

MEMORANDUM

Agenda Item No. 11(A)(4)

TO: Honorable Chairman Anthony Rodriguez
and Members, Board of County Commissioners

DATE: January 21, 2026

FROM: Geri Bonzon-Keenan
County Attorney

SUBJECT: Resolution urging President Donald J. Trump to direct the Office of Foreign Assets Control (OFAC) and Bureau of Industry and Security (BIS) to immediately suspend any applicable Cuba-related general licenses under 31 C.F.R. §515.570, authorized carrier services under 31 C.F.R. §515.533, and exports authorized under 15 C.F.R. §746.2, pending audits for ties to the Cuba restricted list and for review of the nature and destination of goods and services provided; urging the Florida legislature to enact Senate Bill 1176, House Bill 1397, or similar legislation that would require any applicants for a local business tax receipt, or renewal thereof, that conduct transactions subject to federal sanctions programs to exhibit an active license or authorization from OFAC; and directing the County Mayor to provide a report to this Board regarding the current enforcement status of local business tax for businesses unlawfully transacting business with Cuba or any persons affiliated with the Cuban government, and stricter enforcement and penalties for such businesses

The accompanying resolution was prepared and placed on the agenda at the request of Prime Sponsor Commissioner Natalie Milian Orbis.



Geri Bonzon-Keenan
County Attorney

GBK/uw



MEMORANDUM (Revised)

TO: Honorable Chairman Anthony Rodriguez
and Members, Board of County Commissioners

DATE: January 21, 2026

FROM: 
Gina Bonzon-Keenan
County Attorney

SUBJECT: Agenda Item No. 11(A)(4)

Please note any items checked.

“3-Day Rule” for committees applicable if raised

6 weeks required between first reading and public hearing

4 weeks notification to municipal officials required prior to public hearing

Decreases revenues or increases expenditures without balancing budget

Budget required

Statement of fiscal impact required

Statement of social equity required

Ordinance creating a new board requires detailed County Mayor’s report for public hearing

No committee review

Applicable legislation requires more than a majority vote (i.e., 2/3’s present ___, 2/3 membership ___, 3/5’s ___, unanimous ___, majority plus one ___, CDMP 7 vote requirement per 2-116.1(3)(h) or (4)(c) ___, CDMP 2/3 vote requirement per 2-116.1(3) (h) or (4)(c) ___, CDMP 9 vote requirement per 2-116.1(4)(c) (2) ___) to approve

Current information regarding funding source, index code and available balance, and available capacity (if debt is contemplated) required

Approved _____
Veto _____
Override _____

Mayor

Agenda Item No. 11(A)(4)
1-21-26

RESOLUTION NO. _____

RESOLUTION URGING PRESIDENT DONALD J. TRUMP TO DIRECT THE OFFICE OF FOREIGN ASSETS CONTROL (OFAC) AND BUREAU OF INDUSTRY AND SECURITY (BIS) TO IMMEDIATELY SUSPEND ANY APPLICABLE CUBA-RELATED GENERAL LICENSES UNDER 31 C.F.R. §515.570, AUTHORIZED CARRIER SERVICES UNDER 31 C.F.R. §515.533, AND EXPORTS AUTHORIZED UNDER 15 C.F.R. §746.2, PENDING AUDITS FOR TIES TO THE CUBA RESTRICTED LIST AND FOR REVIEW OF THE NATURE AND DESTINATION OF GOODS AND SERVICES PROVIDED; URGING THE FLORIDA LEGISLATURE TO ENACT SENATE BILL 1176, HOUSE BILL 1397, OR SIMILAR LEGISLATION THAT WOULD REQUIRE ANY APPLICANTS FOR A LOCAL BUSINESS TAX RECEIPT, OR RENEWAL THEREOF, THAT CONDUCT TRANSACTIONS SUBJECT TO FEDERAL SANCTIONS PROGRAMS TO EXHIBIT AN ACTIVE LICENSE OR AUTHORIZATION FROM OFAC; AND DIRECTING THE COUNTY MAYOR OR COUNTY MAYOR'S DESIGNEE TO PROVIDE A REPORT TO THIS BOARD REGARDING THE CURRENT ENFORCEMENT STATUS OF LOCAL BUSINESS TAX FOR BUSINESSES UNLAWFULLY TRANSACTING BUSINESS WITH CUBA OR ANY PERSONS AFFILIATED WITH THE CUBAN GOVERNMENT, AND STRICTER ENFORCEMENT AND PENALTIES FOR SUCH BUSINESSES

WHEREAS, Miami-Dade County is home to the largest Cuban exile community in the United States and serves as a major gateway for Cuba-related financial, shipping, and export activities; and

WHEREAS, in recent history, the Cuban government has engaged in troubling actions, some of which have amounted to terrorism or support thereof, including: shooting down civilian airplanes, providing safe harbor to members of foreign terrorist organizations, and allowing China to operate an electronic “eavesdropping” station on the island to monitor United States telecommunications; and

WHEREAS, accordingly, federal general licenses and export authorizations related to Cuba have a direct impact on Miami-Dade County residents, businesses, and public safety; and

