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Viviana Aldous

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Viviana Aldous
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CENSORSHIP IN CUBA

Freedom of the press, of expression and of association in Cuba continue without improvement, despite the economic reforms, and meanwhile official repression with paramilitary characteristics is gaining ground against those who seek to demonstrate their political discrepancies. . . . [T]here has been no lack of verbal attacks, threats, beatings and humiliation of all kinds.¹

INTRODUCTION

The Cuban Constitution guarantees freedom of religion,² belief,³ conscience,⁴ speech,⁵ and press;⁶ grants rights of assembly, demonstration, and association;⁷ and recognizes the freedom and full dignity of man and the enjoyment of the people's rights.⁸ Yet the Cuban Human Rights and National Reconciliation Commission estimates that there were more than 4,000 arbitrary detentions in Cuba in 2013 related to free press, expression, and association.⁹ Cuba's communist regime has refused to grant its citizens the right to free speech, free expression, and free

¹ Yoani Sánchez, in a report presented to the Inter American Press Association in November 2013. *See Press Freedom, Free Speech Show No Signs of Improvement in Cuba*, INTER AMERICAN PRESS ASS'N (Nov. 1, 2013), <http://www.sipiapa.org/en/press-freedom-free-speech-show-no-signs-of-improvement-in-cuba/>.

² CONSTITUTION OF THE REPUBLIC OF CUBA, art. 8, 55.

³ *See id.* art. 8.

⁴ *See id.* art. 55.

⁵ *See id.* art. 53.

⁶ *See id.*

⁷ *See id.* art. 54.

⁸ *See id.* art. 9.

⁹ *Press Freedom, Free Speech Show No Signs of Improvement in Cuba*, *supra* note 1.

assembly.¹⁰ The government censors books, newspapers, radio stations, music, movies, television, and internet,¹¹ restricting access to materials that criticize or fail to support its regime. Cuba has one of the lowest internet penetration rates in the world, and the International Telecommunication Union ranks Cuba 125 out of 166 countries in telecommunications development.¹²

One dissident¹³ told us, “When you grow up, you’re told ‘Shh, be quiet! The neighbors can hear you,’ so you grow up thinking that speaking against the government is bad.” He and many other locals said that there were likely numerous undercover police officers on the streets, and this widely held belief results in apprehension to speak openly against the government for fear of detention or arrest. The dissident said he is not sure whether there actually are undercover police, but he assured us that it didn’t matter; the fear the government instilled in the people was powerful enough.

This paper discusses the widespread censorship in Cuba. It addresses free speech and press, internet access, and Cubans’ access to digital content from abroad via the black market. It also briefly explores what one dissident called “the two biggest myths of Cuba”: health care and education.

¹⁰ See *The Long Road: Pursuing Cuban Freedom of Speech*, FOUNDATION FOR HUMAN RIGHTS IN CUBA, <http://www.fhrcuba.org/2014/01/long-road-pursuing-cuban-freedom-speech/>.

¹¹ *Id.*

¹² David Adams, *Cuba Aims to Ramp Up Internet Access: U.S. State Department Official*, Reuters (Mar. 30, 2015), <http://www.reuters.com/article/2015/03/30/us-cuba-usa-telecommunications-idUSKBN0MQ2BV20150330>.

¹³ Many names in this research paper have been excluded to protect the identity of the speaker.

I. FREE SPEECH AND PRESS

*We are deeply disturbed by the Cuban government's repeated use of arbitrary detention to silence critics, disrupt peaceful assembly, and impede independent journalism.*¹⁴

There are two daily newspapers in Cuba: Granma, published by the Communist Party of Cuba, and Juventud Rebelde, published by the Union of Young Communists. “Mass media are not private entities,” explained one attorney and member of the National Union of Cuban Jurists. “We are free to give our opinion.” Interestingly, to provide an example of his exercising his right to free speech, he told us about a guest column he wrote that was published in the newspaper. In the column, he complained about the machines used to clean up litter on the streets, which destroyed the streets and sidewalks. He said he was a bit surprised when the newspaper published the column two weeks later. “[Our free speech right] is not exactly what you’re familiar with, but we do have that right,” he said.

