their extinction, merger or any other organizational movement when appropriate.

1. For the purposes set forth in the preceding Section, the proposal submitted to the Council of Ministers shall have the criteria of the Ministry of Economy and Planning.

ARTICLE 3. Senior business management organizations that are subordinate to the Council of Ministers are considered national entities for all purposes.

ARTICLE 4. The Chairman of the Council of Ministers appoints the Chairman or General Director of the senior business management organizations that are subordinate to the Council of Ministers.

CHAPTER II

REGARDING THE RELATIONSHIPS OF THE NATIONAL STATE BODIES, THE AGENCIES OF THE CENTRAL ADMINISTRATION OF THE STATE AND THE STATE INSTITUTIONS WITH THE OSDE

ARTICLE 5. The national state bodies, the agencies of the Central State Administration and the state institutions directly establish with the senior business management organizations the relationships that are necessary, for the best fulfillment of the mission and functions assigned to them in the field of their competence

CHAPTER III

REGARDING ATTENTION GIVEN TO THE SENIOR BUSINESS MANAGEMENT ORGANIZATIONS

ARTICLE 6.1. Attention given to a senior business management organization is assigned by the Council of Ministers to a vice chairman of this body or to a Minister. Exceptionally, it can be assigned to a cadre who is not a member of the Council of Ministers. All of them are referred to hereinafter as the designee.

2. The attention that is assigned in the preceding Section is personal and non-delegable, so that in the cases in which it is granted to the Minister, it is exercised by the latter and not by the structure of the Ministry directed thereby.

3. The Minister or the appointed cadre has a small work team, made up of specialists who can combine this task with others which they perform, to assist in the exercise of these functions.

ARTICLE 7. In the exercise of attention, the designee may not supplant the Chairperson or General Director of the senior business management organization in his or her management functions.

ARTICLE 8. The designee to handle a senior business management organization uses the information systems established by the National Statistics and Information Office, in correspondence with the Government Information System. In cases where the systems are not yet designed, the designee may establish one solely for the purposes of fulfilling the attention function.

ARTICLE 9.1. The exercise of attention given to a senior business management organization includes guidance, coordination and control, for which the designee performs among others the following functions:

1. Evaluates socio-economic results of the senior business management organization based on the indicators approved in the plan;
2. controls the investment process and development programs;
3. controls the implementation of the Economic and Social Policy Guidelines, as appropriate;
4. controls compliance with the provisions on the transfer of technology to and from abroad, ensuring the country's technological sovereignty;
5. controls the economic affectations caused to the country by the companies that make up the senior business management organization it serves, including foreign trade operations;
6. coordinates studies for the creation of structures and mechanisms of integration of science, technology and the environment with the production of goods and services;

7. coordinates and controls the application of foreign investment policy, collaboration and its results;
8. evaluates the Chairman or General Director of the senior business management organization; approves his or her work plan; and
9. fulfills any other function assigned to it by the Council of Ministers or as legally provided.

2. Furthermore, the designee participates or is systematically informed of the analyses and agreements of the Governing Board of the senior business management organization.

SPECIAL PROVISIONS

ONE: In the senior business management organizations that are served by a vice-chairman of the Council of Ministers, matters relating to cadres, defense, state reserve, and auditing are addressed directly by the state bodies, governing bodies of the Central State Administration governing in those matters or others, according to their respective competencies.

TWO: Attention to matters related to cadres, defense, state reserve, and auditing of the senior business management organizations served by a Minister or other designated cadre, are temporarily maintained by the corresponding organizational units of the organizations from which they come or which govern the activity, as appropriate.

THREE: The Ministers of the Revolutionary Armed Forces and of the Interior adapt the relationships with the senior business management organizations of their system, in correspondence with the specific characteristics of these agencies.

TRANSITIONAL PROVISIONS

ONE: The proposals for the creation of new senior business management organizations submitted by Central State Administration agencies to the Minister of Economy and Planning before the entry into force of this Decree, on the occasion of the institutional improvement process, continue their processing according to the procedure established at the time of submission.

FINAL PROVISIONS

ONE: Upon the entry into force of this Decree, the senior business management organizations created or those which are developed as a result of the institutional improvement process, whether served by a Minister or by a designated cadre, are subordinated to the Council of Ministers.

TWO: The heads of the agencies of the Central State Administration; national state bodies and state institutions; within a term of ninety (90) days from the date of entry into force of this Decree, provide the relevant measures to repeal or modify the provisions that contradict what is regulated herein.

THREE: As of the entry into force of this Decree, the Ministers of Foreign Trade and Foreign Investment; of Communications; of Industry; and of Finance and Prices serve the senior business management organizations from their respective systems.

FOUR: This Decree enters into force ninety (90) business days after its publication in the Official Gazette of the Republic of Cuba.

BE IT HEREBY PUBLISHED in the Official Gazette of the Republic of Cuba.

December 13, 2017

OFFICIAL GAZETTE

1107

EXECUTED in the Palacio de la Revolución [Palace of the Revolution], in Havana, on September 5, 2017.

Raúl Castro Ruz
Chairman of the councils
of State and of Ministers

Exhibit 31

10/25/2019

Narciso Cobo Roura | Cuba Capacity Building Project

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Cuban Horizon

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Narciso Alberto Cobo Roura

Narciso Alberto Cobo Roura. Professor Narciso Alberto Cobo Roura received his law degree and masters of business law from the University of Havana. He is currently a full professor at the University of Havana Law School and the Department of Economics. Beginning in 1987, he has been serving on the Cuban Court of International Commercial Arbitration, which is part of the Cuban Chamber of Commerce, and since 2002 as its Vice President. From 1991-2004 he served as justice of the Economic Chamber of the Supreme People's Court of Cuba and as president of the court from 2005-2013. He retired in 2013.

His academic positions include teaching at the Higher Institute for Management of the Economy and lecturing on international law at the *Higher Institute of International Relations* of the Cuban Ministry of Foreign Relations. He publishes articles in the *Cuban Journal of Law* and in numerous legal journals in a variety of other countries. He has participated in scores of academic conferences, workshops and events in Cuba and abroad.

Professor Cobo is a founding member of the Cuban Society of Economic and Financial Law. He served as its president from 1991-2013 and thereafter in emeritus status.

<https://horizontecubano@law.columbia.edu/directory/narciso-cobo-roura>

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10/25/2019

Businesses and Entrepreneurs in Cuba (Part I) | Cuba Capacity Building Project

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Businesses and Entrepreneurs in Cuba (Part I)

March 18, 2019

[image]

Narciso A. Cobo, Full Professor, University of Havana

(first of two parts)

... The future can only claim superiority over the past, if it can be shown that, in it, appearance may have more and more to do with reality.

G. E. Moore, Ethical Essays, 1897

Businesses and Entrepreneurs in Cuba: “E puor...?” [*sic*]

<https://horizontecubano.law.columbia.edu/content/businesses-and-entrepreneurs-in-cuba-part-i>

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Businesses and Entrepreneurs in Cuba (Part I) | Cuba Capacity Building Project

It is in the company, whatever its ownership regime, whether public or private, where the wealth of a country is created. Hence its centrality for any economic, planned economy or market model. And hence also the importance that it have the independence and autonomy necessary for its performance. And in this there is a difference, whether the model is one or the other.

What is consubstantial —and operating budget— in a market economy model is not in a centralized economy, called to respond to a plan, so in any case it must be the result of a “design.” This, badly for us, has not been the case of the Cuban business system so far.

At present, the Cuban business system can be understood as structured in two fundamental sectors: the state sector, [1] considered priority because of its greater weight in the national economy, employs 3.1 million people, [2] and the non-state sector, which today employs approximately 1.4 million workers. [3]

The latter is formed by a cooperative sector, mostly engaged in agricultural production, [4] and a private sector, which is extremely uneven, integrated by the participation of foreign capital on the Island. This has been evolving: from a merely complementary role has come to have a greater recognition of its importance for the economic development of the country. It is made up of a growing slice of private entrepreneurs that overcomes the narrow margins of self-employment. Even when it is not recognized as domestic capital, in fact it begins to have its own physiognomy.

The intention of these notes is just to examine the current configuration of the business matrix of the current Cuban economic model, with a brief reference to their respective regulatory frameworks, and from there to conjecture a bit on what their offsets could be in light of the transformations that they project in the new Constitution of the republic.

1. State business system

Unlike perhaps other models of public enterprise, in the case of the Cuban state-owned company, it is obligatory to start from a subordinate relationship with the central government agencies, which are involved in its creation, modification, establishment, and approval of its corporate purpose, operation, control, and termination, including the appointment and removal of its directors.

This high degree of intervention, which awaits a long time for changes, has tried to change in recent years as part of a process that aims at the separation of state and business functions, leading to the reorganization and gradual modification of the powers and functions (missions) of all agencies. And it includes, as a more recent measure, the elimination of the direct subordination of companies to agencies, limiting them to their “attention,” [5] a term that always denotes an important degree of control.

Instead, the group companies has been arranged into senior business management organizations (OSDE), entities that by becoming “interlocutors” of companies in relation to the government (instead of agencies) run the risk of replicating the previous dependence of companies on these agencies and becoming more administrative than business instances. In fact, this is what seems to be taking place.

Consequently, today the state business system is structured on three levels: the senior business management organization (OSDE), the company, the base business unit; and eventually in four if we take into account the so-called government boards.

1.1 Senior Business Management Organizations (OSDE)

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If we look at the reasons offered by the legal system, these “arise out of necessity of the leadership of the Government in its different instances or to support the separation of the state functions from the business functions, which allows companies to be organized in correspondence with the state interests, its technological and productive similarities; make management processes more flexible, achieve speed in solving problems and strengthen control; as well as guarantee an effective link between research and production and the best use and preservation of scientific potential.” [6] Until now this is more a desire than a reality.

