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Filing date: **03/01/2010**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Petition for Cancellation

Notice is hereby given that the following parties request to cancel indicated registration.

Petitioner Information

Name	Corporacion Habanos, S.A.		
Entity	Corporation	Citizenship	Cuba
Address	Avenida 3ra #2006 e/20 y 22 Miramar, Havana, CUBA		

Name	Empresa Cubana del Tabaco, d.b.a. Cubatabaco		
Entity	Corporation	Citizenship	Cuba
Address	OReilly No. 104 Havana, CUBA		

Attorney information	David B. Goldstein Rabinowitz, Boudin, Standard, Krinsky & Lieberman, P.C. 111 Broadway Suite 1102 New York, NY 10006-1901 UNITED STATES dgoldstein@rbskl.com Phone:212-254-1111		
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Registration Subject to Cancellation

Registration No	3542236	Registration date	12/02/2008
Registrant	Rodriguez, Juan E 6148 Bellaire Drive New Orleans, LA 70124 UNITED STATES		

Goods/Services Subject to Cancellation

Class 034. First Use: 2008/07/00 First Use In Commerce: 2008/07/00 All goods and services in the class are cancelled, namely: Cigars

Grounds for Cancellation

Deceptiveness	Trademark Act section 2(a)
<i>Torres v. Cantine Torresella S.r.l.Fraud</i>	808 F.2d 46, 1 USPQ2d 1483 (Fed. Cir. 1986)
The mark is primarily geographically deceptively misdescriptive	Trademark Act section 2(e)(3)
Other	Articles 23-28 of the General Inter-American Convention for Trade Mark and Commercial Protection, 46 Stat. 2907

Attachments	Pinar Del Rio Cancel Petition.pdf (14 pages)(221142 bytes)
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/David B. Goldstein/
Name	David B. Goldstein
Date	03/01/2010

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of trademark Registration No. 3542236
Registered (Supplemental): December 2, 2008
Mark: PINAR DEL RIO

CORPORACION HABANOS, S.A., and EMPRESA)
CUBANA DEL TABACO, d.b.a. CUBATABACO,)

Petitioners,)

v.)

RODRIGUEZ, JUAN E.,)

Registrant.)

Cancellation No. _____

PETITION TO CANCEL

Petitioners CORPORACION HABANOS, S.A. (“Habanos, S.A.”) and EMPRESA CUBANA DEL TABACO (“Cubatabaco”) (together “Petitioners”) believe that they will be and have been damaged by registration on the Supplemental Register of the mark PINAR DEL RIO, Registration No. 3542236, for “cigars,” registered on December 2, 2008, and, by and through their undersigned attorneys, hereby petition to cancel said registration, and aver as follows:

THE PARTIES

1. Petitioner Habanos, S.A. is a corporation organized under the laws of Cuba, with its principal place of business located at Avenida 3ra #2006 e/20 y 22, Miramar, Havana, Cuba.

2. Petitioner Cubatabaco is a state corporation with independent juridical personality and independent property established by law No. 1191, dated April 25, 1966, of the Republic of Cuba, with its principal place of business located at O’Reilly No. 104, Havana, Cuba.

3. Upon information and belief, Registrant Rodriguez, Juan E. (“Registrant”) is an individual residing in Gretna, Louisiana.

4. Petitioner Habanos, S.A. currently owns numerous registrations in the United States Patent and Trademark Office (“USPTO”) for cigars and related products.

5. Petitioner Cubatabaco currently owns numerous registrations in the USPTO for cigars and related products and services.

6. Petitioner Cubatabaco currently owns the application in the USPTO for the certification mark HABANOS, Application Serial No. 77157193, in IC A for “cigars,” filed April 16, 2007. The mark certifies “that the cigars have their geographical origin in Cuba and are made from Cuban grown tobacco, ‘Cuba’ meaning the entire national territory of the Republic of Cuba.”

7. Petitioner Habanos, S.A. is engaged, *inter alia*, in the trade, marketing, and advertising of Cuban cigars throughout the world, including in Cuba, and the export of Cuban cigars throughout the world (with the exception of the United States due to the United States trade embargo). Petitioners emphasize that their cigars are made in Cuba from 100% Cuban-origin tobacco in promotions, marketing and advertising, including in advertisements in publications in the United States.

