



OFFICE OF INSPECTOR GENERAL

REVIEW OF USAID'S CUBAN CIVIL SOCIETY SUPPORT PROGRAM

REVIEW REPORT NO. 9-000-16-001-S
DECEMBER 22, 2015

WASHINGTON, D.C.



Office of Inspector General

December 22, 2015

MEMORANDUM

TO: USAID/DCHA, Deputy Assistant Administrator, Robert Jenkins
USAID/OGC, Deputy General Counsel, Susan Pascoello
USAID/LAC, Deputy Assistant Administrator, Paloma Adams-Allen
USAID/M, Senior Deputy Assistant Administrator, Clinton D. White
USAID/M/OAA, Deputy Director of Operations, Mark A. Walther

FROM: IG/A, Assistant Inspector General for Audits, Nathan Lokos /s/

SUBJECT: Review of USAID's Cuban Civil Society Support Program (Report No. 9-000-16-001-S)

This memorandum transmits our final report on the subject review. In finalizing the review report, we considered your comments on the draft and included them in their entirety, excluding attachments, in Appendix II.

The report contains an overview of the program's ZunZuneo project and its grant covering an HIV prevention workshop. In addition, the report includes 16 recommendations to help the Agency improve its internal controls reviewed under this report. After reviewing information provided in response to the draft report, we determined that the Agency has taken final action on Recommendations 1, 9, 10, 12, 14, and 15, and made management decisions on the rest. Please provide evidence of final action on the open recommendations to the Audit Performance and Compliance Division.

Thank you and your staff for the cooperation and assistance extended to us during this effort.

cc: USAID/M, Assistant Administrator, Angelique M. Crumbly
USAID/OGC, General Counsel, John L.S. Simpkins
USAID/DCHA, Senior Deputy Assistant Administrator (Acting), Thomas H. Staal

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Abbreviations

The following abbreviations appear in this report:

ADS	Automated Directives System
CAFC	Commission for Assistance to a Free Cuba
CBJ	congressional budget justification
CFR	Code of Federal Regulations
COR	contracting officer's representative
DCHA	Bureau for Democracy, Conflict, and Humanitarian Assistance
DEC	Development Experience Clearinghouse
FY	fiscal year
GAO	Government Accountability Office
IQC	indefinite quantity contract
LAC	Bureau for Latin America and Caribbean
M&E	monitoring and evaluation
NGO	nongovernmental organization
NIMESA	NiteMedia SA
OAA	Office of Acquisition and Assistance
OGC	Office of General Counsel
OIG	Office of Inspector General
OTI	Office of Transition Initiatives
PPR	program performance review
SMS	short message service
SWIFT	Support Which Implements Fast Transitions

BACKGROUND

Under the Cuban Democracy Act of 1992,¹ U.S. law supports the transition to democracy in Cuba. The Cuban Liberty and Democratic Solidarity (LIBERTAD) Act of 1996² gives the President legal authority to provide assistance to individuals and independent nongovernmental organizations (NGOs), including democratic and human rights groups, in support of democracy-building efforts in Cuba.³ A presidential commission formed in 2003, named the Commission for Assistance to a Free Cuba (CAFC), advocated measures to hasten the regime's downfall, including efforts to bypass the Cuban Government's restrictions on communication. CAFC issued two reports with recommendations on ways to support the empowerment of the Cuban people in an effort to "hasten the end of the Castro dictatorship." (More details on U.S. law and policy on Cuban programming are in Appendix III.)

In 2008 the U.S. Department of State notified Congress of its intent to obligate funds to support the commission's recommendations; a portion of these funds were for USAID. To implement the commission's recommendations, USAID created the Cuban Civil Society Support Program to support activities "that expand the reach and impact of independent civil society in Cuba." They included:

[I]ncreasing the flow and access to accurate, independent, and uncensored information (from multiple domestic and international sources, including the internet) on political, economic, and/or social issues relevant to Cuban citizens; assist the development of independent Cuban non-governmental groups and entities engaged in consensus building and economic and social mobilizations activities; and, assist in the development of peaceful, strong, and independent non-governmental civil society organizations, professional associations and other groups through capacity building, material assistance, and technical training.

In October 2008 USAID's Office of Transition Initiatives (OTI) awarded Creative Associates International Inc. a \$15.5 million contract to implement the 3-year program; \$11,170,671 was obligated, and \$11,167,031 was disbursed over almost 4 years.⁴ The contract was a task order under an indefinite quantity contract (IQC) known as Support Which Implements Fast Transitions (SWIFT) II; its purpose was to provide quick-response assistance to countries, focusing on political transition and stabilization needs.

The program—which OTI managed within the Bureau for Democracy, Conflict, and Humanitarian Assistance (DCHA)—sought to provide support to nontraditional actors and organizations in Cuba for activities that would create "positive enabling environments for change in advance of, during, and as needed, immediately following a transition." The program's goal and objectives are in Table 1 on the next page.

¹ Cuban Democracy Act of 1992, Public Law No. 102-484 (1992), codified at Title 22 of the United States Code, Sections 6001-10.

² Also known as the Helms-Burton Act of 1996, Public Law No. 104-114 (1996).

³ According to the Government Accountability Office (GAO) and USAID, the U.S. Government funded \$225 million to support Cuban democracy programming from 1996 through 2012.

⁴ Contract modifications in 2011 and 2012 extended the program to August 31, 2012.

Table 1. Program Goal and Objectives

Program Goal		
Create an enabling environment for democratic change		
Program Objective		
Cultivate and empower citizens to actively participate in public decision-making processes		
Create organized groups seeking common goals	Create alternative means of mass communication	Create safe physical meeting places
Activity Objectives		
Foster emerging social leadership	Increase community engagement in social activities	Strengthen the capacity of nascent social groups and networks

Source: Adapted from Creative’s monitoring and evaluation (M&E) plan, January 30, 2009.

The program awarded 103 grants, 12 of which made up a Twitter-like project eventually called ZunZuneo. ZunZuneo supported the program’s first key objective: empowering citizens to participate in public decision-making. Specifically, the project was designed to provide “a free flow of information to Cuban Citizens” to increase community engagement in social activities, according to project documents. As the project grew, the purpose expanded to give Cubans new technologies they could use to form interest groups and coordinate activities to strengthen networks among social groups. Toward the end, the project focused on “enhancing and facilitating independent communication networks for Cuban citizens” to increase their access to mass communications, according to project documents.

NiteMedia SA (NIMESA), a Nicaraguan organization, received two grants, and Mobile Accord Inc., of Denver, Colorado, received ten. The program obligated \$1.7 million for these grants, which are listed in Appendix IV. Another grant, titled “Supporting the Commitment of Youths with the Community” totaling \$20,943, went to Fundacion Operacion Gaya Internacional (Gaya), a Costa Rican NGO. A portion of this grant was used for an HIV prevention workshop.

In April 2014 the Associated Press published an article stating that ZunZuneo was secretly created to stir unrest and raised concerns about the legality and covert nature of the project. In August 2014 it reported on an HIV prevention workshop, airing allegations that the workshop was a guise to recruit young Cubans to antigovernment activism and that it undermined the credibility of USAID’s health work around the world.

REVIEW RESULTS

The Office of Inspector General (OIG) conducted this review of USAID's Cuban Civil Society Support Program to answer three objectives related to activities under the program.

1. How was USAID's Cuban Civil Society Support Program—including ZunZuneo—designed, approved, and implemented?
2. How did program implementers design and use an HIV prevention workshop?
3. Did USAID use appropriate management controls for selected aspects of the program?

To answer the first two objectives, we identified and described corresponding facts. For the third objective, we assessed USAID's management controls, developed findings and made recommendations for improvement.

During the course of our work, we noted two other matters related to the program. This report highlights concerns regarding financial management accountability and covert action as defined by the National Security Act of 1947. Although we did not find any evidence of fraud, the methods designed to conceal funding sources and recipients pose inherent risks. We also describe program activities in relation to the covert action definition. We did not conduct work to determine whether the program involved covert actions as defined under the National Security Act. However, during the course of our review, we obtained information related to this matter and present it in this report. In the future, we plan to conduct audit work on USAID's approach to handling activities that are not widely acknowledged and that may raise questions about whether they could be considered covert.

Throughout the course of the review, we encountered some scope limitations that presented problems obtaining complete information and, in some cases, verifying the accuracy of information received. Information about these limitations is available in Appendix I.

OIG responses to the review objectives are provided below.

Objective 1. We found that the program, which ZunZuneo was part of, was designed to carry out CAFC's recommendations to foster democracy. According to OTI and Creative field staff based in Costa Rica, the idea for ZunZuneo originated with them. OTI approved ZunZuneo, stating that "a strong desire for knowledge of current events and anything novel, coupled with access to basic cell phones . . . has created the prime opportunity for [ZunZuneo], to allow Cubans to be engaged with the rest of the world."

Messages via short message service (SMS), or text messages, were sent out under the project as a way to provide uncensored information to Cuban citizens. The majority of the text messages sent under ZunZuneo contained information about sports and trivia. According to the award document, project staff then expanded the communications platform "to provide Cubans the means to form shared interest groups and coordinate activities through the use of technologies." Eventually, ZunZuneo grew into a multifaceted communication system including text messaging and e-mail newsletters, as well as a Facebook page, a Twitter account, and a Web site.

The grantee—concerned about the risk that the Cuban Government would discover the U.S. Government’s involvement and shut down the project—took action to conceal the origin of funds and ownership of the platform. Without identifying financial support to sustain ZunZuneo, the project ended in August 2012.

Objective 2. We found that members of a Cuban NGO, Revolution, who received capacity-building training from Gaya, designed and delivered an HIV prevention workshop. The purpose of Gaya’s grant was aimed at empowering local youth to “reach consensus on community-based projects” and “identify new tools and methods to enhance social participation.” It supported the program’s objective by providing capacity-building training that included problem solving, team-building, and management skills to Revolution.

Gaya’s founder said Revolution members decided to give an HIV prevention workshop in their community because HIV was an issue for them. The chief of party said it was a way for them to feel they had made a difference in their community. Gaya also provided Revolution with technical guidance on how to conduct a workshop. The HIV prevention workshop was conducted using an HIV/AIDS prevention manual published by the United Nations Population Fund called *Socio-Education Module for the Prevention of HIV/AIDS among Youth*. Gaya’s founder said the manual was selected because it was public and related to an international convention signed by the Cuban Government.⁵

After the workshop, Revolution led a mural-painting activity, followed by an electronic music concert. Program officials said no other HIV activities were funded by the program.

Objective 3. We found that appropriate management controls were not in place for all selected aspects of the program. The review team mainly focused on the controls covering program documentation, communication, oversight, monitoring, and susceptibility to fraud, waste, and abuse. Although the ZunZuneo grants were the main focus of this objective, the team also reviewed additional grants to determine whether issues identified were specific to ZunZuneo or applied across the entire program.

The team found the following problems.

- The Agency’s class deviation request from acquisition regulations did not meet all requirements (page 18). The justification for the deviation did not clearly reflect the various conditions for which the deviation applied. Also, the deviation request did not have an expiration date, contractor’s name, contract or task order number, or control number, and no related semiannual reports were submitted.
- The program did not follow internal controls consistently in awarding grants (page 20). The controls were insufficient at preventing the mishandling of exceptions to competition, split purchases, and excessive grant modifications and extensions.
- Conflicts of interest occurred under ZunZuneo (page 25). Creative staff had conflicts of interest involving related parties under ZunZuneo. OTI’s country representative and contracting officer’s representative (COR) were aware of these conflicts.

⁵ The Ibero-American Convention on the Rights of Youth was signed by the Cuban Government in 2005 and later ratified by five signatory countries in 2008. Cuba and other countries have not ratified it yet.

- Legal roles and responsibilities were ambiguous (page 26). Despite the risks involved in working in Cuba, there was confusion among the Agency, contractor, and grantees about who had legal responsibility.
- Program monitoring and evaluation (M&E) were not implemented fully (page 28). Creative was unable to implement its M&E activities as planned, and in a couple of instances, both OTI and Creative did not follow guidance fully. For example, program performance reviews (PPRs) were not conducted in accordance with guidance, and program performance information was not sent to the Development Experience Clearinghouse (DEC).
- USAID had incomplete legal and congressional contact records (page 31). Despite the requirements to record and document decisions, transactions, and events, offices involved with the program did not have appropriate records.
- USAID did not have a policy protecting its programming from potential subversion (page 33). When a 2007 OIG report⁶ pointed out that USAID needed such a policy given the risk the Cuban Intelligence Service posed to Agency programs, officials with the Bureau for Latin America and the Caribbean (LAC) agreed to follow such a policy if USAID established one. However, USAID does not have an Agency-wide policy to address subversion threats.

We also found that some financial management decisions made during ZunZuneo's implementation raised concerns about accountability (page 35). In addition, we provide the definition of covert action and other relevant information on the matter (page 36).

We recommend that:

1. OTI, in collaboration with the Office of Acquisition and Assistance (OAA) and OGC, develop and implement a plan in which future class deviations from acquisition policies and/or procedures clearly state the conditions for which the deviation will apply (page 19).
2. OTI, in collaboration with OAA, review all deviations from Automated Directives System (ADS)⁷ or acquisition regulations for its active awards, and determine whether they comply with Title 48 of the Code of Federal Regulation (CFR), Subpart 701.4, and correct any instances of noncompliance (page 20).
3. OAA review its procedure for approving and managing deviations, and determine whether it needs to be updated to comply with 48 CFR 701.4, and make any corrections necessary (page 20).
4. OTI establish and implement procedures that require oversight of implementing partners' proper compliance with exception to competition requirements (page 25).
5. OAA review the control procedures for OTI's grants under contract and implement a plan to conduct periodic monitoring of OTI's grants under contract (page 25).
6. OAA establish ADS guidance to identify and prevent personal conflicts of interest, including by contractor staff when executing grants under contract (page 26).

⁶ *Audit of USAID's Cuba Program* (No. 9-516-07-009-P), September 25, 2007.

⁷ ADS is the Agency's source for policies and procedures that govern its programs and operations.

7. OTI develop a plan to implement the new requirements that prohibit personal conflicts of interest, including how to identify and avoid them (page 26).
8. OTI, in collaboration with OGC and OAA, develop and implement a policy that requires (1) including clearly delineated legal responsibilities in its awards in the context of OTI's unique business model, and (2) communicating legal responsibilities to its partners (page 28).
9. OTI and OGC develop procedures on when and how OTI country teams should seek legal counsel, which includes during implementation and administration of a program (page 28).
10. OTI develop and implement a policy to document actions taken to address recommendations stemming from PPRs, and, if a review is not conducted or recommendations are not followed, that those decisions are documented (page 30).
11. OTI check that all Cuban Civil Society Support Program formal reviews and project deliverables are finalized properly and labeled accordingly (page 30).
12. OTI update its office guidance and inform current staff on the need to finalize project deliverables properly and to finalize deliverables of ongoing projects that were not done properly before (page 30).
13. OTI submit program documents, including the final program evaluation with lessons learned, to the DEC in accordance with ADS, or obtain the appropriate waiver (page 31).
14. OTI inform current staff in writing and update office guidance on the requirement to document legal guidance, including correspondence, in project files and maintain these files in accordance with the Agency's disposition schedule (page 33).
15. OGC inform current staff in writing and update office guidance on the requirement to follow the Agency's disposition schedule and require attorneys to maintain appropriate documentation of legal opinions, including legal correspondence, in accordance with that schedule (page 33).
16. The Bureau for Management conduct an Agency-wide analysis to determine whether a screening policy is needed to address intelligence and subversion threats that apply to USAID, and, if so, develop and implement one (page 34).

The first part of the report, describing the program's approval, award, strategy, and implementation, starts on page 7. How ZunZuneo was designed, approved, and implemented starts on page 11. The second part of the report, describing the implementation of the HIV prevention workshop, starts on page 15. The third part, containing the assessment of management controls over selected aspects of the program, starts on page 18. Matters relating to fraud risk and covert action can be found in "Other Matters" on page 35. The scope and methodology, including the review team's scope limitations, appear in Appendix I. Management comments on the draft report appear in Appendix II, and our evaluation of them starts on page 41.

A summary of U.S. policy on Cuba can be found in Appendix III, and details of the ZunZuneo grants appear in Appendix IV. Additionally, a list of the SMS messages sent by grantees under ZunZuneo appears in Appendix V.

Objective 1: Cuban Civil Society Support Program and ZunZuneo

OTI's Cuban Civil Society Support Program was initiated in 2008 when, according to OTI officials, they were asked by the U.S. Department of State and the National Security Council to become more involved in Cuban programming.⁸ One OTI official said State and the council sought OTI involvement because Congress wanted new ideas and award recipients. Another OTI employee said State wanted to take advantage of OTI's flexibility and small grants mechanism for Cuba programming. According to its mission statement, OTI seizes "critical windows of opportunity," and works globally "on the ground to provide fast, flexible, short-term assistance targeted at key political transition and stabilization needs."

Despite OTI's concerns about whether a window of opportunity existed in Cuba, OTI officials moved forward with the program in July 2008, stating in its initiation memo, "There are some clues that Cuba may be changing." The clues included Raul Castro, Fidel Castro's successor, encouraging Cubans to speak more openly about issues; the Cuban Government allowing citizens to buy cell phones and access hotels; and young people voicing their discontent. OTI concluded in the memo that the "political space for dissent, while still small, may represent an opportunity for OTI engagement."

To set the program in motion, USAID required the involvement of other Government entities, including State, Congress, and the Department of Treasury.

Approval. According to OTI's Cuba internal program initiation memo, the program was funded by the Economic Support Fund, which provides assistance to countries and organizations to promote economic or political stability. The fund is appropriated by Congress and provided to USAID by State.

Obligating or expending funds for programming in Cuba requires special congressional notification, allowing Congress to review the notification, make inquiries, express objections, and place a hold on the obligation. Staff from OTI and LAC briefed Congress on the programs covered by the notification, including OTI's Cuba program.

Treasury's Office of Foreign Assets Control issued USAID a license authorizing the Agency and its grantees and contractors "to engage in all financial transactions necessary for the entry into and execution of USAID grants and contracts in Cuba," including "travel related transactions involving Cuba."

Award. USAID competitively selected Creative to implement the program. The contract, effective October 2008, explicitly stated that the contractor would implement CAFC's recommendations by "supporting activities that expand the reach and impact of independent civil society in Cuba." Creative was to help Cuban NGOs or individuals implement activities including:

⁸ Before 2008, USAID's programming in Cuba was done almost exclusively by the Office of Cuban Affairs, under LAC.

[I]ncreasing the flow and access to accurate, independent, and uncensored information . . . on political, economic, and/or social issues relevant to Cuban citizens; assist the development of independent Cuban non-governmental groups and entities engaged in consensus building and economic and social mobilization activities; and, assist in the development of peaceful, strong, and independent [groups] through capacity building, material assistance, and technical training.

Strategy. To identify people or organizations that could be part of peaceful community change, Creative conducted an analytical exercise to categorize segments of the population along a political spectrum reflecting levels of loyalty toward the Castro regime.⁹ Table 2 presents the categories.

Table 2. Members of the Cuban Population by Their Potential for Effecting Change

Category	Description	Examples
1	Committed loyal	State Security, army, police
2	Passively loyal	Teachers and others whose survival depends on status quo
3	Neutral	Small business sector
4	Passively nonloyal	Artists, intellectuals, bloggers
5	Committed nonloyal	Democracy movement, political opposition

Source: Creative's technical proposal.

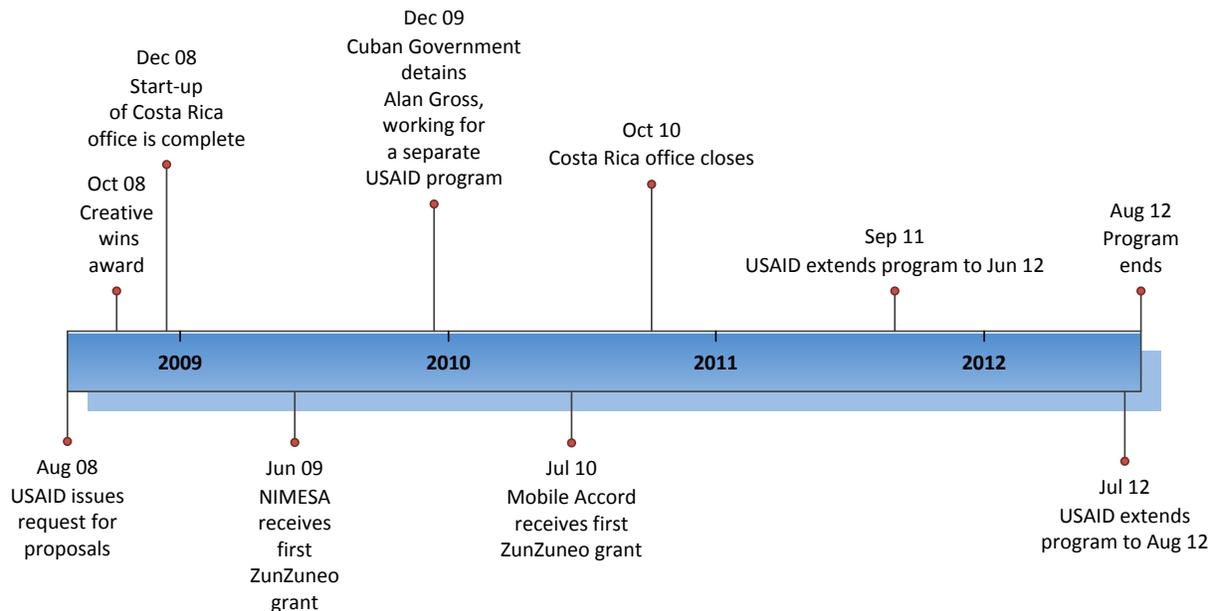
Creative's staff sought to work with those in Categories 2, 3, and 4 (shaded), all of whom the program could empower and help become active in improving the living conditions in their communities. This strategy, according to a program review conducted by USAID in August 2010, would "demonstrate collective, civic-oriented action independent of the state and thereby challenge the state's self-arrogated monopoly of the public realm."

Creative planned to build the capacity of Cuban citizen associations "to peacefully and effectively engage with government to advocate for community needs" by creating and using partnerships between off-shore NGOs primarily based in Latin America and the Caribbean, and Cuban beneficiaries.

Implementation. Figure 1 on the next page shows the program's timeline.

⁹ According to Creative's chief of party, this conceptual tool was created by CANVAS, an NGO in Belgrade, Serbia. The tool is used by social movements and conflict resolution practitioners to understand and map the relationship between different sectors of a society and the status quo.

Figure 1. Key Events



U.S. Government assistance to Cuba has numerous restrictions. OTI adapted its operations to work in Cuba, including operating from a third country (Costa Rica); awarding grants to offshore NGOs that could travel to Cuba and work with Cubans; and developing security measures.

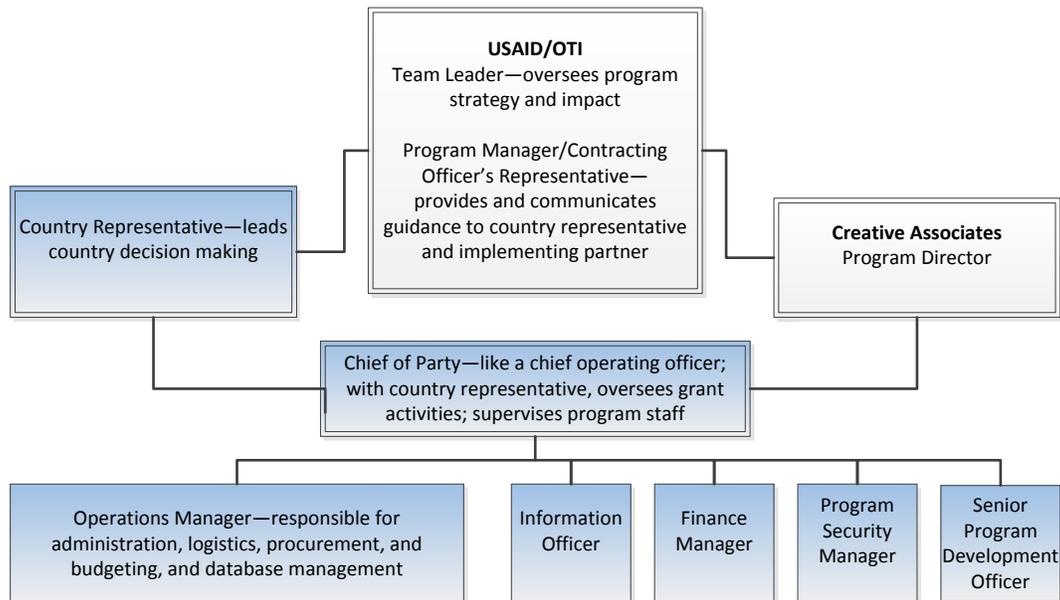
From the beginning, OTI determined that the program office would be established in a third country that had “easy and direct flight access to the island.” A former OTI official said Costa Rica was considered because USAID already had an Office of Foreign Disaster Assistance there, the Costa Rican Government was receptive, there were direct flights from there, and embassy officials were supportive. Following a briefing with the Costa Rican Government and discussions with the U.S. Embassy, the program was based in San Jose. According to a cable from the State Department approving the establishment of an OTI office in Costa Rica, the location was selected because the program strategy required regular contact with local organizations and residents, and there would be easy access to OTI partner organizations’ locations. Furthermore, Costa Rica was relatively safe, with less crime than other Central American countries.

The contract required Creative to provide a security plan. Its security plan contained guidelines for travel, information, crisis response, and communications. Creative hired a security manager for the program who was responsible for enforcing the security guidelines.

Apart from those adaptations, OTI and Creative established an operating structure for program management that was generally standard for OTI (shown in Figure 2 on the next page). Daily decision-making responsibility was with OTI’s country representative in the field and the chief of party, the leader of Creative’s team. The country representative was supported by an OTI team in Washington, mainly the program manager¹⁰ and team leader. Supporting the chief of party and the country team was the implementing partner’s home office, which in this case was also in Washington.

¹⁰ The program manager can sometimes be the COR.

Figure 2. Program Operating Structure and Key Positions



Sources: Adapted from OTI guidance, the program task order, and Creative’s organizational chart (positions in unshaded boxes were in Washington, D.C.)

According to OTI and Creative, the ideas for grants originated from Creative’s field staff and sometimes from OTI’s country representative. Creative’s field staff presented grant ideas to the OTI country representative during weekly program meetings, and the country representative would either approve or reject them through the OTI activity database. Any that were approved became grants and were assigned to a program development officer—a Creative field staff member—to manage. OTI also used its activity database, a central repository, as a communication and monitoring tool. The database allowed OTI Washington to monitor program developments.

OTI senior leaders said they were informed about what was happening in the field through weekly staff meetings and weekly senior leadership team meetings. OTI also participated in interagency meetings designed to prevent conflict with and duplication of other U.S. Government programs in Cuba.

The arrest of U.S. citizen Alan Gross in Cuba in December 2009 caused the program to adjust its implementation strategy.¹¹ According to program officials, the program design included grantee travel to Cuba as an essential implementation mechanism; however, after Gross’s arrest, USAID approved little to no travel to Cuba. Some program grants were closed or did not reach their overall objectives. OTI shifted its programming approach to include methods that did not rely upon travel to Cuba.

Additionally, OTI noted that the Costa Rica field office was expensive and used funds that could be spent on grants instead. OTI closed the office in October 2010 and moved most of the

¹¹ While participating in a separate USAID program titled the Cuba Democracy and Contingency Planning Program, subcontractor Alan Gross was arrested in Cuba for allegedly committing “acts against the integrity and independence of the state [Cuba],” according to the primary contractor that implemented the program.

program's operations to Washington, D.C., where Creative and OTI staff then managed the program until it ended in August 2012.

Design, Approval, and Implementation of ZunZuneo. To meet the program's objective to increase information flow and provide Cubans with access to "accurate, independent, and uncensored information . . . on political, economic, and/or social issues," Creative awarded 12 grants to two grantees—NIMESA and Mobile Accord—to create and implement a communications platform later known as ZunZuneo. The project commenced in June 2009 with USAID's approval. The project evolved over time with its design occurring intermittently throughout implementation and ended in 2012.

According to Creative and OTI field staff, the idea for ZunZuneo originated with them. A source gave Creative 500,000 Cuban cell phone numbers. The source said the numbers were obtained on the Cuban "informal market" (i.e., on the street in Cuba) and said they were widely available to anyone interested on and off the island. The source provided a copy of *Huffington Post's* "The Ten Most Popular Android Apps in Cuba" that discussed the availability of these phone numbers throughout Cuba through an app. The article stated that every year a pirated copy of the telephone directory from the Cuban phone company is "leaked and ends up on the computers and phones of thousands of people." The country representative said OTI did not pay for the numbers. A memo from the chief of party stated that the source gained access to the cell phone numbers independently and gave them to Creative for free.