WHEREAS, gaps in oversight and the infrequency of audits may have allowed bad actors, including regime agents and entities that are a front for the Cuban government, to exploit general licenses to move goods and services that are not strictly humanitarian in nature and that may benefit the Cuban communist regime; and

WHEREAS, Miami-Dade County has firsthand knowledge of the need for stronger compliance and enforcement, as evidenced by the Miami-Dade County Tax Collector's recent actions that have brought some regulatory concerns to light; and

WHEREAS, upon taking office on January 20, 2025, President Donald J. Trump exercised executive authority to rescind prior executive actions easing sanctions on Cuba, restore a stricter enforcement posture, reaffirm Cuba's designation as a state sponsor of terrorism, and revive enhanced restrictions on engagement with regime-affiliated entities; and

WHEREAS, notwithstanding these actions, enforcement gaps may exist with respect to existing general licenses, such that additional targeted executive action is warranted; and

WHEREAS, on January 6, 2026, Senator Ana Maria Rodriguez (R – Doral) filed Senate Bill 1176 for consideration during the 2026 Florida Legislative Session, which provides that if an applicant for a local business tax receipt (or renewal thereof) conducts transactions subject to the sanctions programs administered by the Office of Foreign Assets Control (OFAC) of the United States Department of the Treasury, such person must exhibit proof of an active license or authorization from OFAC before such local receipt may be issued; and

WHEREAS, on January 9, 2026, Representative Alex Rizo (R – Hialeah) filed House Bill 1397 for consideration during the 2026 Florida Legislative Session, which is the identical House companion bill to SB 1176; and

WHEREAS, this Board would like for the federal government and the state to take additional measures with respect to regulatory oversight on transactions involving Cuba that are subject to federal sanctions programs; and

WHEREAS, this Board also desires that the County Mayor or County Mayor's designee provide this Board with additional information on the current enforcement status of local business tax for businesses unlawfully transacting business with Cuba, as well as stricter enforcement and civil and criminal penalties for such businesses,

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF MIAMI-DADE COUNTY, FLORIDA, that this Board:

Section 1. Urges President Donald J. Trump to direct the Office of Foreign Assets Control (OFAC) and the Bureau of Industry and Security (BIS) to immediately suspend any applicable Cuba-related general licenses under 31 C.F.R. §515.570, authorized carrier services under 31 C.F.R. §515.533, and exports authorized under 15 C.F.R. §746.2, pending audits for ties to the Cuba Restricted List and for review of the nature and destination of goods and services provided.

Section 2. Urges the Florida Legislature to enact Senate Bill 1176, House Bill 1397, or similar legislation that would require any applicants for a local business tax receipt, or renewal thereof, that conduct transactions subject to federal sanctions programs to exhibit an active license or authorization from OFAC.

Section 3. Directs the County Mayor or County Mayor's designee to provide a report to this Board regarding: (a) the current enforcement status of local business tax for businesses unlawfully transacting business with Cuba or any persons affiliated with the Cuban government; and (b) stricter enforcement and civil and criminal penalties for such businesses. The report should consider and include the input of the Miami-Dade County Tax Collector's Office. The completed report shall be provided to this Board within 60 days of the effective date of this resolution and placed on an agenda of the full Board without committee review pursuant to rule 5.06(j) of the Board's Rules of Procedure and Ordinance No. 14-65.

Section 4. Directs the Clerk of the Board to transmit a certified copy of this resolution to the President of the United States, the United States Secretary of State, the Speaker of the United States House of Representatives, the President Pro Tempore of the United States Senate, the Chair and Members of the Florida Congressional Delegation, the Governor of Florida, the Speaker of the Florida House of Representatives, the President of the Florida Senate, and the Chair and remaining members of the Miami-Dade State Legislative Delegation.

Section 5. Directs the County's state lobbyists to advocate for the action described in Section 1 above, and authorizes and directs the Office of Intergovernmental Affairs to: (a) amend the 2026 State Legislative Package to include this item, and (b) include this item in the 2026 Federal Legislative Package when it is presented to the Board.

The Prime Sponsor of the foregoing resolution is Commissioner Natalie Milian Orbis. It was offered by Commissioner [REDACTED], who moved its adoption. The motion was seconded by Commissioner [REDACTED] and upon being put to a vote, the vote was as follows:

Anthony Rodriguez, Chairman
Kionne L. McGhee, Vice Chairman
Marleine Bastien Juan Carlos Bermudez
Sen. René García Oliver G. Gilbert, III
Roberto J. Gonzalez Keon Hardemon
Danielle Cohen Higgins Vicki L. Lopez
Natalie Milian Orbis Raquel A. Regalado
Micky Steinberg

The Chairperson thereupon declared this resolution duly passed and adopted this 21st day of January, 2026. This resolution shall become effective upon the earlier of (1) 10 days after the date of its adoption unless vetoed by the County Mayor, and if vetoed, shall become effective only upon an override by this Board, or (2) approval by the County Mayor of this resolution and the filing of this approval with the Clerk of the Board.

MIAMI-DADE COUNTY, FLORIDA
BY ITS BOARD OF
COUNTY COMMISSIONERS

JUAN FERNANDEZ-BARQUIN, CLERK

By: _____
Deputy Clerk

Approved by County Attorney as
to form and legal sufficiency.



Christian J. Fernandez-Andes