8. PINAR DEL RIO is an Appellation of Origin (also known as a denomination or indication of geographical origin) for “raw or manufactured tobacco and goods made thereof” in the area of production of Pinar del Rio Province, Cuba, registered by Petitioner Cubatabaco in 2003, in accordance with the 1958 Lisbon Agreement for the Protection of Appellations of Origin and their International Registration, as revised and amended.

9. Cubatabaco also owns the registration for the Denomination of Origin PINAR DEL RIO in Cuba, applied for in the Cuban Industrial Property Office in 1998, and granted on December 30, 2003, Registration No. 22/98. This registration has been renewed and is valid

until December 28, 2018.

10. On September 26, 2008, the Board, in a precedential decision, refused registration of the mark HAVANA CLUB for non-Cuban “cigars made from Cuban seed tobacco,” on the ground that the mark was “primarily geographically deceptively misdescriptive” under section 2(e)(3) of the Lanham Act. *Corporacion Habanos, S.A. v. Anncas, Inc.*, 88 U.S.P.Q.2d 1785 (TTAB 2008). That decision became final and non-appealable on November 26, 2008.

11. In February 2008, the Board, in a precedential decision, refused registration of the mark GUANTANAMERA for non-Cuban “cigars” under section 2(e)(3) of the Lanham Act. *Corporacion Habanos, S.A. v. Guantanamera Cigars Co.*, 86 U.S.P.Q.2d 1473 (T.T.A.B. 2008).

12. By Specific License, CU-78926-a, issued February 23, 2010, the Office of Foreign Assets Control of the United States Department of Treasury (“OFAC”) has authorized Petitioners to bring this Petition to Cancel (copy annexed hereto).

THE APPLICATION PROCEEDINGS

13. On March 22, 2008, Registrant filed an intent-to-use application in the USPTO to register PINAR DEL RIO for “cigars” and other cigar and tobacco related products and accessories, which application was assigned Serial No. 77428932 (“Application”).

14. On July 21, 2008, the USPTO Examiner issued a non-final Office Action refusing registration because the mark is “geographically deceptive and primarily geographically deceptively misdescriptive” under section 2(a), (e)(3) of the Lanham Act, 15 U.S.C. § 1052(a), (e)(3). The evidence attached to the Office Action showed that Pinar del Rio is a province in Cuba that produces the tobacco “used to make the cigars that are so prized overseas,” that the province’s economy relies on tobacco farming and that Pinar del Rio produces 70% of Cuba’s tobacco crop. The Examiner noted that “Cuba is known for its cigars” and that “[t]he applicant

is from Louisiana.”

15. In his August 21, 2008 Response to Office Action, the applicant, through counsel, asserted that the mark is not geographically deceptively misdescriptive, stating, “Applicant has included a declaration that the goods have an association with Pinar Del Rio, Cuba.” The so-called “declaration” was in fact an unsworn letter, signed by Registrant, stating in its entirety: “Our tobacco seeds come from Pinar del Rio Cuba.”

16. Registrant, through counsel, then contended that the mark was “geographically descriptive” and amended the Application for registration on the Supplemental Register.

17. Upon information and belief, Registrant’s tobacco seeds for his PINAR DEL RIO-branded cigars do not, in fact, come from Pinar del Rio, Cuba.

18. Even if Registrant’s tobacco seeds for his PINAR DEL RIO-branded cigars do come from Pinar del Rio, Cuba, that would not alter the fact that the mark is geographically deceptive and primarily geographically deceptively misdescriptive.

19. Registrant also filed an amendment to allege use, deleting all goods other than “cigars,” and claiming a first use and first use in commerce date of July 2008.

20. The Application was then approved for registration for “cigars” on the Supplemental Register and a registration issued on December 2, 2008.

21. Registrant’s mark is primarily geographically deceptively misdescriptive and geographically deceptive of the identified goods, and, upon information and belief, the registration was obtained through fraud on the USPTO.

PINAR DEL RIO IS A RENOWNED TOBACCO GROWING REGION OF CUBA

22. “Pinar del Rio” primarily refers to the province of Pinar del Rio, Cuba, on the western end of Cuba.