In May 2009 Creative's operations manager informally contacted a family member who owned a technology company called NIMESA to discuss the feasibility of sending out mass messages; the family member said it was feasible. The following month, on June 25, OTI approved the project, stating that "a strong desire for knowledge of current events and anything novel, coupled with access to basic cell phones . . . has created the prime opportunity for [ZunZuneo], to allow Cubans to be engaged with the rest of the world." OTI also noted that SMS technology was being used in a wide range of social and business applications. According to project documents, sending out mass messages via SMS would provide uncensored information to Cuban citizens. Four days later NIMESA received the first ZunZuneo grant for \$97,968, effective until September 30, 2009; it subsequently was extended through October 16, 2009.¹²

OTI managers said USAID senior managers were briefed on the program, and specifically on ZunZuneo, because of the sensitive nature of the Cuba program and its potential political impact. OTI staff said each incoming and acting assistant administrator in DCHA was made aware of the program. OTI staff also recalled that a former Administrator was briefed on the program, and that the recent Administrator, who was very interested in its innovative approaches, was briefed on ZunZuneo.

Creative's program staff held brainstorming sessions on how to implement the SMS idea. During one of these sessions, a program consultant presented many examples of how mobile technologies had been used globally as a communications tool for social objectives, such as the mobile money industry,¹³ opinion polling, and smart mobs.¹⁴ The chief of party stated that these

¹² The conflict of interest involving Creative's operations manager's family member is discussed on page 25.

¹³ Mobile money provides access to banking services such as money transfers to be sent using cell phones.

¹⁴ Smart mobs were described as a way to mobilize users to participate in unannounced public action, thereby encouraging democratic participation.

examples were not intended to be and were never incorporated into the project. Final activity reports showed no evidence that smart mobs were organized.

According to Creative's evaluation of the first ZunZuneo grant, NIMESA "increased access of independent information by opening communication channels to the cell phone population in the island, using SMS technology and through an Internet web page." Initial test messages were sent to cell phone numbers in Cuba, and responses were received from these messages. NIMESA then researched the incoming messages to gauge interest and responsiveness by the provider's gender, message type, age, location, receptiveness to messages received, and political tendencies according to the scale in Table 2 on page 8. Aside from receptiveness, however, the project received negligible data on the other categories.

The project also grouped senders—or subscribers—into categories to receive news and updates. Users could access the project's Web site to sign up for this service, and a "dropped call system" was created in which users could dial into the project's gateway, hang up, and thus have their number added to the subscriber lists.

To buy communication minutes for sending SMS messages to the island without revealing that the money was from the U.S. Government, Creative used gift cards and wire transfers to send money to the grantee's consultant, who then purchased the minutes, first from Skype and then from Lleida.net, a Spanish company that offers SMS communication to Cuba. Sources stated that Lleida.net was more effective for sending larger volumes of messages and they could be sent through different routes. The minutes paid the cost of sending messages through the Cuban Government's mobile telecommunications service, Cubacel.¹⁵

NIMESA's final activity report and evaluation, dated September and October 2010 respectively, stated that the system reached approximately 460,000 Cuban phone numbers, and 24,000 users were registered as subscribers. The final activity report stated that users received "news and updates on information that would be, otherwise, banned in the country." During the test phase of the project, a few messages were sent containing political satire. For example, one message referred to a politician declaring that laptops were "weapons of the enemy." As seen in Appendix V, the majority of the text messages sent under ZunZuneo had information about sports and trivia. OTI officials said the list in Appendix V was the complete list of messages sent out by the project.

After gaining a following on the island, OTI and Creative sought to expand the platform to include a multidirectional, Twitter-like service allowing Cubans to communicate with each other. The final evaluation for the second grant stated that a grantee with a larger capacity was needed to manage this kind of service and handle the growing number of Cuban cell phone users.

Mobile Accord Inc., a Denver-based mobile services company, was selected to expand the service. Creative awarded Mobile Accord its first of ten grants for ZunZuneo in July 2010 for \$200,000, effective July 1, 2010, through August 16, 2010. A former Department of State communications specialist familiar with Mobile Accord said she mentioned the company during brainstorming sessions with OTI and Creative. Mobile Accord had worked for State on a mobile social network project in Pakistan called Humari Awaz, which was praised by Secretary of State Hillary Clinton in 2009.

¹⁵ Cubacel is the mobile service provided by Empresa de Telecomunicaciones de Cuba S.A.

The purpose of Mobile Accord's grant was to "expand the capacity of the communication platform to provide Cubans the means to form shared interest groups and coordinate activities through the use of technologies." Eventually, ZunZuneo grew into a multifaceted communication system including text messaging and e-mail newsletters, as well as a Facebook page, a Twitter account, and a Web site. Users visiting the ZunZuneo Web site could register, provide demographic information, and set up a profile. By early 2011, Mobile Accord reported that it had invited 79 system users to create their own groups, and by September of that year, it reported that more than 50 user groups were sending messages consistently.

The program collected demographic data on users. The country representative and chief of party said it was an effort to better meet users' needs and pointed out that the demographic information is not personally identifiable information; for example, they said, the number of male and female users in no way identified them. Further, Mobile Accord staff said providing the information was voluntary, either through Web site registrations or customer support calls.

By January 2011 Mobile Accord reported that it also created log-ins for the ZunZuneo Web site and purchased a security certificate for the site to keep information private and secure. One of the project's final activity reports stated that the grantee also developed a privacy policy and posted it on ZunZuneo's Web site under "Terms of Use."

Mobile Accord was concerned about the risk that the Cuban Government would find out the U.S. Government was involved and shut the program down. They considered setting up servers in Spain to avoid a trail, but that turned out to be too expensive. Instead, they rented space in Amazon Cloud, whose servers were based in Ireland.

Mobile Accord also created a company—MovilChat—in the Cayman Islands. According to one of Mobile Accord's final activity reports, "to distance Mobile Accord from its involvement with ZunZuneo," MovilChat was established and "owned by a bank in the Cayman Islands . . . and serves as a depositor for ZunZuneo and owner of the ZunZuneo assets, and the bank keeps records and filings for the company." Later, Cayman Management Ltd. was paid to "own, manage and keep the books for Movilchat."

According to a Mobile Accord report, MovilChat had two accounts in a Cayman Islands bank—one for U.S. dollars, one for Cayman Islands dollars. Mobile Accord transferred money to the U.S. account, and then Cayman Management Ltd. transferred the money to the Cayman account. Cayman Management Ltd. paid outside entities, such as Lleida.net, from the Cayman account. Mobile Accord officials said this was done for security, to prevent the Cuban Government from tracing the money back to a U.S. company.

OTI, Creative, and Mobile Accord officials said they wanted to make ZunZuneo sustainable without public funding. According to a Mobile Accord planning document, this would be done by Mobile Accord establishing a new company in Spain, possibly called ZunZuneo Ltd., and hiring a chief executive officer and chief operating officer. Initially the planning document stated that the candidates were to have no knowledge that ZunZuneo originated from the U.S. Government and that it was established by Mobile Accord, which was important to avoid future problems when dealing with Cubacel. According to OTI and Mobile Accord officials, they pitched the ZunZuneo idea to potential investors and potential chief executive officers; however, they could not find anyone, and the company was never established.

Mobile Accord's president and project documents mentioned attempts and ideas to make ZunZuneo profitable and attract investors by advertising, getting donations, and selling voluntary

demographic information. According to Mobile Accord, this approach did not work since few businesses were interested in advertising to Cuban consumers, and it had too little demographic information to monetize.

Mobile Accord also highlighted a fundraising strategy that sought out investors, such as members of the Cuban diaspora or NGOs, interested in supporting open communication platforms in Cuba. In 2011 Mobile Accord officials had identified 20 organizations or individuals. However, by early 2012, they told Creative they had problems finding an investor. Mobile Accord documents reported the following reasons: high cost (primarily messaging costs), no revenue potential, instability, risk, uncertainty, and regulation.

In addition to not finding investors, in May 2012 Mobile Accord reported several difficulties, including problems for users accessing ZunZuneo's Web site, credits to send messages running out before they could transfer money, and other technical issues.

Despite these issues, Mobile Accord, Creative, and OTI officials and staff praised the project's success at increasing communication among Cubans. In August 2012 the program, including ZunZuneo, ended.

Objective 2: HIV Prevention Workshop

Between 2009 and 2011, a Costa Rican NGO, Fundacion Operacion Gaya Internacional (Gaya),¹⁶ received four grants to perform various activities, designed primarily to expand the role of Cuban youths in their communities. Because the grants met the small award exemption,¹⁷ they were not awarded competitively. Instead, the program's chief of party said Creative sought out Gaya to do grant work in Cuba because it had experience doing community development work with youths in conflict areas. Although Gaya had not worked in Cuba before, the chief of party said the program wanted to work with new groups. As a result of the partnership, he explained, Gaya would develop capacity and gain experience working in Cuba, while the program would avoid working with the more established Miami-based groups already working there.

Gaya's second grant, titled "Supporting the Commitment of Youths with the Community," was aimed at empowering local youth to "reach consensus on community-based projects" and "identify new tools and methods to enhance social participation." It supported the program objective to "assist in the development of peaceful, strong, and independent non-governmental civil society organizations . . . through capacity building, material assistance, and technical training." The grant lasted from October to November 2010 and was awarded for \$20,943, of which OTI reported \$17,308 was spent. Gaya provided capacity-building training to a Cuban youth group that elected to conduct an HIV-prevention workshop. According to the chief of party and the country representative, aside from this workshop under Gaya's second grant, no other HIV activities were funded by the program. The review team performed a key word search in the program files for HIV and did not find any other HIV activities.

The grant's objectives were to:

- Promote the participation of independent youth groups in the community and encourage the concept of independence and self-reliance among Cubans.
- Provide training and technical assistance to an independent local group of young people to improve their organizational skills and set their goals in society.
- Create, along with the local group, a work plan for next actions.

To achieve this, the grant agreement outlined three expected results:

- Create a work plan and agenda demonstrating a professional relationship between Gaya and a fully independent, empowered youth group.

¹⁶ Gaya's focus was on increasing young people's capacity to promote social change on environment, collaborative leadership, social entrepreneurship, and human rights.

¹⁷ According to the version of ADS 303 that was in effect during the project, if a grant has an estimated value of \$100,000 or less and a term of no more than 1 year, the Agency does not require competition as long as there is proper justification.

- Carry out a community project that enlists volunteers from the community.
- Establish and rehabilitate a group meeting space.¹⁸

To implement this grant, Gaya worked with a local Cuban youth group of musicians and artists called Revolution. Gaya's founder said Creative introduced Revolution to them during the first grant and asked them to work together. According to the chief of party and Gaya's founder, for reasons of safety, Revolution was not meant to know that the funds were from the U.S. Government.

Gaya provided capacity-building training to Revolution; according to Gaya's founder, the training covered management, problem-solving, and team-building skills. According to the program's chief of party, the group identified many issues that the youth in their community were interested in, including the environment, housing, and youth health issues. According to Gaya's founder, Revolution members eventually decided to give an HIV-prevention workshop in their community, and Gaya then provided the group with technical guidance on how to conduct the workshop. According to the chief of party, the workshop was a way for Revolution to apply Gaya's training. By carrying out a community project, they would feel they had made a difference in their community.

Project documents show that Revolution conducted the HIV prevention workshop in November 2010 at a Cuban arts school. About 60 students attended, as did an unknown individual identified in a Creative security report as a Cuban state police officer. Gaya's founder said he was not an officer, only a community observer, acting on behalf of a neighborhood watch.

Multiple sources said the HIV prevention workshop used an HIV/AIDS prevention manual published by the United Nations Population Fund titled *Socio-Education Module for the Prevention of HIV/AIDS among Youth*. Gaya's founder said the manual was selected because it was public and related to an international convention signed by the Cuban Government.

The manual had 13 modules, 1 of which included a discussion of 8 human rights related to sexual and reproductive health, listed below.

1. Liberty, security, and personal integrity
2. Information and education
3. Equality and nondiscrimination
4. Intimacy and privacy
5. Freedom of thought
6. Care and health protection
7. Physical and mental integrity
8. Freedom of assembly and participation

These rights were meant to be discussed at Revolution's HIV prevention workshop. However since nobody from Gaya was present at the workshop, they could not confirm that the rights were discussed. In addition to the workshop, Revolution led a mural-painting activity and held an electronic music concert that was open to the general youth public. The grantee said these activities were a continuation of the workshop and concluded the grant.

¹⁸ This did not happen, according to the final evaluation report.

In its final evaluation of the grant, Creative stated that, outside of some capacity building needed, Gaya's trainings were successful and expressed clear commitment to the beneficiary group. According to the founder, Gaya is no longer in operation because of the publicity surrounding its work on the program.

Objective 3: Use of Appropriate Management Controls for Selected Aspects of the Program

The review team focused mainly on the ZunZuneo grants and the management controls related to them covering program documentation, communication, oversight, monitoring, and susceptibility to fraud, waste, and abuse. However, we also reviewed additional grants to determine whether issues identified were specific to ZunZuneo or applied to all aspects of the program. In addition, we looked at controls that covered the overall management of the program.

Class Deviation Request From Acquisition Regulations Did Not Meet All Requirements

When deviating from acquisition policies and procedures, ADS 302 states that USAID contracting officers must follow 48 CFR 7.¹⁹ This regulation stated during the time of the program that “deviation from the mandatory requirements of the [Acquisition Regulation] shall be kept at a minimum and be granted only if it is essential to effect necessary procurement and when special and exceptional circumstances make such deviation clearly in the best interest of the Government.”

In 2002 OTI requested and was granted by OAA a class deviation from several ADS 302²⁰ requirements related to grants under contract for all its contracts. A class deviation affects more than one contract or contractor and can be granted to meet the specific needs and requirements of each agency. This deviation from ADS 302 requirements also applied to OTI’s SWIFT II IQC under which the program task order was awarded.²¹

Although OAA, DCHA’s OGC, and the relevant contracting officer reviewed and approved the class deviation, it did not meet all of the requirements of 48 CFR 701.4. Specifically:

- The regulation states that requests for deviation shall include a “complete justification of the deviation.” In the deviations approval document, OTI justified the deviations as necessary because there are certain types of organizations that have unique programmatic knowledge, regional experience, and capacity to work in post-conflict environments. Also OTI claimed that the deviation would allow it to fulfill the office’s requirement to respond rapidly to address critical and urgent opportunities. Finally, OTI mentioned its need for rapid initial response and set-up and that its programs are brief, typically 2 years.

¹⁹ 48 CFR 7 was updated March 16, 2015.

²⁰ USAID grants under contract requirements currently are located in ADS 302.3.4.13.

²¹ According to 48 CFR 16.504, an IQC is designed to provide an indefinite quantity of supplies or services during a fixed period and within stated limits. Task orders are awarded under an IQC at any given time during the award.

However, the justification was not specifically relevant to the program. For example, while the justification emphasized operations in post-conflict environments, Cuba is not a post-conflict environment. In addition, program staff said the program was much slower than a normal OTI program with the program lasting 4 years, indicating that the rapid response justification also did not apply.

An OTI official said class deviations are done at each IQC level of SWIFT and not for every individual task order awarded under the IQC because that would be too time-consuming to get approval for each task order; this is also the reason why deviations are requested at the start of the IQC. An OAA official said the 2002 class deviation was approved based on the global requirements for task orders to provide a fast, flexible response in transition contexts under SWIFT II; and that OAA and OTI ensure that task orders issued are consistent with the IQC scope of work, thus making the class deviation applicable.

- The regulation states that expiration dates shall be shown on all class deviations. However, there was no expiration date for OTI's class deviation. An OAA official said it was unclear why the expiration date was not included and that it appeared to be an oversight.
- The regulation states that requests for deviation shall contain the name of the contractor and the contract or task order number. However, neither appeared in the deviation package. An OAA official said this was because the deviation is applied at the IQC level prior to it being awarded, thus the task order or contract numbers were unknown when the deviation was approved.
- The regulation states that each deviation shall be recorded in its appropriate register and shall be assigned a control number that shall be embodied in the document authorizing the deviation. However, the class deviation was not registered with a control number. OAA officials said they could not find one and did not know whether one was issued for the class deviation in 2002.
- The regulation states that USAID contracting officers shall submit a semiannual report to OAA of all contract actions effected under class deviations. However, OAA officials said they did not know about any semiannual reports on the deviation and said that it was not clear why the requirement was not met for the 2002 deviation.

Because the deviation was approved 6 years before the program began, and it applied to all task orders under SWIFT II, there was no subsequent determination made by OTI or OAA about whether the program specifically met the justification for the deviations. As a result, OTI could not have specifically determined that the deviations were clearly necessary for the program and used in the best interest of the U.S. Government. Furthermore, by not including all of the required elements, the handling of the deviation package did not fully comply with the CFR. An OTI official did note, however, that OAA's guidance on the deviation approval process has improved over time and become more detailed. This, according to the official, has led to improvements in the deviation process for the fourth iteration of the current SWIFT IQC. Based on issues identified in this finding, we make the following recommendations.

Recommendation 1. We recommend that the USAID Office of Transition Initiatives, in collaboration with the Office of Acquisition and Assistance and the Office of the General Counsel, develop and implement a plan in which future class deviations from acquisition policies and/or procedures clearly state the conditions for which the deviation will apply.

Recommendation 2. We recommend that the USAID Office of Transition Initiatives, in collaboration with the Office of Acquisition and Assistance, review all deviations from Automated Directives System or acquisition regulations for its active awards, and determine whether they comply with Title 48 of the Code of Federal Regulations, Subpart 701.4, and correct any instances of noncompliance.

Recommendation 3. We recommend that the USAID Office of Acquisition and Assistance review its procedure for approving and managing deviations, and determine whether it needs to be updated to comply with Title 48 of the Code of Federal Regulations, Subpart 701.4, and make any corrections necessary.

Program Did Not Consistently Follow Internal Controls in Awarding Grants

According to GAO's *Standards for Internal Controls in the Federal Government*, control activities are an integral part of an entity's accountability for stewardship of government resources and include approvals and authorizations. Furthermore, internal controls generally should be designed to assure that ongoing monitoring is part of normal operations, is performed continually, and that duties are being performed appropriately.

Under the Cuban Civil Society Support Program, USAID authorized Creative to execute grants under contract with NGOs.²² This type of mechanism requires significant involvement by USAID. OTI guidance states that it clears every grant and approves the selection of every grantee through clearance forms, and provides programmatic guidance throughout the activity development and approval process. Different USAID officials approve grants based on their value, as listed below.²³

- Country representatives approve grants up to \$100,000.
- CORs approve grants between \$100,000 and \$250,000.
- Contracting officers approve grants that are more than \$250,000.

For ZunZuneo, Creative awarded 12 grants under contract, obligating \$1.7 million. (Appendix IV lists the breakdown of ZunZuneo grants and dollar amounts.) However, established internal controls for managing these were insufficient at preventing the mishandling of exceptions to competition, split purchases, and excessive grant modifications and extensions.

Exceptions From Competition. According to ADS 303, the Agency can award grants without competition if certain exceptions apply.²⁴ To use these exceptions, a justification for its use must contain sufficient facts and be documented in accordance with ADS.

One exception to competition covers small awards, in which USAID can issue an award with an estimated value each of \$100,000²⁵ or less and a term of no more than 1 year. Another

²² ADS 302 defines grants under contract as when USAID enters into a direct contract that allows the contractor to execute grants with NGOs.

²³ OTI received prior approval to deviate from the standard approval thresholds and allow its contractors to make larger grants under contract than usual to U.S. organizations.

²⁴ Under ADS 303.3.6, USAID encourages competition in the award of grants and cooperative agreements.

²⁵ This amount increased to \$150,000 in 2011.

exception can be made if an award recipient can be considered to have an exclusive or predominant capability; if so, details about why this is the case and how it applies to the activity must be documented, along with a description of other options considered. This exception cannot be used to continue an ongoing relationship when the applicant developed the exclusive or predominant capability during performance of a USAID award, or when the previous award was made without competition using the small grants award exception.

Though all of the program awards were issued by Creative rather than USAID under the grants under contract mechanism, ADS 302 states that when using grants under contract, USAID must make sure the requirements that apply to USAID-executed grants also are applied to grants executed by USAID contractors. Thus, regulations that govern how USAID handles exceptions to competition also applied to Creative when awarding grants under contract, and USAID has the responsibility to make sure they are applied.

All of the program grant files contained a competition exemption form, developed by Creative, which specified details on what was needed if the grant proposal was not bid competitively. All 12 ZunZuneo grants were not awarded competitively, and Creative cleared each as meeting either (1) the small awards exception or (2) the exclusive or predominant capability exceptions, as shown in Table 3 below.

Table 3. ZunZuneo Grants Exceptions to Competition (Audited)

Implementing Partner	Grant Number	Total Award Amount (\$)	Exception to Competition
NIMESA	1	97,968.00	small award less than \$100,000
	2	134,710.00	exclusive or predominant capability
	3	200,000.00	exclusive or predominant capability
	4	96,975.59	exclusive or predominant capability
	5	231,557.65	exclusive or predominant capability
	6	200,180.27	exclusive or predominant capability
	7	90,000.00	small award less than \$100,000
Mobile Accord	8	90,000.00	small award less than \$100,000
	9	144,921.64	exclusive or predominant capability
	10	70,000.00	small award less than \$100,000
	11	175,400.01	exclusive or predominant capability
	12	174,893.21	small award less than \$100,000

Source: OIG analysis of OTI grant documents.

Creative's ZunZuneo justifications for exceptions, however, did not fully comply with ADS. For the seven awards relying upon the exclusive or predominant capability exemption, none of Creative's exemption forms documented what other options were considered, as required. Additionally, in several cases grants were awarded to grantees that had received previous awards based on the small award exemption. For example:

- Creative did not compete NIMESA's first grant because it was less than \$100,000, meeting the requirement for the small grants exemption. Creative continued working with NIMESA under a second grant, claiming exemption from competition because of the grantee's predominant capabilities, which was against the policy.
- Creative continued the pattern with Mobile Accord's ten grants, switching between predominant capability and small grants exemptions. It exempted six from competition

because of “exclusive or predominant capability,” and the remaining four because they were small grants.

Furthermore, the last grant relied on the small grants exemption because it initially totaled \$80,143.08. However, the amount was later amended up to \$174,893.21, even though the small grants exemption said these awards may not be amended to add funds beyond \$100,000. The country representative cleared the initial award, and the COR approved the amendments.

In addition to inaccurate exemptions, the ZunZuneo awards were characterized by conflicts of interest, as discussed on page 25.

Split Purchases. Split purchases—breaking down amounts that add up to more than an applicable threshold into several amounts that are less merely to use simplified acquisition procedures available below the threshold—should be avoided because they can be used to bypass procurement requirements and competition.

Under ZunZuneo, Creative split purchases in two ways.

- It made overlapping awards to Mobile Accord, and separated them between work under ZunZuneo and the purchases of related proprietary licenses to be used for that same work. It originally awarded two \$90,000 cash grants and one \$70,000 cash grant to obtain licenses for three Mobile Accord communication platforms. The country representative cleared the licensing grants, and the COR cleared the other grants. Table 4 below displays pairs of overlapping grants.

Table 4. Overlapping ZunZuneo Grants to Mobile Accord (Audited)

Grant Title	Dates	Final Award Amount (\$)	Award Total if Combined (\$)
Alternative Communication Services – Test Phase VI	2/7-6/17/2011	200,180	290,180
Alternative Communication Services – Access*	5/9-6/17/2011	90,000	
Alternative Communication Services – Access*	6/20-7/29/2011	90,000	234,922
Alternative Communication Services – Phase VII	6/20-9/30/2011	144,922	
Alternative Communication Services – Access III*	10/7-11/18/2011	70,000	245,400
Alternative Communication Services – Phase VIII	10/1-2/29/2012	175,400	

Source: OIG analysis of OTI grant documents.

* “Access” is the purchase of licenses for use of Mobile Accord’s communication platforms.

Had the above pairs of overlapping grants been combined, they would have required a higher level of approval. For instance, the first two grants listed, if combined, would have required the contracting officer’s approval to increase the grant ceiling.

Additionally, according to OTI, not all of the licenses were used, and so those grant funds ended up being used for messaging costs instead. However, none of the award documents reflected this change.

- Creative awarded Mobile Accord two grants for the same purpose. Of the first two grants listed above, the second was designed to, among other things, support the “successful completion of all objectives and deliverables” of the first ongoing grant. Both grants were extended to end on the same date, June 17, 2011.

Award Modifications and Extensions. Modifying awards can be a way to avoid competition and also prevent the Agency from doing a timely closeout—reviewing expenditures, accomplishments, and failures.²⁶

Awards under the program were modified and extended often. Creative amended 79 of 103, or 77 percent, of program grants to provide more time and money. Of those 103, 62 percent ended later than planned, and 33 percent received more money than planned. This practice continued until the end of the program. Of the last ten grants awarded, nine were modified to increase the amount, and eight were extended.

Poor grant management practices—the mishandling of exceptions to competition, grant-splitting, and excessive grant modifications and extensions—occurred for the following reasons.

Lack of contracting officer oversight may have contributed to these poor grant management practices. Table 5 below presents the thresholds set in the contract that dictate who should approve which grant and the number of program grants approved at each level. As shown, the country representative was responsible for approving most grants. None of the 12 ZunZuneo grants or any of the other 91 program grants required the contracting officer’s approval, and only 12 percent needed the COR’s approval.

Table 5. Grants as Initially Awarded by Approving Official (Unaudited)

Grant Approval Thresholds	Approving Official	Number of Program Grants Other Than ZunZuneo	Number of ZunZuneo Grants	Total Program Grants	Percent of Total
Less than \$100,000	country representative	84	7	91	88
\$100,000-\$250,000	COR	7	5	12	12
More than \$250,000	contracting officer	0	0	0	0
Total		91	12	103	100

Source: OIG analysis of grant documents and OTI’s activity database.

²⁶ U.S. Democracy Assistance for Cuba Needs Better Management and Oversight, GAO-07-147, November 15, 2006.

Overall, there were about four contracting officers involved in handling the program's awards and any modifications at the task order, or contract, level. Each one we interviewed said they were only limited or partially involved with the program, and no one claimed to be the assigned contracting officer for the program.

Common practices within OTI operations also may have been a contributing factor to poor grant management. OTI employees said the use of exceptions to competition to work with new groups and relatively small grant amounts are common features in managing grants under contract. According to one official, the average grant amount awarded under contracts is \$43,000, and arranging for the country representative to approve most grants was done intentionally, since the country representative is most familiar with programming. Furthermore, the official said one of the purposes of using grants under contract is that the amount of time to prepare full grant proposals and wait for a USAID contracting officer's approval would interfere with achieving outcomes in a transition environment.

OTI employees said their contractors generally do not competitively award grants under contract, and OTI guidance states that the issue of competition rarely arises because its activities typically fall under one of the exceptions in ADS 303. According to OTI, country representatives were not responsible for reviewing the exemption from competition forms during the program and are still not required to review the forms. Instead, they explained, the contractor is responsible for completing the forms and following any and all requirements related to competition. With this approach, however, no oversight is conducted to ensure that contractors comply with Agency competition requirements.

Regarding split purchases, an OTI official believed it was a judgment call made at the time and that they are trained not to make split purchases. The official added that if one of the grants was not used as originally intended, then the scope should have been amended. When asked about grant oversight related to split purchases, OTI employees stated that CORs regularly review activities in OTI's activity database. If there were multiple activities with the same organization, the COR would determine whether they were substantially different. They stated that programs often have multiple activities with the same partners, allowing them to phase activities and test performance in less stable transition environments.

Regarding frequent amendments, an OTI employee said it is common but should get better over time. He said timelines change because of conflict areas, and grant cost extensions (adding more time and more money) are fairly common early in a program and for new grant ideas.

As shown in Table 5, the contracting officer had little involvement in the management of grants under contract. While these methods may be common practice, according to ADS 302, USAID has a responsibility to ensure that requirements that apply to USAID-awarded grants, such as complying with exception to competition policies, also are applied to grants awarded by USAID contractors.

Without appropriate controls over grant management, there is less assurance that requirements will be followed and that methods will be in the best interest of the U.S. Government or the Agency. Furthermore, the lack of competition decreases the possibility that the Government is receiving the best goods and services for a reasonable price. Finally, splitting grants raises the risk of inappropriately allowing for favoritism, diminishing economic advantage, avoiding the scrutiny that goes along with higher-value awards, and could allow the grantee to bill for the same work or supplies twice, once on each grant. To address these conditions, we make the following recommendations.

