
Treasury Department Imposes New Sanctions Against Iran and Clarifies Russia Cyber Sanctions

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New Iran Designations

On Friday, the US Treasury Department's Office of Foreign Assets Control (OFAC) designated 25 individuals and entities under Executive Orders 13382 and 13224 for their roles in procuring technology and/or materials in support of Iran's ballistic missile program and for acting on behalf of Iran's Revolutionary Guard Corps-Qods Force. OFAC stated that these designations were "fully consistent with" US commitments under the Joint Comprehensive Plan of Action because they were taken in response to Iran's ballistic missile testing, rather than its nuclear program. OFAC's actions did not reflect an expansion of current sanctions against Iran, but followed a White House statement earlier in the week that the United States was placing Iran "on notice" for engaging in "provocative" ballistic missile testing.

Russia Cyber Sanctions

Last week, OFAC also announced a new [general license](#) under Executive Order 13757, which President Obama had issued to [sanction](#) various Russian persons and entities involved in malicious cyber-enabled activities during the US presidential election. The general license authorizes "[r]equesting, receiving, utilizing, paying for, or dealing in licenses, permits, certifications, or notifications issued or registered by the Federal Security Service...for the importation, distribution, or use of information technology products in the Russian Federation." This authorization permits US and non-US companies exporting US-origin technology to the Russian Federation to engage the Russian security service in regulatory approval processes, provided that the export is otherwise licensed by the US Commerce Department, the payment of any regulatory fees to the Federal Security Service does not exceed \$5,000 per calendar year, and the Federal Security Service is not the end user of the exported technology. The general license seeks to ensure that authorized exports of US-origin information technology for use in Russia are not impeded by Executive Order 13757 as an unintended collateral consequence of OFAC sanctions.

Authors



Ronald I. Meltzer

SENIOR COUNSEL

✉ ronald.meltzer@wilmerhale.com

☎ +1 202 663 6389