23. The primary significance of the mark, PINAR DEL RIO, is a generally known geographic location – Pinar del Rio, Cuba.

24. Pinar del Rio is renowned throughout the world, including the United States, as the finest tobacco growing region in Cuba and throughout the world, and is the main source of tobacco for the famed Cuban-origin premium hand-made cigars that are sold both in Cuba and throughout the world, except the United States.

25. Encyclopedias, leading cigar books, consumer guides, and cigar magazines published in the United States and elsewhere describe Pinar del Rio as Cuba's most important tobacco-growing region, the source of the finest cigar tobacco in Cuba and in the world, and the main source of tobacco for the premium Cuban-origin cigars that are exported throughout the world, and describe Pinar del Rio as famous for its tobacco.

26. Cuba is internationally recognized, including in the United States, as the most renowned country in the world for the growth of tobacco for cigars, and for the production and manufacture of the highest quality cigars, and Pinar del Rio is internationally recognized, including in the United States, as the province most renowned for the growth of the finest tobacco in Cuba and as the main source of tobacco for the premium Cuban-origin cigars that are exported throughout the world.

27. Registrant's website includes a downloadable and printable brochure, which states, referring to "Pinar Del Rio on the west coast of the island [of Cuba]":

The mecca of tobacco cultivation and production. Pinar Del Rio is a jewel of a region in the cigar world. ... the hallowed history of this famed tobacco-growing province of Cuba....

28. United States and international publications directed to the cigar-consuming public and to the trade, including the United States cigar-consuming public and trade, refer to the

premium 100% Cuban-origin cigars, manufactured with tobacco from Pinar del Rio, as a different type of cigar from those cigars that are not of Cuban origin.

29. No other country is as renowned as Cuba for cigars and cigar tobacco, and no geographic location is as renowned for cigar tobacco as Pinar del Rio.

30. Hand-made Cuban-origin cigars made from tobacco from Pinar del Rio are desired by cigar smokers throughout the world, including in the United States, because of their geographic origin.

31. Consumers in the United States and elsewhere in the world associate cigars and cigar tobacco with Cuba and Pinar del Rio. This association is one of the strongest goods/place associations of any consumer product with a particular geographic region in the world.

32. Registrant's mark denotes, is, and will be understood by United States consumers as denoting, that cigars bearing that mark are manufactured in Cuba, or are made from tobacco grown in Pinar del Rio, Cuba and manufactured elsewhere.

33. Registrant's goods do not come from, or otherwise originate in Pinar del Rio, Cuba or elsewhere in Cuba.

34. Registrant's goods are not manufactured, produced or sold in Pinar del Rio or elsewhere in Cuba.

35. The main ingredients or components of Registrant's goods do not come from, or otherwise originate in, and are not manufactured, produced or sold in, Pinar del Rio or elsewhere in Cuba.

36. Registrant, an individual residing in the United States, has no lawful means of obtaining, purchasing, or selling Cuban-origin cigars, Cuban-origin tobacco, or Cuban-origin tobacco seeds, nor any lawful means of obtaining or selling cigars or other tobacco products that

are made anywhere in the world if they are made or derived in whole or in part of any article which is the growth, produce or manufacture of Cuba. Without limitation, this is so because the United States' Cuban Assets Control Regulations, including specifically 31 C.F.R. § 515.201, 515.204, prohibit any such activity.

37. The cigar-consuming public is likely to believe that the place identified by Registrant's mark – Pinar del Rio, Cuba – describes Registrant's goods, and their geographic origin, or the geographic origin of the good's main ingredients, that is, the tobacco, when neither the cigars nor the tobacco used to make those cigars in fact come from Pinar del Rio or elsewhere in Cuba.

38. Consumers' mistaken belief that Registrant's cigars come from Pinar del Rio or elsewhere in Cuba, or are comprised in whole or in part of tobacco grown in Pinar del Rio or elsewhere in Cuba, would be a material factor in such consumers' purchasing decision.

39. Registrant deliberately fosters a false association between his goods and Pinar del Rio, Cuba in his advertisements and promotions of his PINAR DEL RIO-branded cigars.