Recommendation 4. We recommend that the USAID Office of Transition Initiatives establish and implement procedures that require oversight of implementing partners' proper compliance with exception to competition requirements.

Recommendation 5. We recommend that the USAID Office of Acquisition and Assistance review the control procedures for the Office of Transition Initiatives' grants under contract and implement a plan to conduct periodic monitoring of the Office of Transition Initiatives' grants under contract.

Conflicts of Interest Occurred Under ZunZuneo

Federal regulations generally prohibit conflicts of interest from occurring in acquisition and assistance functions of the government. A conflict of interest generally occurs when an employee has a financial or personal (such as a familial relationship) interest that could impair the employee's ability to act impartially and in the best interest of the government. Federal Acquisition Regulation (FAR), Subpart 3.11, for example, states that it is the government's policy to require contractors to identify and prevent personal conflicts of interest of their covered employees. CFR, Title 22, Section 226.42,²⁷ covering the administration of assistance awards to U.S. NGOs, states, "No employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by Federal funds if a real or apparent conflict of interest would be involved."

Under the program, Creative awarded grants using USAID funds. ADS 302.3.4.8 b (4) states that when using grants under contract, USAID must be sure that the requirements that apply to USAID-executed grants also are applied to grants that a USAID contractor executes. Thus, federal regulations that restrict USAID from conflicts of interest also apply to contractors awarding grants under contract, and USAID has a responsibility to ensure these restrictions are applied.

The review team found that conflicts of interest involving related parties occurred under the ZunZuneo grants.²⁸

- Creative's operations manager contacted a family member—the president of NIMESA—in May 2009 to discuss the feasibility of setting up a mobile messaging platform from another country. The first ZunZuneo grant, totaling \$97,968, was awarded to NIMESA, on June 29, 2009. The award was made, according to one program official, after the operations manager recommended him as the grantee. Because it met the small award exemption, the NIMESA grant was not awarded competitively. A file memo dated more than a year after NIMESA's award stated that selection was based on "proven technical capability, size and operational flexibility, immediate availability, and business confidentiality." However, a program official said he thought other knowledgeable Costa Rican companies could have performed the same work. NIMESA also was awarded a subsequent grant.
- Starting under the same grant as above in the second half of 2009, the chief of party's family member was recruited as a consultant to do both information technology work and cultural

²⁷ This was updated in December 2014 and is now in 2 C.F.R., Section 200.318.

²⁸ USAID/OIG is evaluating information concerning other potential conflicts of interest not discussed in this finding.

translation—i.e., make the communications platform understandable to Cubans. The chief of party claimed the family member had “unique expertise.” The relative’s consultant services continued through several other ZunZuneo grants.

One OTI staff member said implementers such as Creative often give grants to people they have come to know through working with civil society organizations. The review team verified that the OTI country representative and COR were aware of these conflicts during the project and had nonetheless approved the selection of the grantees. The COR said she did not have concerns about the conflicts of interest because she trusted the Creative staff, and their relationships were widely known. The country representative and the COR said they felt comfortable with the structures put in place (self-imposed controls in which the two Creative officials swapped signing checks for the other’s family member), whereas both OTI’s and Creative’s legal teams said they were unaware of these conflicts of interest during the project.

Conflicts of interest generally are prohibited government-wide. Sufficient mitigation measures may have been lacking in the program because USAID’s ADS guidance in the administration of assistance awards does not cover personal conflicts of interest and how to handle them.²⁹ Additionally, federal regulations did not specifically cover personal conflicts of interest in the case of contractors awarding grants. Following concerns that the CFR was missing a statement requiring standards of conduct that mitigate potential conflicts of interest in the administration of federal awards, a requirement to have standards was added to the CFR in December 2014.³⁰

Government agencies are subject to public scrutiny. As a government agency, USAID should not tolerate, much less approve, awards that constitute conflicts of interest. Such conflicts, which in ZunZuneo amounted to nepotism, increased the program’s vulnerability to fraud, waste, and abuse. Furthermore, the absence of ADS guidance on preventing personal conflicts of interest is a liability to the integrity of the award process. Therefore, we make the following recommendations.

Recommendation 6. We recommend that the USAID Office of Acquisition and Assistance establish Automated Directives System guidance to identify and prevent personal conflicts of interest, including by contractor staff when executing grants under contract.

Recommendation 7. We recommend that the USAID Office of Transition Initiatives develop a plan to implement the new requirements that prohibit personal conflicts of interest, including how to identify and avoid them.

Legal Roles and Responsibilities Were Ambiguous

According to GAO’s *Standards for Internal Control in the Federal Government*, “Internal control should provide reasonable assurance that the objectives of the agency are being achieved [including] . . . compliance with applicable laws and regulations.” Management is responsible for putting strong control mechanisms in place and making sure they are built into operations.

²⁹ ADS guidance does discuss organizational conflicts of interest and conflicts of interest related to procurement standards.

³⁰ 2 C.F.R. 200.112, “Conflict of Interest.”

Information should be communicated to those who need it, allowing them to carry out their internal control responsibilities.

According to ADS 101.3.1.10, OGC provides “legal advice, counsel, and services to the Agency and its officials and ensures that USAID programs are administered in accordance with legislative authorities.” OGC also “advises on legal matters arising in the operation and administration of USAID programs.” OTI’s guidance states that OTI and the implementing partner “must from the outset and throughout the country program seek a healthy balance between OTI program direction and the [implementing partner’s] management prerogatives, legal requirements, experience, and capacity.”

U.S. Government assistance to Cuba is subject to numerous restrictions. USAID’s risk assessments of its Cuba activities between 2008 and 2011 stated that many restrictions “create overlapping prohibitions.” These restrictions increase the need for oversight to mitigate legal risk; however, there was confusion about who was responsible for providing legal oversight.

- Members of USAID’s OGC said they were not responsible for providing legal advice to the contractor on program and project implementation. They said their office would have been involved with the task order only until it was awarded, after which the contractor was responsible for making sure that its actions in implementing the task order were legal. They said the contractor and grantees in turn should have consulted with their own legal counsel about the legality of the actions that they were taking in connection with the program and not solely limited to regulatory concerns. Furthermore, OGC officials said, OTI should have sought legal review subsequently, as appropriate, in connection with approvals of proposed grants such as ZunZuneo, if it appeared that they were likely to raise legal concerns.

OTI’s former assistant general counsel said he did not recall being asked to legally clear ZunZuneo, but may have given the program team legal guidance on ZunZuneo. The country representative said OGC did not approve any grants, and traditionally did not, but he recalled discussing ZunZuneo in vague terms with the former assistant general counsel.

- Creative officials said they did not make any legal opinions regarding ZunZuneo. Creative’s contracting division director said he expected USAID to determine the legality of activities since OTI instructed Creative to perform the work and authorized the program and the ZunZuneo project. Creative’s general counsel said their legal focus would have been regulatory rather than on the overall legality of a program. Since Creative worked under the direction of OTI, he assumed USAID’s OGC performed the necessary legal analysis.
- NIMESA’s president said he did not provide his legal counsel any details about ZunZuneo, including financial details, because of the sensitivity and complexity of working in Cuba. Nor did NIMESA obtain or seek legal counsel from Creative.
- Mobile Accord’s legal counsel said she reviewed contracts and talked to team members, but did not do a legal review of ZunZuneo’s operating approach. She said Mobile Accord was told a legal analysis had been done of the project, but she was not involved and did not get confirmation.

Confusion about legal obligations occurred because OTI’s implementation model created a misunderstanding about each party’s level of responsibility. While USAID’s OGC officials said they were not responsible for providing legal advice to the contractor on program and project implementation, Creative staff said they believed any legal review of ZunZuneo would be OTI’s

responsibility because of OTI's heavy involvement in the program's implementation. OTI's operational and programmatic guidance confirmed that its system of mutual decision-making with implementing partners, as well as its practice of co-locating with them, can greatly blur the lines of responsibility. Its guidance further stated that OTI, unlike most USAID offices,³¹ was in charge of program strategy and approach, and has final decision approval.

Furthermore, OTI's contract documents for the program also were unclear about legal responsibility. For instance, the contract identified OTI as the party with authority to approve all grant activities and grantees selected for implementation, but made no reference to legal responsibility over implementation.

The confusion may have contributed to the lack of any legal analysis being done on ZunZuneo as neither OGC nor OTI provided evidence to the review team of any legal reviews or legal guidance specific to ZunZuneo.³² (More information about the lack of legal documentation is in a finding that starts on page 31.)

Each entity involved in the program should have been aware of their responsibility to ensure the legality of their actions at each step of the process. Generally, USAID is responsible for its programs. The burden to manage and mitigate program risks ultimately is on the Agency. Not doing so effectively can result in damage to its reputation and potentially put Agency and partner personnel in greater danger. There is also a risk that a project could violate federal laws without appropriate legal analysis. Initial and periodic legal reviews would have helped mitigate these risks; therefore, we make the following recommendations.

Recommendation 8. We recommend that the USAID Office of Transition Initiatives, in collaboration with the Office of General Counsel and the Office of Acquisition and Assistance, develop and implement a policy that requires (1) including clearly delineated legal responsibilities in its awards in the context of the Office of Transitive Initiatives unique business model, and (2) communicating legal responsibilities to its partners.

Recommendation 9. We recommend that the USAID Office of Transition Initiatives and the Office of the General Counsel develop procedures on when and how the Office of Transition Initiatives country teams should seek legal counsel, which includes during implementation and administration of a program.

Program Monitoring and Evaluation Were Not Implemented Fully

Both GAO's *Standards for Internal Controls in the Federal Government* and ADS 203 emphasize the importance of M&E. The first states, "Internal control monitoring should assess the quality of performance over time" and it "should generally be designed to assure that ongoing monitoring occurs in the course of normal operations." According to ADS, developing monitoring plans, conducting monitoring activities, and capturing and reporting the results are important because they show whether desired outcomes are being achieved and advance

³¹ OTI's country representative operates like the implementing partner's chief of party, providing strategic direction to the actual chief of party, who serves more as a chief operations officer within the OTI model.

³² One piece of legal correspondence regarding ZunZuneo was provided to the OIG after its discovery by OGC following the exit conference.

organizational learning. Communicating results also demonstrates USAID's contribution to U.S. foreign assistance goals.

During the life of the program, OTI conducted some program performance monitoring, such as a PPR, a management review, and a couple of strategy reviews. However, Creative was unable to implement its M&E activities as planned, and in a couple of instances, both OTI and Creative did not follow guidance fully.

Creative Could Not Verify Accuracy of Some Program Information. Creative was responsible under the contract for developing and implementing controls over M&E, which included an M&E plan and process. As required by the contract, Creative hired an M&E specialist for the Costa Rica office to draft the plan and oversee the contractor's overall M&E efforts.³³ The plan provided an overall framework for gathering information, tracking performance, and managing and maximizing results. The plan listed three methods for program monitoring: final activity reports with lessons learned, visitor reports, and specific M&E visits.

In accordance with the plan, Creative completed final reports for each activity. However, because of travel restrictions to Cuba established after Alan Gross's detention in December 2009, Creative could not conduct other aspects of the plan—such as specific M&E visits to Cuba. Accordingly, OTI could not extensively verify the accuracy of information collected by Creative from grantees that was reported in their grant final activity reports.³⁴ An OTI official said that in some instances, grantees in Cuba provided pictures as evidence of performance, but the reports mainly consisted of testimony from grantees about program activities and results.

Furthermore, the program's M&E specialist said final reports basically summarized activities, provided few specific details, and varied by activity. She said the country team was concerned primarily with the feasibility of implementing activities, and only secondarily with monitoring them.

Overall, program officials said M&E weaknesses stemmed from cost and security concerns. OTI staff said over the past several years they have improved M&E of their programs, including awarding a task order to provide technical assistance and other M&E services to OTI programs and forming an in-house team of technical experts to provide regular remote and in-country support to OTI programs. According to OTI, these efforts "enhance the skills of OTI and [implementing partner] staff, improve the guidance on how to design M&E systems in challenging environments, and increase the resources available to implement robust M&E practices."

Proper M&E helps ensure that desired results are achieved and that results and lessons learned are captured. Restrictions on travel to Cuba limited USAID and Creative's ability to confirm whether planned activities occurred and obtain knowledge to make any necessary midcourse adjustments.

No recommendations are being made to address this issue because the travel restrictions were outside USAID's ability to control and the program ended in 2012.

³³ The M&E specialist was retained until the Costa Rica office closed in October 2010.

³⁴ According to the program's M&E plan, grant final activity reports are designed to provide the program team feedback to "determine whether to hold fast or revise the program overall, shift focus, objectives, implementing partners, the [M&E plan] and other processes or elements."

OTI Did Not Conduct PPRs in Accordance With Guidance. According to OTI guidance, the office conducts PPRs at least once a year for each of its country programs. The PPR process is designed to bring the results of OTI's program implementation and M&E together with its country approach to the attention of OTI's senior leadership, which includes the OTI director. This review on three analytical and evaluation levels (strategy, program, and activity) is supposed to enable decision-making and action. Once the PPR is done, OTI guidance recommends the senior leadership team be briefed on PPR findings and issue a memo to the country team outlining actions to address the recommendations.

Only one PPR for the program was conducted, there was no documentation that action was taken on recommendations, and the report was not finalized, as detailed below.

OTI conducted only one PPR for the Cuba program in 2010 when, according to the head of field programs, officials wanted an opinion on whether to close the Costa Rica office. One employee attributed the lack of annual reviews to the program's slow start and cost. Another said it was not uncommon for PPRs to be done less frequently than annually; however, no documentation was maintained as to why it was not done annually for the program. In addition, OTI employees said they had no formal documentation for any changes made to the program based on PPR findings, but said that they were implemented fully or in part and tracked through regular meetings.

Furthermore, OTI kept the "draft" marking on its 2010 PPR report, although the staff said the draft was the final. Two OTI officials said this was intentional, and one said this was done so that the report would not be subject to Freedom of Information Act requests. The PPR report also questioned whether leaving items in "draft" or not finalized would preclude them from Freedom of Information Act requests. The program's final evaluation report also was found marked "draft" amid confusion among OTI staff about whether the final report was even done. The review team eventually found the report in OTI's files.

The lack of annual PPRs reduced the amount of oversight controls put in place to provide senior leadership coverage over all levels of the program. Furthermore, not documenting key decisions or changes made to a program decreases management's ability to track and ensure that any issues identified from the PPR were addressed. This also could result in not complying with ADS 502, "The USAID Records Management Program," which requires that decisions and essential transactions be recorded and adequately documented. Last, keeping documents marked "draft" can lead to them being left out of any Freedom of Information Act requests, which can undermine the transparency initiative of the government. Therefore, we make the following recommendations.

Recommendation 10. We recommend that the USAID Office of Transition Initiatives develop and implement a policy to document actions taken to address recommendations stemming from program performance reviews, and, if a program performance review is not conducted or recommendations are not followed, that those decisions are documented.

Recommendation 11. We recommend that the USAID Office of Transition Initiatives check that all Cuban Civil Society Support Program formal reviews and project deliverables are finalized properly and labeled accordingly.

Recommendation 12. We recommend that the USAID Office of Transition Initiatives update its office guidance and inform current staff on the need to finalize project

deliverables properly and to finalize deliverables of ongoing projects that were not done properly before.

Program Information Not Sent to Development Experience Clearinghouse. The DEC is a repository designed “to preserve and promote knowledge of the Agency’s performance, results, lessons learned, and experiences in development activities throughout the world,” as well as to support the President’s Open Government Initiative. According to ADS and the SWIFT II IQC, contractors must submit development experience documentation to the DEC.

Neither Creative nor OTI, however, submitted documentation about the program to the DEC. According to employees in USAID’s Knowledge Service Center,³⁵ they did not get anything from OTI relating to Cuba for the DEC; in general, they added, they have never received much related to Cuba. OTI officials said they discussed getting a waiver that would allow the program to opt out of posting information to the DEC, but they could not find one.

Not submitting program documents to the DEC violates Agency policy, and it prevents others from benefiting from lessons learned that could be used in future work. Therefore, we make the following recommendation.

Recommendation 13. *We recommend that the USAID Office of Transition Initiatives submit Cuban Civil Society Support Program documents, including the final program evaluation with lessons learned, to the Development Experience Clearinghouse in accordance with Automated Directives System, or obtain the appropriate waiver.*

USAID Had Incomplete Legal and Congressional Contact Records

According to GAO’s *Standards for Internal Controls in the Federal Government*, “Internal control and all transactions and other significant events need to be clearly documented, and the documentation should be readily available for examination . . . All documentation and records should be properly managed and maintained.” ADS 502, “The USAID Records Management Program,” requires that decisions and essential transactions be recorded and documented adequately. USAID’s Washington offices are required to follow the mandatory reference disposition schedule, located in the 2006 version of ADS 502.

Despite these statutory and ADS requirements to record and document decisions, transactions, and events, offices involved with the program failed to do this adequately.

Legal Documents. Regarding ZunZuneo, neither OTI nor USAID’s general counsel had any written evidence of legal guidance, memos, or formal opinions on its implementation during the life of the project. For example, they could not provide documentation that there was any legal consideration about using offshore bank accounts, establishing a separate company to conceal the origin of funds, or collecting user demographic data.

For the overall program, OGC and OTI staff said USAID’s OGC was involved at several points, but USAID officials could not provide complete records of legal guidance, and the records were not in the program files. The country representative said he talked to OGC about several program issues, such as funding going to Cubacel, procurement, business licenses, what

³⁵ The center manages the DEC.

economic support in Cuba was allowed, legality of specific program activities, and overall concerns. The former OTI attorney affiliated with the program said he had kept personal files of his communication with OTI staff; however, he said he did not know what happened to the files after he retired in 2013.

Furthermore, the limited program correspondence we received was incomplete. OTI gave OIG e-mails from OTI and OGC about questions that arose in the planning and early initiation stages related to traveling to the island under the Office of Foreign Assets Control license and what activities could be considered democracy assistance under the LIBERTAD Act. However, neither OTI nor OGC had documented what decisions—if any—were made.

Congressional Contact Documents. Staff in the Bureau for Legislative and Public Affairs, LAC, and OTI recalled briefing Congress on the program, but records containing details of those discussions were incomplete. One congressional liaison officer had personal notes beginning in December 2011, but they had limited information on the Cuba program. Two additional records of OTI briefings were located and provided at the end of our review.

The Bureau for Legislative and Public Affairs e-mails updates to the Agency called legislative reports. These included references to more than 35 briefings between USAID and members of Congress and congressional staff about the Agency's Cuba programming between 2009 and 2013. However, these emails do not capture specific details discussed, and only include basic information such as dates, topics, names of the briefing officials, and the member, committee, or office that was briefed.

Several factors contributed to the lack of legal documentation. The country representative said any archived e-mails on legal matters were lost when the Agency migrated from Microsoft Outlook to Gmail. Furthermore, OGC officials said they are not required to maintain legal files on country programs, asserting that the responsibility for documentation maintenance falls to the program office and OAA. Finally, OTI officials said they frequently consulted with OGC informally and on an ad hoc basis, a practice not conducive to record-keeping on legal guidance. The Information and Records Division, the Agency's records management office, said legal correspondence should be located in both offices: in OTI program files and within OGC by the person who drafted the legal opinion.

Both LAC and OTI staff referred us to the Bureau for Legislative and Public Affairs for any documentation of congressional briefings. Staff there said that at the time of the program they were encouraged to record briefing notes, but the notes were not standardized or consistent throughout the office. Bureau employees said they have since taken steps to improve the process. In 2012—after the program ended—the bureau established a standard operating procedure with a template for briefings, and employees said they began using a database to track congressional engagements. In 2014 the bureau issued guidance for new employees on how to use briefing notes and enter them into the database daily.

As there are new procedures, we are not making any recommendations for congressional contact documentation at this time.

Because of the absence of legal documentation, we could not verify all testimonial evidence or determine whether effective legal communication and guidance occurred or why it did not. Not having this documentation decreased the Agency's ability to respond to public scrutiny about the legality of its work. Therefore, we make the following recommendations.

Recommendation 14. *We recommend that the USAID Office of Transition Initiatives inform current staff in writing and update office guidance on the requirement to document legal guidance, including correspondence, in project files and maintain these files in accordance with the Agency disposition schedule.*

Recommendation 15. *We recommend that the USAID Office of General Counsel inform current staff in writing and update office guidance on the requirement to follow the Agency's disposition schedule and require attorneys to maintain appropriate documentation of legal opinions, including legal correspondence, in accordance with that schedule.*

USAID Did Not Have Policy on Protecting Programming From Potential Subversion

GAO's *Standards for Internal Control in the Federal Government* states that management should identify, analyze, and manage risks that impact accomplishing their objectives. It suggests that managers conduct risk assessments to identify and analyze risks, estimate their level of significance, determine the best response, and design specific actions to address the risks.

The 2007 OIG *Audit of USAID's Cuba Program* found that the Cuban Intelligence Service posed a significant threat to U.S. Government programs because groups operating and receiving assistance in Cuba "have been infiltrated by the Cuban government." However, USAID did not have policies and procedures in place to vet potential grantees. Because of the risk of subversion,³⁶ OIG made a recommendation related to vetting Cuba program grantees and their staff. LAC staff agreed and stated that they would follow a standard policy on vetting once USAID established one. To date, the Agency has not done so, however.

While doing Cuba risk assessments for fiscal years 2008, 2009, 2011, and 2012, LAC staff found that the risk of subversion by the Cuban Intelligence Service was still significant. The risk assessments stated that historically the Cuban Intelligence Service has "aggressively targeted USG programs and resources for subversion and exploitation." They further stated that "the Cuban [I]ntelligence [S]ervice would undoubtedly have interest in not only learning as much as they can about USAID's efforts, but likely undermining those efforts through various means." USAID/LAC's risk assessments noted that USAID programs lacked counterintelligence support to address identified vulnerabilities. USAID's Office of Security concurred with USAID/LAC's assessments.

However, according to Agency officials, while USAID has certain policies to check awardees for terrorism associations, USAID does not have a policy to address subversion threats. Specifically on Cuba programs, an official in USAID's Office of Security said there were no screening requirements for grantees, but he supported the idea to do so.

Regarding the Cuban Civil Society Support Program, OTI's country representative said there was no formal process for screening program grantees for subversion and recalled trying to involve the Embassy's Regional Security Office, but was not sure whether he ever used them.

³⁶ Merriam-Webster defines subversion as an attempt to overthrow or undermine a government or political system.

One of Creative's security managers said it was well known that Cuba was running extensive intelligence operations in Costa Rica. Taking informal steps to address the risk of subversion, Creative researched potential grantees by looking into the potential grantees' funding and experience in Cuba. According to the chief of party, this included looking into their formal and informal associations, history of activities in country of origin, and seeking references. Creative's scrutiny of grantees increased after Alan Gross was arrested to include checks through OTI, approval through Creative's headquarters management and security teams, and checks in the visual compliance database system, which checks various watch lists. However, the security manager said he continued to have concerns about the adequacy of security practices and was suspicious that one grantee may have been giving information to the Cubans.

According to an Agency official and the Cuba risk assessments, one of the reasons why the Agency has not developed counterintelligence screening policies is to protect the identities of the people USAID works with. Another reason provided by the Agency official is that such a policy would lessen the ability of USAID to respond quickly to emergencies.

If the Cuban Intelligence Service is able to access USAID's Cuba program information, individuals and groups working with USAID could be exposed and enable the Cuban intelligence to denigrate the networks and threaten these individuals. Without counterintelligence screening policies and procedures or other mitigating activities, USAID programs and resources risk subversion and exploitation.

As USAID still does not have an operational vetting policy, a recommendation to LAC to implement such a policy would not be effective, as LAC already had agreed to follow such a policy once implemented in response to OIG's 2007 recommendation. Further, LAC stated, "The types of risks addressed by the IG that relate to subversion and intelligence threats apply to the agency as a whole, not just to the LAC Bureau" and would "require an agency-wide discussion, analysis, and case study in order to arrive at an appropriate determination and screening policy to address intelligence and subversion threats that applies to the entire agency or the U.S. Government." To address the issue of screening for subversion effectively, we are addressing the recommendation to the Bureau for Management.

Recommendation 16. *We recommend that the USAID Bureau for Management conduct an agency-wide analysis to determine whether a screening policy is needed to address intelligence and subversion threats that apply to USAID, and, if so, develop and implement one.*

OTHER MATTERS

Some Financial Management Decisions Raised Concerns About Accountability

According to GAO's *Standards for Internal Controls in the Federal Government*, controls serve "as the first line of defense in safeguarding assets and preventing and detecting errors and fraud" and should "provide reasonable assurance regarding prevention of or prompt detection of unauthorized acquisition, use or disposition of an agency's assets." According to ADS 596, Agency managers ensure that "internal controls are incorporated into strategies, plans, guidance, and procedures that govern programs and operations," "internal control standards are maintained in the implementation of activities to achieve Agency program goals," and "programs are managed in compliance with applicable laws."

Although the review team did not perform a financial audit³⁷ or test financial controls of the Cuban Civil Society Support Program or ZunZuneo, certain decisions regarding ZunZuneo's implementation raised concerns about financial accountability. While we did not find any specific evidence of fraud, each of the following can be linked to a fraud indicator in the *Fraud Indicators Handbook*, produced by OIG's Office of Investigations.

- The project team established a company, MovilChat, in the Cayman Islands. It was created solely to pay for messages and had no employees. The fraud handbook states that concealing true ownership is a warning sign of fraud, as is hiding an audit trail.
- The project team used offshore bank accounts to support ZunZuneo messaging. Mobile Accord opened bank accounts in the Cayman Islands and hired a management company, Cayman Management Ltd., to transfer money from MovilChat through the bank accounts to Lleida.net, the Spanish company that sold credits for the text message service. The fraud handbook states that using multiple bank accounts could indicate a fraud scheme.
- Project employees used aliases. One employee set up an account with Lleida.net and paid bills using an alias and a fictitious address. Other aliases were used in project documents and in correspondence. Aliases suggest the existence of phantom contractors and consultants, which the fraud handbook states require additional due diligence to ensure that funds are not being abused. One way to confirm that payees are real is to verify their addresses; however, fake names and addresses make verification difficult.
- The project team adopted practices that made it difficult to track funds. Under NIMESA's ZunZuneo grants, Creative's finance manager in Costa Rica documented the flow of the project's financial resources. He said he never felt comfortable with the whole process—including the measures to mitigate conflicts of interest involving two project team members (discussed on page 25)—and documented the wire transfer process so he could explain it in the future. The fraud handbook lists actions that diminish the audit trail and conflicts of interest as fraud indicators.

³⁷ We found evidence that GAO reviewed some of ZunZuneo's financial information for Creative and Mobile Accord in 2012, but we did not review the extent of the work done.

Project officials decided to take the actions mentioned above so the Cuban Government would not find out that the United States supported the project and to protect project stakeholders from being targeted by Cuba. Grantees took steps to conceal that support for their own and beneficiaries' safety. According to Creative and Mobile Accord, employees used aliases to protect the identity of people involved in the project.

Although the review team did not find any evidence of fraud, methods designed to conceal funding sources and recipients pose inherent risks. Because the program ended in 2012, we make no recommendations, but we raise the issue to make OTI aware that certain activities, even if they are the contractor's responsibility, increase the Agency's risk of fraud and misuse of government funds. We encourage OTI to take appropriate action to address these risks.

Definition of Covert Action and Other Relevant Information

In 2011 the U.S. Senate Committee on Foreign Relations highlighted concerns, raised by NGOs, about the U.S. Government's Cuba program activities' "aura of secrecy and covertness." Following the 2014 media coverage of ZunZuneo, members of Congress questioned USAID about the covert nature of the project. In response, USAID officials said USAID's implementation of the ZunZuneo project was done "discreetly" but was not covert.

Although the review team did not assess whether the program involved covert action, we provide the definition of covert action and other relevant testimonial and documentary information below.

Title 50 of the United States Code, Chapter 44, Section 3093(e), also known as the National Security Act of 1947, defines "covert action" as:

[A]n activity or activities of the United States Government to influence political, economic, or military conditions abroad, where it is intended that the role of the United States Government will not be apparent or acknowledged publicly, but does not include-

- (1) activities the primary purpose of which is to acquire intelligence, traditional counterintelligence activities, traditional activities to improve or maintain the operational security of United States Government programs, or administrative activities;
- (2) traditional diplomatic or military activities or routine support to such activities;
- (3) traditional law enforcement activities conducted by United States Government law enforcement agencies or routine support to such activities; or
- (4) activities to provide routine support to the overt activities (other than activities described in paragraph (1), (2), or (3)) of other United States Government agencies abroad.