Cuba ranks 169 of 180 in Reporters Without Borders’ World Press Freedom Index.¹⁵ The World Press Freedom Index “reflects the degree of freedom that journalists, news media and netizens (Internet citizens) enjoy in each country, and the efforts made by the authorities to respect and ensure respect for this freedom.”¹⁶ To compile the index, Reporters Without Borders distributes a questionnaire aimed

¹⁴ U.S. State Department spokesman William Ostick said in a CNN story regarding the arrest of Yoani Sanchez. *Dissident Cuban Blogger Arrested, Colleagues Say*, CNN (Oct. 5, 2012), <http://www.cnn.com/2012/10/05/world/americas/cuba-blogger-arrest/>.

¹⁵ *2015 World Press Freedom Index*, REPORTERS WITHOUT BORDERS (2015) <https://index.rsf.org/#/>.

¹⁶ *2015 World Press Freedom Index: How We Compiled the Index*, REPORTERS WITHOUT BORDERS 1 (2015), <http://fr.rsf.org/IMG/pdf/methodology-en.pdf>.

to provide quantitative data in seven categories: (1) the degree to which opinions are represented in the media; (2) the degree to which the media are able to function independently of sources of political, governmental, business and religious power and influence; (3) the environment in which journalists and other news and information providers operate; (4) the impact of the legislative framework governing news and information activities; (5) the transparency of the institutions and procedures that affect the production of news and information; (6) the quality of the infrastructure that supports the production of news and information; and (7) the level of violence and harassment during the period assessed.¹⁷ Reporters Without Borders notes that the Cuban government fails to tolerate an independent press, tightly controls internet access, and limits freedom of information.¹⁸

Moreover, outspoken journalists and bloggers are subject to threats, arrests, and arbitrary detention.¹⁹ Havana resident and “Cuba’s best known dissident”²⁰ Yoani Sánchez started her blog *Generación Y*, which launched on April 9, 2007, to provide insight into daily life in Cuba. “She’s one of those voices you have to hear, because she’s talking about the reality of the Cuban people, the real life, the daily

¹⁷ *See id.* at 2.

¹⁸ *Details About Cuba*, REPORTERS WITHOUT BORDERS (2015), <https://index.rsf.org/#!/index-details/CUB>.

¹⁹ *Id.* *See generally* Rob Sequin, *Cuban Government Trying to Shut Down Cuba Bloggers But It’s Not Working*, HAVANA JOURNAL (May 25, 2009), <http://havanajournal.com/politics/entry/cuban-government-trying-to-shut-down-cuba-bloggers-but-its-not-working/>.

²⁰ Eyder Peralta, *Cuban Authorities Detain Artist, Dissidents, Thwarting Performance*, NATIONAL PUBLIC RADIO (Dec. 31, 2014), <http://www.npr.org/blogs/thetwo-way/2014/12/31/374158250/cuban-authorities-detain-artist-dissidents-thwarting-performance>.

life in Cuba,” reader Rosa de la Torre told NPR.²¹ Sánchez has been harassed, abused, detained and arrested,²² and the government blocked access to her blog for three years.²³

In addition, Cuban artist Tania Bruguera organized a performance, *Yo También Exijo*, or *I Also Demand*, to take place at Havana’s Revolution Square on December 30, 2014. She was going to provide a microphone and encourage Cubans to speak publicly about their vision for the future of the country.²⁴ The event would have been the island’s first to challenge the Castro regime’s “tight control of political dissidence” since the U.S. and Cuba announced their intent to normalize diplomatic relations.²⁵ During his announcement on December 17, 2014, President Obama said Cubans should not be arrested or harassed and that the U.S. would continue to monitor human rights in Cuba.²⁶ But Bruguera’s event never

²¹ Greg Allen, *Cuban Dissident Blogger Seeks To Unite Castro's Cuba With Miami's Cuba*, NATIONAL PUBLIC RADIO (Apr. 2, 2013), <http://www.npr.org/2013/04/02/175997121/cuban-blogger-wants-fidels-cuba-miamis-cuba-to-unite>.

²² See, e.g., Yoani Sánchez, *A Gangland Style Kidnapping*, GENERATION Y (Nov. 7, 2009), <https://generacionyen.wordpress.com/2009/11/07/kidnap-style-street-fight/>; *Dissident Cuban Blogger Arrested, Colleagues Say*, CNN (Oct. 5, 2012), <http://www.cnn.com/2012/10/05/world/americas/cuba-blogger-arrest/>.