**REGISTRANT'S CLAIM THAT THE "TOBACCO SEEDS
COME FROM PINAR DEL RIO"**

40. Upon information and belief, Registrant represented to the USPTO that his "tobacco seeds come from Pinar del Rio Cuba" and that his goods "have an association with Pinar Del Rio, Cuba" solely to avoid the USPTO refusing to register his PINAR DEL RIO mark on the ground that "Pinar del Rio" is geographically deceptive and deceptively misdescriptive, as initially determined by the Examiner.

41. When Registrant made those representations to the USPTO, upon information and belief, Registrant in fact knew that the tobacco seeds do not come from Pinar del Rio.

42. Even if Registrant's tobacco seeds do come from Pinar del Rio, Cuba, when he

made his representations to the USPTO, Registrant knew that his cigars in fact do not have any relevant association with Pinar del Rio or elsewhere in Cuba.

43. When he made his representations to the USPTO, Registrant knew that cigars that are manufactured outside of Cuba from tobacco grown outside of Cuba from tobacco seeds that are claimed to come from Cuba, or that are claimed to be descendants of tobacco seeds that are claimed to come from Cuba, are different from cigars produced in Cuba and made from Cuban-origin tobacco in terms of quality, taste, aroma, and other organoleptic characteristics.

44. When he made his representations to the USPTO, Registrant knew that Registrant's cigars do not come from Pinar del Rio or elsewhere in Cuba; do not have their origin in Pinar del Rio or elsewhere in Cuba; the tobacco in Registrant's cigars does not come from or have their origin in Pinar del Rio or elsewhere in Cuba; the main ingredients or components of Registrant's cigars do not come from or have their origin in Pinar del Rio or elsewhere in Cuba; and Registrant's cigars do not have any connection or association with Cuban cigars, tobacco from Pinar del Rio, Cuba, or elsewhere in Cuba, or with Petitioners.

45. The claim that Registrant's "tobacco seeds come from Pinar del Rio Cuba," even if true, does not, and cannot, change the primarily geographically deceptively misdescriptive and geographically deceptive nature of Registrant's PINAR DEL RIO mark for cigars.

46. Upon information and belief, the USPTO would not have registered the mark had it known either that Registrant's tobacco seeds do not come from Pinar del Rio, or that, even if the seeds do come from Pinar del Rio, Registrant's cigars do not have any relevant association or connection with Pinar del Rio, elsewhere in Cuba, or Cuban-origin tobacco or cigars.

INJURY TO PETITIONERS

47. Petitioners believe that they will be and have been damaged by the registration of

Registrant's PINAR DEL RIO mark upon the Supplemental Register, including by Registrant's use of that mark on cigars of non-Cuban origin, which will damage and have damaged the reputation that genuine Cuban-origin cigars have in the United States. Such registration and use also will deceive and has deceived consumers into believing that Cuban-origin cigars made with tobacco from Pinar del Rio, Cuba, or cigars made from tobacco from Pinar del Rio, Cuba, are presently available for purchase in the United States.

48. Petitioners' intend to market and sell 100% Cuban-origin cigars, made with tobacco from Pinar del Rio, to U.S. consumers as soon as U.S. law permits, including under the trademarks for cigars that Petitioners have registered with the USPTO.

49. Petitioners' success in marketing and selling 100% Cuban-origin cigars, made with tobacco from Pinar del Rio, to U.S. consumers as soon as U.S. law permits, including under the trademarks for cigars that Petitioners have registered with the USPTO, will be and has been damaged and diminished by the registration of Registrant's PINAR DEL RIO mark, which deceptively suggests that Registrant's cigars are of Cuban origin, or are made with tobacco from Pinar del Rio, Cuba.

FIRST GROUND FOR CANCELLATION

50. Petitioners repeat and reallege each and every allegation set forth in paragraphs 1 through 49 of this Petition to Cancel as if fully set forth herein.

51. The PINAR DEL RIO mark, as used on or in connection with Registrant's identified goods, is deceptive and primarily geographically deceptively misdescriptive within the meaning of Section 2(a), (e)(3) of the Lanham Act, 15 U.S.C. § 1052(a), (e)(3), for lack of the requisite nexus with Pinar del Rio, Cuba or with Cuba, and, therefore, the registration of the mark should be cancelled.