Lawyers in USAID's OGC said there were interagency discussions about the covert action definition and its applicability to Cuba programming in general. They gave OIG a June 2009 e-mail that the State Department's Office of the Legal Adviser sent to OTI, LAC, and others. The e-mail stated, "U.S. foreign assistance programs for Cuba are not covert, as defined in legislation." Among the points raised by the State Department's Office of the Legal Adviser were:

- It is publicly known that the U.S. Government is funding NGOs that try to influence conditions in Cuba. There are specific appropriations to fund Cuba programs, and they are explained in the annual congressional budget justifications that are publicly available on the Internet. Congress is notified of the programs and has been briefed on them. In addition, most programs are selected in response to a public request for proposal. Awardees are aware that they are receiving U.S. Government funds.
- A government's objection to some or all of a U.S. Government foreign assistance program does not serve to make that program a "covert program."
- Not publicly identifying all of the organizations or individuals working with our program implementers or identifying the exact parameters of the program does not make it a covert action. Instead, there is recognition that we will accomplish more by acting discreetly instead of in a confrontational manner.
- Although U.S. Government programs in Cuba operate discreetly, it is not intended "that the role of the United States Government will not be apparent or acknowledged publicly." Grantees and contractors are not instructed to deny receiving funds from the U.S. Government; it is left to them to determine how best to operate inside Cuba.

U.S. Legislation Publicly Supports Peaceful Democratic Transition in Cuba. As discussed on page 55, U.S. legislation publicly supports a peaceful democratic transition in Cuba and gives authority to the President to provide assistance to support democracy-building efforts in Cuba. The publicly available reports from CAFC I and II contain central actions or recommendations to achieve this transition, including strengthening civil societies and breaking the information blockade. CAFC II recommended \$80 million for a Cuba Fund for a Democratic Future. According to a Department of State congressional notification, approximately \$45 million was intended to be obligated in FY 2008, and this was part of the \$80 million recommended in CAFC II. A portion of the approximately \$45 million was used to implement USAID/OTI's Cuban Civil Society Support Program and its ZunZuneo project.

Program's Overarching Goal Was to "support activities that will help advance a peaceful democratic transition in Cuba." The initial request for program proposals, as well as the award document, for the Cuban Civil Society Support Program stated that the program's overarching goal was to "support activities that will help advance a peaceful democratic transition in Cuba." According to grant documents, the first grant awarded under ZunZuneo stated that it was to help achieve that goal by providing a free flow of information to Cuban citizens. When the project expanded under the third grant, the documents stated that it would then provide the capacity for Cubans who have shared interests to connect.

Throughout the project, text messages were sent by the grantees to recipients. The messages did not encourage or ask recipients to take political action. The chief of party and a consultant of the grantees said they intentionally avoided sending political messages, although they acknowledged that a couple of the initial messages sent contained some political satire. For example, one message referred to a politician declaring that laptops were "weapons of the enemy," and another referenced an artist who said, "It's time to change, freedom has no owner." Appendix V lists in Spanish and English the text messages sent by the project grantees.

Midway through the project, SMS-based user groups were created to provide a means for Cubans to connect with each other on areas of interest, such as news, culture, science, and

sports, using what the implementing partner described as a Twitter-like application. According to the grantee, group message content was sent by users. Examples of content were occasionally documented in the project's reports, and samples from one appear in Table 6.

Table 6. Examples of Group Messages

Examples of Group Message Content	English Translation of Group Message Content
Egipto juzga a Mubarak por asesinato.Descartan paso de tormenta tropical Emily sobre Venezuela.Penelope Cruz tendra un hermano a los 37.	Egypt tries Mubarak for assassinations. Parts of tropical storm Emily scattered over Venezuela. Penelope Crus will have a brother at age 37.
Hola amigos no los olvido Sigo en gira nacional y estoy en La Ciudad Heroe Santiago de Cuba Es precioso el oriente de Cuba! Miles de abrazos a todos	Hello friends I haven't forgotten you. Still on my national tour and am currently in the City of Heroes Santiago de Cuba. The western part of Cuba is gorgeous! Many hugs to everyone.
Cuba celebrara un simposio internacional de hip hop del 17 al 21 de agosto con la participacion de musicos de Canada Estados Unidos Francia Haiti	Cuba celebrates an international symposium of hip hop from August 17 to the 20 with the participation of musicians from Canada, US, France and Haiti.
El Consejo Nacional de Transición (CNT) libio, con el apoyo de la OTAN, ofrece 1,6 millones de dólares a cualquiera que capture o mate a Gadafi	The Libyan National Transitional Council, with the support of NATO, is offering 1.6 million dollar for the capture or killing of Gaddafi
Hola a todos mis amigos ya estoy de vuelta recupere mi contraseña gracias a los servicios de ZunZuneo y a su excelente equipo. Saludos para todos	Hello to all my followers, I'm back. Recovered my password thanks to the help of ZunZuneo and its excellent team. Regards to all.
Buenos días, les invito a una fiesta barra abierta a mi casa ya que hoy es mi cumple, para que todos mis seguidores puedan ir, nos veemoooss	Hello, I'm inviting you all to an open bar at my house today to celebrate my birthday, hope all my followers can make it, see you theerrreeee
Para recibir de otros grupos debes mandar un SMS con el nombre del grupo al +34675374113, y si desea darse de baja enví PARAR TODO al +34675374113.	To receive messages from other groups, send an SMS with the name of the group to +34675374113, and if you want to stop receiving messages send PARAR TODO to 34675374113.
Deberíamos cuadrar una fiesta para asistir todas las personas con ZunZuneo, pa los que estén solos busquen su jeva o jevo. que creen?? yo creo que si!	We should plan a party for everyone who's on ZunZuneo so that everyone who is single can find someone. What do you guys think? I think we should!
Pablo Milanés, cantautor de la era revolucionaria en Cuba, afirma que ha dejado de ser un seguidor ferviente de Fidel Castro.	Pablo Milanes, the revolutionary singer from Cuba, affirms that he is no longer a fervent follower of Fidel Castro.

The English translation was copied over from the project's activity report. OIG did not review the accuracy of the translations.

ZunZuneo Activities Were Reported, but Not Named, in Public Congressional Budget Justifications. USAID's work in Cuba is reported in annual congressional budget justifications (CBJs) to Congress, which are posted online. Within the duration of the program, fiscal years 2008 to 2011, the annual CBJs said U.S. assistance to Cuba would include focusing on strengthening civil society; breaking the information blockade; and supporting information sharing into and out of Cuba, as well as with local civil society. When ZunZuneo was initiated in FY 2009, the CBJs included information on the use of new technology to meet U.S. objectives in Cuba:

- The FY 2009 CBJ reported that USAID assistance would support “technology that improves the availability of uncensored information on the island.”
- The FY 2010 CBJ reported, “The use of technology and new media enhance program results and galvanize international support and solidarity for the objectives.”
- The FY 2011 CBJ reported that:

U.S. assistance supports information sharing into and out of Cuba, as well as among civil society groups on the island. The United States supports nascent pro-democracy groups, the use of technology, and new information sharing opportunities. . . . In response to increasingly more vibrant and vocal pro-democracy movement on the island, U.S. assistance would be used to support nascent pro-democracy groups while enhancing information sharing opportunities through the use of technology and new media.

Information in the CBJs was general. None specifically mentioned ZunZuneo or other program activities by name, nor did they include specific details of the program. According to OTI, this is not uncommon for many USAID programs. CBJ descriptions often do not include details, such as project names or descriptions of their individual activities.

USAID and Department of State Officials Discussed Program With Congress. In addition to the reporting requirements under the CBJs, USAID is required to notify Congress before obligating or expending funds for programming in Cuba under a special congressional notification process. During this process, Congress can review the notification, make inquiries, express objections, and place a hold on the obligation. Staff from OTI and LAC reported that they briefed Congress on the programs covered by the notification, including OTI's Cuba program. Agency officials said Department of State personnel also attended the briefings.

USAID provided further information in March 2012 in response to a request from Senators Robert Menendez (D-NJ), Patrick Leahy (D-VT), and John Kerry (D-MA). The senators had asked USAID in pursuant to congressional approval of FY 2010 funding for democracy programs in Cuba, to assess the impact of these programs. In response, USAID stated: “The [Cuba] programs have also increased the information flow into, out of, and within Cuba. USAID expanded access to social media and to other uncensored information to help Cubans communicate amongst themselves and the outside world.” In the response USAID also reported that its activities (here referring to ZunZuneo) had “facilitated information sharing and communications into and out of Cuba via cell phone messaging and the internet.”

USAID and Implementers Took Steps to Conceal Program From Cuban Government.

Citing political and project success concerns, USAID and program implementers took steps to conceal the U.S. Government's involvement with the program, including with ZunZuneo, from the Cuban Government and people. For example:

- *Marking requirements.* USAID waived marking requirements for all of its Cuba programs under 22 CFR 226.91(j) authority,³⁸ citing political concerns. In its approval memo, USAID noted that Cuban law prohibits Cubans from cooperating with U.S. democracy assistance activities, and the Castro government tightly controls all official communications. It further stated that in light of the sensitive political environment, USAID's support would need to be "provided in a way that is not immediately blocked or disparaged by the Cuban Government due to the presence of USAID markings, or any other markings that may indicate funding sources from a United States government (USG) entity."
- *Origin of project funds and ownership of communications platform.* The main ZunZuneo grantee documented that, for the project to succeed, it needed to hide U.S. Government involvement, including concealing the origin of the funds and the ownership of the ZunZuneo platform. Mobile Accord reported:

If it is discovered that the [ZunZuneo] platform is, or ever was, backed by the United States government, not only do we risk the channel being shut down by Cubacel, but we risk the credibility of the platform as a source of reliable information, education, and empowerment in the eyes of the Cuban people. There will be absolutely no mention of United States government involvement. This is absolutely crucial for the long-term success of the service and to ensure the success of the Mission . . . The objective will be to put Cubacel and the Cuban government in a position where they will tolerate, and actually support, the platform.

Accordingly, the grantees took the following steps.

- **NIMESA.** NIMESA's consultant used gift cards and wire transfers from Creative to buy minutes from non-U.S. providers: first Skype and then Lleida.net, a Spanish company that offers SMS communication to Cuba.
- **Mobile Accord.** Mobile Accord took over ZunZuneo's implementation, introduced more sophisticated technology, and continued to increase the number of message recipients. When setting up servers in Spain to avoid detection proved too expensive, Mobile Accord rented space in Amazon Cloud, whose servers were based in Ireland.

According to Mobile Accord's final activity report, the project team also created a company—MovilChat—in the Cayman Islands "to distance Mobile Accord from its involvement with ZunZuneo." MovilChat had two accounts in a Cayman Islands bank—one for U.S. dollars and one for Cayman Islands dollars. Mobile Accord transferred money to the U.S. dollar account, and an intermediary management company transferred the money to the other account to pay Lleida.net and other suppliers with Cayman Islands dollars.

³⁸ 22 CFR 226.91(j) authorizes USAID to make a waiver by region or country under exceptional circumstances if required marking would pose compelling political, safety, or security concerns.

EVALUATION OF MANAGEMENT COMMENTS

In response to the draft report, the Agency agreed with all 16 recommendations. We acknowledged and agreed with the Agency's response to all the recommendations and accept final action on six of them upon issuance of this report. The Agency provided additional information following its management comments, and this information is reflected below as applicable.

Recommendation 1. USAID's Office of Transition Initiatives agreed with the recommendation and made a management decision to use clear language regarding the applicability of any future class deviations. The office noted in follow-up correspondence that as a standard practice it maintains reference files on previous guidance of deviations for future use. In response to the OIG review, the office included a formal note to this file that lists the issues identified in the review and describes how to resolve those issues for future deviation requests to ensure that they meet the applicable requirements. This action was completed on November 3, 2015. We acknowledge the Agency's management decision and final action upon issuance of this report.

Recommendation 2. USAID's Office of Transition Initiatives agreed and made a management decision to review all of its active deviations. It has identified needed corrections and is working with the applicable offices to submit amendments to these deviations. The target date for completion is February 1, 2016. We acknowledge the Agency's management decision.

Recommendation 3. USAID's Office of Acquisition and Assistance agreed and made a management decision to ensure that any deviations made by the Office of Transition Initiatives comply with 48 CFR 701.4. The Office of Acquisition and Assistance determined that its own current deviation procedures adhere to these requirements as well. The target date for completion is February 1, 2016. We acknowledge the Agency's management decision.

Recommendation 4. USAID's Office of Transition Initiatives agreed and made a management decision to update its office guidance to reflect the requirement to provide oversight of its implementing partners to ensure proper compliance with restrictions to eligibility³⁹ requirements. The office plans to do this by developing and providing training to its staff; updating guidance for its office and partners on use of justifications to restrict eligibility and CORs' oversight responsibilities; reviewing activity manuals being developed by implementing partners for future task orders for compliance; and updating its systems to ensure regular access to information on its partners' use of justifications to restrict eligibility and its competition practices. The target completion date for final action is March 1, 2016. We acknowledge the Agency's management decision.

Recommendation 5. USAID's Office of Acquisition and Assistance agreed and made a management decision to work with the Office of Transition Initiatives to adjust the control procedures and add additional requirements, including ones on monitoring, regarding the

³⁹ As of July 22, 2015, "Exceptions to Competition" was renamed "Restrictions to Eligibility" within ADS 303.

management of its grants under contract mechanism. The target completion date of its plan is February 1, 2016. We acknowledge the Agency's management decision.

Recommendation 6. USAID's Office of Acquisition and Assistance agreed and made a management decision to clarify guidance regarding personal conflicts of interest related to grants under contract. It plans to complete this action by March 21, 2016. We acknowledge the Agency's management decision.

Recommendation 7. USAID's Office of Transition Initiatives agreed and made a management decision to work with the Office of Acquisition and Assistance and the Office of General Counsel to develop guidance and training for relevant staff on how to identify, mitigate, and report potential conflicts of interest. On October 13, 2015, the Office of Transition Initiatives also updated its office order covering COR designations to clearly describe the COR's responsibility to report potential conflicts of interest they have identified. The target date for completion of the management decision is March 1, 2016. We acknowledge the Agency's management decision.

Recommendation 8. USAID's Office of Transition Initiatives agreed and, in follow-up correspondence, made a management decision to develop guidance that outlines the conditions for when contractual language that delineates legal responsibilities should be added to its awards. OTI will also provide guidance to its partners on responsibilities for legal review during regularly scheduled meetings. The target date for completion is February 1, 2016. We acknowledge the Agency's management decision.

Recommendation 9. The Agency stated that various procedures regarding legal guidance were already in place. Specifically, its January 2014 issuance of a "Legal Considerations Spotter during Activity Development" was designed to be used by the Office of Transition Initiatives' staff members to identify potential key legal issues and to know when to seek counsel. According to USAID, by mid-2014, the spotter was incorporated into biweekly training for new staff and also included in other training and brown bag sessions both on activity implementation and on specific legal issues relevant to DCHA/OTI country programs. This spotter was later updated in January to include additional key legal issues, such as "activities that may require 'discretion' for either effectiveness or safety/security purposes." On November 13, 2015, OTI documented the use of the spotter in its field guide as a requirement for staff to review prior to approving program activities. We acknowledge the Agency's management decision and final action upon issuance of this report.

Recommendation 10. USAID's Office of Transition Initiatives agreed with this recommendation by making a management decision to provide more detailed guidance on the process and responsibility to document actions concerning PPRs, including actions taken in response to PPR recommendations. The guidance was updated and communicated to staff on October 9, 2015. We acknowledge the Agency's management decision and final action upon issuance of this report.

Recommendation 11. USAID's Office of Transition Initiatives agreed and made a management decision to ensure that all of the Cuban Civil Society Support Program formal reviews and project deliverables are finalized and labeled properly. It plans to complete this action by March 1, 2016. We acknowledge the Agency's management decision.

Recommendation 12. USAID's Office of Transition Initiatives agreed and made a management decision to update its office guidance and inform staff on the need to finalize project deliverables. OTI's office order was updated on October 13, 2015, and an announcement was

sent to staff. We acknowledge the Agency's management decision and final action upon issuance of this report.

Recommendation 13. USAID's Office of Transition Initiatives agreed and made a management decision to submit the program's documents to the DEC in accordance with ADS. It plans to complete this action by March 1, 2016. We acknowledge the Agency's management decision.

Recommendation 14. USAID's Office of Transition Initiatives agreed with the recommendation by communicating to its staff the requirement to maintain written evidence of legal guidance on October 15, 2015, and by updating its office guidance to articulate this requirement on November 13, 2015. We acknowledge the Agency's management decision and final action upon issuance of the report.

Recommendation 15. USAID's Office of General Counsel agreed with this recommendation by communicating to its staff in writing the requirement to maintain appropriate documentation of legal guidance in accordance with the Agency's disposition schedule. The office also issued official guidance on records management to staff. We acknowledge the Agency's management decision and final action upon issuance of the report.

Recommendation 16. USAID's Bureau for Management agreed with this recommendation and made a management decision to conduct an analysis to determine whether a screening policy is needed to address intelligence and subversion threats that apply to USAID. It plans to complete this action by July 16, 2016. We acknowledge the Agency's management decision.

SCOPE AND METHODOLOGY

Scope

We conducted this review in accordance with the general standards in Chapter 3 of *Government Auditing Standards* and with the documentation, evidence, and finding development standards in Sections 6.56 through 6.82. They require that we obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions in accordance with our review objectives. We believe that the evidence obtained provides that basis.

Effective October 2008, OTI awarded Creative a \$15.5 million contract to implement the 3-year Cuban Civil Society Support Program, which was later extended for almost an additional year. According to the Agency's financial management system, \$11,170,671 was obligated over almost 4 years, of which \$11,167,031.06 was disbursed.

The purpose of this review was to determine (1) how USAID's Cuban Civil Society Support Program—including ZunZuneo—was designed, approved, and implemented; (2) how the program implementers designed and used an HIV prevention workshop; and (3) whether USAID used appropriate management controls for selected aspects of the program.

The review covered the period from program inception in July 2008 to program completion in August 2012. We considered certain background information before program inception—Cuban Democracy Act of 1992, which authorized U.S. assistance in Cuba, and the 2004 and 2006 CAFC reports. We also considered certain activities after program completion, namely media reports on the program dated April 2014 and August 2014. Fieldwork was performed in Washington, D.C., from July 16, 2014, to March 24, 2015, primarily at USAID/Washington. We also visited Creative's headquarters and Mobile Accord's office in Washington, D.C. The team conducted telephone interviews with some program staff who were not available for in-person interviews in the Washington, D.C., metro area.

The review team focused on ZunZuneo and implementation of one grant with an HIV prevention workshop titled "Supporting the commitment of youths with the community." In addition, we reviewed the appropriateness of controls in place during the program. We focused on the controls covering program documentation, communication, oversight, monitoring, and susceptibility to fraud, waste, and abuse. Since the program ended in 2012, we could not test management controls to determine their appropriateness. However, during our review, we asked and looked for indications of their appropriateness. We did not examine or test financial controls, nor did we verify the accuracy of the reported amounts spent for program grants.

Throughout the course of the review, we encountered some scope limitations that included problems obtaining complete information and, in some cases, verifying the accuracy of information received, as follows:

- We did not interview beneficiaries who received funds from the grantees. As a result, we were limited to testimonial evidence from OTI, Creative, and relevant grantees about those beneficiaries' perspective, including activities and results. For example, when answering the second objective, we did not speak with members of the beneficiary group who actually conducted the HIV prevention workshop.

- The program ended in 2012, and some people we interviewed could not recall specific or exact program events and controls. This led to several gaps and inconsistencies in their statements. When possible, we obtained and reviewed documents to support what we were told.
- Creative provided close to a terabyte of program data. Due to the volume, we did not review everything and in some instances relied on key word searches. Therefore, different evidence could exist that we did not consider when developing the findings.
- OGC gave us a list of text messages the project sent. We could not verify whether this was a complete list.
- OTI previously used eRooms, a Web-based information management tool, for internal communication and documentation storage. Because the archived information was provided to us on a shared drive instead of through eRooms, we could not verify the completeness of OTI's communications and documentation records and examine applicable controls.
- OTI maintained limited documentation and relied heavily on Creative to keep records and documentation of program activities. As a result, we may not have received all of OTI's internal documentation related to the program.
- OTI employees told us that when USAID switched from Outlook to Gmail, they lost e-mails. Staff in USAID's chief information office said only a portion of e-mails were recoverable, and it would be time-consuming to retrieve them. As a result, we may be missing relevant communications.
- OTI and Creative staff used Hushmail for sensitive communications. The review team was told these e-mails were lost because they no longer use Hushmail. As a result, we are missing communication about the program.
- As described in the finding about incomplete legal documentation, OGC's records of communications and decisions were not complete.
- Because this project was based in Cuba and the Costa Rica office closed in 2010, we could not travel to verify project results. OTI could not verify results either, as discussed in the finding about M&E.
- Early in our review, we had indications that USAID's Office of General Counsel was in contact with some interviewees before we spoke with them. The nature of these discussions is unclear. This may have led to interference with obtaining unhampered testimonial evidence. After we became aware of the issue, OIG raised it with the Office of General Counsel and did not note any reoccurrence of this practice. In the end, this issue did not affect our ability to obtain sufficient, appropriate evidence. OIG also provided a briefing to Office of General Counsel personnel to further address the matter.

Methodology

To plan for this review, we examined the program contract and associated modifications, the 12 grants for ZunZuneo, and the 1 grant associated with the HIV prevention workshop. We also

reviewed program inception and design documents, Creative's annual performance reports, work plan, M&E plans, monthly progress reports, security protocols, and other documents.

For criteria, we reviewed Creative's and OTI's guidance, policies, and procedures. We also reviewed applicable USAID policies and procedures pertaining to program design, implementation, monitoring, and internal controls. This included multiple ADSs that were in effect during the project design and implementation and our fieldwork. We used GAO's *Standards for Internal Control in the Federal Government* as criteria for determining whether proper management controls were in place.

To gain an understanding of the program and to identify and assess, to the extent possible, whether appropriate management controls were in place, we reviewed program documents and conducted interviews with the following people:

- Current and former OTI officials and staff, including the program's country representative, team leads, CORs, and several contracting officers. We also spoke with staff who conducted the PPR and management review, as well as the current and former director of OTI.
- LAC's former deputy assistant administrator, director of that bureau's Cuba office, and its budget analyst.
- DCHA's director of the Office of Program Policy and Management
- OAA's deputy director of operations, contracting officers, and branch chief of that office's Cost Audit and Support Division
- Office of Legislative and Public Affairs' lead congressional liaison and former Cuba congressional liaison officer
- Division and branch chiefs for the Office of Security's Counterterrorism and Information Security Division
- Budget analyst from the Bureau for Management, Office of Management Policy, Budget, and Performance, Division of Policy
- USAID's deputy general counsel, the assistant general counsel for DCHA, and deputy assistant general counsel and attorney-advisor for OTI
- Former program staff from Creative's field office: the chief of party, operations manager, M&E specialist, financial management analyst, procurement manager, a former project development officer for the HIV grant, and security manager who was also one of the project development officers for ZunZuneo
- Current and former staff from Creative's headquarters: security manager, director of contracting, program director, vice president and senior director of the Communities in Transition Division, general counsel, senior account manager, and chief executive officer
- Mobile Accord's chief executive officer and lawyer
- NIMESA's owner and a consultant for that company as well as for Mobile Accord

- The founder of Gaya

During fieldwork, we reviewed documents concerning the program's inception, funding mechanisms, congressional correspondence, and interagency involvement. We also reviewed design and approval documents for the program and ZunZuneo. For information about the program and project implementation, we reviewed status reports, internal communications, and grant deliverables. We reviewed a legal analysis from the State Department examining the covert action definition and its applicability to Cuba programming in general, and an internal assessment from USAID's Office of General Counsel examining whether the project constituted "covert action" and Cuba risk assessments developed by LAC.

To gain an understanding of the design and implementation of the HIV prevention workshop's history, we reviewed Gaya's grant agreements, amendments, program descriptions, final activity evaluation report, and other documents provided by OTI and Creative. We reviewed UN Population Fund documents used to design the HIV prevention workshop and compared the content of the workshop to grant documents. We also reviewed the Iberian-American Convention for Youth Rights and compared the content to what was included in the workshop and also to document what countries had signed on to this convention.

The team reviewed documents that outlined processes and procedures of program operations as well as OTI's processes and procedures for managing the program. We did not test the quality of the computer-processed data from OTI's online activity database.

MANAGEMENT COMMENTS



MEMORANDUM

TO: AIG/A, Nathan Lokos

FROM: AA/M, Angelique M. Crumbly
SDAA/DCHA (Acting), Thomas H. Staal
GC, John L.S. Simpkins

SUBJECT: Management Comments on the Draft OIG Review of USAID's Cuban Civil Society Support Program, Report No. 9-000-15-00X-S

This memorandum conveys USAID's management response to the above referenced review of the Cuban Civil Society Support Program (CCSSP) dated September 16, 2015. USAID would like to thank the OIG for its work on this review. The OIG report affirms that the CCSSP was consistent with U.S. legislation and designed to support activities "that expand the reach and impact of independent civil society in Cuba." CCSSP helped citizens address locally-defined concerns through citizen participation and promoted the free flow of information in Cuba. USAID is pleased that the OIG report accurately describes the intent, design, and realities of the implementation of the reviewed activities.

USAID's specific comments and responses to the audit recommendations are provided below. In addition, since the completion of the audit team's work and exit briefing, USAID has taken several measures to address the findings highlighted during the review.

Recommendation 1: We recommend that the USAID Office of Transition Initiatives, in collaboration with the Office of Acquisition and Assistance and the Office of the General Counsel, develop and implement a plan in which future class deviations from acquisition policies and/or procedures clearly state the conditions for which the deviation will apply.

Management Decision: DCHA/OTI implemented this recommendation in February 2014. DCHA/OTI worked with M/OAA and GC staff to review existing and future class deviations to clarify the language regarding applicability of those deviations to task orders. As noted during the review, DCHA/OTI, M/OAA, and GC had a shared understanding that the previously approved class deviations for the Support Which Implements Fast Transitions (SWIFT)

indefinite quantity contract (IQC) were and are intended to apply to all task orders. The current SWIFT IV IQC deviation dated February 2, 2014, already addressed this recommendation and clearly states that the approved class deviations are "for all task orders under the SWIFT IV IQC." DCHA/OTI will use similar language for future class deviations.

DCHA/OTI requests that this recommendation be closed upon report issuance.

Recommendation 2: We recommend that the Office of Transition Initiatives, in collaboration with the Office of Acquisition and Assistance, review all deviations from Automated Directives System or acquisition regulations for its active awards, and determine whether they comply with Title 48 of the Code of Federal Regulations Subpart 701.4, and correct any instances of noncompliance.

Management Decision: DCHA/OTI agrees with and has begun implementing this recommendation. DCHA/OTI and M/OAA have reviewed the active deviations for SWIFT III and SWIFT IV, and have identified the required edits to the deviations to ensure full compliance with 48 CFR, Subpart 701.4. DCHA/OTI and M/OAA are working with M/OAA/P (Policy) for submission of amendments to these existing deviations. The new class deviations for SWIFT III and SWIFT IV are currently going through clearance for approval. We anticipate that the deviations will be approved within 60 days of publication of this report.

Target completion date: February 1, 2016.

Recommendation 3: We recommend that the Office of Acquisition and Assistance review its procedure for approving and managing deviations, and determine whether it needs to be updated to comply with Title 48 of the Code of Federal Regulations, Subpart 701.4, and make any corrections necessary.

Management Decision: M/OAA agrees with this recommendation and will ensure that it is implemented for DCHA/OTI deviations. M/OAA's current deviation procedures adhere to the requirements of 48 CFR 701.4 (AIDAR). M/OAA will ensure that any deviations for DCHA/OTI will comply with the requirements of this regulation.

Target completion date: February 1, 2016.

Recommendation 4: We recommend that the Office of Transition Initiatives establish and implement procedures that require oversight of implementing partners' proper compliance with exception to competition requirements.

Management Decision: DCHA/OTI agrees with and has begun implementing this recommendation. As a first step to address these concerns, DCHA/OTI held a meeting on September 17, 2015, with its primary implementing partners to discuss their practices for grant competitions and use of justifications to restrict eligibility. DCHA/OTI will share the notes from that meeting with the implementing partners and DCHA staff. DCHA/OTI will also develop and deliver training for its staff on competition requirements and the use of restrictions to eligibility; update guidance for DCHA/OTI and its implementing partners on use of justifications to restrict eligibility; and update DCHA/OTI's Office Order for CORs/AORs to clearly define

requirements for oversight of implementing partners' use of justifications to restrict eligibility. DCHA/OTI and M/OAA are also reviewing activity manuals currently being prepared by the implementing partners for new SWIFT IV IQC Task Orders to ensure that the guidance on restricting eligibility complies with the requirements in ADS 303 and 2 CFR 200. Finally, DCHA/OTI is working to update its systems to ensure that it has regular access to information on implementing partners' grant competition practices and use of justifications to restrict eligibility. We anticipate that these updated procedures will be finalized within 90 days of publication of this report.