²³ Juan Forero, *Yoani Sanchez, Dissident Cuban Blogger Behind “Generation Y,” Goes on Tour*, THE WASHINGTON POST (Mar. 11, 2013), http://www.washingtonpost.com/world/the_americas/yoani-sanchez-dissident-cuban-blogger-behind-generation-y-goes-on-tour/2013/03/11/c505af4c-8a75-11e2-a88e-461ffa2e34e4_story.html.

²⁴ See Carmen Sésin, *Cuba Dissidents Report Arrests Ahead of Gathering*, NBC NEWS (Dec. 30, 2014), <http://www.nbcnews.com/storyline/u-s-cuba-relations/cuba-dissidents-report-arrests-ahead-gathering-n277236>.

²⁵ Peralta, *supra* note 20.

²⁶ Sésin, *supra* note 24.

happened.²⁷ The government blocked the event, and Bruguera and many others were arrested.²⁸ U.S. State Department spokesman Jeff Rathke said in a statement that the Department was “deeply concerned” about the arrests: “[A]s part of the process of normalization of diplomatic relations, the United States will continue to press the Cuban government to uphold its international obligations and to respect the rights of Cubans to peacefully assemble and express their ideas and opinions.”²⁹

II. INTERNET ACCESS

*In Cuba’s case, we are first trying to make technology a right while respecting our privacy. Having that ability or possibility to be plugged in 24 hours a day or have a Twitter account or simply choose not to use their mobile device—our situation in Cuba today is far from being like that. Today it’s about getting Internet connectivity in our homes, which is nearly impossible. We’re still living in a rudimentary state of existence here; we have to solve that problem first.*³⁰

More than 2.6 million Cubans, or about 23 percent of the population, had internet access in 2011, according to a report from Cuba’s National Office of Statistics and Information.³¹ The International Telecommunication Union, an agency of the United Nations, estimates that about 25 percent of the population had

²⁷ See Peralta, *supra* note 20; Sesin, *supra* note 24.

²⁸ See Peralta, *supra* note 20; Sesin, *supra* note 24.

²⁹ Press Release, U.S. Department of State, Detentions of Activists in Cuba (Dec. 30, 2014), <http://www.state.gov/r/pa/prs/ps/2014/12/235550.htm>.

³⁰ Yoani Sánchez in an interview with Maria Hinojosa of NPR’s Latino USA. Maria Hinojosa, *Latino USA: Yoani Sánchez: Blogging for Free Speech in Cuba*, NATIONAL PUBLIC RADIO (July 3, 2014), <http://latinousa.org/2014/07/03/yoani-sanchez-cuba/>.

³¹ *Tecnología de la Información y las Comunicaciones en CIFRAS*, OFICINA NACIONAL DE ESTADISTICA E INFORMACION 7 (June 2012) <http://www.one.cu/publicaciones/06turismoycomercio/TIC%20en%20Cifras%20Cuba%202011/TIC%20en%20Cifras%20Cuba%202011.pdf>.

internet access in 2014.³² But those statistics account only for those who have access to Cuba's intranet, according to Freedom House, an NGO that advocates democracy, political freedom, and human rights.³³ Freedom House estimates that about 5 percent of Cubans have access to the global internet.³⁴ The government filters the intranet; indeed, the government blocked access to Sánchez's blog from 2008 until 2011.³⁵ The intranet provides access to a national email system, a Cuban encyclopedia, educational materials, open-access journals, Cuban websites, and foreign websites that are supportive of the Cuban government.³⁶

Access to the global internet in Cuba is severely limited, both because it is not widely offered and because it is prohibitively expensive. Cubans can typically access the internet only through government institutions, high-end hotels, and the black market.³⁷ Computers cost about \$720 and at least \$550 on the black market, according to Freedom House.³⁸ And while about 31 percent of Cubans report having access to a computer, 85 percent of them have that access at work or school.³⁹

³² Nancy Scola, *Only 5 Percent of Cubans Can Get on the Same Internet Americans Do. That Could Soon Change.*, THE WASHINGTON POST (Dec. 17, 2014), <http://www.washingtonpost.com/blogs/the-switch/wp/2014/12/17/cubans-might-soon-actually-be-able-to-get-on-the-real-internet/>.

³³ *Cuba*, FREEDOM HOUSE (2014), <https://freedomhouse.org/report/freedom-net/2014/cuba>.

