

U.S. ECONOMIC SANCTIONS UPDATE: IRAN



UNITED STATES IMPOSES ADDITIONAL SANCTIONS AGAINST IRAN

On June 24, 2019, The United States imposed additional sanctions against Iran. The additional sanctions expand the universe of Iranian SDNs (sanctions targets) and require U.S. persons to block the property of and refrain from transactions with:

- (a) the Supreme Leader of the Islamic Republic of Iran and the Iranian Supreme Leader's Office (SLO); or (ii) any person determined by the Secretary of the Treasury, in consultation with the Secretary of State;
- (b) to be a person appointed by the Supreme Leader of Iran or the SLO to a position as a state official of Iran, or as the head of any entity located in Iran or any entity located outside of Iran that is owned or controlled by one or more entities in Iran;
- (c) to be a person appointed to a position as a state official of Iran, or as the head of any entity located in Iran or any entity located outside of Iran that is owned or controlled by one or more entities in Iran, by any person appointed by the Supreme Leader of Iran or the SLO;
- (d) to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of any person whose property and interests in property are blocked pursuant to this section;
- (e) to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly any person whose property and interests in property are blocked pursuant to this

section; or (E) to be a member of the board of directors or a senior executive officer of any person whose property and interests in property are blocked pursuant to this section.

The additional sanctions:

- authorize the imposition of sanctions on a foreign financial institution upon a determination that the foreign financial institution has knowingly conducted or facilitated any significant financial transaction for or on behalf of any person whose property and interests in property are blocked under the additional sanctions (persons described above);
- prohibit donations to any person whose property and interests in property are blocked under the additional sanctions (persons described above) and prohibit such persons from entering the United States; and
- define the term "United States person" to mean any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States.

Questions and Guidance

Should you wish to discuss any questions or need additional guidance regarding any aspect of the foregoing or sanctions involving other countries (Iran, Syria, Cuba, North Korea, Russia, the Crimea region of Ukraine, Venezuela (presently only SDNs)) or Russian and other entities or individuals subject to U.S. economic sanctions (*e.g.*, OFAC SDN List), please contact us.

The Eren Law Firm will continue to closely monitor developments with respect to the implementation of the additional sanctions against Iran and provide further guidance, as necessary.

For more information or questions regarding the subject covered in this *Economic Sanctions Update*, please contact:

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The Eren Law Firm is an economic sanctions boutique. Its other core areas of concentration and practice include corporate transactions, and international dispute resolution, anti-money laundering, and international trade regulation. The Firm's clients from around the world include banks and

financial institutions; insurance, reinsurance and other financial services companies; natural resource extraction companies, industrial companies, marine and air transportation companies, ship owners; sovereign governments; foreign state enterprises; and individuals.

Mr. Eren and Mr. Pinter of the Firm served in senior positions at the U.S. Treasury's Office of Foreign Assets Control (OFAC), the U.S. government agency that administers and enforces U.S. economic sanctions, for a combined 25 years prior to entering private law practice, respectively 18 and 16 years ago, and since this time, they have devoted and continue to devote most of their time in private practice to economic sanctions issues and matters, particularly those involving Iran. Mr. Pinter was OFAC's Chief of Licensing for 17 years during which time he was one of the chief arbiters of OFAC decisions. Mr. Eren's portfolio at Treasury mainly involved issues and matters involving Iran and the former Yugoslavia.

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