Without strictly constituting a true typology, these are called “business group” when they are integrated “by companies with different structures of production, technology, services, research, and marketing; without necessarily having a direct interrelation with each other; and as “unions,” when they are integrated “by companies whose organizational, technological, productive, and economic characteristics have a high interrelation and dependence.” [7] In reality, this classification seems to be limited to domestic groups, while the integration of companies into local subordination groups does not seem to follow either one or the other criteria. It is due, rather, to a purely administrative control purpose.

Even though the OSDEs are conceived as a level of business management that aims to escape from the agencies and concentrate those management functions that previously corresponded to them, nevertheless, they do not cease to look a lot like them and act in a similar way to these administrative instances. In practice, they tend to reinforce verticality and centralization problems, assuming or exercising prior control over the main decisions of the company and conditioning, when not annulling, the exercise of its autonomy. Hence the need to review the dimensions, scope and timing of this control. [8]

In turn, these higher organizations, which are subordinate to the Council of Ministers, operate under the control of the so-called governing boards. [9]

1.2 Government boards

These are a collegiate management body created by agreement of the Council of Ministers to serve the senior business management organizations. They are called on to represent the interests of the Cuban State in the control of business activity in the strategic sectors. Among their attributions and functions are to approve the strategic projection of the OSDE, evaluate the relevance of the plan of the companies that integrate it, before their approval, evaluate the investments that it projects, approve the distribution of profits, and evaluate the fulfillment of the leading indicators.

As a general rule, these boards are made up of representatives of the ministries of Economy and Planning, Finance, and Labor and Social Security, the Central Bank, the branch organization, and the director of the OSDE itself.

They appear as an intermediate level between the business system and the branch agencies of the central State administration, to which national companies were subordinated. Although they do not constitute a level of the business structure and are intended to represent the State-entrepreneur as owner, in fact they are placed as one more level that adds verticality and involve, to one degree or another, control and conditioning mechanisms of the business management that tend to detract from the company’s autonomy.

1.3 State company

It has been defined again and again as the fundamental link of the Cuban economy, from the theses and resolutions adopted in the different congresses of the Communist Party to its current vision in *Conceptualization of the Economic and Social Model*. [10] Despite becoming reflected in the different

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legal provisions [11] approved to regulate their creation, organization and operation, this has failed to open the necessary recognition of their autonomy.

The very legal provision that describes the OSDE defines the company as the main link in this system, “an entity with legal personality and its own assets, created for the production of goods and the provision of services, in order to efficiently conduct its business management, according to the approved annual plan.” [12] It must cover its expenses with its income, ensure its contribution to the State —subsidize, as well, the OSDE to which it belongs— and be independently responsible for its obligations with its financial resources. [13]

In recent years there are spaces in which it has gained certain autonomy—that is, “proactive” autonomy—in terms of its corporate purpose, its structure and workforce, the use of certain funds and the formation of wages and prices. However, its performance has been hindered by both external factors and monetary duality and the multiplicity of exchange rates, which vitiate any efficiency measurement criteria, together with the severe financial restrictions to which the economy is subjected and with the instability of productive inputs. A repercussion of a foreign trade subject to the conditions of an economic and financial blockade aggravated by the current decline in bilateral relations with the United States, a problem that has not ceased to complicate international transactions. There are also factors that seem to have to do with the economic model itself and its regulatory framework, which determine its lack of autonomy.

Its powers are diminished from the superior structures—OSDE, board, agency— subject to an oversized regulatory framework; intimidated by external control mechanisms with stereotypes that sometimes seem to want to be unaware of the risk of any business practice; subject to the state commission of central planning, which is still a transmuted version of the old leading indicators; considered most often unable to handle and decide on the use of currencies and their funds; with objections and questions regarding their relations with the other forms of property (towards which their own workers often migrate in search of compensation and working conditions); and conditioned more often than not on the choice of its suppliers of inputs and services, asking for efficiency and competitiveness from this state-owned company seems to go before the need for a comprehensive redesign, not only nor so much of it but of its institutional environment. A new business law does not suffice.

Also forming part of the State’s business system are the business companies of one hundred percent Cuban capital. [14] As a general rule, they operate under this private form as corporations to accentuate their separation from State controls and intervention. Frequently they adopt this corporate form for association with foreign capital or to carry out foreign trade operations.

Like those created for joint ventures or those ventures with totally foreign capital, these business companies must be governed by a Commerce Code dating from 1886, almost completely repealed, which must give way to a new company law.

1.4 Base business unit

Although it is just an internal division of the company, as a structural element of the company, or of the senior business management organization, and “it is the only structure from which all production or service delivery processes are organized,” [15] and even when it lacks its own legal personality, it may be subject to contractual relationships, contract rights and obligations and be responsible for them.

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However, in spite of the fact that due to their productive dimensions, capacities and background, many constitute real companies—for example, the “sugar mills”, agribusiness complexes of enormous influence in the formerly main industry of the country— cannot be recognized nor operate as such, [16] limiting business organizational forms that are more flexible and closer to reality (as were the previous experiences of the “parent company”), [17] closing the way to new formulas that could be tested and imposing a unique criterion of subordination of a more administrative than business nature.

[1] This includes 1,785 state-owned companies and 2,241 budgeted units, as entities dependent on the state budget. Institutional Organization. Main entities. July - September 2018. National Office of Statistics and Information, ONEI, October 2018.

[2] Of these, 52% work in the business, productive system, and 48% in the budgeted sector. This proportion brings the number of workers employed in the state productive sector to the number employed by the private sector.

[3] Data offered by the Minister of Labor in her appearance at the “Round Table,” a televised program on December 28, 2018.

[4] Of a total of 5,320 cooperatives, 4,886 correspond to the agricultural sector, and 434 to other productive and service activities. Institutional Organization. Main entities. July - September 2018. ONEI, October 2018.

[5] Decree Law 334 of 2017 and Decrees 334, 335 and 336 of 2017.

[6] Decree 335, Article Four.

[7] Decree 335, Article 8.

[8] Decree 336 of 2017.

[9] Decree 302 of 2012.

[10] Programmatic document that together with Guidelines to achieve the main economic and social objectives in the next five years, were approved by the last congress of the CPC [Communist Party of Cuba], held in 2016, and the National People’s Power Assembly.

[11] Decree 42 of 1979, “General Regulations of State Enterprise;” Agreement of the CECM [Executive Committee of Council of Ministers] of June of 1988, “Regulations of Union and State Company” (both repealed); Decree Law 187 of 1994, “Bases for Business Improvement;” Decree Law 252 of 2007, “On the continuity and strengthening of the Cuban business leadership and management system” and its Regulations, Decree 281 of 2007 (these last two modified successively in 2010, 2014, 2015, and 2017).

[12] Decree 335, Article 12.

[13] Although in accordance with the current Constitution, the state company is solely responsible with its financial resources, the draft of the new constitutional text contemplates a greater scope for its responsibility (Article 26).

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[14] At the beginning of this year, the ONEI reported 230.

[15] Decree 335, Article 20.

[16] Decree Law 252, Article 14. This establishes as “principle” that “a company cannot be subordinated to another company.”

[17] “Regulations of Union and State Company,” 1988, Article 6: “The leadership of the union should preferably lie, provided it is rational, in one of its companies, which serves as the parent company...”

[emblem] NCR Companies I (ed) + Access.pdf 294.26 KB

Document Topics

Economic Models

Exhibit 32

Cuban Oil Industry

The Union Cuba-Petroleo (CUPET) is the organization that will effectively satisfy the supply of fuel and lubricant to the national market, maximizing the value of the national fuels with competitive products in the Caribbean area, based on the application of top technology and a highly qualified human potential, and involved in the development of the country.

About CUPET (<https://www.cupet.cu/industria-petrolera-en-cuba/?lang=en>)



Exploration-Production

Attractive possibilities to be the next discoverer of the region.

(<https://www.cupet.cu/operaciones/exploracion-produccion/?lang=en>)



Refining

We maximize the supply of the national demand of oil derivatives

(<https://www.cupet.cu/operaciones/refinacion/?lang=en>)



Trade and Supply

To ensure the supply of fuels and lubricants to our main customers .

(<https://www.cupet.cu/operaciones/comercializacion/?lang=en>)

Category

Exploration-Production ▼

Our Enterprises

They meet part of the country's energy needs as a result of exploration, development of the exploitation of oil gas deposits and specialized services, either directly or in return for foreign firms, representing CUPET.



West Drilling and Extraction Oil Enterprise (EPEP Occidente)

Address: Vía Blanca km. 37, The Caribbean, Santa Cruz do Norte, Mayabeque. **Phone:** (+ 53) 7796-2089. **Fax:** (+ 53) 7796-3802.



Center Drilling and Extraction Oil Enterprise (EPEP Centro)

Address: Finca La Cachurra, Guásimas, Cardenas, Matanzas. **Phone:** (+53) 541210/541255. **Fax:** (+53) 541254.

Exhibit 33

CUPET in numbers

The oil industry is already an important element of the Cuban economy. The Union Cuba-Petroleo is committed with the increasing production, expanding industry, and fuel quality and savings.

OIL AND GAS PRODUCTION

Equivalent Oil

Approximately 4 million tons per year (25 million barrels per year)

Crude Oil

Approximately 3 million tons per year (19 million barrels per year)

Natural gas

Approximately 1 100 million cubic meters per year.