SECOND GROUND FOR CANCELLATION

52. Petitioners repeat and reallege each and every allegation set forth in paragraphs 1 through 49 of this Petition to Cancel as if fully set forth herein.

53. “Pinar del Rio” is an indication of geographical origin or source within the meaning of Articles 23-28 of the General Inter-American Convention for Trade Mark and Commercial Protection, 46 Stat. 2907 (“IAC”), to which both Cuba and the United States are parties, and which treaty is in force between the United States and Cuba.

54. “Pinar del Rio” does not correspond to the place in which Registrant’s identified goods are, will be, or lawfully could be, fabricated, manufactured, produced or harvested.

55. “Pinar del Rio” has not through constant, general and reputable use in commerce come to form the name or designation itself of Registrant’s identified goods.

56. To the consuming public, the quality and reputation of cigars depend on the place of production or origin, including production of the cigar tobacco.

57. Articles 23-28 of the IAC prohibit Registrant’s use and registration in the United States of the term “Pinar del Rio” in connection with non-Cuban origin cigars.

58. Under the aforesaid provisions of the IAC and also pursuant to Section 44(b), (h) of the Lanham Act, 15 U.S.C. § 1126(b), (h), the registration of the mark should be cancelled.

THIRD GROUND FOR CANCELLATION

59. Petitioners repeat and reallege each and every allegation set forth in paragraphs 1 through 49 of this Petition to Cancel as if fully set forth herein.

60. Upon information and belief, Registrant made a material misrepresentation of fact to the USPTO when he claimed, “Our tobacco seeds come from Pinar del Rio Cuba.”

61. Registrant made a material misrepresentation of fact and omissions of material facts to the USPTO when he represented that Registrant’s “goods have an association with Pinar

Del Rio, Cuba,” without informing the USPTO that the claim that Registrant’s tobacco seeds come from Cuba, even if true, does not mean that Registrant’s cigars have any relevant connection or association with tobacco from Pinar del Rio or with Cuban-origin cigars made with tobacco from Pinar del Rio.

62. Registrant made his material misrepresentations and omissions with the specific intent and purpose of deceiving the USPTO in order to obtain registration of the mark.

63. But for Registrant’s aforesaid intentional material misrepresentations and omissions, the USPTO would have refused registration of the mark.

64. Because of Registrant’s aforesaid material misrepresentations and omissions to the USPTO, the registration of the PINAR DEL RIO mark should be cancelled.

WHEREFORE, Petitioners pray that Registration No. 3542236 on the Supplemental Register for PINAR DEL RIO be cancelled pursuant to 15 U.S.C. § 1064, and that this Petition be granted in favor of the Petitioners.

Dated: March 1, 2010

Respectfully submitted,

/David B. Goldstein/
DAVID B. GOLDSTEIN
RABINOWITZ, BOUDIN, STANDARD,
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*Attorneys for Petitioners Corporacion Habanos,
S.A. and Empresa Cubana del Tabaco*

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this Petition to Cancel Registration No. 3542236 on the Supplemental Register for PINAR DEL RIO is being filed electronically today, March 1, 2010, on the Electronic System for Trademark Trials and Appeals for the United States Patent and Trademark Office.

/David B. Goldstein/
David B. Goldstein

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Petition to Cancel Registration No. 3542236 on the Supplemental Register for PINAR DEL RIO was served on Registrant by mailing, postage prepaid, said copy on March 1, 2010 via U.S. Certified Mail, return receipt requested, to the Correspondent's (and Attorney of Record's) address of record listed for Registration No. 3542236 on the USPTO's TARR database:

Christopher J. Day
Law Office of Christopher Day
301 East Bethany Home Road, Suite A-213
Phoenix AZ 85012

/David B. Goldstein/
David B. Goldstein



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

Cuban Assets Control Regulations

License No. CU-78926-a

AMENDED LICENSE

(Granted under the authority of 50 U.S.C. App. 5(b), 22 U.S.C. 2370(a),
22 U.S.C. 6001 et seq., Proclamation 3447, and 31 CFR Parts 501 and 515)

To: **Rabinowitz, Boudin, Standard, Krinsky & Lieberman, P.C. (the "Licensee")**
111 Broadway, Eleventh Floor
New York, NY 10006-1901
Attn: David B. Goldstein, Esq.

