



Sanctions

Moderator: Anthony Christino III
Director
Foreign Policy Division, BIS



U.S. DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY



Sanctions Panel

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Panelists

- ◆ **Andrea Gacki, Assistant Director for Licensing, Office of Foreign Assets Control (OFAC), Treasury**
- ◆ **Aydin Akgün, Program Manager, TSRA Licensing, OFAC, Treasury**
- ◆ **John-Marshall Klein, Foreign Affairs Officer, Office of Terrorism Finance and Economics Sanctions Policy, State**



2012 Developments

**Bureau of Industry and Security
U.S. Department of Commerce**

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|  | <h2><i>Iran</i></h2> |  |
| <ul style="list-style-type: none"> ◆ January 2012: Additional Iran Sanctions Act (ISA) export prohibitions imposed <ul style="list-style-type: none"> ● FAL Oil Company Limited (United Arab Emirates) ● Kuo Oil (S) Pte. Ltd (Singapore) ● Zhuhai Zhenrong Company (China) ◆ February 2012: EAR § 744.19 amended <ul style="list-style-type: none"> ● Denial policy for applications involving parties sanctioned pursuant to ISA | | |

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|  | <h2><i>Syria</i></h2> |  |
| <ul style="list-style-type: none"> ◆ August 2011: Executive Order 13582 signed <ul style="list-style-type: none"> ● Blocks property of the Government of Syria and prohibits certain transactions with respect to Syria ● OFAC General License No. 4 authorizes certain exports and reexports licensed by BIS and transactions ordinarily incident thereto ◆ December 2011: EAR General Order No. 2 and § 746.9 amended <ul style="list-style-type: none"> ● Facilitates public awareness and compliance | | |

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|  | <h2><i>Syria</i></h2> |  |
| <ul style="list-style-type: none">◆ April 2012: Executive Order 13606 (GHRVITY) signed<ul style="list-style-type: none">● Blocks property of and suspends entry into the United States by certain persons with respect to grave human rights abuses by the Governments of Iran and Syria via information technology● OFAC General License No. 4A authorizes certain exports and reexports licensed by BIS and transactions ordinarily incident thereto<ul style="list-style-type: none">◆ <i>Replaces and Supersedes General License No. 4</i> | | |

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|  | <h2><i>United Nations Arms Embargos</i></h2> |  |
| <ul style="list-style-type: none">◆ July 2012: EAR Parts 732, 738, 746 and 774 amended<ul style="list-style-type: none">● Updates and clarifies implementation of U.N. arms embargos in EAR | | |



Questions?



**For general inquiries on foreign policy-
based export controls call:
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