Human Capital

More than 24 000 employees:



% High Level



% Middle Level



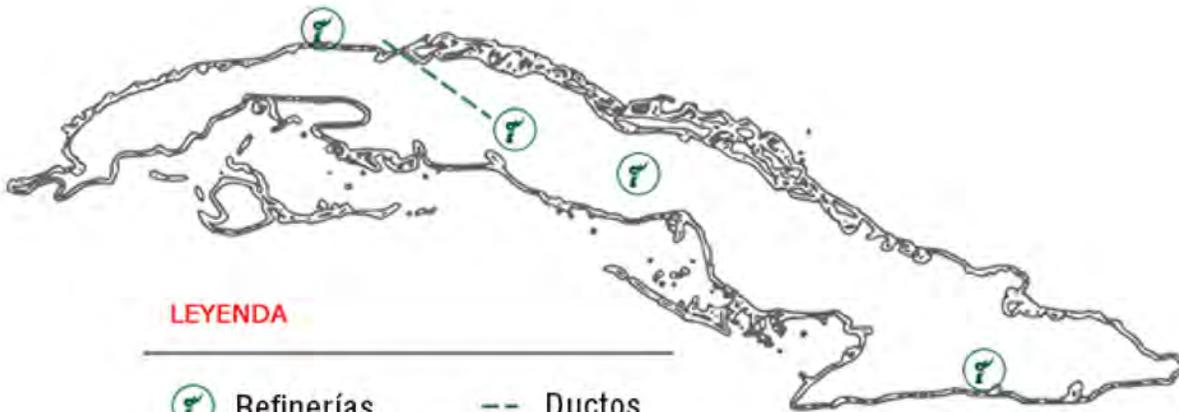
% Womens



% Men

Refining

135 mil barrels per day



LEYENDA

- Refinerías
- Ductos

Ñico López

Medium Conversion

Procesos	MBPD
Atmospheric distillation	36.4
Vacuum distillation	18.0

Cathalytic cracking	12.5
Reformer	2.7
Hydrofination distillates	3.2

Sergio Soto

Hydroskimming

Processses	MBPD
Atmospheric destillation	2.8
Vacuum destillation	1.4

Cienfuegos

Medium Conversion

Processes	MBPD
Atmospheric destillation	65.0
Reformer	9.6
Hydrofination distillades	25.0

Hermanos Diaz

Medium Conversion

Processes	MBPD
Atmospheric destillation	30.0
Vacuum destillation	18.0
Reformer	2.7

Exhibit 34

Total Lubricants-Motor Oils-Greases (mt)											
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Nico Lopez Refinery Production	49.8	51.5	37.3	46.7	48.3	46.7	47.5	48.1	48.4	1.2	NA
Total Supply	71.4	79.3	61.3	46.0	59.4	47.1	47.5	49.4	49.5	49.5	50.6

Source: Compiled from data published by Cuba's Oficina Nacional de Estadisticas e Informacion ("ONEI")

Exhibit 35

Ñico Lopez La Habana Refinery				
Oil Throughput 1959-2016				
Year	Tons*	Barrels/Day*	Avg. Price/Barrel (\$)	Value of Throughput (\$MM)
1959	2,538.8	49.7	3.00	54.40
1960	2,007.5	39.3	2.91	41.70
1961	2,019.0	39.6	2.85	41.20
1962	2,580.4	50.5	2.85	52.50
1963	2,641.1	51.7	2.91	54.90
1964	2,361.6	46.3	3.00	50.70
1965	2,493.3	48.8	3.01	53.60
1966	2,427.1	48.4	3.10	54.80
1967	2,556.4	50.1	3.12	57.10
1968	2,704.0	53.0	3.18	61.50
1969	2,759.7	54.1	3.32	65.60
1970	2,880.5	56.4	3.39	69.80
1971	2,887.7	56.6	3.60	74.40
1972	3,063.0	60.0	3.60	78.80
1973	3,373.1	66.1	4.75	114.60
1974	3,417.3	66.9	9.35	228.30
1975	3,695.1	72.4	12.21	322.70
1976	3,867.4	75.8	13.10	362.40
1977	3,850.8	75.4	14.40	396.30
1978	3,964.0	77.7	13.76	390.20
1979	3,915.7	76.7	20.88	584.50
1980	3,844.6	75.3	31.83	874.80
1981	3,980.9	78.0	34.86	992.50
1982	4,033.8	79.0	32.62	940.60
1983	3,991.9	78.2	28.62	816.90
1984	3,977.4	77.9	28.38	806.90
1985	4,005.2	78.5	26.17	749.80
1986	3,996.4	78.3	13.28	379.50
1987	3,934.1	77.1	17.21	484.30
1988	3,965.6	77.7	13.54	384.00
1989	3,976.6	77.9	17.59	500.10
1990	3,394.9	66.5	21.59	524.00
1991	2,477.7	48.5	17.17	304.00
1992	1,173.4	23.0	17.39	327.40
1993	1,017.2	19.9	15.72	114.20
1994	929.5	18.2	15.10	100.30
1995	974.9	19.1	16.84	117.40
1996	1,250.8	24.5	20.53	183.60
1997	1,067.8	20.9	18.57	90.10
1998	866.1	17.0	11.81	73.30
1999	862.0	16.9	17.33	106.90
2000	1,162.7	22.8	27.60	229.70
2001	1,509.9	29.6	23.29	251.60

Year	Tons*	Barrels/Day*	Avg. Price/Barrel (\$)	Value of Throughput (\$MM)
2002	1,329.4	26.0	24.40	231.60
2003	1,540.7	30.2	27.78	306.20
2004	1,453.0	28.5	35.99	374.40
2005	1,421.6	27.7	49.94	504.90
2006	1,582.9	30.8	59.38	667.50
2007	1,394.9	27.2	68.95	684.50
2008	1,456.7	28.4	97.30	1,008.60
2009	1,371.3	26.7	61.28	597.20
2010	1,135.6	22.1	78.35	632.00
2011	1,207.7	23.5	106.06	909.70
2012	1,276.7	24.9	105.92	962.70
2013	1,349.6	26.3	101.63	975.60
2014	1,307.3	25.5	93.64	871.60
2015	914.0	17.8	49.58	322.10
2016	493.9	9.6	41.73	146.20
			Total	21,756.70

* Amounts in Thousands

Source: Compiled from data published by Cuba's Oficina Nacional de Estadísticas e Información ("ONEI")

Exhibit 36

Cuban Officials Try to Spark U.S. Investment in Petroleum Sector

Greenwire

|

Share



Cuban officials asked a group of multinational oil companies last week to invest in Cuba's oil sector. Cuba's oil reserves are estimated at 3 billion barrels. Speaking in Mexico City to a group of companies that included Exxon Mobil Corp. and Valero Energy Corp., 16 Cuban energy officials offered details about the country's potential. But the U.S. Treasury Department sought to break up the meeting, citing trade embargo violations, and both Exxon and Valero did not attend Saturday's meetings after being present in prior days.

The office of Louisiana Gov. Kathleen Blanco (D) said both Texas and Louisiana have all the services and supplies Cuba needs to expand its oil sector. "There is a market in Cuba. These people have cash, and they are willing and able to pay the bills," said Dane Revette, an energy industry director with the Louisiana governor's office. "U.S. companies need to find a way to get there."

Rafael Tenreyro of Cuba Petroleo, Cuba's national oil company: "Cuba has heavy oil, but we are positioned to find lighter oil in the heavy oil belt" (Eliza Barclay, Houston Chronicle, Feb. 5).

Last year, Castro said the firms Pebercan and Sherritt International had discovered fields with estimated reserves of 100 million barrels of higher quality crude than the country's smaller existing wells are producing. The 75,000 barrels per day of oil the country produces were too heavy and high in sulfur to refine into gasoline and instead are used in cooking oil and to fuel power plants. Since most U.S.-Cuba trade has been banned under the embargo and the Helms-Burton Act, U.S. companies are forbidden from investing in exploration in Cuba's territorial waters. But a discovery of commercially viable oil by international firms could lead to additional pressure to change the political calculations that have kept Cuba's products out of U.S. hands.

Many international oil companies see Cuba as an opportunity to discover oil in a largely untouched area of the productive Gulf of Mexico. An offshore exploratory well drilled by Spanish oil firm Repsol-YPF SA struck oil in the Yamagua-1 field in July 2004. While company officials said the well was not commercially viable, the fact that it produced oil had sparked renewed interest in Cuba's oil reserves. Other international oil companies have acquired blocks in the area and were performing seismic testing to identify potential supplies (Greenwire, Jan. 11, 2005).

"U.S. oil suppliers and services providers are invited to participate in Cuba's oil sector," said Manuel Marrero, a principal specialist for Cuba's economic ministry. He said that legal hurdles could prevent business partnerships between American companies and Cupet. "When we can look for services and suppliers in Houston, we certainly will," Marrero said.

"We're just here gathering information," said Joseph Newhart, with Exxon Mobil Exploration's new venture special project's division. Newhart was skeptical about whether there is credible evidence backing the Cuban government's claim that there are big oil deposits offshore. "The presentations were good, but we need more technical information like all the seismic data," he added (Eliza Barclay, Houston Chronicle, Feb. 4). -- LK

Exhibit 37

Business



Doing Business with CUPET

We are the authorized organization to establish relations with foreign oil companies to explore and produce hydrocarbons in the Republic of Cuba and in its Exclusive Economic Zone, by its own means or in association with foreign companies. Since 1991 Cuba has adopted a policy of attracting foreign investment to key sectors of the economy, [...]

Know more (<https://www.cupet.cu/negocios/english-como-hacer-negocios-con-cupet/?lang=en>)



CUPET and the World

The Union Cuba-Petroleo (CUPET) has business and training agreements with the following countries: Business: Canada, Venezuela, Angola, Russia, China, Vietnam Training: Canada, Mexico, Venezuela, Trinidad and Tobago, Brazil, China, Argentina, Norway

Know more (<https://www.cupet.cu/negocios/english-cupet-y-el-mundo/?lang=en>)



AEI & Joint Ventures

International Economic Associations Sherrit International Cuba Established in 1992, Sherritt's Oil and Gas operations in Cuba have grown from a modest oil recovery program to an intermediate exploration and production business that contributes significantly to the success of the Corporation. Over the years, Sherritt has demonstrated its ability to find, develop and produce oil and [...]