³⁴ *Id.*

³⁵ See Heidi Fortes, *Forbidden Freedom: Yoani Sánchez's Struggle for an Open Cuba*, CANADIAN JOURNALISTS FOR FREE EXPRESSION (July 3, 2014), <https://cjfe.org/resources/features/forbidden-freedom-yoani-s%C3%A1nchez%E2%80%99s-struggle-open-cuba>.

³⁶ *Cuba*, *supra* note 33.

³⁷ Scola, *supra* note 32.

³⁸ *Cuba*, *supra* note 33.

³⁹ *Id.*

Internet cards that provide Wi-Fi access at the Parque Central, a high-end hotel in Old Havana, cost about 5 Cuban convertible pesos (CUCs), or about \$5, per hour. The Cuban newspaper *Gaceta Oficial* reported that the public can access national websites for \$0.60 per hour and international websites for \$4.50 per hour and can check email for \$1.50 per hour. Meanwhile, with only two internet service providers, Cuba has a maximum connection speed of 2 Mbps,⁴⁰ compared with the U.S. average of 18.2 Mbps.⁴¹

But the landscape is changing. In early 2015, Cuban artist Kcho began offering a public-access Wi-Fi service, the first of its kind in Cuba, allowing anyone near his studio to access the internet for free at any time of the day.⁴² Kcho said of his studio hot spot: “The Internet was invented for it to be used. There’s this big kerfuffle here in Havana that Kcho has Internet at his place. There’s nothing to it. It’s just me, who is willing to pay the cost and give it to the people. It’s about sharing something with people, the same way my country does.”⁴³ Cuban officials told U.S. State Department officials that they are committed to providing Cubans

⁴⁰ See *Cuba*, *supra* note 33.

⁴¹ Reid Wilson, *The Fastest and Slowest Internet Speeds in America*, THE WASHINGTON POST (Jan. 9, 2014), <http://www.washingtonpost.com/blogs/govbeat/wp/2014/01/09/the-fastest-and-slowest-internet-speeds-in-america/>.

⁴² See Robert Siegel, *An Object of Desire: Hope and Yearning for the Internet in Cuba*, NPR (Mar. 23, 2015), <http://www.npr.org/blogs/parallels/2015/03/23/394276385/an-object-of-desire-hope-and-yearning-for-the-internet-in-cuba>.

⁴³ *Id.*

with unrestricted internet access and to getting web access in 50 percent of households by 2020.⁴⁴

III. DIGITAL CONTENT AND THE BLACK MARKET

*Stealing from the state, for Cubans, is like taking firewood from the forest, or picking blueberries in the wild. It's considered public property that wouldn't otherwise be used productively, so one helps oneself.*⁴⁵

Archibald Ritter, an economist and professor at Carlton University, estimates that 95 percent of Cubans participate in the country's black market.⁴⁶ Ritter conducted an extensive study in 2005 that examined the extent of the black market in Cuba. Ritter said it was impossible to know the dollar value of the underground economy, but it is extensive and covers a variety of activities—"everything from a woman selling stolen spaghetti door-to-door, to a bartender at a tourist hot spot replacing high-quality rum with his own moonshine, to a bicycle repairman selling spare parts out the back door."⁴⁷

Justin Davis, a United States Foreign Service Officer who works at the U.S. Interests Section in Havana, explained that Cubans access media from abroad through "El Paquete," the underground system that delivers digital content to

⁴⁴ David Adams, *Cuba Aims to Ramp Up Internet Access: U.S. State Department Official*, Reuters (Mar. 30, 2015), <http://www.reuters.com/article/2015/03/30/us-cuba-usa-telecommunications-idUSKBN0MQ2BV20150330>.

⁴⁵ Archibald Ritter, an economist and professor at Carlton University in Ottawa, said this in a story by the Associated Press. *Cuba's Black Market Thrives Despite Raul Castro's New Market Reforms*, ASSOCIATED PRESS (July 5, 2011), http://www.huffingtonpost.com/2011/07/05/cubas-black-market-thrives_n_890307.html.