1. Based on your application dated **July 7, 2009** (the "Application"), and information otherwise available to the Office of Foreign Assets Control, License No. CU-78926 dated **October 8 2009**, is hereby revoked and replaced by this License which authorizes the transactions delineated herein.

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

2. This license is granted upon the statements and representations made in your application, or otherwise filed with or made to the Treasury Department as a supplement to your application, and is subject to the conditions, among others, that you comply in all respects with all regulations, rulings, orders and instructions issued by the Secretary of the Treasury under the authority cited above and the terms of this license.
3. The Licensee shall furnish and make available for inspection any relevant information, records or reports requested by the Secretary of the Treasury or any duly authorized officer or agency.
4. This license expires on **February 28, 2012**, is not transferable, is subject to the provisions of Title 31, Parts 501 and 515 of the Code of Federal Regulations and any regulations and rulings issued pursuant thereto, and may be revoked or modified at any time at the discretion of the Secretary of the Treasury acting directly or through the agency through which the license was issued, or any other agency designated by the Secretary of the Treasury. If this license was issued as a result of willful misrepresentation on the part of the applicant or his duly authorized agent, it may, in the discretion of the Secretary of the Treasury, be declared void from the date of its issuance, or from any other date.
5. This license does not excuse compliance with any law or regulation administered by the Office of Foreign Assets Control or any other agency (including reporting requirements) applicable to the transactions(s) herein licensed, nor does it release Licensee(s) or third parties from civil or criminal liability for violation of any law or regulation.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By Clara Y. David 2/23/10
Clara Y. David Date
Chief, TWEA Licensing Section

[Attention is directed to 18 U.S.C. 1001,
50 U.S.C. App. 16, and 31 CFR 515.701 et seq. for provisions relating to penalties.]

License No. CU-78926-a

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Licensees: Rabinowitz, Boudin, Standard, Krinsky & Lieberman, P.C.

SECTION 1 - AUTHORIZATION: (a) All necessary transactions are authorized to enable the Cuban entities Corporacion Habanos, S.A. ("Habanos") and Empresa Cubana del Tabaco ("Cubatabaco") to file and prosecute a cancellation petition in the Trademark Trial and Appeal Board of the United States Patent and Trademark Office to an application to register the trademarks "PINAR DEL RIO" and "PINAR" for cigars filed by Juan E. Rodriguez, Gretna, Louisiana, Reg. No 3542236, as described in the Application, and to pay all necessary filing and other fees in connection therewith.

(b) The law firm **Rabinowitz, Boudin, Standard, Krinsky & Lieberman, P.C.** is authorized to provide legal services to Habanos and Cubatabaco in said cancellation petition, to receive payment for such services and reimbursement for expenses related to such services from Cuban nationals through banking channels, provided the funds are routed from Cuba to the United States via a third-country bank.

(c) The law firm **Rabinowitz, Boudin, Standard, Krinsky & Lieberman, P.C.** is authorized to open and maintain an escrow account in a United States financial institution for funds to be used to cover fees and expenses to be incurred in connection with the legal representation authorized by this license. Any unused portion of said advances held in the escrow account may be returned to the source outside the United States.

Authority: 31 CFR § 515.512.

SECTION 2 – CONDITION: It is a condition of this license that payments of fees or retainers pursuant to paragraph (b) above are made exclusively from fresh funds originating from a source not currently within the United States or within the possession or control of a United States person, including its overseas branches, and that such payments are not made from a blocked account or from other blocked property.

SECTION 3 – RECORDKEEPING REQUIREMENT: The Licensee shall keep a record of the transactions under this license. Such records shall be made available for examination upon demand for at least five years from the date of each transaction.

SECTION 4 – WARNINGS: (a) Except as explicitly authorized in Section 1 above, nothing in this license authorizes any person subject to the jurisdiction of the United States to engage in any transaction or activity prohibited by the Cuban Assets Control Regulations, 31 C.F.R. Part 515.

(b) Nothing in this license authorizes the transfer of funds through methods which involve debits or credits to blocked accounts subject to the jurisdiction of the United States.

SECTION 5 – PRECEDENTIAL EFFECT: The authorization contained in this license is limited to the facts and circumstances specific to the application.