Target completion date: March 1, 2016.

Recommendation 5: We recommend that the USAID Office of Acquisition and Assistance review the control procedures for the Office of Transition Initiatives' grants under contract, and implement a plan to conduct periodic monitoring of the Office of Transition Initiatives' grants under contract.

Management Decision: M/OAA agrees with this recommendation and has begun to work with DCHA/OTI to adjust control procedures. M/OAA already works closely with DCHA/OTI to review and approve the procedures for management of grants under contract (GUCs) that are described in activity manuals prepared by implementing partners under the SWIFT IV IQC, and M/OAA staff regularly meets with DCHA/OTI CORs and Program Office staff to resolve specific issues related to USAID/OTI activities.

M/OAA will also work with DCHA/OTI to ensure that contractors under the SWIFT IV IQC include clear policies and procedures in the activity manuals to deal with the issues highlighted in this review related to justifications to restrict eligibility, split funding, activity modifications, and conflicts of interest. In addition, M/OAA intends to add additional requirements to the COR designation letters for SWIFT task orders to require CORs to perform periodic reviews of contractor documentation for GUCs and report back to their Contracting Officer and M/OAA negotiator. Finally, M/OAA will work with DCHA/OTI to update Office Orders for SWIFT task order CORs. We anticipate that the process to conduct periodic monitoring will be finalized within 90 days of publication of this report.

Target completion date: February 1, 2016.

Recommendation 6: We recommend that the USAID Office of Acquisition and Assistance establish Automated Directives System guidance to identify and prevent personal conflicts of interest, including by contractor staff when executing grants under contract.

Management Decision: M/OAA agrees with this recommendation. M/OAA will undertake clarification of guidance in regard to personal conflicts of interest related to grants under contracts.

Target completion date: March 21, 2016.

Recommendation 7: We recommend that the Office of Transition Initiatives develop a plan to implement the new requirements that prohibit personal conflicts of interest, including how to identify and avoid them.

Management Decision: DCHA/OTI agrees with and has begun implementing this recommendation. DCHA/OTI has requested copies of written codes of business ethics and conduct from all SWIFT IV IQC holders, and M/OAA and DCHA/OTI will make them available to CORs and other DCHA/OTI staff managing task orders to familiarize them with the contractors' processes for reporting conflicts of interest and other ethical violations. DCHA/OTI will work with M/OAA and GC to develop guidance/training for DCHA/OTI staff responsible for contractual oversight to recognize conflicts of interest and to work with implementing partner to mitigate and report potential conflicts of interest. Finally, DCHA/OTI has updated the Office Order for CORs and AORs (October 13, 2015) to clearly describe the COR's responsibility to notify M/OAA, OIG, and GC if staff identifies a potential conflict of interest in a SWIFT task order. The plan to implement new requirements and training for USAID/OTI staff will be finalized within 90 days of publication of this report.

Target complete date: March 1, 2016.

Recommendation 8: We recommend that the USAID Office of Transition Initiatives, in collaboration with the Office of General Counsel and the Office of Acquisition and Assistance, develop and implement a policy that requires (1) including clearly delineated legal responsibilities in its awards in the context of the Office of Transition Initiatives unique business model, and (2) communicating legal responsibilities to its partners.

Management Decision: DCHA/OTI agrees with this recommendation and will incorporate the following language in its main contracting mechanism, the SWIFT IV IQC, in an upcoming IQC modification: "DCHA/OTI programs typically operate in complex transition contexts. The unique challenges of these operating environments can present additional legal concerns for DCHA/OTI programs. The Contractor is ultimately accountable for its performance under the award. The Contractor is therefore responsible for consulting with its own legal counsel, as appropriate, to ensure that its activities during the implementation of this contract, including the award of grants under contract, comply with all applicable laws and regulations." Via its regularly scheduled meetings with partners, DCHA/OTI will provide guidance on its expectations regarding responsibility for legal review in the context of DCHA/OTI's unique business model. The new language will be incorporated into DCHA/OTI's awards and will be communicated to implementing partners within 60 days of publication of this report.

Target completion date: February 1, 2016.

Recommendation 9: We recommend that the USAID Office of Transition Initiatives and the Office of General Counsel develop procedures on when and how the Office of Transition Initiatives country teams should seek legal counsel, which includes during implementation and administration of a program.

Management Decision: DCHA/OTI, in collaboration with GC, has already implemented this recommendation by following the procedures outlined below:

- GC has been attending DCHA/OTI staff meetings weekly and taken note of and followed up on any issues that are raised that may require legal analysis to ensure DCHA/OTI compliance with applicable laws and regulations.
- GC meets biweekly with DCHA/OTI's Program Office to discuss and resolve legal and compliance issues.
- GC is available at all times to provide legal advice on specific issues that come up in the routine course of business, and DCHA/OTI staff has been made aware that they are encouraged to contact GC for consultation for any reason.
- GC regularly conducts brownbag presentations for DCHA/OTI staff on key legal compliance issues.
- In addition to these regular opportunities for DCHA/OTI to ensure compliance through informal interaction with and advice from GC, GC and DCHA/OTI have established required procedures that ensure GC clearance at key points in the program cycle. Among other things, prior to obligation of funds, DCHA/OTI provides completed country checklists and activity checklists covering upcoming programming to GC for clearance. These checklists cover common legal issues and require DCHA/OTI to either verify that anticipated programming will not touch on legally restricted topics or that legal restrictions have been addressed via a waiver, reliance on notwithstanding authority, or other legally compliant means.
- GC and DCHA/OTI have developed a "Legal Considerations Spotter during Activity Development" (Spotter) document that DCHA/OTI staff members consult prior to approving a sub-grant. This Spotter has been distributed to all DCHA/OTI staff, and DCHA/OTI has memorialized the requirement for staff to review the Spotter prior to activity approval in the guidance. DCHA/OTI also trains staff on the Spotter during new staff on-boarding.

DCHA/OTI requests that this recommendation be closed upon report issuance.

Recommendation 10: We recommend that the USAID Office of Transition Initiatives develop and implement a policy to document actions taken to address recommendations stemming from program performance reviews, and, if a program performance review is not conducted or recommendations are not followed, that those decisions are documented.

Management Decision: Existing guidance for follow-up on Program Performance Review (PPR) recommendations indicates that the Field Programs Division will "track PPR memorandum recommendations for accountability purposes." DCHA/OTI has developed more detailed guidance regarding the process and responsibility for documenting decisions regarding whether a PPR is conducted, and for documenting actions taken in response to PPR recommendations. The additional guidance for PPRs was updated and communicated to staff on October 9, 2015.

DCHA/OTI requests that this recommendation be closed upon report issuance.

Recommendation 11: We recommend that the USAID Office of Transition Initiatives check that all Cuban Civil Society Support Program formal reviews and project deliverables are finalized properly and labeled accordingly.

Management Decision: USAID agrees with this recommendation. DCHA/OTI has assigned staff who are in the process of ensuring that all CCSSP formal reviews and project deliverables are finalized properly and labeled accordingly. This will be completed within 60 days of publication of this report.

Target completion date: March 1, 2016.

Recommendation 12: We recommend that the USAID Office of Transition Initiatives update its office guidance and inform current staff on the need to finalize project deliverables of ongoing projects that were not done properly before.

Management Decision: DCHA/OTI agrees with this recommendation. DCHA/OTI has updated its office guidance and informed current staff on the need to finalize project deliverables of ongoing projects by updating the COR/AOR Office Order on October 13, 2015, with instructions for CORs, AORs, and program managers for finalizing deliverables.

DCHA/OTI requests that this recommendation be closed upon report issuance.

Recommendation 13: We recommend that the USAID Office of Transition Initiatives submit Cuban Civil Society Support Program documents, including the final program evaluation with lessons learned, to the Development Experience Clearinghouse in accordance with the Automated Directives System, or obtain the appropriate waiver.

Management Decision: USAID agrees with this recommendation. DCHA/OTI will ensure that all CCSSP documents, including the final program evaluation with lessons learned, are submitted to the Development Experience Clearinghouse as required by the task order contract in accordance with the ADS within 90 days of the publication of this report.

Target completion date: March 1, 2016.

Recommendation 14: We recommend that the USAID Office of Transition Initiatives inform current staff in writing and update office guidance on the requirement to document legal guidance, including correspondence, in project files and maintain these files in accordance with the Agency disposition schedule.

Management Decision: DCHA/OTI has updated pertinent office guidance. DCHA/OTI already conducts records management training during new staff orientation and provides recurring records refreshers bi-annually to ensure USAID/OTI staff are aware of records processes, policies, and procedures. The new updated office guidance will be included in all forthcoming training and refreshers. Written guidance was sent to all USAID/OTI staff on October 14, 2015.

DCHA/OTI requests that this recommendation be closed upon issuance of the report.

Recommendation 15: We recommend that the USAID Office of General Counsel inform current staff in writing and update office guidance on the requirement to follow the Agency's disposition schedule and require attorneys to maintain appropriate documentation of legal opinions, including legal correspondence, in accordance with that schedule.

Management Decision: GC recently developed a new knowledge management platform and, in that context, issued a reminder to all legal staff regarding the Agency's record retention policy and disposition schedule; as well as addressing the need to maintain appropriate documentation of legal opinions, including legal correspondence, in accordance with that schedule.

GC requests that this recommendation be closed upon issuance of the report.

Recommendation 16: We recommend that the USAID Bureau for Management conduct an agency-wide analysis to determine whether a screening policy is needed to address intelligence and subversion threats that apply to USAID, and, if so, develop and implement one.

Management Decision: M/MPBP agrees with this recommendation. USAID has established policies to address intelligence and subversion threats as they relate to USAID personnel. In accordance with USAID policy in ADS 569, Counterintelligence and Insider Threat, all USAID employees are required to report Counterintelligence (CI) concerns to the Office of Security. In accordance with ADS 566, Personnel Security Investigations and Clearances, background investigations are required of employees who require access to classified information, and CI reviews are conducted when concerns are identified during the process. Overseas, USAID employees whose conduct raises CI concerns also receive a CI review in coordination with the Department of State Regional Security Officer. All new USAID staff receive CI awareness training as part of their New Employee Orientation.

M/MPBP will undertake an analysis of whether a screening policy is needed to address intelligence and subversion threats applicable to USAID programming. M/MPBP will conduct the analysis through the formation of a cross-functional team. The cross-functional team will include representatives of the Bureau for Management, the Office of Security (which has functional responsibility for CI programs), and GC. If the cross-functional team's analysis determines there is a need for such a policy, M/MPBP will coordinate the development and implementation of such a policy by July 16, 2016. As a part of the analysis, the cross-functional team will conduct consultations with USAID regional bureaus and other agencies. Consultations within USAID will include interviews with key stakeholders, such as senior regional bureau leadership, office directors, and senior mission staff with responsibility for countries and regions rated as having a high risk of intelligence and subversion activity. The analysis will also incorporate information received from officials at other agencies, including the Department of State and the Federal Bureau of Investigation. Should the review conclude that such a screening policy can be an effective tool for addressing intelligence and subversion threats that apply to USAID programming, the analysis will also examine options for conducting screening related to programming.

Target completion date: July 16, 2016.

U.S. Policy on Cuba

Cuban Democracy Act and LIBERTAD Act. U.S. legislation, such as the Cuban Democracy Act of 1992 and the LIBERTAD Act of 1996 (also known as the Helms-Burton Act), The LIBERTAD Act highlights the United States' commitment to universal human rights and fundamental freedoms and its history of solidarity "with the democratic aspirations of the Cuban people." The act gives the President legal authority to provide assistance to individuals and independent NGOs, including democratic and human rights groups, in support of democracy-building efforts in Cuba.

CAFC. In 2003, President George W. Bush formed a commission to explore ways to help hasten Cuba's democratic transition. CAFC published its first report,⁴⁰ known as CAFC I, in 2004. It elaborated on the President's intention to "empower Cuban society and strengthen the democratic opposition" in Cuba through various means, including breaking the "information blockade," referring to the Castro regime's control of "all formal means of mass media and communication on the island."

In 2006 the commission, building off of CAFC I, published a second report,⁴¹ known as CAFC II, which recommended that the U.S. Government take actions consistent with U.S. law to support the empowerment of the Cuban people in various ways in an effort "to hasten the end of the Castro dictatorship." One of the report's recommendations was to allocate \$80 million over 2 years and \$20 million annually thereafter for a Cuba Fund for a Democratic Future. Besides supporting independent civil society groups and educational exchanges, the fund would "expand the Cuban people's access to independent information, including through the Internet."

Congressional Notification of Cuba Programs. Accordingly, the U.S. Department of State, in its FY 2008 congressional notification on U.S. assistance to Cuba, reported its intent to provide \$45 million to:

[B]olster the ability of the Cuban democratic movement to share information, coordinate their activities, and expand the reach of pro-democracy movements across the island. Foreign assistance is intended to generate a sustainable means by which Cuban civil society can call attention to the human rights situation in Cuba; break the information blockade by disseminating information; and coordinate strategies to plan, organize and implement peaceful civil society initiatives, including democratic reforms.

These funds were reported as "part of the \$80 million in funding recommended by the report of the Commission for Assistance to a Free Cuba."

A portion of these funds went to USAID/OTI's Cuban Civil Society Support Program and the ZunZuneo grants under it.

⁴⁰ CAFC, *Report to the President*, May 2004.

⁴¹ CAFC, *Report to the President*, July 2006.

Table 7. ZunZuneo Grant Information and Implementing Partners (Audited, Except as Noted)

	Grant	Amounts Awarded (\$)	Type	Dates	Partner
1	Alternative Communication Services – Test Phase [†]	97,968	in-kind	6/29/2009–10/16/2009	NIMESA
2	Alternative Communication Services – Test Phase II	134,710	in-kind	12/3/2009–7/2/2010	NIMESA
3	Alternative Communication Services – Test Phase III	200,000	cash	7/1/2010–10/15/2010	Mobile Accord
4	Alternative Communication Services – Test Phase IV	96,976	cash	10/16/2010–11/15/2010	Mobile Accord
5	Alternative Communication Services – Test Phase V	231,558	cash	11/22/2010-2/4/2011	Mobile Accord
6	Alternative Communication Services – Test Phase VI	200,180	cash	2/7/2011-6/17/2011	Mobile Accord
7	Alternative Communication Services – Access	90,000	cash	5/9/2011-6/17/2011	Mobile Accord
8	Alternative Communication Services – Access [II]	90,000	cash	6/20/2011-7/29/2011	Mobile Accord
9	Alternative Communication Services – Phase VII	144,922	cash	6/20/2011-9/30/2011	Mobile Accord
10	Alternative Communication Services – Access III	70,000	cash	10/7/2011-11/18/2011	Mobile Accord
11	Alternative Communication Services – Phase VIII	175,400	cash	10/1/2011-2/29/2012	Mobile Accord
12	Alternative Communication Services – Phase IX	174,893	cash	3/1/2012-8/10/2012	Mobile Accord
	Total	1,706,606*			

* The total amount spent per OTI's activity database was \$1,558,869. This amount was not audited.

[†] Originally this grant was called "Short Messages Service Test."

Messages Sent

The Spanish messages below were provided by OTI. The review team did not verify the completeness of the list. The translations into English were done by OIG auditors working in RIG/San Salvador and verified by OTI.

Grant	Message
Grant #1	<p>News Update! Mystery resolved: Michael Jackson was murdered. Raul sends condolences to Obama. Fidel reflects, "it was Lage."</p> <p><i>Ultima hora! Se aclara misterio: Michael Jackson fue asesinado. Raul manda condolencias a Obama. Fidel reflexiona: "fue Lage."</i></p>
	<p>THE LATEST! Cuban dies from laptop electric shock. Ramiro Valdes declares: I already told you, these devices are weapons of the enemy!! haha Visit us at www.quevola.net</p> <p><i>LO ULTIMO! Cubano muere por corrientazo de laptop. Ramiro Valdes declara: Yo ya lo dije. Esos aparatos son armas del enemigo!! jaja Visitanos en www.quevola.net</i></p>
	<p>Would you like it if <i>Los Aldeanos</i> sang for peace with Juanes at the Square??? Give us your opinion at www.quevola.net !!!</p> <p><i>Te pareceria bien que Los Aldeanos cantaran por la paz con Juanes en la Plaza??? Danos opinion en www.quevola.net !!!</i></p>
	<p>Are you thinking about going to the concert for Peace? Tell us what singer you like most and what you like about him. See the results at www.quevola.net or send an SMS +34692264523</p> <p><i>Piensas ir al concierto por la Paz? Dinos que cantante te gusta mas y que te gusta de el! Mira los resultados en www.quevola.net o manda un SMS +34692264523</i></p>
	<p>Are you at the concert for peace? Or watching it? How is it going? Give us your opinion at www.quevola.net info@quevola.net or SMS to +34657589891</p> <p><i>Estas en el concierto por la paz? o viendolo? Como la estas pasando? Danos tu opinion en www.quevola.net info@quevola.net o envia un SMS a +34657589891</i></p>
	<p>Juanes said it: It's time to change, freedom has no owner. We want to hear your opinion www.quevola.net info@quevola.net or Send an SMS to +34691122648</p> <p><i>Ya lo dijo Juanes: Es tiempo de cambiar, la libertad no tiene propiedad. Queremos oir tu opinion www.quevola.net info@quevola.net o Envia un SMS al +34691122648</i></p>
Grant #2	<p>What if you could be in the know through your cell?? ZunZuneo is coming... let your friends know!</p> <p><i>y si pudieras estar en talle a traves de tu celular?? Zunzuneo ya viene llegando... pasa la jugada!</i></p>
	<p>What if you could get the latest on your cellular? Neat right? ZunZuneo is coming... will you be ready?</p> <p><i>y si recibieras lo ultimo en tu celular? volao no? ZunZuneo esta llegando... estaras listo?</i></p>
	<p>What if you could get the latest without paying a penny? Share stuff with your friends? Coming soon: ZunZuneo on your cellular...</p> <p><i>y si pudieras estar en lo ultimo sin pagar un kilo? Compartir con tu gente? Proximamente: ZunZuneo en tu celular...</i></p>

Grant	Message
	<p>ZunZuner@! Write to us at Info@zunzuneo.com or text 1 to receive Sports Zunes, 2= Technology, 3= Factoids. Message costs according to cubacel rates</p> <p>ZunZuner@! Escribenos a info@zunzuneo.com o envia 1 para recibir Zunes de Deportes, 2 = Tecnologia, 3 = Curiosidades. Coste del mensaje segun tarifas de cubacel</p>
	<p>ZunZuner@! Write to us at Info@zunzuneo.com or send 1 to receive Sports Zunes, 2= Technology, 3= Factoids. SMS +34675374113 or www.zunzuneo.com</p> <p>ZunZuner@! Escribenos a info@zunzuneo.com o envia 1 para recibir Zunes de Deportes, 2 = Teconolgia, 3 = Curiosidades. Un SMS al +34675374113 o www.zunzuneo.com</p>
	<p>ZunZuner@! Write to us at Info@zunzuneo.com or send 1 to receive Sports Zunes, 2= Technology, 3= Factoids. SMS +34675374113 or www.zunzuneo.com</p> <p>ZunZuner@! Escribenos a info@zunzuneo.com o envia 1 para recibir Zunes de Deportes, 2 = Teconolgia, 3 = Curiosidades. Un SMS al +34675374113 o www.zunzuneo.com</p>
	<p>SPANISH SOCCER Barcelona still leads, but Madrid is closing in, only a 2 point difference and the classic is near. Today CHAMPIONS (League): Madrid vs. Lyon and Milan vs. Manchester ZZ</p> <p>FUTBOL ESP El Barca sigue lider, pero el Madrid acecha, solo 2 puntos de diferencia y el clasico por venir. Hoy CHAMPIONS: Mad Vs Lyon y Milan Vs Manchester ZZ</p>
	<p>Microsoft presents Windows Phone 7 / Steve Ballmer, Microsoft's delegate counsel, has presented the next generation of Windows Phone at the MWC 2010</p> <p>Microsoft presenta Windows Phone 7 / Steve Ballmer, consejero delegado de Microsoft Corp., ha presentado en el MWC 2010 la próxima generación de Windows Phone</p>
	<p>Burj Dubai, United Arab Emirates, is the tallest building built by man. Finished in Jan 2010 at 828 meters. It's 7 times the height of the FOCSA building! Info@zunzuneo.com</p> <p>Burj Dubai, Emiratos Arabes. Es el edificio mas alto construido por el hombre. Finalizado en ene del 2010 con 828m. Es 7 veces el FOCSA! info@zunzuneo.com</p>
	<p>European Champions (League) results: Lyon 1 Real Madrid 0, Milan 2 Manchester United 4 Comment and subscribe your friends! Info@zunzuneo.com SMS +34675374113 zunzuneo.com</p> <p>Resultados Futbol Champions Europa: Lyon 1 Real Madrid 0, Milan 2 M. United 3 Comenta y suscribe a tus amigos! info@zunzuneo.com SMS +34675374113 zunzuneo.com</p>
	<p>When you place a shell in your ear, what you really hear is not the sound of the ocean, but the echo of the blood flowing through your ear. Subscribe your friends at +34675374113</p> <p>Cuando usted pone un caracol en su oreja, realmente no escucha el sonido del mar, sino el eco de la sangre de su oido. Suscribe a tus amigos SMS al +34675374113</p>
	<p>EUROPE CHAMPIONS: Bayern Munich defeats Fiorentina 2-1 and Oporto beats Arsenal by the same score. The second round will tell. Info@zunzuneo.com</p> <p>EUROPA CHAMPIONS: El Bayern de Munich gana a la Fiorentina 2-1 y el Oporto al Arsenal por igual marcador. Todo se decidira en la vuelta. info@zunzuneo.com ZZ</p>

Grant	Message
	<p>IBM sets a world record with the creation of a solar cell made with materials commonly found on Earth. Very efficient and ecological! Subscribe: Info@zunzuneo.com</p> <p>IBM marca record mundial con la creacion de celda solar hecha de materiales abundantes en la tierra. Muy eficiente y ecologica! Suscribete: info@zunzuneo.com</p>
	<p>The biggest cities in the world are: 1-Tokyo 2-Seoul 3-Mexico DF 4-Delhi 5-Bombay 6-NY 7-Sao Paulo 8-Manila 9-Los Angeles Info@zunzuneo.com www.zunzuneo.com</p> <p>Las ciudades mas grandes del mundo son: 1-Tokio 2-Seul 3-Mexico DF 4-Delhi 5-Bombay 6-NY 7-Sao Paulo 8-Manila 9-Los Angeles info@zunzuneo.com www.zunzuneo.com</p>
	<p>SPANISH SOCCER: Real Madrid 6 Villareal 2, Barcelona 4 Racin 0 ITALY: Inter 0 Sampdoria 0, Roma 1 Catania 0 ENGLAND: Everton 3 M. United 1, Wolverton 0 Chelsea 2 zunzuneo.com</p> <p>FUTBOL ESP: Real Madrid 6 Villarreal 2, Barcelona 4 Racing 0 ITA: Inter 0 Sampdoria 0, Roma 1 Catania 0 ING: Everton 3 M.United 1, Wolv 0 Chelsea 2 zunzuneo.com</p>
	<p>Facebook is now the second most popular internet site in the U.S.A., beating Yahoo with 133 million unique visitors in Jan. Info@zunzuneo.com</p> <p>Facebook ahora es el segundo sitio mas popular de la Internet en los EEUU, sobrepasando a Yahoo con 133 millones de visitantes unicos en ene. info@zunzuneo.com</p>
	<p>NBA: Clippers 98 - Bobcats 94, Knicks 67 - Bucks 83, Nets 94 - Grizzlies 104, Mavericks 91 - Pacers 82. Subscribe your friends Info@zunzuneo.com Yes!</p> <p>BASKET NBA: CLIPPERS 98 - BOBCATS 94, KNICKS 67 - BUCKS 83, NETS 94 - GRIZZLIES 104, MAVERICKS 91 - PACERS 82. Subscribe a tus amigos info@zunzuneo.com ZZ SI!</p>
	<p>Did you know that since the stone age, cockroaches have easily resisted sudden climate changes, lack of food and even an atomic bomb? Info@zunzuneo.com</p> <p>Sabia ud que desde la prehistoria, la cucaracha resiste tranquilamente cambios bruscos de clima, falta de comida y hasta la bomba atómica? info@zunzuneo.com ZZ</p>
	<p>EU Champions SOCCER: Stuttgart 1 Barcelona 1, Olympiacos 0 Girondins 1. Send your opinion or subscribe your friends at info@zunzuneo.com www.Zunzuneo.com or SMS +34675374113</p> <p>FUTBOL EU Champions: Stuttgart 1 BAR 1, Olympiacos 0 Girondins 1. Envia tu opinion o pon a tus amig@s a info@zunzuneo.com www.zunzuneo.com o SMS al +34675374113</p>
	<p>Researchers at Brighton University (England) develop computers that understand language. This will help blind people use the internet.</p> <p>Academicos de la Univ. de Brighton (Inglaterra) desarrollan computadoras que entienden el lenguaje. La investigacion ayudaria a gente ciega a usar Internet. ZZ</p>
	<p>Did you know that lighters were invented before matches? Subscribe your friends: info@zunzuneo.com or SMS +34675374113 ZUNZUNEO IT WORKED!</p> <p>Sabia ud. que el encendedor fue inventado antes que los fosforos? Pon a tus amig@s: info@zunzuneo.com www.zunzuneo.com o SMS al +34675374113 ZUNZUNEO SI SIRVIO!</p>

Grant	Message
	<p>SPANISH LEAGUE Standings: 1-Barcelona (61) 2-Real Madrid (59) 3-Valencia (46) 4-Sevilla (43) Italian League: 1-Inter (58) 2-Milan(54) 3-Roma (51) 4-Palermo (43) English Premier: 1-Chelsea (61) 2-Manchester (60) 3-Arsenal (58) 4-Tottenham (49)</p> <p>LIGA ESP TABLA: 1-BAR (61) 2-RMA (59) 3-VAL (46) 4-SEV (43) ITA: 1-INTER (58) 2-MIL (54) 3-ROMA (51) 4-PAL (43) ING: 1-CHE (61) 2-MAN (60) 3-ARS (58) 4-TOT (49)</p>
	<p>After Microsoft launched Windows 7, interest in adopting the system grew quickly for one in five IT professionals. Zunzuneo</p> <p>Luego de que Microsoft lanzara Windows 7, el interes por adoptar rapidamente el sistema operativo aumento para uno de cada cinco profesionales de IT. ZunZuneo</p>
	<p>FACTOID: The videogame industry (PC, Nintendo, PlaySt., Xbox, etc.) makes more money than movies and music combined! info@zunzuneo or SMS +34675374113</p> <p>CURIOSIDAD: La industria del videojuego (PC, Nintendo, PlaySt, Xbox, etc.) gana mas dinero que el CINE y la MUSICA juntos! info@zunzuneo.com o SMS +34675374113</p>
	<p>INTERNATIONAL SOCCER FRIENDLIES: BRA-2 IRL-0, GER-0 ARG-1, FRA-0 SPA-2, TUR-2 HON-0, SUI-1 URU-3. Subscribe your friends in ZZ: www. Zunzuneo.com info@zunzuneo.com</p> <p>FUTBOL INTERNACIONAL AMISTOSOS: BRA-2 IRL-0, ALE-0 ARG-1, FRA-0 ESP-2, TUR-2 HON-0, SUI-1 URU-3. Pon a tus amigos en ZZ: www.zunzuneo.com info@zunzuneo.com</p>
	<p>The free software community has received another good news with the launching of Firefox for mobile phones. Zunzunate! SMS to +34675374113</p> <p>La comunidad del software libre ha recibido otra buena noticia con el lanzamiento oficial de Firefox para telefonos moviles. ZunZuneate! SMS al +34675374113 ZZ</p>
	<p>A photon (light) takes 500 years to travel from the sun's nucleus to its surface, and 8 minutes to reach Earth. Zunzuneo worked! info@zunzuneo.com ZZ</p> <p>Un foton (luz) tarda en salir del nucleo del sol a la superficie del mismo 500 años. Y en llegar a la tierra 8 minutos. ZunZuneo si sirvio! info@zunzuneo.com ZZ</p>
	<p>Soccer: Madrid defeats Sevilla 3-2 and is 1st in the league due to Barca's draw (2-2). In Italy Inter is still up with 59 pts, 4 over Milan.</p> <p>Futbol: El Madrid gana al Sevilla 3-2 y se pone 1ro en la liga por el empate del Barca (2-2). En Italia el Inter sigue arriba con 59 puntos a 4 del Milan. ZZ Si</p>
	<p>Apple has sued HTC for infringement of 20 patents related with the Iphone's user interface, architecture, and hardware.</p> <p>Apple ha presentado una demanda contra HTC por infringir 20 patentes de Apple relacionadas con la interfaz de usuario del iPhone, la arquitectura y el hardware</p>
	<p>CHAMPIONS LEAGUE SOCCER: Arsenal destroys Oporto 5-0 and Bayern loses against Fiorentina but reaches the next level 3-2. Subscribe with a missed call to +34675374113</p> <p>FUTBOL CHAMPIONS LEAGUE: El Arsenal machaca al Oporto 5-0 y el Bayern pierde con la Fiorentina pero pasa a cuartos 3-2. Suscribete: una perdida al +34675374113</p>