⁴⁶ *Id.*

⁴⁷ *Id.*

Cubans weekly.⁴⁸ One woman in Havana, Jessica,⁴⁹ told me that she purchases a paquete every Monday for 1 CUC (about the equivalent of \$1). Jessica explained that people who have access to the internet at work—typically those who work in government offices—download hundreds of hours of international media content each Sunday. The cost of a paquete decreases throughout the week, she said. Those selling paquetes go to the buyer’s home, set up the external hard drive, leave the buyer’s home as the one terabyte of data is uploaded onto the buyer’s computer, and come back after three or four hours to pick up the external hard drive. Jessica said that through her paquete, she and her mother enjoy *The Good Wife*, *Scandal*, *How I Met Your Mother* and other TV shows, music, and films from the United States and Mexico. She said paquetes were so common that the Cuban government would have little success trying to eradicate their use. Others suggest the government tolerates the use of paquetes because they do not provide “politically controversial references.”⁵⁰

In addition to accessing digital content through the black market, Jessica said obtaining physical items from abroad is not difficult. She explained that many Cubans travel abroad, sometimes taking requests for purchases before they go, and bring back goods, selling them on the black market. When doing so, they tell

⁴⁸ See Julissa Soriano, *Cuba’s Underground Delivery of TV and Films*, Dollars and Sense Blog, CITY UNIVERSITY OF NEW YORK: BARUCH COLLEGE (Jan. 31, 2015), <http://blogs.baruch.cuny.edu/dollarsandsense/2015/01/31/cubas-underground-delivery-of-tv-and-films/>.

⁴⁹ The local woman’s name has been changed to protect her identity.

⁵⁰ See Soriano, *supra* note 48.

authorities that the goods are for their relatives in Cuba; bringing goods back to Cuba for relatives is a practice that Jessica said is permitted to some degree.

Ted Henken, a professor at Baruch College who has studied Cuba's economy for several years, commented on the extensive and widespread use of the black market:

Turning to the black market and informal sector for nearly everything is so common that it has become the norm, with little or no thought of legality or morality. When legal options are limited or nonexistent, then everyone breaks the law, and when everyone breaks the law, the law loses its legitimacy and essentially ceases to exist.⁵¹

In a story by the Associated Press, a self-described "mule" who transports clothes from Europe to Havana for sale in the city's underground stores said, "Half of Cuba lives off the black market, and the other half depends on it. To me, it is unstoppable."⁵²

IV. THE TWO "MYTHS" OF CUBA: HEALTH CARE AND EDUCATION

*A question was tormenting me: Where was the Cuba I was promised? Because since I was a child, I was promised a Cuba that has never been realized.*⁵³

Because of the censorship of the press, internet, and other media and the fear many Cubans have of speaking out against the government, it is difficult for foreigners to get a real sense of Cuba, four political dissidents told us at dinner.

⁵¹ *Cuba's Black Market Thrives Despite Raul Castro's New Market Reforms*, *supra* note 45.

⁵² *Id.*

⁵³ Yoani Sánchez in an interview with Maria Hinojosa of NPR's Latino USA. Hinojosa, *supra* note 30.

Instead, Cubans often recite propaganda favorable to the government. This section discusses two subjects that came up frequently in our conversations with locals: health care and education. “Those are the two biggest myths in Cuba,” one dissident said. Propaganda and censorship facilitate the perpetuation of these “myths.”

A. Health care

Cuba is widely recognized for guaranteeing and providing nationwide access to health care.⁵⁴ Despite limited resources, Cuba has achieved results “similar to those of the most developed nations” through its efficient system based on preventive medicine.⁵⁵ Two doctors and the policlinic’s chief nurse said preventive medicine—for example, Cuba’s focus on good hygiene, a balanced diet, and the dangers of smoking—is the best way to target health issues, particularly in a country with extremely limited resources. “We say we live like the poor but die like the rich,” the deputy director of the policlinic said. The leading causes of death in Cuba, she said, include cancer and cardiovascular-related illnesses, causes of death common in developed nations.

In response to one of the Cuban Democracy Act’s⁵⁶ stated goals of maintaining sanctions on Cuba “so long as it continues to refuse to move toward democratization and greater respect for human rights,”⁵⁷ Vladimir Falcón of the Cuban Institute for the Friendship with the Peoples (ICAP) said, “In the United

⁵⁴ See Salim Lamrani, *Cuba’s Health Care System: a Model for the World*, THE HUFFINGTON POST (Aug. 8, 2014), http://www.huffingtonpost.com/salim-lamrani/cubas-health-care-system-_b_5649968.html.

⁵⁵ *Id.*

⁵⁶ See 22 U.S.C. § 6001 et seq.

⁵⁷ 22 U.S.C. § 6002.

States, 40 million people lack access to health care. Isn't health care a basic human right? If you're poor, can you really exercise your human rights?"