Know more (<https://www.cupet.cu/negocios/aei-empresas-mixtas/?lang=en>)

People information



Province	La Habana ▼
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Liquified Gas Enterprise, La Habana

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Union Cuba-Petroleo CUPET Customer Services Group.

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Telephone: (7)8766292

Address: Salvador Allende 666 e/ Oquendo and Soledad (5to floor). Centro Habana.

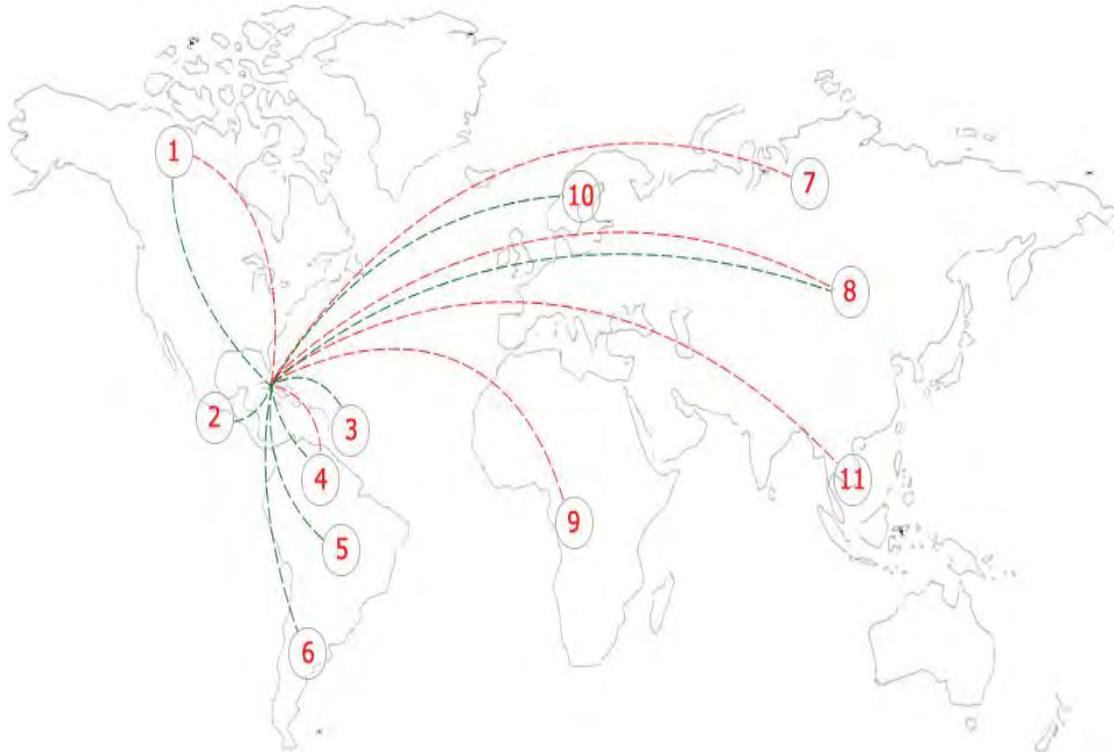
Exhibit 38

CUPET and the World

The Union Cuba-Petroleo (CUPET) has business and training agreements with the following countries:

Business: Canada, Venezuela, Angola, Russia, China, Vietnam

Training: Canada, Mexico, Venezuela, Trinidad and Tobago, Brazil, China, Argentina, Norway



LEYENDA		
1 - Canadá	7 - Rusia	Negocios
2 - México	8 - China	
3 - Trinidad y Tobago	9 - Angola	Capacitación
4 - Venezuela	10 - Noruega	
5 - Brasil	11 - Vietnam	
5 - Argentina		

Exhibit 39

AEI & Joint Ventures

International Economic Associations

Sherrit International Cuba

Established in 1992, Sherritt's Oil and Gas operations in Cuba have grown from a modest oil recovery program to an intermediate exploration and production business that contributes significantly to the success of the Corporation. Over the years, Sherritt has demonstrated its ability to find, develop and produce oil and gas in the challenging environment of Cuba's complex fold and thrust belt reservoir.

Average gross working-interest production in 2012 for Oil and Gas in Cuba was approximately 20,164 bpd.

Sherritt believes that there is potential for growth in Cuba's oil and gas industry, and its primary focus will be to continue investing in its Cuban production and reserve base. The Corporation plans to grow its production through ongoing development drilling and by implementing heavy oil recovery technologies proven in western Canada and other jurisdictions.

To date, Sherritt's operations have used natural reservoir pressures and conventional pumping technology and estimates that its recoverable reserves represent less than 2% of the original oil in place, which currently stands at over seven billion barrels. These low recovery factors are due to the viscous quality of the crude oil produced by conventional means and the nature of the fractured carbonate reservoirs. Typical Cuban oil fields are believed to contain large accumulations of hydrocarbons and individual fields may contain more than one billion barrels of original oil in place.



PDVSA Cuba

On April 28, 2005, PDVSA Cuba opened its doors in Havana in order to shore up the Petrocaribe project, within the framework of the Agreement for the Implementation of the Bolivarian Alternative for the Americas (ALBA). The inauguration of this commercial and business office is a major event in the expansion of energy cooperation relations between the Bolivarian Republic of Venezuela and the Republic of Cuba, which point to a new model of integration in Latin America and the Caribbean, based on the principles of mutual cooperation, solidarity, complementarity and the sustainable socio-economic development of the peoples of the region. The strategic location of PDVSA Cuba in Havana will allow for the articulation of other businesses and instrumental projects in order to accelerate the advance of Petrocaribe in the vast area of the Caribbean basin, which has a significant prolific potential in hydrocarbon reserves and a growing demand to improve the quality of life of the Caribbean population. Products and services PDVSA Cuba will work together with Cuba-Petroleum (CUPET) to multiply the potentialities of the Caribbean energy market, both in the exploration and production (upstream) and refining and commercialization (downstream) processes, in order to promote the social progress of the Caribbean and Central American peoples, through free and democratic access to energy at a fair and reasonable price. The PDVSA Cuba office in Havana will allow us to offer more support and attention to the region and to promote the progress of projects for the production and commercialization of lubricants, fuels and other petroleum products for Central America and the countries of the Caribbean Basin. It will also assume coordination in the field of technological exchange and training of human resources in the hydrocarbons sector.

Joint Ventures

Castrol – World leader in lubricants



([http://www.cupet.cu/wp-](http://www.cupet.cu/wp-content/uploads/2016/08/mixtas21.png)

[content/uploads/2016/08/mixtas21.png](http://www.cupet.cu/wp-content/uploads/2016/08/mixtas21.png))

Castrol is the brand of lubricants that BP acquired in 2002. Castrol's automotive and motorcycle oils are world-renowned and sold in more than 150 countries, but Castrol manufactures lubricants for other applications on land, sea and air.

Energas



([http://www.cupet.cu/wp-](http://www.cupet.cu/wp-content/uploads/2016/08/mixtas3.png)

[content/uploads/2016/08/mixtas3.png](http://www.cupet.cu/wp-content/uploads/2016/08/mixtas3.png))

ENERGAS was inaugurated by Commander-in-Chief Fidel Castro in December 2000, and from that date to the present has an installed capacity of between 10 and 15 percent of the National Electroenergetic System. The project, built with mixed capital, cost \$ 150 million and has met expectations for its high efficiency and environmental care, taking into account that it is close to the Varadero tourist center.

This efficient entity consists of three plants, plus a small peak plant, and is the only one with combined cycle installed, taking full advantage of all possibilities to produce energy.

The entity generates little more than 200 megawatt hours, so that with its closed cycle process ostensibly reduces environmental pollution, it delivers electricity at a cost of only 1.5 US cents per kilowatt hour and contributes tens of tons of sulfur a year, with a High percent purity; In addition to liquefied petroleum gas, known as propane-butane and solvents such as naphtha of industrial interest.

Eleven years later, Energas has exceeded its expectations for its high efficiency and environmental care, and deserves national awards for a correct management of the environment, conferred by the Ministry of Science, Technology and Environment of the Greater the Antilles.

Empresa Cubana de Gas S.A.



(<http://www.cupet.cu/wp-content/uploads/2016/08/mixtas4.png>)

This mixed company is in charge of the reception, storage, packaging, dispatch and commercialization of liquefied gas; Supplying through the Liquefied Gas Company, the LPG necessary for the cooking of food from families in the provinces of Havana, Artemisa and Mayabeque.

It also complies with the distribution of bottled and bulk LPG to the self-financed sector: hotels, restaurants, commercial firms, diplomatic corps and others in the western region of the country, with its own automotive fleet.

This service is achieved with efficiency and quality reflected in the level of customer satisfaction.

Among the most important achievements of Empresa Cubana de Gas SA is the service of evaluation of the safety conditions of non-portable LPG pressure vessels owned by customers by highly qualified technical personnel.

There is also a re-packaging plant, which allows the operation of cylinders in optimum safety conditions for the general population.