Grant	Message
	<p>A duck's call (quack quack) makes no echo and nobody knows why. So that your friends enter Zunzuneo all you need is a missed call at +34675374113 (let it ring once)</p> <p><i>El graznido de un pato (cuac, cuac) no hace eco y nadie sabe por que. Para que tus amig@s entren en ZunZuneo basta una perdida al +34675374113 (hacer un ring)</i></p>
	<p>Techonology News: Cisco presents the latest medular router for internet. The new router for operators has three times the capacity of the current ones</p> <p><i>Noticias de Tecnologia: Cisco presenta el proximo enrutador medular de Internet El nuevo enrutador para operadores tiene tres veces la capacidad de los actuales</i></p>
	<p>CHAMPIONS LEAGUE SOCCER: Real Madrid is out (1-1) against Lyon. Cristiano Ronaldo scores at the 6 min. mark. Manchester eliminates Milan 4-0 to advance to the next round</p> <p><i>FUTBOL CHAMPIONS LEAGUE: El Real Madrid cae eliminado (1-1) Ante el Lyon gol de Cristiano Rolando a los 6min. El Manchester elimina al Milan 4-0. Pase a cuartos</i></p>
	<p>NBA: HEAT 108-CLIPPERS 97 / TIMBERWOLVES 102 - NUGGETS 110 / PISTONS 104 - JAZZ 115 / THUNDER 98 - HORNETS 83 / Durant and Westbrook are still unstoppable (Thunder)</p> <p><i>NBA: HEAT 108 - CLIPPERS 97 / TIMBERWOLVES 102 - NUGGETS 110 / PISTONS 104 - JAZZ 115 / THUNDER 98 - HORNETS 83 / Durant y Westbrook siguen imparables (Thunder)</i></p>
	<p>Intel presents its first six core processors. The Core i7-980X for desktop computers geared at gamers will run at 3.33GHz arriving soon</p> <p><i>Intel muestra sus primeros procesadores de seis nucleos! El Core i7-980X para computadoras de escritorio dirigido a jugadores, correra a 3.33GHz llegara pronto.</i></p>
	<p>The 1st cellular phone was invented by Motorola during WWII, it was called Handie Talkie H12-16, but its modern counterpart is Martin Cooper and the Motorola DynaTAC</p> <p><i>El 1r celular lo invento Motorola en la Segunda Guerra Mundial, se llamaba Handie Talkie H12-16, pero el padre moderno fue Martin Cooper y su Motorola DynaTAC</i></p>
	<p>Remember that any of your friends can start receiving messages with only a missed call (let it ring once and hang up) to +34675374113 and it's free!</p> <p><i>Recuerda que cualquiera de tus amig@s puede empezar a recibir mensajes con solo hacer una perdida (un timbrazo y colgar) al numero +34675374113 y sale gratis!</i></p>
	<p>This is a quick way for us to get the number and place it on our distribution list, remember it can't have a hidden number since we won't be able to see it! ZZ</p> <p><i>Esto es una via rapida para nosotros coger el numero y ponerlo en nuestra lista de envios, recuerda que no debe tener el numero oculto, pues no veremos nada! ZZ</i></p>
	<p>NBA: WARRIORS 105 -TRAIL BLAZERS 110 /SPURS 97 - KNICKS 87 /MAGIC 111 -CHICAGO BULLS 82 Carter led another scoring exhibition for the Magic ZunZuneo.com</p> <p><i>NBA: WARRIORS 105 - TRAIL BLAZERS 110 / SPURS 97 - KNICKS 87 / MAGIC 111 - CHICAGO BULLS 82 Carter lidero otra exhibicion anotadora de los Magic. ZunZuneo.com</i></p>

Grant	Message
	<p>SOCCER ESP[Spanish]: Barcelona 3 - Valencia 0 / Valladolid 1 - Real Madrid 4 ITA [Italian]: Catania 3 - Inter 1 / Milan 1 - Chievo 0 ENG [English]: M.United 3 - Fulham 0 / Chelsea 4 - Wes 1</p> <p><i>FUTBOL ESP: Barcelona 3 - Valencia 0 / Valladolid 1 - Real Madrid 4 ITA: Catania 3 - Inter 1 / Milan 1 - Chievo 0 ING: M.United 3 - Fulham 0 / Chelsea 4 - Wes 1</i></p>
	<p>Quickscan, the online free scanner by BitDefender, combines local intelligent analysis with cloud computing, it can now be used from Google Chrome.</p> <p><i>QuickScan, el escaner online gratuito de BitDefender, combina analisis local inteligente y en la nube, ya puede ser utilizado desde navegadores Google Chrome.</i></p>
	<p>Did you know that a zunzun, native from Cuba and the Bahamas, is 10cm long, and bats its wings 100 times per second and can fly 20 hrs nonstop. Zunzuneo</p> <p><i>Sabias que el zunzun, es autoctono de Cuba y Bahamas, mide unos 10cm de largo, bate sus alas cien veces por segundo y puede volar 20 horas sin parar. ZunZuneo</i></p>
	<p>ITALIAN LEAGUE SOCCER STANDINGS: 1.Inter - 59 2.Milan-58 3.Roma-53 4.Palermo-46 5.Juventus-45 6.Sampdoria-44 7.Genoa-42 8.Napoli-41 9.Cagliari-39 10.Fiorentina-38 ZZ</p> <p><i>FUTBOL LIGA ITALIANA TABLA: 1.Inter-59 2.Milan-58 3.Roma-53 4.Palermo-46 5.Juventus-45 6.Sampdoria-44 7.Genoa-42 8.Napoles-41 9.Cagliari-39 10.Fiorentina.38 ZZ</i></p>
	<p>SPANISH LEAGUE SOCCER STANDINGS: 1.Real Madrid-65 2.Barcelona-65 3.Valencia-47 4.Sevilla-44 5.Mallorca-43 6.Deportivo-42 7.Athletic-41 8.Getafe-36 9.Villarreal-36 ZZ</p> <p><i>FUTBOL LIGA ESPAÑOLA TABLA: 1.RealMadrid-65 2.Barcelona-65 3.Valencia-47 4.Sevilla-44 5.Mallorca-43 6.Deportivo-42 7.Athletic-41 8.Getafe-36 9.Villarreal-36 ZZ</i></p>
	<p>PREMIER LEAGUE SOCCER STANDINGS: 1. M.United-66 2. Chelsea-64 3. Arsenal-64 4.Tottenham-52 5. Liverpool-51 6. Manchester C.-50 7. AstonVilla-46 8. Birmingham C.-44 9. Everton-42</p> <p><i>FUTBOL LIGA INGLESA TABLA: 1.M.United-66 2.Chelsea-64 3.Arsenal-64 4.Tottenham-52 5.Liverpool-51 6.ManchesterC-50 7.AstonVilla-46 8.BirminghamC-44 9.Everton-42</i></p>
	<p>CHAMPIONS LEAGUE SOCCER: Messi is from another planet, serves Barcelona for a 4-0 win over STUTTGART. Inter eliminated Chelsea 1-0 with a goal by Eto</p> <p><i>FUTBOL CHAMPIONS LEAGUE: Un Messi de otro planeta, da el pase al Barcelona que gano 4-0 al STUTTGART. El Inter por otro lado elimino al Chelsea 1-0 gol de Eto</i></p>
	<p>Did you know that the Statue of Liberty in NY was a gift from the French to the USA in 1886 to commemorate the 100th anniversary of the Declaration of Independence? ZZ</p> <p><i>Sabias que Estatua de la Libertad de NY fue un regalo de los franceses a los EEUU en 1886 para conmemorar el centenario de la Declaracion de Independencia? ZZ</i></p>
	<p>Microsoft just announced that its next navigator is ready for developer reviews: Internet Explorer 9. Availabe at IE Test Drive</p> <p><i>Microsoft acaba de anunciar que ya esta lista la primera developers preview de su proximo navegador: Internet Explorer 9. Version disponible en IE Test Drive</i></p>

Grant	Message
	<p>Let your friends know that they can also receive SMS from ZunZuneo by visiting www.zunzuneo.com or sending an email with their cell phone number to: info@zunzuneo.com ZZ</p> <p><i>Avisa a tus amigos que tambien pueden recibir SMS de ZunZuneo visitando: www.zunzuneo.com o enviando un email con tu numero de celular a: info@zunzuneo.com ZZ</i></p>
	<p>NBA: NUGGETS - HORNETS 93-80 / HEAT 102 - 108 MAGIC / CELTICS 109 - KNICKS 97 Piercey Garnett and his winning force before over the Knicks. Jordan buys the Bobcats</p> <p><i>NBA: NUGGETS - HORNETS 93-80 / HEAT 102 - MAGIC 108 / CELTICS 109 - KNICKS 97 Pierce y Garnett y su fuerza ganadora ante los Knicks. Jordan compra los Bobcats</i></p>
	<p>[Hype] Champions: Bayern Vs M. United FIRST LEG 30/03 SECOND LEG 07/04. Lyon Vs Girondins I 30/03 V 07/04. CSKA Vs Inter I 31/03 V 06/04. Arsenal Vs Barcelona I 31/03 V 06</p> <p><i>Bombo Champions: Bayern Vs M.United IDA 30/03 VUELTA 07/04. Lyon Vs Girondins i 30/03 V 07/04. CSKA Vs Inter i 31/03 V 06/04. Arsenal Vs Barcelona i 31/03 V 06</i></p>
	<p>On March 15, 1985 the first .com domain was registered in the history of the internet. There are currently over 80 million web sites active under this suffix</p> <p><i>El 15 de marzo de 1985 se registro el primer dominio .com de la historia de Internet. Actualmente hay mas de 80 millones de sitios web activos bajo este sufijo</i></p>
	<p>Remember that any of your friends can start to receive messages simply by placing a missed call (one ring and hang up) at number +34675374113 and is free 941</p> <p><i>Recuerda que cualquiera de tus amigos puede empezar a recibir mensajes con solo hacer una perdida (un timbrado y colgar) al numero +34675374113 y sale gratis!</i></p>
	<p>SOCCER: Messi is out of this league! He scored 3 goals again! Of those, one was like Maradona and provoked a penalty for the 4th goal ZAR 2 BAR-4. R. Madrid also won 3-1 and is in first place</p> <p><i>FUTBOL: MESSI Esta FUERA DE LIGA! Marco 3 goles de nuevo! De esos tipo Maradona y provoco el penalti del 4to gol, ZAR-2 BAR-4. RMadrid tambien gana 3-1 y va 1ro</i></p>
	<p>SOCCER ZUNZUNEO ITA[Italian]: Milan lost the opportunity to reach first place, Milan-1-1 Naples, Palermo-1 Inter-1. ENG[English]: Manchester 1st round after winning 2-1 at Liverpool</p> <p><i>FUTBOL ZUNZUNEO ITA: El Milan pierde la oportunidad de ponerse 1ro, Milan-1 Napoles-1, Palermo-1 Inter-1. ING: Manchester 1ro despues de ganar al Liverpool 2-1</i></p>
	<p>The piano (derived from the Italian pianoforte) was invented in 1700 by Bartolomeo Cristofori in Padua, Italy. Almost all pianos have 88 keys. ZZ</p> <p><i>El piano (derivado del italiano pianoforte) Fue inventado en el año 1700 por Bartolomeo Cristofori, en Padua, Italia. Casi todos los pianos tienen 88 teclas. ZZ</i></p>
	<p>Microsoft announces the hardware acceleration HTML5 with which it crosses frontiers in web development and in the cloud! Dean Hachamovitch, Director General of IExp</p> <p><i>Microsoft anuncia la aceleracion por hardware HTML5, con la que cruza fronteras en el desarrollo en la web y en la nube! Dean Hachamovitch, Dir. general de IExp</i></p>

Grant	Message
	<p>NBA. Raptors 106 Vs T-Wolves 100 / SUNS 93 TRAIL BLAZERS 87/ CLIPPERS 89 KINGS 102 / PACERS 121 Vs THUNDER 101. The best sports are at ZunZuneo.com ZZ</p> <p>NBA: Raptors 106 Vs T-Wolves 100 / SUNS 93 Vs TRAIL BLAZERS 87 / CLIPPERS 89 Vs KINGS 102 / PACERS 121 Vs THUNDER 101. El mejor deporte esta en ZunZuneo.com ZZ</p>
	<p>Did you know streets in Japan have no name? The addresses follow a structure very different than that to which we are accustomed. Three # Dist House and Block.</p> <p>Sabias que en Japon las calles no tienen nombre? Las direcciones siguen una estructura muy diferente a la que estamos acostumbrados. Tres # Dist Casa y Manzana.</p>
	<p>ESP SOCCER: Real Madrid and Barcelona UNSTOPPABLE, don't stop winning. 2-4 at Gatafe and 2-0 at Osasuna respectively. Standings: 1.RMadrid (71) 2.Barcelona (71) 3.VAL (53)</p> <p>FUTBOL ESP: Real Madrid y Barcelona IMPARABLES no dejan de ganar, 2-4 al Getafe y 2-0 al Osasuna respectivamente. Tabla: 1.RMadrid(71) 2.Barcelona(71) 3.VAL(53)</p>
	<p>SOCCER ITA[Italian]: Inter won at Livorno 3-0 with 2 goals from Eto and move away from Milan who lost 0-1 with Parma. Standings:. 1. Inter-63 2.Milan-59 3.Roma 59 4. Palerm-48</p> <p>FUTBOL ITA: El Inter gana al Livorno 3-0 con 2 goles de Eto y se aleja del Milan que perdio 0-1 con el Parma. TABLA: 1.Inter-63 2.Milan-59 3.Roma-59 4.Palerm-48</p>
	<p>Adobe launches the next major version of their collection of applications Creative Suite for Printing, the Web and professional creation of videos, on April 12. ZZ</p> <p>Adobe lanzara la proxima mayor version de su coleccion de aplicaciones Creative Suite para impresion, la Web y creacion profesional de videos el 12 de abril. ZZ</p>
	<p>Did you know that bees can recognize human faces? It is surprising that an insect with such a small brain is capable of performing analysis of images! ZZ</p> <p>Sabias que las abejas pueden reconocer rostros humanos? Es sorprendente que un insecto con un cerebro tan diminuto sea capaz realizar analisis de imagenes! ZZ</p>
	<p>THE SPANISH LEAGUE: RMadrid-3 AtMadrid-2, Mallorca-0 Barcelona-1, Zaragoza-3 Valencia-0. Standings: 1.RMadrid-74 2.Barcelona-74 3.Valencia-53 4.Mallorca-47 5.Sevilla-45 6.Athl</p> <p>LA LIGA: RMadrid-3 AtMadrid-2, Mallorca-0 Barcelona-1, Zaragoza-3 Valencia-0. TABLA: 1.RMadrid-74 2.Barcelona-74 3.Valencia-53 4.Mallorca-47 5.Sevilla-45 6.Athl</p>
	<p>ITALIAN SOCCER: Roma-2 Inter-1, Milan-1 Lazio-1, Palermo-3 Bolonia-1. Standings: 1.Inter-63 2.Roma-62 3.Milan-60 4.Palermo-51 5.Napoles-58 6. Juventus-48 7.Sampdoria</p> <p>CALCIO ITALIA: Roma-2 Inter-1, Milan-1 Lazio-1, Palermo-3 Bolonia-1. TABLA: 1.Inter-63 2.Roma-62 3.Milan-60 4.Palermo-51 5.Napoles-58 6.Juventus-48 7.Sampdoria</p>
	<p>PREMIER: Bolton-0 M.United-4, Chelsea-7 Aston Villa-1, Birmingham C-1 Arsenal-1, Liverpool-3 Sunderland-0. Standings: 1.M.United-72 2.Chelsea-71 3.Arsenal-68 4.Totten</p> <p>PREMIER: Bolton-0 M.United-4, Chelsea-7 AstonVilla-1, BirminghamC-1 Arsenal-1, Liverpool-3 Sunderland-0. TABLA: 1.M.United-72 2.Chelsea-71 3.Arsenal-68 4.Totten</p>

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	<p>TECH NEWS ZUNZUNEO Yahoo pushes to Facebook from within Yahoo Mail. Users can update their status on Facebook from Yahoo Mail. ZunZuneo</p> <p>NOTICIAS DE TECNOLOGIA ZUNZUNEO: Yahoo impulsa a Facebook dentro de Yahoo Mail. Los usuarios podran actualizar su estado en Facebook desde Yahoo Mail. ZunZuneo</p>
	<p>Did you know that the first friction matches were called Lucifer? That is how you translate to Latin the Greek word fo sfo ros, meaning he who brings light.</p> <p>Sabias que el 1er fosforo de friccion inventado se llamaba Lucifer? asi es como se traduce al latin la palabra griega fo sfo ros, significado: el que lleva luz.</p>
	<p>ZUNZUNEO FACTOIDS: It is absolutely impossible for you to suck your elbow. Try and see. Subscribe at ZZ: info@zunzuneo.com or www.zunzuneo.com</p> <p>CURIOSIDADES ZUNZUNEO: Es absolutamente imposible que te puedas chupar el codo. Prueba y veras. Suscribete a ZZ: info@zunzuneo.com o www.zunzuneo.com Dale!</p>
	<p>Remember that any of your friends can start to receive messages simply by placing a missed call (one ring then hang up) to the number +34675374113 and it's free!</p> <p>Recuerda que cualquiera de tus amig@s puede empezar a recibir mensajes con solo hacer una perdida (un timbrazo y colgar) al numero +34675374113 y sale gratis!</p>
	<p>Guardiola loses the thread. Arsenal-2 Barcelona-2, Goals by Zlatan Ibrahimovic, Inter-1 CSKA-0, Goal by Milito. Ayer Bayern-2 M.United-1, Lyon-3 Girondins-1. ZZ</p> <p>Guardiola pierde el hilo. Arsenal-2 Barcelona-2, Golazos de Zlatan Ibrahimovic, Inter-1 CSKA-0, Gol de Milito. Ayer Bayern-2 M.United-1, Lyon-3 Girondins-1. ZZ</p>
	<p>Google and Adobe seem to be uniting forces to merge Adobe Flash with the Google Chrome browser or an operating system that includes both. T ZunZuneo</p> <p>Google y Adobe parece que estan uniendo fuerzas para unir el Flash de Adobe con el navegador Chrome de Google o el sistema operativo e incluso ambos. T ZunZuneo</p>
	<p>In the U.S., when you sneeze people tell you: Bless You! (Dios te bendiga) because when you sneeze, your heart stops for a millisecond. ZunZuneo</p> <p>En EEUU, cuando estornudas la gente te dice: Bless You! (Dios te bendiga), porque cuando estornudas, tu corazon se detiene por una milesima de segundo. ZunZuneo</p>
	<p>ENG[ISH] LEAGUE: Chelsea beats M.United in their home and puts them out of first place 1-2. Arsenal wins 1-0 at Wolverhampton, and awaits Barcelona on Tuesday, without Cesc.</p> <p>LIGA ING: El Chelsea gana al M.United en su casa y le quita el 1er puesto 1-2. El Arsenal gana 1-0 al Wolverhampton, lo espera el Barcelona el martes, sin Cesc.</p>
	<p>ITA[LIAN] League: Inter won 3-0 at Bologna and remains leading, Tuesday CSKA Moscow awaits. Bari-0 Roma-1, Cagliari-2 Milan-3, Catania-2 Palermo-0. ZunZuneo.com</p> <p>LIGA ITA: El Inter gana 3-0 al Bolonia y sigue lider, el martes en Moscu lo espera el CSKA. Bari-0 Roma-1, Cagliari-2 Milan-3, Catania-2 Palermo-0. ZunZuneo.com</p>
	<p>LIGA ESP: Racing-0 Real Madrid-2, Goals to CR9 and Higuain, RMAD remains leader. Barcelona-4 At.Bilbao-1 (Bojanx2 and Messi), Valencia-3 Osasuna-0, Sevilla-3 Tenrfe-0.</p> <p>LIGA ESP: Racing-0 Real Madrid-2, Goles de CR9 y Higuain, RMAD sigue lider. Barcelona-4 At.Bilbao-1 (Bojanx2 y Messi), Valencia-3 Osasuna-0, Sevilla-3 Tenrfe-0.</p>

Grant	Message
	<p>New smartphone BlackBerry Bold 9700 presents a thin and refined design with first class materials. It weighs only 122 grams.</p> <p><i>Nuevo telefono inteligente BlackBerry Bold 9700 presenta un diseño delgado y refinado y esta fabricado con materiales de primera calidad. Pesa solo 122 gramos.</i></p>
	<p>MESSI STUNS! Equals the record for goals in one Champions game (4) Barcelona CRUSHES Arsenal 4-1 and awaits Inter, who won 1- 0 in Moscow. ZZ</p> <p><i>MESSI IMPRESIONANTE! Iguala el record de goles en un partido de Champions(4), El Barcelona APLASTA al Arsenal 4-1 y lo espera el Inter que gana 0-1 en Moscu. ZZ</i></p>
	<p>ZUNZUNEO FACTOIDS: Like fingerprints, marks on the tongue are unique. You can write for more info to info@zunzuneo.com or send an SMS to +3467 5374113</p> <p><i>CURIOSIDADES ZUNZUNEO: Tal como las huellas digitales, las marcas de tu lengua son unicas. Si quieres escribe a info@zunzuneo.com o manda un SMS al +34675374113</i></p>
	<p>Again Messi, Barcelona beats Real Madrid in their stadium 0-2 and starts leading the league. ITA: Roma leading 2-1 after beating Atalanta and an Inter tie.</p> <p><i>Otra vez Messi, El Barcelona gana al Real Madrid en su estadio 0-2 y se pone lider en la liga. ITA: La Roma lider tras vencer 2-1 al Atalanta y el Inter empatata.</i></p>
	<p>Intel sends samples of experimental processors with 48 cores, mainly going to academic institutions and not for commercial sales. ZZ</p> <p><i>Intel envia muestras de procesador experimental de 48 nucleos, estas iran principalmente a instituciones academicas y no estaran disponibles comercialmente. ZZ</i></p>
	<p>NBA: Howard and Nowitzki, selected as Players of the Week. It is the 3rd for the Orlando Magic center and 4th for the German power forward for the Mavericks. ZZ</p> <p><i>NBA: Howard y Nowitzki, elegidos como Jugadores de la Semana. Es el 3ro para el pivot de Orlando Magic y el 4to para el ala-pivot aleman de los Mavericks. ZZ</i></p>
	<p>Instead of the Bible, the Romans swore to tell the truth by pressing testicles with the right hand. From this custom comes the words testify and witness.</p> <p><i>A falta de Biblia, los romanos juraban decir la verdad apretandose los testiculos con la mano derecha. De esta costumbre procede la palabra testificar y testigo</i></p>
	<p>Canon PowerShot SX20 IS: An almost perfect megazoom. It has a huge optical lens with 20X zoom, 12.1 megapixel sensor, 720p HD video mode. ZZ Yes</p> <p><i>Canon PowerShot SX20 IS: Una megazoom casi perfecta. Tiene un enorme lente de zoom optico de 20X, un sensor de 12,1 megapixeles, modo de video HD de 720p. ZZ SI</i></p>
	<p>Remember that the ZunZuneo number is +34675374113 Neither X nor Y, only +3467 S374113. With one ring, you start to receive the SMS forever.</p> <p><i>Acuerdate que el numero de ZunZuneo es el +34675374113 ni X ni Y, solo el +34675374113. Con timbrar una sola vez, ya empiezas a recibir los SMS para siempre..</i></p>

Grant	Message
	<p>Factoids ZunZuneo. Did you know? In his youth, Picasso burned some of his paintings for warmth. Today any of them would cost a fortune! Holy Cow!</p> <p>Curiosidades ZunZuneo. Sabias que? En su juventud, Picasso quemaba algunos de sus dibujos para calentarse. Hoy cualquiera de ellos costaria un dineral! Candela!</p>
	<p>Friend if you get this SMS you are already part of ZunZuneo, no need to call more, nor send any SMS to receive the messages. See you soon. ZZ</p> <p>Amigo@ Si recibes este SMS es que ya eres parte de ZunZuneo, no hace falta que llames mas, ni que envíes ningun SMS para recibir los mensajes. Hasta ahorita. ZZ</p>
	<p>SPAN[ISH] LEAGUE: Espanyol-0 Barcelona-0, Real Madrid-2 Valencia-0, Sevilla-3 Sporting-0. Standings: 1.Barcelona-84 2.RMadrid-83 3.Valencia-59 4.Sevilla-54 5.Mallorca-52 ZZ</p> <p>LIGA ESP: Espanyol-0 Barcelona-0, RealMadrid-2 Valencia-0, Sevilla-3 Sporting-0. TABLA: 1.Barcelona-84 2.RMadrid-83 3.Valencia-59 4.Sevilla-54 5.Mallorca-52 ZZ</p>
	<p>ITALIAN LEAGUE: Inter Milan-2 Juventus-0, Sampdoria-2 Milan-1, Lazio-1 Roma-2 Standings: 1.Roma-712.Inter-70 3.Milan-64 4.Sampdoria-57 5.Palermo-5S 6.Napoles-52 ZZ</p> <p>LIGA ITALIANA: Inter Milan-2 Juventus-0, Sampdoria-2 Milan-1, Lazio-1 Roma-2 TABLA: 1.Roma-71 2.Inter-70 3.Milan-64 4.Sampdoria-57 5.Palermo-55 6.Napoles-52 ZZ</p>
	<p>ENGLISH LEAGUE: Tottenham-2 Chelsea-1, Manchester C-0 Manchester Unltd-1, Wigan- 3 Arsenal-2. Standings : 1.Chelsea-77 2.M.Unltd-76 3.Arsenal-714.Tottenham-64 ZZ</p> <p>LIGA INGLESA: Tottenham-2 Chelsea-1, Manchester C-0 Manchester United-1, WiganA- 3 Arsenal-2. TABLA: 1.Chelsea-77 2.M.United-76 3.Arsenal-71 4.Tottenham-64 ZZ</p>
	<p>Adobe launches Photoshop CS5 and Photoshop CS5 Exten. Indispensable versions that have become the standard for professionals in the image editing business.</p> <p>Adobe lanza Photoshop CS5 y Photoshop CS5 Exten. Versiones indispensables que se han convertido en el estandar del sector profesional en la edicion de imagenes.</p>
	<p>Champions League: Inter Milan-3 Barcelona-1 The favorite complicated its life. Bayern Munich-1 Olympique Lyon-0. Ribery expelled by red card, won't play in Lyon.</p> <p>Champions League: Inter de Milan-3 Barcelona-1 El favorito se complica la vida. Bayer Munich-1 Olympique de Lyon-0. Ribery expulsado por roja no jugara en Lyon.</p>
	<p>The fastest war in the world: 27 Aug 1896 erupted between Great Britain and Zanzibar, now part of Tanzania-a war that lasted only 38 minutes. ZunZuneo</p> <p>La guerra mas rapida del mundo: El 27 de Ago de 1896 estallo entre Gran Bretaña y Zanzibar -hoy parte de Tanzania- una guerra que solo duro 38 minutos. ZunZuneo</p>
	<p>NBA PLAYOFFS: JAZZ-105 NUGGETS-93 (2-1), HEAT-98 CELTICS-100 (0-3), SPURS-94 MAVERICKS-90 (2-1), BLAZERS-89 SUNS-108 (1-2), THUNDER-101 LAKERS-96 (1-2) ZunZuneo</p> <p>NBA PLAYOFFS: JAZZ-105 NUGGETS-93 (2-1), HEAT-98 CELTICS-100 (0-3), SPURS-94 MAVERICKS-90 (2-1), BLAZERS-89 SUNS-108 (1-2), THUNDER-101 LAKERS-96 (1-2) ZunZuneo</p>