But health care is one of the two biggest myths in Cuba, according to political dissidents. One dissident said, "We earn on average \$20 per month. That's probably about 1 percent of the money I would earn if I worked in a capitalist society. So where does that 99 percent go? Poor education and poor health care." They noted Cuba's low infant mortality rate,⁵⁸ a statistic often cited by Cuban government officials and doctors. One dissident responded that the low infant mortality rate is attributable to high rates of abortion. He said that when doctors learn of potential birth defects prior to birth, they strongly encourage expectant mothers to have an abortion. "Our abortion rate is a statistic you'll never hear in Cuba," he said. The United Nations estimates that Cuba's abortion rates have fluctuated between 47 and 62 abortions per 1,000 women.⁵⁹ The dissident said, "If U.S. health inspectors came to Cuba, they'd shut down almost every clinic."

B. Education

⁵⁸ See Arlin Alberty Loforte, *Cuba Registers Lowest Infant Mortality Rate in Its History—4.2 per 1,000 Live Births*, GRANMA (Jan. 5, 2015) <http://en.granma.cu/cuba/2015-01-05/cuba-registers-lowest-infant-mortality-rate-in-its-history-42-per-1000-live-births>; see also *The World Factbook*, CENTRAL INTELLIGENCE AGENCY, <https://www.cia.gov/library/publications/the-world-factbook/rankorder/2091rank.html>.

⁵⁹ *Abortion Policies: A Global Review*, UNITED NATIONS, <http://www.un.org/esa/population/publications/abortion/doc/cubasr1.doc>.

In Cuba, everyone has access to education. Cuba spends about 10 percent of its central budget on education, compared with 2 percent in the United States.⁶⁰ Its literacy rate is 99.8 percent.⁶¹ A tour guide at the University of Havana explained that after high school, students take several placement tests and then apply for 10 majors. Based on the placement scores, among other factors, they are admitted into a major. Most majors require five years of coursework, though some, such as medicine, require six. Graduation is followed by two years of “service.” The tour guide explained, “Service is like our way of paying for our education, since it is free here in Cuba.” Service entails working in a job to which the government assigns graduates based on demand and skill. Many Cubans discussed the convenience of avoiding the job search altogether. For example, Falcón of ICAP said, “After you all graduate, you will have to find your own jobs. In Cuba, the government gives you a job.” Another attorney from the National Union of Cuban Jurists said, “This is the only country in the world that gives you a job. Everywhere else, you have to look for a job.”

But many Cubans criticize the country’s education system. Cuban blogger Yoani Sánchez explained:

In Cuba, there are a lot of myths and stereotypes that have been exported—for example, education. When someone complains in Cuba about the lack of

⁶⁰ *Latin Lessons: What Can We Learn from the World’s Most Ambitious Literacy Campaign?*, THE INDEPENDENT (Nov. 7, 2010), <http://www.independent.co.uk/news/world/americas/latin-lessons-what-can-we-learn-from-the-worlds-most-ambitious-literacy-campaign-2124433.html>.

⁶¹ *The World Factbook*, CENTRAL INTELLIGENCE AGENCY, <https://www.cia.gov/library/publications/the-world-factbook/fields/2103.html>.

liberty and the lack of a free press or about the censorship of information, they're told essentially "shut up" because in the end you've been educated by that same system for free.⁶²

Yet the school system lacks "proper textbooks," and Cuban education involves "fierce political indoctrination," Sánchez said.⁶³ Teachers are paid on average less than \$20 per month and at most \$30 per month.⁶⁴ Sánchez described the "mass exodus" of teachers to other professions, including prostitution.⁶⁵ As a result, children must sit in front of TVs for teleclasses because there are not enough teachers.⁶⁶ "Yes, we have 'free' education," one dissident said. "But at what cost?"

V. CONCLUSION

Despite constitutional guarantees, the Cuban government severely restricts free speech, free press, and internet access. Many Cubans are nervous to speak out against the government—and for good reason given the high number of arbitrary detentions and arrests of activists and dissidents. While the United States continues to express an interest in ensuring Cuba respects its citizen's human rights, which include the freedom to speak freely and the right to self-expression, it is not yet clear what impact the normalization of relations between the United States and Cuba will have on human rights in Cuba.

⁶² Hinojosa, *supra* note 30.

⁶³ *Id.*

⁶⁴ *Id.*

⁶⁵ *Id.*

⁶⁶ *Id.*