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NEWS



Exhibit 40

Doing Business with CUPET

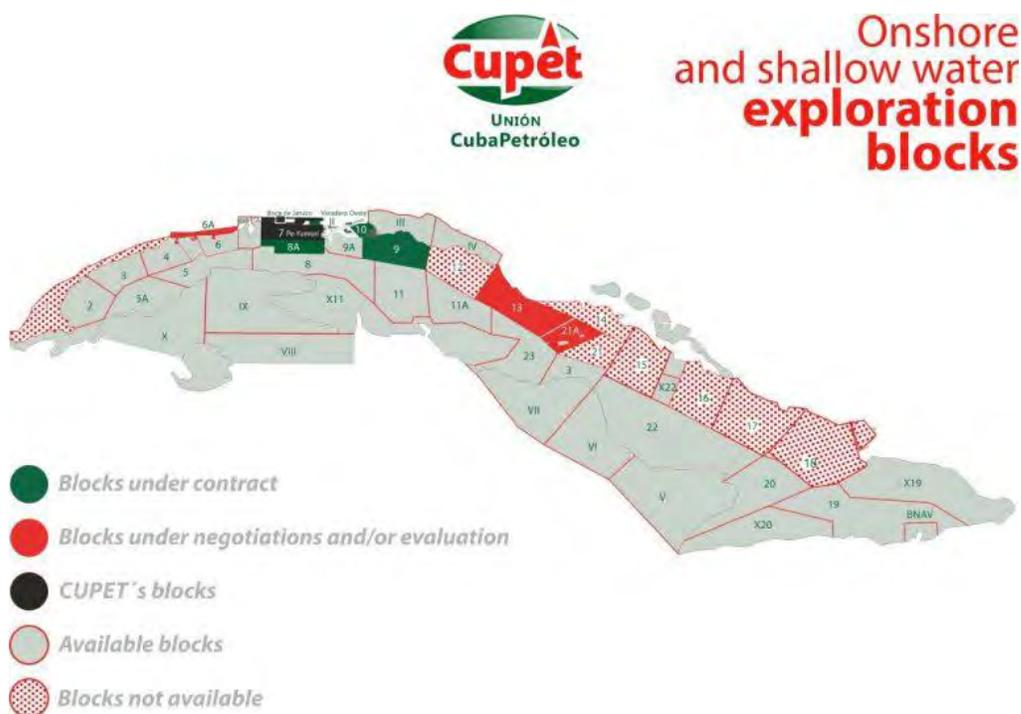
We are the authorized organization to establish relations with foreign oil companies to explore and produce hydrocarbons in the Republic of Cuba and in its Exclusive Economic Zone, by its own means or in association with foreign companies.

Since 1991 Cuba has adopted a policy of attracting foreign investment to key sectors of the economy, including the energy sector and our first oil contract was signed in December 1990 with Total Energy Company. From that date to date, 42 petroleum contracts have been signed at risk.

In 1992 the Constitution was amended to recognize ownership of joint ventures and economic associations constituted in accordance with the law.

Under the current legal framework, the rights to carry out oil activities, both onshore and offshore, are conferred by direct adjudication of the government of the Republic, considering the state oil management policy and the economic and social development of the country. The regulator of oil activities is the Ministry of Energy and Mines, the State Oil Company is the Union Cuba-Petroleo Union (CUPET) and its agent and business manager is Commercial CUPET, S.A.

Other national and foreign legal entities may carry out oil activities in Cuba, in association with CUPET and prior authorization by the Council of Ministers (CM), the highest administrative-executive body of the Republic. The rights conferred to carry out these activities are formalized through production participation contracts (PSC in English) that are signed with CUPET.





Business opportunities



Deep waters exploration blocks in the ZEE of Cuba

- Blocks under contract
- Blocks under negotiations
- Available blocks
- Blocks not available

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(<https://twitter.com/intent/tweet?url=https://www.cupet.cu/negocios/english-como-hacer-negocios-con-cupet/>)

SEE ALSO

NEWS



Change of work at the Níco Lopez Refinery

(<https://www.cupet.cu/noticia/english-change-of-work-at-the-nico-lopez-refinery/?lang=en>)



Exhibit 41

Hosted by / Auspiciado por



3RD ANNUAL

CUBA ENERGY OIL AND GAS



FEATURING CUPET'S FIRST BID ROUND

THE OFFICIAL CUBAN EVENT FOR CUPET'S BID ROUND

26-29 November 2019

Meliá Cohiba, Havana

www.cuba-energy.com

STRATEGIC PARTNER



PLATINUM SPONSORS



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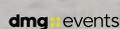


PARTNERS



Embassy of the Corporate Republic of Guyana

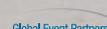
Part of the dmeg events Network



Part of the Gastech Network



Organisers



THE TIMING OF CUBA ENERGY, OIL AND GAS IS INCREDIBLY IMPORTANT

IN 2018, UNION CUBA-PETRÓLEO (CUPET) ANNOUNCED A NEW OFFSHORE BID ROUND.

As part of this licensing round process, CUPET is calling on all international IOCs, operators, service providers and companies throughout the value chain to convene in Havana over four days of strategic and technical networking and business development.

CUPET has continued with hydrocarbon exploration efforts, both on and offshore. Among these actions excels the biggest ever offshore 2D Multi-Client survey acquired by BGP Offshore in the Cuban Economic Exclusive Zone. Newly released 26,880km of 2D PSTM and PSDM data are available to license from BGP, including 21,000 KM in the Cuban sector of the Gulf of Mexico.

Preliminary results reveal deep and high-quality information under the sea bed.

Delegates to Cuba Energy, Oil and Gas will receive an exclusive insight into the very latest information and analysis provided by CUPET and industry experts across a three-day programme.

It will discuss and debate the future of oil and gas exploration and production in Cuba, providing an exclusive in-depth insight into the opportunities and the priorities for domestic and international investors and suppliers. It will also examine the regulatory and fiscal framework to provide participants with a detailed understanding of how to work in Cuba and to make the most of the opportunities presented.

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350+
DELEGATES

80+
CUPET
DELEGATES

45+
INDUSTRY
EXPERTS

85+
PARTICIPATING
COMPANIES

30+
PARTICIPATING
COUNTRIES



CUBA ENERGY, OIL AND GAS GOING FROM STRENGTH TO STRENGTH



27%
MD/COMPANY
DIRECTOR

16%
CEO/VICE
PRESIDENT

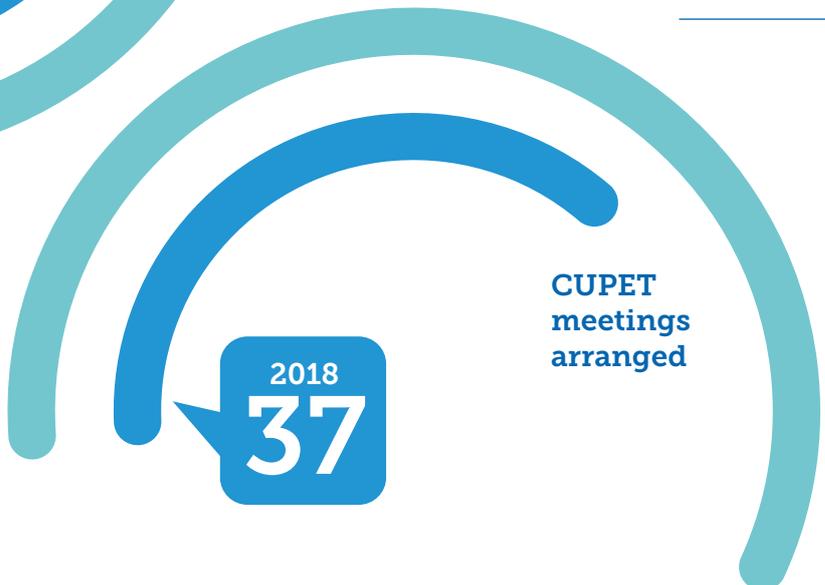
15%
COMMERCIAL
DIRECTOR

11%
DIRECTOR

10%
EXPERT /
CONSULTANT /
ACADEMIC

9%
GOVERNMENT

12%
OTHER



Different participant
countries outside Cuba

Top 5 includes:



THE PROGRAMME

TUESDAY 4TH DECEMBER 2018

SPECIAL SESSION: Cuba Offshore Data Presentation

All delegates will receive an insight into the very latest information and an analysis provided by CUPET further to the results of the extensive BGP 2D multi-client survey offshore Cuba.

14:00 – 17:00 Sponsored by:



Carried out by BGP Marine, the data is the result of 18 months of extensive work over 27,000 km of 2D long-offset, high resolution, broadband seismic and gravity data. The survey specifically targets the Cuba Economic Zone of the Gulf of Mexico areas.

The under-explored offshore Cuba contains large areas of open acreage. The presence of an active hydrocarbon system is indicated by oil and gas shows in some of the wells.

The survey has been designed to acquire data that will be fundamental in assisting the interpretation of the geology in the offshore Cuba, and the identification of prospective structural and stratigraphic trends that can be used for regional evaluation and future detailed seismic survey designs.

Keynote Address:

Mr Xing Hongkai, General Manager, BGP Multi Client

Hydrocarbon Potential of Cuban Economic Exclusive Zone in the Gulf of Mexico

- **Mr Osvaldo López Corso**, Chief of Exploration Group, Unión Cuba-Petróleo (CUPET), Cuba

Petroleum Potential Identified from New Non-exclusive Seismic Data In Cuba Offshore

- **Mr Shi Kuitai**, Chief Geologist, BGP Multi Client, BGP Offshore

2D Seismic Data Processing of Cuban Offshore Multi-Client Project

- **Mr Guo Jianqing**, Deputy Chief Geophysicist of Dagang Branch, BGP GRI

The Differences and Similarities Between Gulf of Mexico and Caribbean Basins and the Petroleum Potential of Cuba Offshore Area

- **Mr Chen Zhigang**, Director of International Branch, GGRG of BGP GRI

First Offshore Licensing Round Cuba 2019

- **Mr Roberto Suárez Sotolongo**, Deputy General Director, Unión Cuba-Petróleo (CUPET), Cuba
- **Mr Juan Andrés Barrizonte Ballesteros**, Exploration and Production Manager, Comercial CUPET S.A, Unión Cuba-Petróleo (CUPET), Cuba

The presentation will be followed by Questions and Answers.