Grant	Message
	<p>SPAN[ISH] LEAGUE: Barcelona-3 Xerez-1, Zaragoza-1 Real Madrid-2, Valencia-1 Deportivo-0. Standings: 1.Barca-87 2.RMadrid-86 3.Valencia-62 4.Mallorca-56 5.Sevilla-54 6.VillRe</p> <p>LIGA ESP: Barcelona-3 Xerez-1, Zaragoza-1 RealMadrid-2, Valencia-1 Deportivo-0. TABLA: 1.Barca-87 2.RMadrid-86 3.Valencia-62 4.Mallorca-56 5.Sevilla-54 6.VillRe</p>
	<p>ITA[LIAN] LEAGUE: Inter-3 Atalanta-1, Roma-1 Sampdoria-2, Palermo-3 Mllan-1, Standings: 1.Inter-73, 2.Roma-71, 3.Milan-64, 4. Sampdoria-60, 5. Palermo-58 6. Juventus-54 7.Napo</p> <p>LIGA ITA: Inter-3 Atalanta-1, Roma-1 Sampdoria-2, Palermo-3 Milan-1, TABLA: 1.Inter-73, 2.Roma-71, 3.Milan-64, 4.Sampdoria-60, 5.Palermo-58 6.Juventus-54 7.Napo</p>
	<p>Sharp announces a Tablet based on Ubuntu, joins the manufacturers who will launch a small tablet. Its name will be Netwalker PC-T1. ZunZuneo</p> <p>Sharp anuncia un Tablet basado en Ubuntu, se une a los fabricantes que lanzaran un pequeño ordenador de tipo Tablet. Su nombre sera Netwalker PC-T1. ZunZuneo</p>
	<p>FACTOIDS: Women in ancient Greece counted their age starting from when they got married. Like ZunZuneo? Give us your opinion at Info@zunzuneo.com, www.zunzuneo.com</p> <p>CURIOSIDADES: Las mujeres de la antigua Grecia, empezaban a contar su edad desde que se casaban. Te gusta ZunZuneo? opina en info@zunzuneo.com www.zunzuneo.com</p>
	<p>SOCCER CHAMPIONS LEAGUE: Final on May 22, Bayern-Inter. Inter Milan a man down, stops Barca 1-0. Bayern won easily 0-3 at Lyon</p> <p>FUTBOL CHAMPIONS LEAGUE: La final el 22 de Mayo, Bayern-Inter. El Inter de Milan con un hombre menos, frena al Barca 1-0. El Bayern gana al Lyon facilmente 0-3</p>
	<p>Nokia premieres the new Symbian 3 in the N8, according to Nokia, its most advanced terminal, will make an appearance at the end of the year accompanied by a new version: Symbian 3 ZZ</p> <p>Nokia estrena Symbian 3 en el nuevo N8, segun Nokia, su terminal mas avanzado, hara su aparicion a finales del año acompañado de una nueva version: Symbian 3 ZZ</p>
	<p>ZZ Factoids: Among Tibet's Tre-Bat, all of the sons of the same father share the same wife. Thus there was only one wedding held per family in each generation.</p> <p>ZZ Curios: En los tre-bat del Tibet, todos los hijos del mismo padre compartian una unica esposa. Asi solo se celebraba una boda por familia en cada generacion.</p>
	<p>USB 3.0 Now it's here! With (600Mb/s) exceeds by up to 10 times the data transfer speeds of the current USB 2.0 and consumes less electricity.</p> <p>USB 3.0 Ya esta aqui! Con (600Mb/s) supera hasta en 10 veces la velocidad de transferencia de datos del actual USB 2.0 y tiene un menor consumo de electricidad..</p>
	<p>PLAYOFFS NBA: SUNS 110 -SPURS 102 (2-0), MAGIC 114- HAWKS 71 (1-0), LAKERS 111-JAZZ 103 (2-0). LeBron James' elbow improves and he will not be undergoing tests.</p> <p>PLAYOFFS NBA: SUNS 110 - SPURS 102 (2-0), MAGIC 114 - HAWKS 71 (1-0), LAKERS 111 - JAZZ 103 (2-0). LeBron James mejora de su codo y no sera sometido a pruebas.</p>

Grant	Message
	<p>SOCCER: Bayern Munich CHAMPION of the German Bundesliga! RMadrid and Barcelona to fight for the league next week; Inter and Roma too. ZunZuneo</p> <p><i>FUTBOL: El Bayern de Munich CAMPEON de la Bundesliga Alemana! RMadrid y Barcelona lucharan por la liga hasta la semana que viene, Inter y Roma tambien. ZunZuneo</i></p>
	<p>SOCCER: CHAMPION Chelsea of the English Premier, in style, winning 8-0 against Wigan. The runner-up Manchester United. Happy mother's day. ZunZuneo.com</p> <p><i>FUTBOL: El Chelsea CAMPEON de la Premier Inglesa, por todo lo alto, ganando 8-0 al Wigan. El Manchester United subcampeon. Feliz dia de las madres. ZunZuneo.com</i></p>
	<p>FACTOIDS: The powerful "Sun King", Louis XIV of France, only bathed twice in his life! www.zunzuneo.com info@zunzuneo.com or SMS +34675374113 ZZ.</p> <p><i>CURIOSIDADES: El poderoso Rey Sol, Luis XIV de Francia, solo se bañó dos veces en su vida! www.zunzuneo.com info@zunzuneo.com o envía un SMS al +34675374113 ZZ</i></p>
	<p>New operating system Ubuntu 10.04 Lucid Lynx. Improves the graphic look, more drivers, faster start-ups, GNOME 2.30, Firefox, among other improvements. ZunZuneo</p> <p><i>Nuevo sistema operativo Ubuntu 10.04 Lucid Lynx. Mejora el aspecto grafico, mas drivers, arranque mas rapido, GNOME 2.30, Firefox, entre otras mejoras. ZunZuneo</i></p>
	<p>Inter Milan ITALY'S CHAMPION! No mercy and took its fifth "Scudetto" in a row after winning (0-1) in the field of Sienna, thanks to a goal from Diego Milito</p> <p><i>Inter de Milan CAMPEON de ITALIA! no perdono y se llevo su quinto 'Scudetto' consecutivo tras ganar (0-1) en el campo del Sienna, gracias al gol de Diego Milito</i></p>
	<p>Barcelona is the SPANISH LEAGUE CHAMPION, with a record of points, 99, also gets its twentieth league win after beating Valladolid at Camp Nou. Real Madrid goodbye.</p> <p><i>El Barcelona CAMPEON de LA LIGA ESPAÑOLA, con record de puntos, 99, consigue así su vigesima Liga tras imponerse al Valladolid en el Camp Nou. El RMadrid adios.</i></p>
	<p>When the British arrived in Australia, they asked for that animal that was jumping and were told, "Kan Ghu Ru" which means to the natives: "I DO NOT UNDERSTAND!" ZZ</p> <p><i>Cuando los ingleses llegaron a Australia, preguntaron por ese animal que daba saltos y les dijeron: "Kan Ghu Ru" que para los nativos significa: NO ENTIENDO! ZZ</i></p>
	<p>Microsoft announces the end of security updates for Windows XP SP2. You can only update SP3. XP is in 63% of the world's computers.</p> <p><i>Microsoft anuncia el fin de las actualizaciones de seguridad para Windows XP SP2. Solo se podran actualizar los SP3. XP es el 63% de las computadoras del mundo.</i></p>
	<p>SOCCER CHAMPIONS LEAGUE: Inter Milan, IS EUROPE'S CHAMPION, beating Bayern Munich at the Real Madrid stadium, 2-0, Milito scores the goals. Zunzuneo</p> <p><i>FUTBOL CHAMPIONS LEAGUE: El Inter de Milan, ES CAMPEON DE EUROPA, derrota al Bayern de Munich en el estadio del Real Madrid, 2-0, los goles de Milito. ZunZuneo</i></p>
	<p>FACTOIDS ZunZuneo: The heart of the shrimp is in his head and the ears of the crickets are in their front legs below the knees. Holy Moly!</p> <p><i>CURIOSIDADES ZunZuneo: El corazon de los camarones esta en su cabeza y las orejas de los grillos estan en sus patas delanteras, debajo de las rodillas. ¡Alabao!</i></p>

Grant	Message
	<p>Intel launches Core CPUs i3, i5 and i7 ultra low voltage. It promises better performance and battery life for ultrathin notebooks. A 32% improvement versus Core 2.</p> <p>Intel lanza CPUs Core i3, i5 y i7 de voltaje ultra bajo. Promete mejor desempeño y vida de la batería para portátiles ultradelgadas. Un 32% de mejora Vs Core 2.</p>
	<p>NBA Finals: Los Angeles Lakers will defend its title against the Boston Celtics. People are starting to talk about a historical comparison between Kobe Bryant and [Michael] Jordan. ZZ</p> <p>Final de la NBA: Los Angeles Lakers defenderan su título ante los Boston Celtics. La gente empieza a hablar de un relevo histórico de Kobe Bryant por Jordan. ZZ</p>
	<p>The blue whale can produce sounds up to 188 decibels, the loudest sounds produced by a living thing, you can hear them 850km away. ZZ</p> <p>La ballena azul produce sonidos de hasta 188 decibeles, son los sonidos mas fuertes producidos por un ser viviente, se pueden escuchar a 850km de distancia. ZZZ</p>
	<p>Steve Jobs, Apple's owner, announces that the PC will soon cease to exist, "they will be like trucks and very few people will have them." The mobile devices are the future.</p> <p>Steve Jobs, el dueño de Apple, anuncia que el PC pronto dejara de existir: "Seran como camiones y los tendra muy poca gente". Los equipos móviles son el futuro.</p>
	<p>ZunZuneo prepares for a special WORLD CUP in SOUTH AFRICA 2010. The best reviews, news and all the results. Free and straight to your mobile. 11 June</p> <p>ZunZuneo prepara un especial MUNDIAL DE FUTBOL SUDAFRICA 2010. Los mejores comentarios, noticias y todos los resultados. Gratis y directo en tu movil. 11 Junio.</p>
	<p>THE WORLD CUP IS HERE AND STARTS NOW Zunzuneo, THIS MONTH 100% SOCCER SUD MEX-1-1, FRA-0-0 URG, USA-1 ENG-1, NIG ARG-1-0, COR-2-0 GRE. Argentina is starting off right.</p> <p>ARRANCA EL MUNDIAL! Y YA ESTA AQUI ZunZuneo, ESTE MES 100% FUTBOL MEX-1 SUD-1, FRA-0 URG-0, USA-1 ENG-1, ARG-1 NIG-0, COR-2 GRE-0. Argent comienza con buen pie.</p>
	<p>Germany crushes Australia 4-0, the best German national team from the last 10 years introduces itself. Ghana-1-0 Serbia, Slovenia-Algeria-0 1.</p> <p>Alemania aplasta a Australia 4-0, la mejor seleccion germana de los últimos 10 años enseña su tarjeta de presentación. Ghana-1 Serbia-0, Argelia-0 Eslovenia-1.</p>
	<p>There was no landslide of goals. Brazil beats the weak North Korea 2-1 by a hair. Paraguay 1-1 Italy. The world champion has a lot to improve. Portugal 0-0 Ivory Coast.</p> <p>No hubo goleada, Brasil gana a la debil Korea N. por los pelos 2-1. Italia 1-1 Paraguay, la campeona del mundo con mucho que mejorar. Portugal 0-0 Costa de Marf</p>
	<p>Spain faithful to its history played like never before and lost like always against Switzerland 0-1. Chile 1-0 Honduras. The world cup favorites are off to a weak start. ZZ</p> <p>España fiel a su historia, juega como nunca y pierde como siempre! 0-1 Ante Suiza. Chile 1-0 Honduras. Inicio gris en este mundial para los grandes favoritos ZZ</p>

Grant	Message
	<p>Sports ZunZuneo: Los Angeles Lakers won their second consecutive NBA title and Kobe Bryant took the NBA Finals Most Valuable Player Award. ZZ</p> <p>Deportes ZunZuneo: Los Angeles Lakers ganaron su segundo título de la NBA consecutivo y Kobe Bryant se llevo el premio al Jugador Mas Valioso de las Finales. ZZ</p>
	<p>Portugal thrashes North Korea 7-0. Spain wakes up with a good game. It [Spain] could play Brazil in the second round, but both teams want to avoid that. Chile 1-0 Switzerland. ZunZuneo</p> <p>Portugal golea a CoreaNorte 7-0. España despierta con buen juego, se podría cruzar con Brasil en 8tvos, pero los dos quieren evitarse. Chile 1-0 Suiza. ZunZuneo</p>
	<p>Where are you from? Who are you rooting for in the World Cup? Send us an email or SMS to +34675374113 Info@zunzuneo.com best messages will be transmitted to everyone at ZunZuneo</p> <p>De donde eres? A quien le vas en el mundial? Mandanos un email a info@zunzuneo.com o un SMS +34675374113 los mejores mensajes seran transmitidos x todo ZunZuneo</p>
	<p>United States and Japan go to the next round, the World Cup not for the faint-hearted, middle-of-the-table teams rebel. Tomorrow the group stage closes. ZunZuneo</p> <p>Estados Unidos y Japon pasan de ronda, mundial no acto para cardiacos donde los equipos medianos se revelan. Mañana se cierra la fase de grupos. ZunZuneo</p>
	<p>Brazil-Portugal tie, 0-0 match to forget. Spain and Chile also agree a full 2-1 late in the game. Second round games: BRA-CHI, ESP-POR, ALE-ING. ZunZuneo</p> <p>Brasil-Portugal de tregua, partido para olvidar 0-0. España y Chile tambien pactan un 2-1 en pleno final del partido. 8tvos: BRA-CHI, ESP-POR, ALE-ING. ZunZuneo</p>
	<p>Uruguay Vs Ghana in the quarterfinals. USA and Korea say goodbye. Thanks for the messages supporting your teams and ZunZuneo! If you can sent a message see it in www.zunzuneo.com</p> <p>Uruguay Vs Ghana en 4ts USA y Korea adios. Gracias por los mensajes de apoyo a los equipos y a ZunZuneo! Si enviaste un mensaje puedes verlo en www.zunzuneo.com</p>
	<p>Argentina and Germany are showing their nails. They clash in the quarterfinals, and one will have to leave, but these are one of the best 2 teams that have played so far. ZunZuneo</p> <p>Argentina y Alemania enseñan las uñas. Se enfrentaran en 4tos, por lo que debera irse fuera alguno de los 2 equipos que mejor han jugado hasta ahora. ZunZuneo</p>
	<p>Brazil is scary. Dunga's team eliminated Chile and they did it while playing their best game so far this World Cup. Goals: Fabiano and Robinho. Robben thrusts Holland</p> <p>Brasil asusta. La seleccion de Dunga elimino a Chile y lo hizo jugando su mejor partido en lo que va de Mundial GLS: Fabiano y Robinho. Robben dispara a Holanda</p>
	<p>Spain wins 1-0 against Portugal. Cristiano Ronaldo, is an excellent model, but a mediocre soccer player. Quarterfinal games: URU-GHA, HOL-BRA, ARG-ALE, PAR-ESP ZunZuneo</p> <p>España gana 1-0 a una Portugal sin ideas. Cristiano Ronaldo, excelente modelo pero mediocre jugador de futbol. 4tos: URU-GHA, HOL-BRA, ARG-ALE, PAR-ESP ZunZuneo</p>

Grant	Message
	<p>Oranges against Brazil. The new Clockwork Orange came back with a header by Sneijder and sent home the favorite team. The canarinha was better the 1st half of the game. ZZ</p> <p><i>Naranjazo a Brasil! La nueva naranja mecanica remonto con un gol de cabeza de Sneijder y mando a casa a la gran favorita. La canarinha fue mejor la 1ra mitad ZZ</i></p>
Grant # 3	<p>Germany gives a lesson to Maradona's side 4-0 and Messi leaves South Africa without the title. Germany will play Spain which, FINALLY! SUFFERING! get to semifinals in a World Cup.</p> <p><i>Alemania da una leccion a los de Maradona 4-0 y Messi se va de Sudafrica en blanco. ALE va Vs España que POR FIN! SUFRIENDO! pasan a semifinales en un mundial.</i></p>
	<p>Holland is now waiting in the final. The "orange" team wins the semifinal against Uruguay thanks to Van Bronkhorst, Sneijder and Robben. ZunZuneo</p> <p><i>Holanda ya espera en la gran final. La seleccion "oranje" se impone en la semifinal a Uruguay gracias a los goles de Van Bronkhorst, Sneijder y Robben. ZunZuneo</i></p>
	<p>SPAIN VS. HOLLAND. One of the two will be the unprecedented champion. Spain making history by sneaking in the finals for the 1st time. It's a prize to good soccer playing. ZunZuneo</p> <p><i>ESPAÑA Vs HOLANDA. Alguno de los dos sera un campeon inedito. España haciendo historia, por 1ra vez se cuela en una final. Es un premio al buen futbol. ZunZuneo</i></p>
	<p>Germany defeats the fierce Uruguay team 3-2, which has returned as an elite team. Muller the best of the team. The 3rd place team has been decided, tomorrow is the final. ZZ</p> <p><i>Alemania derrota 3-2 a una aguerrida Uruguay que regresa a la elite de los grandes. Muller el mejor del partido. Decidido el 3r puesto, mañana la gran final. ZZ</i></p>
	<p>SPAIN WORLD CHAMPION AND A tribute to good soccer and team structure. iniesta voted best player of the final. Blessed be Saint Casillas. ZunZuneo</p> <p><i>ESPAÑA CAMPEONA DEL MUNDO! Un homenaje al buen futbol y a la estructura de equipo. Iniesta elegido mejor jugador de la final. Bendito sea San Casillas. ZunZuneo</i></p>
	<p>Coming soon: ZunZuneo will send some messages of support we received from ZunZuneros during the World Cup. Will be chosen randomly. Wait for them at www.zunzuneo.com</p> <p><i>Proximamente: ZunZuneo enviara algunos mensajes de apoyo que recibimos de los ZunZuneros durante el mundial! Seran escogidos al azar. Esperalos www.zunzuneo.com</i></p>
	<p>I love ZunZuneo. I am Cuban from Cardenas my name is Yasiel and I favor the Spain Motherland, faithful to my roots and I am a big fan of Guaje David Villa.</p> <p><i>Me encanta ZunZuneo. Soy cubano de Cardenas me llamo Yasiel y le voy a la Madre Patria España fiel a mis raices y soy fanatico de David Villa el Guaje.</i></p>
	<p>I'm from Moron in Ciego de Avila, Cuba, my name is Darian and I am Spanish to the core. Spain champion and leading scorer David Villa. I am faithful to the red. ZunZuneo</p> <p><i>Soy de Moron en Ciego de Avila, Cuba, me llamo Darian y soy español hasta la medula. España campeon y David Villa lider goleador. Soy fiel a lo roja. ZunZuneo</i></p>

Grant	Message
	<p>FACTOIDS ZunZuneo: Gisele Bundchen turns 30. The Brazilian model is the highest paid supermodel in the world, earning \$25 million per year. What luck!</p> <p>Curiosidades ZunZuneo: Gisele Bundchen cumple 30 años. La modelo brasileña es la top model mejor pagada del mundo, gana al año 25 millones de dolares. ¡Q suerte!</p>
	<p>ZunZuneo technology news: Facebook now has 500 million users, with 6 years online, 34.8% of all Internet users in the world are on Facebook</p> <p>Noticias de tecnología de ZunZuneo: Facebook ya tiene 500 millones de usuarios, con 6 años online, el 34,8% de todos los internautas del mundo están en Facebook</p>
	<p>Factoids ZunZuneo: Tequila was born in a town in the state of Jalisco [Mx]. It is the most popular drink in Mexico and is made with the juice extracted from the agave</p> <p>Curiosidades ZunZuneo: El tequila nació en Tequila, un pueblo del estado de Jalisco. Es la bebida más popular de México y se hace con el jugo extraído del agave</p>
	<p>ZunZuneo News: Apple sells over 1 million iPhone 4, theoretically the best cell phone in the world. Despite its antenna problems people still purchase many of them.</p> <p>Noticias ZunZuneo: Apple vende más de 1 millón de iPhone 4, teóricamente el mejor celular del mundo. A pesar de sus problemas de antena la gente lo compra bien.</p>
	<p>The Spanish language is one of the 6 official UN languages and after Mandarin Chinese it is the most spoken language in the world. 511,003,579 total speakers. ZZ</p> <p>El idioma español es uno de los 6 idiomas oficiales de la ONU y, tras el chino mandarín, es la lengua más hablada del mundo. 511.003.579 total de hablantes. ZZ</p>
	<p>ZunZuner@! We would like to remind you that ZZ is a free service for sharing and discovering information created by Cubans and for the Cuban people. Invite all your friends!</p> <p>ZunZuner@! Le recordamos que ZZ es un servicio gratuito para compartir y descubrir información creada por cubanos y para los cubanos. Invita a todos tus amigos!</p>
	<p>ZunZunero/a remember that anyone can subscribe to ZZ. You have to subscribe ONLY ONCE. It can be: through the website, SMS, email or missed call</p> <p>ZunZunero/a recuerda que cualquiera puede suscribirse a ZZ. Hay que suscribirse SOLO UNA VEZ. Puede ser: a través del sitio web, SMS, correo o llamada perdida.</p>
	<p>Each symbol in a deck of cards represents a King from history. Spades: King David, Clubs: Alexander the Great Heart: Charlemagne, Diamonds: Julius Caesar. ZunZuneo</p> <p>Cada símbolo de las Cartas representa un Rey de la historia. Espada: El Rey David, Trebol: Alejandro Magno, Corazón: Carlomagno, Diamante: Julio César. ZunZuneo</p>
	<p>Android is managed through voice. Google's operating system for mobile recognizes verbal commands, and allows you to dictate emails and send messages by simply talking zz</p> <p>Android se domina con la voz. El sistema operativo de Google para móviles reconoce órdenes verbales, permite dictar correos y enviar mensajes con solo hablar ZZ</p>
	<p>Factoids ZunZuneo: nerve stimulation in the brain is transmitted by the neurons, at a speed exceeding 400 kilometers per hour.</p> <p>Curiosidades ZunZuneo: Los estímulos nerviosos dentro del cerebro se transmiten, gracias a las neuronas, a una velocidad que supera los 400 kilómetros por hora.</p>

Grant	Message
	<p>Sports ZunZuneo: The big teams in Europe start off right, Barca and Inter win Spain's and Italy's Super Cup respectively. Arsenal and Chelsea are two tanks.</p> <p>Deportes ZunZuneo: Los grandes de Europa arrancan bien, Barca e Inter ganan la Supercopa de España e Italia respectivamente. Arsenal y Chelsea como dos tanques.</p>
	<p>ZunZuneo Technology: The new Nokia is official. The Finnish [company] just launched the Nok X3-02 Touch terminal with a simple physical keyboard - Touch & Type.</p> <p>Tecnología ZunZuneo: El nuevo Nokia ya es oficial. Los finlandeses acaban de presentar el Nok X3-02 un sencillo terminal táctil con teclado físico Touch & Type.</p>
	<p>ZunZuneo factoids: The 1st bike was made by Carl van Drais, a German inventor. His rudimentary device, built around 1817, was operated by moving the feet.</p> <p>Curiosi. ZunZuneo: La 1ra bicicleta la hizo Carl von Drais, inventor alemán. Su rudimentario artefacto, creado alrededor de 1817, se impulsaba apoyando los pies</p>
	<p>Zinedine Zidane returns to train with France (only for one day) to help wash the national team's bad image after their performance at South Africa's World Cup DEP ZZ</p> <p>Zinedine Zidane vuelve a entrenar con Francia (Solamente por un día) para ayudar a lavar la mala imagen que dio el país después del mundial de Sudafrica. DEP ZZ</p>
	<p>PlayStation 3 has been pirated. It was bound to happen sooner or later. A way to pirate it has been revealed. The method is simple with a USB and hard drive.</p> <p>La PlayStation 3 es pirateada, tarde o temprano iba a caer, se ha dado a conocer una forma de piratear la PS3. El método es simple, con un USB y un disco duro.</p>
	<p>The name "Oz", used in The Wizard of Oz occurred to the author, Frank Baum, as he looked around at his desk and saw the 2nd volume of his encyclopedia, A-N and O-Z. Cur ZunZuneo</p> <p>El nombre de Oz, usado en El mago de Oz se le ocurrió a su autor Frank Baum cuando miraba en su despacho el 2do tomo de su enciclopedia, A-N y O-Z. Cur ZunZuneo</p>
	<p>The [Spanish] League returns! Barca [Barcelona] is complete and on the other side [Cristiano] C. Ronaldo is almost in 100% shape. This weekend "the real thing" starts with the real teams. SPORT ZunZuneo</p> <p>Vuelve la LIGA! Con el Barca completo y por otro lado C. Ronaldo casi al 100% Este fin de semana "se rompe el corajo" con los equipos de verdad. DEPORT ZunZuneo</p>
	<p>Factoids ZunZuneo: First psychiatric hospital in history was built in Baghdad (now the capital of Iraq) in 792. Write to us at Info@zunzuneo.com</p> <p>Curiosidades ZunZuneo: El primer hospital psiquiátrico de la historia se construyó en Bagdad (hoy capital de Iraq) en el año 792. Escribenos a info@zunzuneo.com</p>
	<p>Technology ZunZuneo: Yahoo upgrades their Webmail mail and the search to provide better results for news and entertainment. Also prepares new APIs.</p> <p>Tecnología ZunZuneo: Yahoo moderniza su correo Webmail y la búsqueda para proveer mejores resultados de noticias y entretenimiento. También prepara nuevas APIs.</p>

Grant	Message
	<p>SOCER ZunZuneo: Liga, Valencia leader with 9 points and no losses. In England Chelsea commands with 12 points. Messi injured for 15 days, his injury is not so serious</p> <p><i>Futbol ZunZuneo: Liga, Valencia invicto lider con 9 puntos! En Inglaterra manda el Chelsea con 12pto. Messi lesionado durante 15 dias, su lesion no es tan grave</i></p> <p>Factoids ZunZuneo: Miguel de Cervantes and William Shakespeare are the greatest in Hispanic and English literature. Both died on April 23, 1616</p> <p><i>Curiosidades ZunZuneo: Miguel de Cervantes y William Shakespeare son los mas grandes de la literatura hispana e inglesa. Ambos murieron el 23 de abril de 1616</i></p> <p>ZunZuneo Sports Champions League: Auxerre 0-1 RMadrid. Ajax 1-1 Miiian. CLUJ Roma 2-1. Basilea 1-2 Bayern. Chelsea 2-0 O. Marsella, the Puma Anelka has returned.</p> <p><i>Deportes ZunZuneo Champions League: Auxerre 0-1 RMadrid. Ajax 1-1 Milan. Roma 2-1 CLUJ. Basilea 1-2 Bayern. Chelsea 2-0 O.Marsella, el puma Anelka ha regresado.</i></p> <p>Tecno ZunZuneo: Google has an alternative to JPEG, the company expects a faster Internet reducing the sizes of the new format images WebP format.</p> <p><i>ZunZuneo Tecno: Google tiene lista alternativa a JPEG, la compa-’a espera una Internet mas rapida reduciendo los tama-os de las imagenes con nuevo formato WebP.</i></p> <p>Factoids ZunZuneo: In the world there are 2100 million Christians, followed by 1820 million Muslims and 1600 million of Buddhists, among many other religions.</p> <p><i>Cur. ZunZuneo: En el mundo hay 2100 millones de Cristianos, seguidos por 1820 millones de Musulmanes y 1600 millones de Budistas, entre otras muchas religiones.</i></p> <p>Steve Jobs, owner of Apple, bought PIXAR company for 5 million dollars. After producing Toy Story, he sold it to Disney for 7400 million! ZunZuneo.</p> <p><i>Steve Jobs, due-o de Apple, compro la compa-ia PIXAR por 5 millones de dolares. Despues de producir Toy Story, la vendio a Disney por 7400 millones!!! ZunZuneo.</i></p> <p>EuroCopa 2012 classification matches: KAZ 0-3 ALE, LUX FRA 2-0, 4-1 HOL SUE, ING MON 0-0, 1-3 ISL POR, 2-3 ESC ESP, ITA-SERB Suspended for disturbances. ZunZuneo</p> <p><i>Partidos clasificacion EuroCopa 2012: KAZ 0-3 ALE, FRA 2-0 LUX, HOL 4-1 SUE, ING 0-0 MON, ISL 1-3 POR, ESC 2-3 ESP, ITA-SERB Suspendido por disturbios. ZunZuneo</i></p> <p>Technology ZunZuneo: Microsoft launches its mobile version for Windows Phone 7, trying to penetrate the market dominated by Google, BBerry and Apple</p> <p><i>Tecnologia ZunZuneo: Microsoft lanza su version para moviles Windows Phone 7, tratando de penetrar el mercado de Smartphones dominado por Google, BBerry y Apple</i></p>
Grant # 4	<p>Factoids ZunZuneo: The maximum temperature on the face of the Earth was registered by a NASA satellite in Lut Desert, Iran: 71 degrees celsius ZZ</p> <p><i>Curiosidades ZunZuneo: La temperatura maxima de la faz de la Tierra, la registro un satelite de la NASA en el desierto de Lut, en Iran: 71 grados celsius! ZZ</i></p> <p>The preseason starts. And these teams open with a win: The Lakers, Blazers, C. Bulls. The NBA will not allow [players] to use new sneakers designed to jump higher. ZunZuneo</p> <p><i>Arranca la pretemporada! Y abren ganando: Los Lakers, Blazers, C. Bulls. La NBA no permitira utilizar las nuevas zapatillas dise-adas para saltar mas. ZunZuneo</i></p>