WEDNESDAY 5TH DECEMBER 2018

AGENDA DAY ONE

08:00 Registration and Welcome Coffee

09:00 Welcome and Opening Remarks:
Paul Gilbert, Director, Global Event Partners

09:05 Opening Keynote:
Ministry of Energy and Mines of Cuba

Keynote Address: **Mr Roberto Suárez Sotolongo**, Deputy General Director, Unión Cuba-Petróleo (CUPET), Cuba

Keynote Address: **H.E. Mr Antony Stokes LVO**, United Kingdom, Ambassador to Cuba

Keynote Address: **H.E. Mr Namir Noureddine**, Lebanon, Ambassador to Cuba

M.Sc. Jude Carasquero, Manager, Trinidad and Tobago Trade Facilitation Office in Havana, Cuba

10:00 Special Address: **Mrs Damar del Carmen Maceo Cruz**, Specialist, Centre for the Promotion of Foreign Trade and Foreign Investment (PROCUBA), MINCEX, Cuba

10:15 Session One: Cuba's Role in the Context of the Caribbean

With new licensing rounds, new discoveries through the Caribbean and finance options, how can this region work together as a major global hub and attract the best investment and resources?

Cuba's Position and Role in the Region

- **Mr Pedro Arturo Sorzano Urquiza**, General Manager, Comercial CUPET S.A, Unión Cuba-Petróleo (CUPET), Cuba

Mexico: The New Energy Model and its Implementation

- **Dr Fluvio César Ruiz Alarcón**, Former Member of the Board, PEMEX

The Trinidad & Tobago Experience: Developing a Sustainable Energy Industry

- **Mrs Aribeca Cazaubon**, Business Venture Manager, National Energy Corporation of Trinidad and Tobago Limited, Trinidad and Tobago

Cuba Central America Fund

- **Dr Enrique Manzanares**, Director por España, Central American Bank for Economic Integration, Honduras

Energy Reform in Mexico and the Social Impact of Energy Projects

- **Mrs Lic. María de las Nieves García-Manzano Fidalgo**, General Director, GMI Consulting, Mexico

Questions & Answers

11:35 – 12:00
Morning Coffee Break and Business Matching

Sponsored by:



WEDNESDAY 5TH DECEMBER 2018

12:00 Session Two: CUPET's Launch of the Next Bid Round

An Update of Cuban Hydrocarbon Exploration and Production

- **Mr Osvaldo López Corso**, Chief of Exploration Group, Unión Cuba-Petróleo (CUPET), Cuba

Why and How to do Business with CUPET in the Upstream Sector

- **Mr Jesús Marrero González**, Chief Business Group Exploration-Production, Unión Cuba-Petróleo (CUPET), Cuba

Questions & Answers

12:50 – 14:00
Lunch and Business Matching

Sponsored by:
Schlumberger

14:00 Session Three: An overview of the latest data and BGP data room opening

Petroleum Potential Identified from New Non-exclusive Seismic Data in Cuba Offshore

- **Mr Shi Kuitai**, Chief Geologist, BGP Multi Client, BGP Offshore

2D Seismic Data Processing of Cuban Offshore Multi-Client Project

- **Mr Guo Jianqing**, Deputy Chief Geophysicist, Dagang Branch, BGP GRI

The Differences and Similarities Between Gulf of Mexico and Caribbean Basins and the Petroleum Potential of Cuba Offshore Area

- **Mr Chen Zhigang**, Director of International Branch, GGRG of BGP GRI

Updating of the Qualification Procedure of Foreign Oil Companies in Cuba

- **Mrs Mercedes Valdés Mesa**, Director of Register, Control and Legal Counselling, Cuban National Office for Mineral Resources (ONRM), Cuba

Questions & Answers

15:15 – 15:45
Morning Coffee Break and Business Matching

Sponsored by:



15:45 Session Four: An International Perspective of Working in Cuba and the Region.

Moderator: **Me. Felix Chevalier**, Managing Partner, Chevalier Law Firm, USA

Cuban Joint Ventures – An Attractive Legal Structure for Foreign Investors

- **Mr Thomas B. Trimble**, Partner, Winston and Strawn, USA

Melbana Energy in Cuba: an International Perspective of Working in Cuba

- **Mr Robert Zammit**, CEO, Melbana Energy, Australia

Sherritt – 26 Years Exploring Cuba

- **Mr Curtis Evert**, VP, Exploration, Exploration – Engineering, Sherritt, Canada

US Policy Towards Cuba and its Impact on Foreign Investment

- **Mrs Julissa Reynoso**, Partner, Winston and Strawn Former US Deputy Ass Sec. Central America and the Caribbean, US Department of State, Former US Ambassador to Uruguay

Questions & Answers

17:15 – 18:00 Business Matching Networking

18:00 – 20:00 Cocktail Reception hosted by DIT



THE PROGRAMME

THURSDAY 6TH DECEMBER 2018

08:30 Coffee and Welcome

08:45 **Session Five:** Natural Gas in the Energy Matrix - Gas to Power

Moderator: **Mr Felix Chevalier**, Managing Partner, Chevalier Law Firm, USA

What measures are being enacted across Cuba and the wider region Caribbean to gas integration into the energy mix?

Power Generation Opportunities by CUPET/UNE Linked to LNG Import

Potential of LNG and its Incorporation into the Cuban Energy Matrix

- **Mr Néstor Pérez Franco**, Operations and Logistic Director, **Unión Cuba-Petróleo (CUPET)**, Cuba

Leveraging Success to Attract Scalable Investment to Achieve Energy Resilience?

- **Mr Mario Burgos**, President & CEO, **Burgos Group**, USA

SPECIAL CASE STUDY: A view from the Ground: A Unique View on Market Entry from a United States and Cuban Perspective

- **Mr Felix Chevalier**, Managing Partner, **Chevalier Law Firm**, USA

CASE STUDY: The EGE Haina Story: A Successful PPP

- **Mr Luis R. Mejia**, CEO, **EGE Haina**, Dominican Republic

Questions & Answers

10:30 – 11:00
Morning Coffee Break and Business Matching

Sponsored by:
sherritt

11:00 **Session Six:** Midstream and Downstream

Moderator: **Dr Lee Hunt**, Director, **Lee Hunt LLC**, USA

Session Six and Seven will focus on the latest trends and technologies on offer in the region and the requirements to develop Cuba's existing and future fields

Infrastructure and technology services available for oil and gas operations

How to be Part of the System of Suppliers in the Oil and Gas Sector in Cuba

- **Mrs María Yodalis Hernández Bernal**, Chief of Business Group, **EPEP Centro**, **Unión Cuba-Petróleo (CUPET)**, Cuba

How can Cuba Ensure that it has Access to Best Practice Solutions and what does Cuba Require?

- **Mr Miguel Angel Lozada**, **PEMEX**

Opportunities for the Application of Improved Oil Recovery Techniques in Cuban Fields

- **Mr José Antonio García Marrero**, Specialist of the Exploration and Production Department, **Unión Cuba-Petróleo (CUPET)**, **Cuba Process of Refining in Cuba**
- **Mr Juan Alfonso López**, Director of Refining, **Unión Cuba-Petróleo (CUPET)**, **Cuba**

Subsea Source Control; Advances in Practice, Technology and Response

- **Mr Andy Cuthbert**, Global Engineering and Technology Manager, **Boots & Coots Services**, a **Halliburton Company**, USA
- **Dr Lee Hunt**, General Partner, **Hunt Petty LP**, USA

Questions & Answers

13:00 – 14:15 Lunch

Sponsored by:



14:15 **Session Seven:** Advanced Oil and Gas Production Technologies

Moderator: **Mr Iain Hutchison**, Managing Director, **Merlin ERD**, **United Kingdom**

Advanced drilling technologies and drilling related services needed to operate in Cuba

Maximising the Reach of ERD Wells & Eradicating Drilling Problems

- **Mr Iain Hutchison**, Managing Director, **Merlin ERD**, **United Kingdom**

Well Completions and Interventions

- **Mr Anthony MacLeod**, Area Vice President, **Welltec**, **Canada**

Process Safety Culture in Cuba

- **Mr Fidel Ilizastigui Pérez**, Specialist in Security and Risk Management, **Office of Environmental Regulation and Nuclear Safety CITMA (ORASEN)**

Questions & Answers

15:45 Conference Summary and Recommendations

16:15 – 17:00
Afternoon Coffee Break and Business Matching

Sponsored by:



FIELD TRIP

FRIDAY 7TH DECEMBER 2018 | 08:00 – 15:00

Sponsored by:

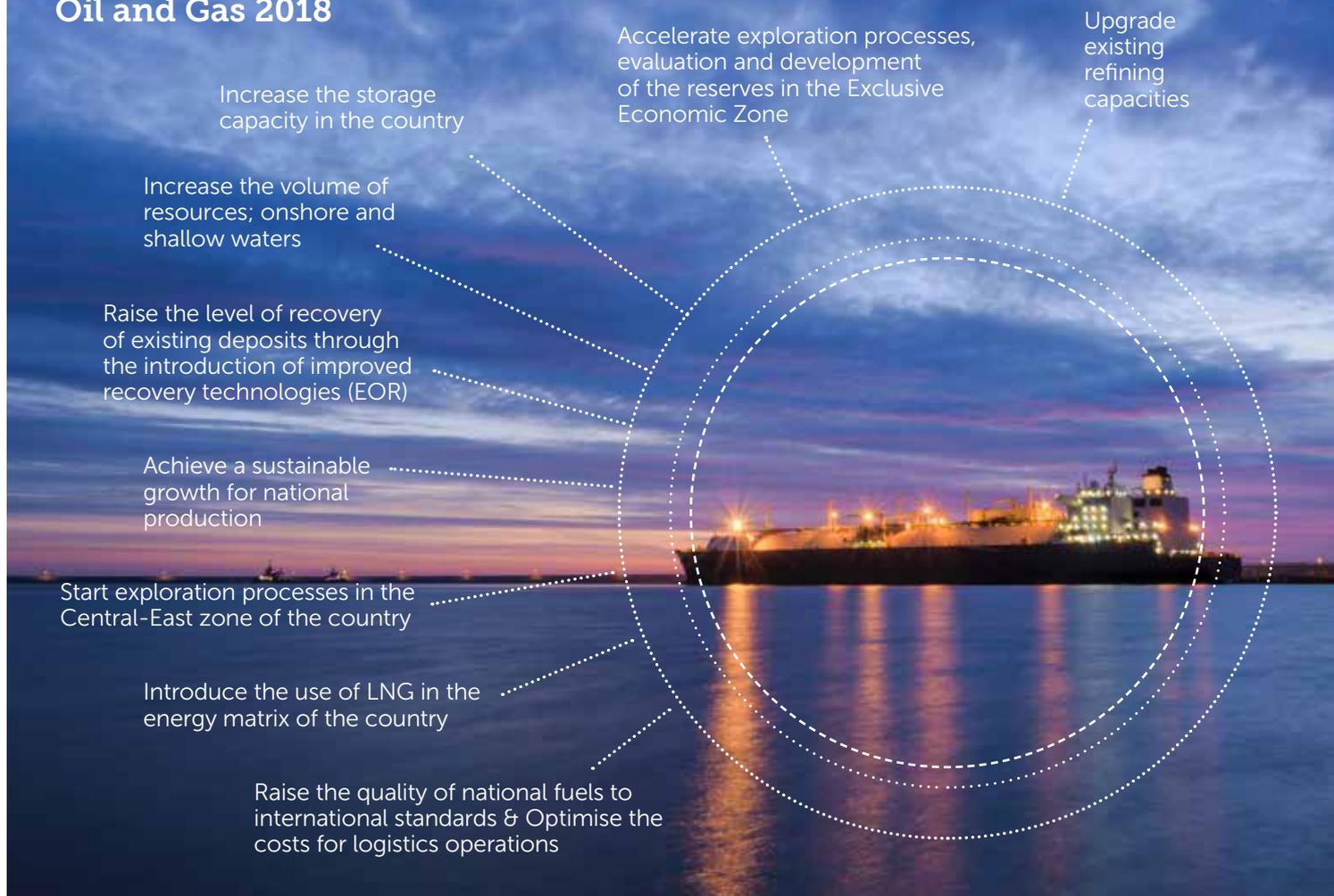


Over 80 delegates of Cuba Energy, Oil and Gas 2018, participated in a unique site visit to Boca de Jaruco Project and to the well Varadero Oeste 1008, to witness Unión Cuba-Petróleo (CUPET) operations there and to gain first hand insight into the opportunities Cuba possesses.

Boca de Jaruco is a jointly project between the Russian company Zarubezhneft and CUPET. The second part of the visit will be conducted by experts from China's state-owned drilling contractor Great Wall. CUPET and Great Wall are jointly drilling 8,255 metres long, horizontal well, Varadero Oeste 1008 located near the city of Matanzas, around 100km from Havana.

INDUSTRY RECOMMENDATIONS AND CHALLENGES UNTIL 2020

Conclusions from Cuba Energy, Oil and Gas 2018



THE PROGRAMME 2019

The organisers are honoured to recognise the endeavours of CUPET as the conference hosts in creating this important event for everyone involved in developing Cuba's energy, oil and gas sectors, in addition to the invaluable contributions of CUPET in shaping this conference programme.



The following programme is being developed in collaboration and under guidance from CUPET



The Cuba Energy, Oil and Gas Conference has been devised by the organising committee to include the following essential areas:

Extensive licensing round held during 2019

CEOG – the official licensing round event for Cuba

Positioning of the Caribbean as growing oil & gas hub

Update on existing exploration and production activities - onshore, shallow water, deep water, Gulf of Mexico

Cuba's exclusive economic zone

Overview of service and supply technologies that can make a difference to Cuba

Enhanced oil recovery on existing fields

Midstream and downstream projects

An insight into the Helms-Burton Act and likely impact for business

The structure of Cuba Energy, Oil and Gas 2019 enables all delegates to attend the full two-day conference programme complete with extensive networking and business matching and concluding with the highly popular site visit on 29th November.



NEW FOR 2019 | CUPET'S BID ROUND AT CUBA ENERGY, OIL AND GAS

Announcement of 2019 Licensing Round for Offshore Blocks in the Cuban Economic Exclusive Zone of Gulf of Mexico

I. INTRODUCCIÓN

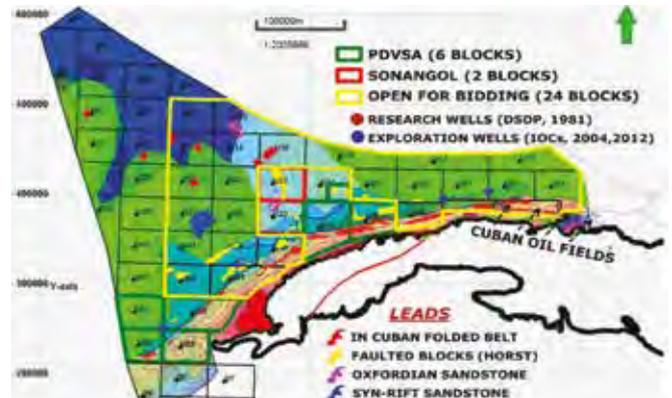
Unión Cuba-Petróleo (CUPET) has the mandate to carry out all kind of operations within the Oil & Gas chain of value in the national territory of the Republic of Cuba. Therefore, CUPET is entitled to join with foreign partners and investors, according to Foreign Investment Law 118, in every possible kind of association authorized by the Law.

II. PURPOSE

CUPET is calling Oil Companies, interested in carrying out exploration and exploitation of Hydrocarbon activities in the Economic Exclusive Zone (EEZ) of the Cuban sector in the Gulf of Mexico to present offers for one or more blocks, under Production Sharing Agreements (PSA).

III. AVAILABLE BLOCKS AND DATA

Offered blocks for the 1st License Round include 24 blocks associated to highest exploratory potential geological scenarios. Classification criteria are based on available information, mapped leads, sea depths, and estimated risks. All existing information and data packages will be available for registered and qualified companies for the license round. Additionally, the offered area is widely covered by a recent BGP 2D multiclient high resolution seismic. Data packages are available from BGP upon request, as well as the possibility to access Data Rooms in specialized events or online. Additionally, the possibility to participate in existing Farm-out projects remains open by direct negotiation with operating companies PDVSA and Sonangol, and with CUPET support. Companies may participate independently or associated in trusts of two or more companies.



IV. PROSPECTIVITY

The Gulf of Mexico is one of the most prolific and prospective offshore areas in the world. Cuba produces around 60000 BOE/day from the western offshore by drilling extended-reach wells through duplex structures in the Folded and Thrusted Belt. Reservoirs are basically fractured and lixiviated carbonates from Late Jurassic. The seals are lithologically composed by Tertiary shale, while source rocks are Jurassic deep water clayey carbonate facies. In 2012, 3 exploration wells were drilled in this area, targets were focused on Cretaceous carbonates and no commercial oil was discovered; however, all wells had oil shows which according to biomarkers were originated in Late Jurassic source rocks. Thus proving the extension of this unit in the offshore. New 2017 2D BGP multiclient seismic provided valuable information concerning basement depth, and sedimentary thickness. Besides, useful data was obtained as deep as 7-9 sec (~10-12 km) to determine with high accuracy the boundaries between different exploration scenarios and the seismic stratigraphic sketch for regional interpretation, exploratory play types could be re-defined. In addition, new areas with huge potential for petroleum systems occurrence were determined. By mapping several leads in a first interpretation stage resources are estimated in more than 10 billion barrels of recoverable oil, with expected qualities of 25-35° API.

NEW FOR 2019 | CUPET'S BID ROUND AT CUBA ENERGY, OIL AND GAS

V. LEGAL FRAMEWORK SUMMARY

- Interested companies must qualify with the national regulation authority, The National Office of Mineral Resources (ONRM), prior to presenting their formal offer for the Licensing Round.
- Terms and Conditions under provision of the Foreign Investment Law 118 and its implementation norms and resolutions.
- Main features of contract model are typical Production Sharing Agreements for which Contractor assumes all risks, costs and responsibilities of the activity.
- Progressive fiscal system. Main terms are 30 to 35-year contract, No Signature Bonus, No Royalties, No taxes or levies of any kind during exploration phase. Up to 70% cost recovery.
- Income tax on profit oil 15%, at the 9th year of the project. No taxes for repatriation of profits.

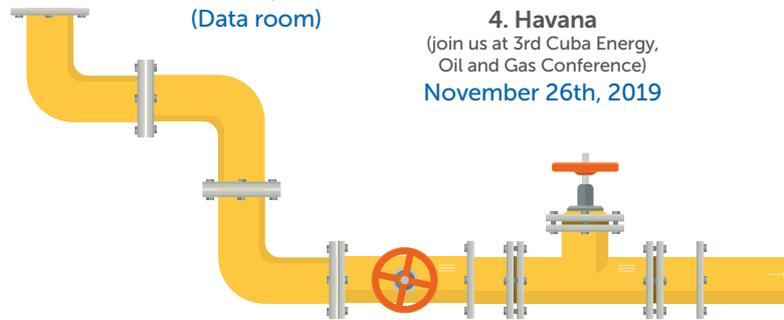
VI. TIMELINE

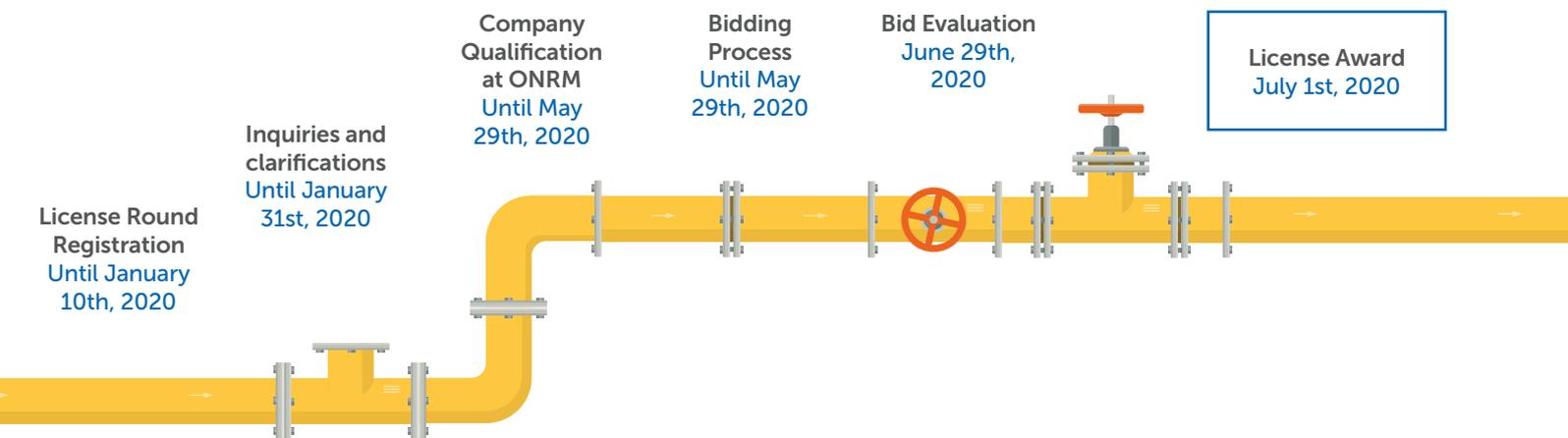
Official
Announcement
June 3rd, 2019

Road Shows
1. London
June 3rd, 2019
(Data room)

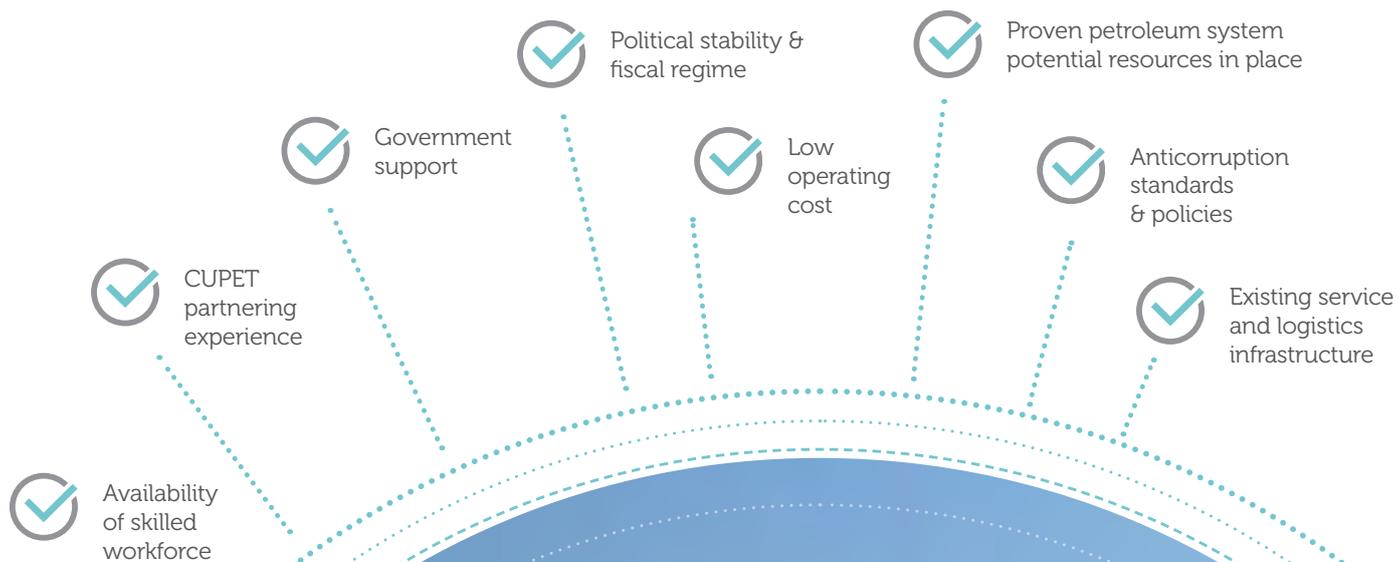
Road Shows
2. & 3. TBA
August –
October, 2019

Road Shows
4. Havana
(join us at 3rd Cuba Energy,
Oil and Gas Conference)
November 26th, 2019





INVESTING IN OIL & GAS IN CUBA: ADVANTAGES



UNRIVALLED SPONSORSHIP OPPORTUNITIES

As a sponsor, your company will be positioned amongst the most influential players in Cuba and the region. Cuba Energy, Oil and Gas provides your company with the opportunity to place your marketing and branding in front of Cuban Stakeholders, industry leaders and buyers, enabling you to secure new business, service your existing clients and engage in industry dialogue.



Global Exposure

With over 35 countries expecting to convene on Havana, Cuba Energy, Oil and Gas provides your business with multiple opportunities to reach new and potential customers from across the world.



Make Sales and Business Transactions

Cuba Energy, Oil and Gas enables you to meet with your existing and future clients, to ensure you sign contracts and meet your companies objectives across Cuba and the region.



Launch Products and Showcase the Latest Innovations

With continuous technological developments, Cuba Energy, Oil and Gas provides your company the opportunity to showcase your key USP's and differentiators over your competitors, ensuring you access over 90% of Cuba Energy, Oil and Gas attendees, whom are decision makers, purchasers and influencers.

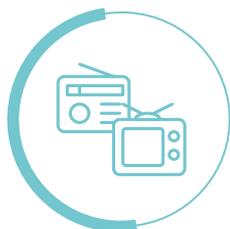


Support and Achieve Business Objectives

Cuba Energy, Oil and Gas regularly updates stakeholders, decision makers and industry leaders with dedicated marketing and support, enabling your company to portray to communicate directly with your clients.



UNRIVALLED SPONSORSHIP OPPORTUNITIES



Real Value that Delivers

Positioning your brand at live events:

- 2x more powerful than TV
- 3x more effective than print
- 4x more effective than Radio



Long lasting Impressions

After attending events, 73% of attendees would recommend a brand they have met.



Corporate Enhancing

Increase your companies perception by showcasing real services and products that your customers can visual see.



Be seen as a Thought Leader and Innovator

Attendees of live events, perceive your products and services to be more innovative than they previous did before.



SPONSORSHIP OPPORTUNITIES 2019

The Cuba Energy, Oil and Gas sponsorship packages offer branding opportunities extensively throughout the conference and exhibition and during the months leading up to the event. Sponsors receive widespread recognition in the national and international press, through global marketing campaigns and PR coverage as well as the post event media reporting.

There are packages to suit all marketing deliverables and budgets. The committee will welcome any suggestions you have and can build any bespoke packages around your marketing plans. All sponsors, gold level or greater will have the option to contribute presentations within the main conference programme to share your vision and

expertise with the audience. The following table outlines the sponsorship menu available and the inclusions for each level that can be selected according to your budget. Due to demand, spaces and packages will be allocated on a first-come first-served basis

SPONSORSHIP LEVELS AND INCLUSIONS PARTNER	STRATEGIC PARTNER *EXCLUSIVE*	PLATINUM PARTNER	GOLD PARTNER	SILVER PARTNER	BRONZE PARTNER
Amount (EUR€)	35,000	25,000	20,000	13,500	8,000
Logo displayed on speaker backdrop	Premium Position	✓	✓	✓	✓
Logo displayed in the main conference hall	✓	✓	✓		
Logo displayed at the registration area	✓	✓	✓	✓	✓
Logo displayed in VIP lounge	✓	✓			
Display space in networking area	✓	✓	✓	✓	
Logo highlighted on all event signage	✓	✓	✓	✓	✓
Opening address at event, welcoming delegates to the Conference on Day 1	✓				
Speaking slot with the option to chair a selected session	✓				
Private function room throughout event with refreshments	✓				
Logo on the event website	✓	✓	✓	✓	✓
Logo printed on all event materials	✓	✓	✓	✓	✓
Logo on all newsletters sent to 150,000+ recipients	✓	✓	✓	✓	✓
Logo in official catalogue	✓	✓	✓	✓	✓
Logo placed on supporting trade advertisements	✓	✓	✓	✓	✓
Advertisement within the show guide	Full Page	Full Page	Full Page	Full Page	Full Page
Company profile	300 word	200 word	200 word	100 word	100 word
VIP conference passes	12	10	7	5	3
Discount on additional delegate places – 25% off	✓	✓	✓		

In addition, selected sponsors have the right to choose sponsorship options from the below to be included	Select 2	Select 1	Select 1
Official lunch on Day 1	✓	✓	✓
Official lunch on Day 2		✓	✓
Drinks reception	✓	✓	
Gala dinner	✓	✓	
Coffee breaks on Day 1 or Day 2	✓	✓	✓
Conference registration desk	✓		
Badges	✓	✓	✓
Conference session sponsor	✓	✓	✓

CONTACT US SECURE YOUR INVOLVEMENT

Participating in Cuba Energy, Oil and Gas 2019 is the most efficient way of combining insight into opportunities with purposeful meetings. Whether your company would like to sponsor, exhibit, contribute to the programme or participate as delegates, contact us today to discuss the most effective solution for you.

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or call on +44 1737 784950

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