Grant	Message
	<p>Technology ZunZuneo: Microsoft Windows 8 is expected to be launched in 2012, according MSoft Netherlands. Google starts internet tests to 1GB/s in universities.</p> <p><i>Tecnologia ZunZuneo: Microsoft Windows 8 parece que sera lanzado en 2012, segun MSoft Holanda. Google comienza las pruebas de Internet a 1GB/s en universidades.</i></p> <p>The Marathon is due to the Greek Philippides, who died of fatigue after running 40 km from Marathon to Athens to announce the victory over the Persian army. ZZ</p> <p><i>El Maraton se debe al griego Filipides, quien murio de fatiga tras correr 40 km desde Maraton hasta Atenas para anunciar la victoria sobre el ejercito persa. ZZ</i></p> <p>SOCCER CHAMPIONS LEAGUE: The RMadrid is unable [to defeat] Milan 2-2 in San SLRO. Inzaghi, the legend. At 37-years, the Italian striker still symbolizes the goal. ll.</p> <p><i>FUTBOL CHAMPIONS LEAGUE: El RMadrid no puede con el Milan en San Siro 2-2 Inzaghi, la leyenda. A sus 37 a-os, el delantero italiano todavia simboliza el gol. ZZ</i></p> <p>Technology ZunZuneo: Avast antivirus confirms that 1 in 8 malware attacks come through USB devices, the key point of attack is the AutoRun.</p> <p><i>Tecnologia ZunZuneo: Avast antivirus confirma que 1 de cada 8 ataques de malware vienen a traves de dispositivos USB, el punto clave del ataque es el AutoRun..</i></p> <p>Did you know that the Grammy awards were created by the Recording Academy (USA) in 1958, and are like the Oscars of music. The prize is a small golden grammophone.</p> <p><i>Sabias que? Los premios Grammy fueron creados por la Recording Academy (USA) en 1958, son como los Oscar de la musica. El premio es una peque-a vitrola dorada.</i></p>
Grant # 5	<p>SPORTS NBA: With 22 triples, the Suns shoot down the Lakers (116-121) Steve Nash, the All-Star point guard for the Phoenix Suns, scores on the famous pick & roll. Info@zunzuneo.com</p> <p><i>DEP NBA: Con 22 triples, los Suns derriban a los Lakers (116-121) Steve Nash el base All-Star de los Phoenix Suns, marco el famoso pick&roll. info@zunzuneo.com</i></p> <p>Facebook launches a "minimalist" email service. Very soon we will have accounts @facebook.com. Zuckerberg confirms that it will not end existing offers ZZ</p> <p><i>Facebook lanza un servicio de correo "minimalista" muy pronto tendremos cuentas @facebook.com. Zuckerberg afirma que no acabara con las ofertas ya existentes ZZ</i></p> <p>Factoids ZunZuneo: Prince of Asturias Alfonso de Borbon renounced being King of Spain to marry Cuban Edelmira Sampedro in 1933.</p> <p><i>Curiosidades ZunZuneo: El Principe de Asturias Alfonso de Borbon renuncio a ser Rey de Espa-a para casarse con la cubana Edelmira Sampedro en 1933.</i></p> <p>Sports ZunZuneo: ITALY Milan stays in front with a goal by Ziatan Included, 33 pts. Lazio comes 2nd with 30 pts after beating Inter 3-1</p> <p><i>Deportes ZunZuneo: ITALIA El Milan se mantiene al frente con un golazo de Ziatan incluido, 33 pto. La Lazio va 2da con 30 pto despues de ganarle al Inter 3-1</i></p> <p>Technology ZunZuneo. Google prepares to launch its operating system: Google Chrome OS, which will be oriented to laptops with internet-based applications</p> <p><i>Tecnologia ZunZuneo. Google prepara el lanzamiento de su sistema operativo: Google Chrome OS, estara orientado a portatiles con aplicaciones basadas en Internet</i></p>

Grant	Message
	<p>The heart propels blood at 80 ml per beat (a mouthful of water). If it was connected to a tanker truck of 8000 liters, it could fill in one day. Cur ZunZuneo</p> <p><i>El corazon impulsa 80 ml de sangre por latido (un buche de agua). Si se conectara a un camion-pipa de 8000 litros, lo podria llenar en un solo dia. Cur ZunZuneo</i></p>
	<p>Champions League, drawing. Champions are warming up: Inter-Bayern, Lyon, Madrid, Arsenal, Barca, Valencia-Schalke, Milan-Tottenham. Dep ZunZuneo Info@zunzuneo.com</p> <p><i>Liga de Campeones, sorteo. Se calienta la Champions: Inter-Bayern, Lyon-Madrid, Arsenal-Barca, Valencia-Schalke, Milan-Tottenham. Dep ZunZuneo info@zunzuneo.com</i></p>
	<p>TIME Magazine names the 2010 person of the year Mark Zuckerberg, creator of Facebook. If FB were a country, it would be the 3rd largest in the world with 600 million inhabitants</p> <p><i>La revista TIME nombra personaje del 2010 a Mark Zuckerberg, creador de Facebook. Si FB fuera un pais, seria el 3ro mas grande del mundo con 600 millones de hab</i></p>
	<p>ZunZuneo wishes you a Merry Christmas Write and tells us your wishes for the new year: Info@zunzuneo.com or send a message to num. of ZunZuneo +34675374113</p> <p><i>ZunZuneo te desea una Feliz Navidad! Escribenos y cuentanos tus deseos para el a-o nuevo: info@zunzuneo.com o envia un mensaje al num. de ZunZuneo +34675374113</i></p>
	<p>ZunZuneo Universal Group: The word Money comes from the Latin word denarius. LRAs coins were made in Lydia, in the current Turkey, in Century VII AC</p> <p><i>ZunZuneo Grupo Universal: La palabra Dinero viene del latin denarius. Las 1ras monedas que se conocen se hicieron en Lidia, la actual Turquia en el Siglo VII AC</i></p>
	<p>The prosecutor seeks evidence to accuse the doctor of M. Jackson for involuntary manslaughter. Your friends can join my Group sending Universal to +34675374113</p> <p><i>El fiscal busca pruebas para acusar al medico de M. Jackson de asesinato involuntario. Tus amigos pueden unirse a mi Grupo enviando Universal al +34675374113</i></p>
	<p>El Barca is in another league, thrashes mercilessly and no difference between strong and weak teams. Brazilian Roberto Carlos scores a goal from a corner. Universal ZZ</p> <p><i>El Barca esta en otra liga, golea sin piedad y no diferencia entre equipos fuertes o debiles. En Brasil Roberto Carlos marca un gol de corner. ZZ Universal</i></p>
	<p>Nintendo jumps to the 3rd dimension, the new portable console was introduced in the Netherlands, the 3DS, with the first games in three dimensions without glasses</p> <p><i>Nintendo salta a la 3ra dimension, la nueva consola portatil fue presentada en Holanda, la 3DS, la primera con juegos en tres dimensiones sin necesidad de gafas</i></p>
	<p>Beyonce will be the star of the fourth remake of "A Star is Born." The film will be directed by Clint Eastwood. Universal Group ZunZuneo</p> <p><i>Beyonce sera la gran protagonista del cuarto remake de "Ha nacido una estrella". La pelicula la dirigira Clint Eastwood. ZunZuneo Grupo Universal</i></p>

Grant	Message
Grant # 6	<p>Facebook turns 7 years, with 600 million users, 1 in 10 people have a FB account. For more information about ZunZuneo visit zunzuneo.com</p> <p>Facebook cumple 7 años, con 600 millones de usuarios, 1 de cada 10 habitantes tiene cuenta en FB. Para mas informacion acerca de ZunZuneo visita zunzuneo.com</p>
	<p>The greatest striker of all times, Ronaldo (Nazario de Lima) retires. For more information about ZunZuneo visit zunzuneo.com</p> <p>Se retira el delantero mas grande de todos los tiempos, Ronaldo Nazario de Lima. Para mas informacion acerca de ZunZuneo visita zunzuneo.com</p>
	<p>Israel was born as a country in 1948, approved by the UN, to give asylum to thousands of Jews displaced by World War II. More info about it ZunZuneo 7 zunzuneo.com</p> <p>Israel como pais nacio en 1948, aprobado por la ONU, para dar asilo a los miles de judios desplazados 2GM. Mas info acerca de ZunZuneo? zunzuneo.com</p>
	<p>Microsoft has released its first update for Windows Phone 7 devices. If you want to receive SMS like this send to Universal to +34675374113</p> <p>Microsoft ha lanzado su primera actualizacion para dispositivos Windows Phone 7. Si quieres recibir SMS como este envia Universal al +34675374113</p>
	<p>The CeBIT technology fair in Hannover, Germany is starting. This time the stars are tablets and online computation. ZunZuneo</p> <p>Comienza la feria de tecnologia CeBIT en Hannover, Alemania. Esta vez las estrellas son las tabletas y la computacion en Internet. ZunZuneo</p>
	<p>Email was invented in 1971 before the Internet, now it is the greatest communication method in the world. Support us on Facebook ZunZuneo LIKE</p> <p>El email se invento en 1971 antes que Internet, hoy en día es el mayor metodo de comunicacion en el mundo. Apoyanos en Facebook ZunZuneo ME GUSTA A</p>
	<p>Not all Muslims are Arabs, not all Arabs are Muslims. If you like our page ZunZuneo look at Facebook, ZunZuneo I LIKE</p> <p>No todos los musulmanes son arabes, ni todos los arabes son musulmanes. Si te gusta ZunZuneo busca nuestra pagina en Facebook, ZunZuneo ME GUSTA!!</p>
	<p>Libya is a country in North Africa, located in the Maghreb. Its capital is Tripoli. Historically inhabited by Bedouin tribes. zunzuneo.com on Facebook.</p> <p>Libia es un pais del norte de Africa, ubicado en el Magreb. Su capital es Tripoli. Historicamente poblado por tribus beduinas. ZunZuneo en Facebook..</p>
	<p>After the disaster in Japan the world debates between the 2 energies: Nuclear or Oil? Group recommended by ZunZuneo this week: LAIberto</p> <p>Despues del desastre de Japon el mundo debate entre las 2 energias: Nuclear o Petroleo? Grupo recomendado por ZunZuneo esta semana: LAIberto</p>
	<p>The euro is the official currency in 17 of the 27 EU member states. Born in 1998, it is the 2nd most used currency in the world after the dollar.</p> <p>El euro es la moneda oficial en 17 de los 27 estados miembros de la UE. Nacio en 1998 y es la 2da moneda mas usada en el mundo despues del dolar.</p>

Grant	Message
	<p>The permanent members of the UN Security Council are the U.S., China, UK, France and Russia. Visit zunzuneo.com find more groups</p> <p><i>Los miembros permanentes del Consejo de Seguridad de ONU son EEUU, China, Reino Unido, Francia y Rusia. Visita zunzuneo.com y encuentra mas grupos!</i></p> <p>Gaddafi loses more than 1/3 of his army but the war remains in stalemate. Remember that there are many groups like this in zunzuneo.com, receiving messages is free!</p> <p><i>Gadafi pierde mas de 1/3 de su Ejercito pero la guerra sigue estancada. Recuerda que hay muchos grupos como este en zunzuneo.com, recibir es gratis!</i></p> <p>President Obama announces that the U.S. has eliminated the terrorist Osama Bin Laden, the world celebrates the news on the streets. zunzuneo.com</p> <p><i>El presidente Obama anuncia que los EEUU ha eliminado al terrorista Osama Bin Laden, el mundo entero celebra la noticia en las calles. zunzuneo.com</i></p> <p>Al Qaeda acknowledges Bin Laden's death and seeks a leader. The Egyptian Al Zawahiri is the natural replacement despite internal resistances. ZunZuneo</p> <p><i>Al Qaeda reconoce la muerte de Bin Laden y busca su lider. El egipcio Al Zawahiri es el reemplazo natural pese a las resistencias internas. ZunZuneo</i></p> <p>There is no crisis in Latin America. Companies mainly from Chile, Mexico and Brazil are gradually becoming global giants. ZunZuneo FB</p> <p><i>No hay crisis para Latinoamerica. Las empresas principalmente de Chile, Mexico y Brasil se convierten poco a poco en gigantes globales. ZunZuneo FB</i></p> <p>There are continuing demonstrations in Madrid against the socialist government of Zapatero. Join ZunZuneo ringing to +34675374113 or zunzuneo.com spread the word</p> <p><i>Continuan en Madrid las manifestaciones contra el gobierno socialista de Zapatero. Unete a ZunZuneo timbrando al +34675374113 o zunzuneo.com pasalo</i></p> <p>Chinese hackers attack Google accounts of U.S. government officials. Without success. Find us on Facebook ZunZuneo +34675374113</p> <p><i>Piratas informaticos chinos atacan cuentas de Google gmail de oficiales del gobierno de EEUU. Sin exito. Buscanos en Facebook ZunZuneo +34675374113</i></p> <p>Cuba was eliminated from the Gold Cup with 16 goals against, the team most scored upon in the tournament, it is time to get serious, think and improve.</p> <p><i>Cuba quedo eliminada de la Copa de Oro con 16 goles en contra siendo el equipo mas goleado del torneo, es hora de ponerse serios , pensar y mejorar.</i></p> <p>Angelina Jolie arrives at the camps for Syrian refugees to give them support. Find us on Facebook: ZunZuneo. Tel: +34675374113 or info@zunzuneo.com</p> <p><i>Angelina Jolie llega a los campamentos de refugiados sirios para dar su apoyo. Buscanos en Facebook: ZunZuneo. Tel: +34675374113 o info@zunzuneo.com</i></p>
Grant # 7	No messages sent.
Grant # 8	No messages sent.

Grant	Message
Grant # 9	<p>River Plate descends to the 2nd division in Argentina and causes chaos leaving 68 wounded. You are also part of ZunZuneo more groups at zunzuneo.com</p>
	<p><i>River Plate descende a la 2a division argentina y provoca un caos que deja 68 heridos. Tu tambien eres parte de ZunZuneo mas grupos en zunzuneo.com</i></p>
	<p>ZunZuneo: The ZunZuneo continues new initiatives in July Search for web groups, and promoted groups (FollowSaturday) Their voice amplified to 50K (Re-Zun) It's coming!</p>
	<p><i>ZunZuneo: El ZunZuneo continua Nuevas iniciativas en julio Buscar grupos p web Grupos promovidos (SigueSabado) Su voz ampliada a 50k (Re-Zun) Ya viene!</i></p>
	<p>ZunZuneo: The ZunZuneo continues with FollowSaturday 9/7. We will advertise stellar groups zuning about technology, sports, culture and more! FollowSaturday follow us!</p>
	<p><i>ZunZuneo: Sigue el ZunZuneo con SigueSabado 9/7. Anunciaremos grupos estelares zuneando acerca de tecnologia, deportes, cultura y mas! SigueSabado siguenos!</i></p>
	<p>ZunZuneo: Messi: Argentinians prospers with criticism. Will the nation carry the victory against Uruguay today?</p>
	<p><i>ZunZuneo: Messi: Argentinos prosperan con el criticismo. Cargara la nacion a la victoria contra Uruguay hoy?</i></p>
	<p>ZunZuneo: The ZunZuneo continues! New Initiatives in July. Search groups in the web , promoted Groups (FollowSaturday) Your voice amplified to 50K (Re-Zun) It's coming!</p>
	<p><i>ZunZuneo: ZunZuneo continua! Nuevas iniciativas en julio. Buscar grupos por la web Grupos promocionados (SigueSabado) Tu voz ampliada a 50k (Re-Zun) Ya viene!</i></p>
<p>ZunZuneo: Follow groups in ZunZuneo with FollowSaturday we will announce stellar groups ZUNZUNING about sports culture technology and more FollowSaturday FOLLOW IT!</p>	
<p><i>ZunZuneo: Sigue grupos en ZunZuneo con SigueSabado Anunciaremos grupos estelares ZUNZUNEANDO acerca de tecnologia deportes cultura y mas! SigueSabado SIGUELO!!</i></p>	
<p>News: The UN declares famine in two regions of southern Somalia.</p>	
<p><i>Noticias: La ONU declara la hambruna en dos regiones del sur de Somalia..</i></p>	
<p>News: Happy Follow Saturday! This Saturday we recommend the following stellar groups - news, LAAlberto, raydeldj. ZZ</p>	
<p><i>Noticias: ¡Feliz Sigue Sabado! Este sabado recomendamos a los siguientes grupos estelares - noticias, LAAlberto, raydeldj. ZZ</i></p>	
<p>Message: Visit My Account on our website to develop your profile. With a profile you will increase your followers and find people with your interests. Z Z</p>	
<p><i>Mensaje: Visita Mi Cuenta en nuestra web para desarrollar tu perfil. Con un perfil aumentaras tus seguidores y encontraras personas con tus intereses. Z Z Z</i></p>	
<p>Message: Welcome to Follow Saturday! Today we recommend Guachiplin, UCI, Javier and PromoHaban. You could look for and follow these groups in our web.ZZ page</p>	
<p><i>Mensaje: ¡Bienvenido a Sigue Sabado! Hoy te recomendamos Guachiplin, UCI, Javier y PromoHaban. Puedes buscar y seguir estos grupos en nuestra pagina web.Z Z</i></p>	

Grant	Message
	<p>Message: RZ: Javier: The Spanish singer Alejandro Sanz has announced on his Twitter the birth of his third child, who will be named Dylan</p> <p>Mensaje: RZ: javier: El cantante español Alejandro Sanz ha anunciado en su Twitter el nacimiento de su tercer hijo, que llevara el nombre Dylan</p>
	<p>Message: Tip: To receive updates of other members of ZZ, send an SMS with the name of the group from ZunZuneo that you want to join +34675374113.</p> <p>Mensaje: Consejo: Para recibir actualizaciones de otros miembros de Z Z, envia un SMS con el nombre del Grupo de ZunZune0 que deseas unirte al +34675374113.</p>
	<p>Challenge: Just in August, the first 50 people who follow five groups through SMS will receive a credit of \$10 in their phone bill. GO! Z.Z.</p> <p>Desafio: Solo en agosto, las primeras 50 personas que sigan cinco grupos a traves de SMS recibirán un credito de \$10 en su cuenta de telefono. !DALE! Z.Z.</p>
	<p>Challenge: This Saturday we welcome you to PMMFiesta, Ernie and ceciliapr, new groups of Z. Z. Follow them!</p> <p>Desafio: Este sabado le damos la bienvenida a PMMFiesta, Ernie y ceciliapr, grupos nuevos de Z . Z . !!SIGUELOS!!</p>
	<p>We are Back: ZvnZvneros! A thunderstorm fried our servers, but now we re-established the connection to our web page Keep ZvnZvning!</p> <p>DeVuelta: !ZvnZvneros! Una tormenta electrica hiso chicharon de nuestro servidor, pero ya restablecimos la conexion a nuestra pagina d web !Sigán ZvnZvneando!</p>
	<p>We are Back: These groups are great, you should follow them! Gulsa. PMMFiesta. Ariatna. Ajax. HenryRC. Orlan. Raydeldj.</p> <p>DeVuelta: Estos grupos son genial, !debes seguirlos! Guisa. PMMFiesta. Ariatna. Ajax. HenryRC. Orlan. Raydeldj..</p>
	<p>Hey! If you love receiving SMS from Z, Z, you'll love to send them! Visit our website to subscribe, it's free! let's do it.</p> <p>OYE!! Si te encanta recibir los SMS de Z,Z, te va a encantar poder MANDARLOS! Visita nuestra pagina web para inscribirte, es gratis!! Dale.</p>
	<p>Did you know that you can receive messages from several persons using ZvnZvne@? Visit our website to find and follow your favorite groups.</p> <p>Sabias que puedes recibir mensajes de varias personas usando ZvnZvne@? Visita nuestra pagina web para buscar y seguir tus grupos de interes..</p>
	<p>Friends, beginning on Monday, you could send 2 updates every day to your followers! Keep up the Z u n Z u n e o !!! Find us on Facebook!</p> <p>Amigos, empezando el lunes, podran mandar 2 actualizaciones cada dia a sus seguidores! Sigán con el Z u n Z u n e o!!! Buscanos en Facebook!</p>
	<p>THANK YOU! Soon you will receive messages from the ZunZune@ Universal Group. To unsubscribe send STOP Universal to +34675374113</p> <p>GRACIAS! Pronto recibirás los mensajes del Grupo de ZunZune@ Universal. Para darte de baja envia PARAR Universal al +34675374113 3</p>

Grant	Message
	<p>Don't stop, continue continue!! To receive notices of the best parties follow the PMMfiesta and PromoHaban groups! ! Join the Z.u.n.Z.u.n.e.o!!</p> <p>No pares sigue sigue!! Para recibir avisos de las mejores fiestas sigan los grupos PMMfiesta y PromoHaban!! Unete al Z.u.n.Z.u.n.e.o!!</p> <hr/> <p>RE Zun Ariatna: The pope in Madrid: The Kings welcome the Pope in his first contact with the young pilgrims.</p> <p>Re Zun Ariatna: El papa en Madrid: Los Reyes dan la bienvenida al Papa en su primer contacto con los jovenes peregrinos.</p> <hr/> <p>You want to receive messages from several ZunZuneO groups? Look ... start with these groups, they are good! Lanegra. abelvf. news. raydeldj. Yelenis</p> <p>Quieres recibir mensajes de varios grupos de ZunZuneO? Mira... empieza con estos grupos, son candela! lanegra. abelvf. noticias. raydeldj. Yelenis</p> <hr/> <p>PMM Party: Hurricane Irene made landfall in the U.S. this Sunday for the second time, now in New Jersey, as a category one cyclone.</p> <p>P M M Fiesta : El huracan Irene toco tierra este domingo en Estados Unidos por segunda vez, ahora en Nueva Jersey, como un ciclon de categoria uno.</p> <hr/> <p>From Marito group: Rory McIlroy, 22 years old, was crowned champion of the U.S. open golf championship and he did it easily, breaking records</p> <p>Del grupo Marlito: Rory McIlroy, de 22 anos, se corono campeon del Abierto estadounidense de golf y lo hizo sin mucha dificultad y rompiendo records</p> <hr/> <p>Wiikie Group. MyKey created by Ford will let the parents leave the car keys to their children knowing that they will not exceed speed limits</p> <p>Grupo Wilkie. MyKey creado por Ford dejara los padres dejarles las llaves del vehiculo a sus hijos sabiendo que no sobrepasaran limites de velocidad d</p> <hr/> <p>Do you have a question about our SERVICE? WRITE !! I n f o @ z u n z u n e o . c o m</p> <p>Tienes una pregunta sobre nuestro servicio? ESCRIBENOS!! I n f o @ z u n z u n e o . c o m</p>
Grant # 10	No messages sent.
Grant # 11	<p>Are you a soccer fan? Do you like information technology? Write us and we will recommend you the best groups sending interesting messages for you!</p> <p>Eres fan del futbol? Te interesa la informatica? Escribenos y te recomendaremos los mejores grupos mandando los mensajes que te interesan a ti!</p> <hr/> <p>New function Z Z eros! Tired of blindly sending messages? No more! Expect to receive a copy of every message you send. It arrived? No more doubts!</p> <p>Nueva funcion Z Z eros! Cansado de enviar mensajes a ciegas? No mas! Espera recibir una copia de cada mensaje que envíes. Llego? No mas dudas!!</p> <hr/> <p>News ZZ - Steve Jobs, innovator and founder of Apple and Pixar died Wednesday, October 5. Speech at Stanford 2005: http:// bit.ly / FOZov</p> <p>Noticias Z Z - Steve Jobs, inovador y fundador de Apple y Pixar fallecio miercoles 5 de octubre. Discurso en Stanford 2005: http://bit.ly/FOZov</p>

Grant	Message
	<p>Greetings! Photos of Shakira with Alicia Alonso in Barcelona 18-09-11, website: j.mp / mSTVEV. More news and videos Shakira official website: j.mp/pC3AaM</p> <p>Saludos! Fotos d Shakira con Alicia Alonso en Barcelona 18-09-11, sitio web: j.mp/mSTVEV. Mas noticias y videos de Shaki, sitio oficial: j.mp/pC3AaM</p>
	<p>Are you frustrated with so much rain? You can create and promote your own group Z Z. Only your voice. Join the conversation Info@ zunzuneo. Com</p> <p>Te tiene frustrad@ tanta lluvia? Puedes crear y promover tu propio grupo Z Z. Solo tu voz. Unete a la conversacion! i n f o @ z u n z u n e o . c o m</p>
	<p>Latest world news: Earthquake in Turkey 7.2 leaves more than 100 dead (http://J.mp/mY9kna), Cristina Fernandez de Kirchner wins reelection.....</p> <p>Ultimas noticias del mundo: Seismo en Turquía de 7,2 deja + de 100 muertos (http://j.mp/mY9kna), logra reeleccion Cristina Fernandez de Kirchner...</p>
	<p>. . . in Argentina and after Gaddafi's death new Libyan leaders declare an end to... (more information by: .j. mp/nzIMpv)</p> <p>... en Argentina y tras muerte de Gadafi nuevos lideres lib ios declaran fin de ... (mas informacion por: j . m p / nzIMpv)</p>
	<p>News-ZZ Cardinals are the new world series champions 6.9 Earthquake in Peru collapses 88 homes EU presents plan to save the Euro</p> <p>Noti Z Z -Los Cardenales son nuevos campeones de la serie mundial Terremoto de 6,9 en Peru derrumba 88 casas La EU presenta plan para salvar el Euro</p>
	<p>Do you Like Z Z? Do you want to improve it? Help them Write us at info @ z u n z u n e o . com</p> <p>Te gusta Z Z? Quieres mejorarlo? Ayudenos! Escribenos a info @ z u n z u n e o . com</p>
	<p>Z Z Competition. Answer our question tomorrow, the 5 most interesting updates will be recharged! If you don't have a group, visit the web to create it.</p> <p>Concurso Z Z. Contesta nuestra pregunta manana, las 5 actualizaciones mas interesantes reciben recarga! Si no tienes grupo, visite web para crearlo..</p>
	<p>Competition z z. The 5 most interesting updates will be recharged! Which news do you think has been the most impressive this week?</p> <p>Concurso Z Z. Las 5 actualizaciones mas interesantes reciben recarga! Que noticias cres que ha sido la mas impactante esta semana?</p>
	<p>ZZ Natl Arab League suspends Syria Berlusconi resigns post in Italy Ballplayer rescued after kidnapping in Venezuela Info @ zunzuneo. Com</p> <p>Noti Z Z Liga Arabe suspende a Siria Berlusconi renuncia posto en Italia Pelotero rescatado tras secuestro en Venezuela info @ z u n z u n e o . com</p>
	<p>Note ZZ Vatican announces pope visit to Cuba and Mexico in 2012. To continue receiving our updates, please register your group by web or SMS.</p> <p>Noti Z Z Vaticano anuncia visita del papa a Cuba y Mexico en 2012. Para seguir recibiendo nuestras actualizaciones, registre tu grupo por web o SMS.</p>

Grant	Message
	<p data-bbox="354 268 1354 327">ZZ News Gaddafi's son was arrested in Libya. International pressure on Syria to stop violence. Tomorrow another contest to win recharge</p> <p data-bbox="354 357 1419 415"><i>Noticias Z Z Arrestan al hijo de Qaddafi en Libia. Presion internacional para que Siria pare la violencia. Manana otro concurso para ganar recarga.</i></p> <p data-bbox="354 424 1299 483">Contest of this week, Which technology would you like to have and why? include competition in your update and the 5 most interesting ones will win a recharge</p> <p data-bbox="354 512 1354 571"><i>Concurso de esta semana, Que tecnologia te gustaria tener y porque? Incluye concurso en tu actualizacion y los 5 mas interesantes ganan recarga</i></p>
Grant # 12	No messages sent.

* Note: This list of messages does not include any group messages sent by members of ZunZuneo.

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