September 11, 2017

Dean, School of Engineering & Applied Science Jayathi Murthy  
Dean, Graduate School of Education & Information Studies Marcelo M Suárez-Orozco  
Dean, Division of Social Sciences Darnell M. Hunt  
Dean, School of Public Affairs Gary Segura  
Dean, School of Medicine Kelsey Martin  
Dean, School of Nursing Linda Sarna  
Dean, Anderson School of Management Judy D. Olian  
Dean, School of Dentistry Paul Krebsbach  
Dean, School of Public Health Jody Heymann  
Dean, Division of Physical Sciences Miguel Garcia-Garibay  
Dean, Continuing Education and UCLA Extension Wayne Smutz  
Dean, School of Law Jennifer Mnookin  
Dean, School of Theater, Film & Television Teri Schwartz  
Dean, Division of Life Sciences Victoria L. Sork  
Dean, Division of Humanities David Schaberg  
Dean, School of the Arts & Architecture David Rousseve

Dear Colleagues:

I am writing to ask you to remind faculty and staff within your respective schools and divisions that any travel to Iran for research or other professional activities is prohibited without prior approval from the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC). OFAC administers and enforces a comprehensive trade embargo against Iran as set forth in the Iranian Transactions and Sanctions Regulations (ITSR). These regulations apply to U.S. Iranian dual citizens, U.S. citizens, and permanent residents.

My request is prompted by a recent experience at another UC campus after a member of their faculty travelled to Iran to attend a ceremony and accept a prize without prior approval from OFAC. Under export control regulations, the campus was compelled to disclose the violation to OFAC once they learned about it. In response, OFAC issued a Cautionary Letter indicating that “accepting the prize, agreeing to attend the ceremony, and traveling to Iran for the purpose of attending the ceremony” violated federal export control regulations.

Please note that OFAC has the discretion to impose civil penalties and can take further action if warranted. Each violation of the ITSR is subject to a civil monetary penalty of up to the greater of $289,238 or twice the value of each underlying transaction.
The ITSR generally prohibit almost all direct or indirect commercial, financial, or trade transactions with Iran unless authorized by OFAC through a license, or exempted by statute. This includes the following types of activities:

- Attending a conference or award ceremony
- Presenting at an academic conference
- Providing technical assistance
- Sharing unpublished data/research results
- Teaching
- Conducting research

The Office of Research Policy & Compliance serves as the campus point of contact for all Export Control questions and license applications. Please contact Ann Pham, UCLA Export Control Administrator, at ann.pham@research.ucla.edu to discuss the details of any proposed travel to or engagements with Iran to ensure full compliance with OFAC regulations. UCLA has obtained OFAC licenses in the past. Please note that the process can take up to six months.

Sincerely,

Roger M. Wakimoto, Ph.D.
Vice Chancellor for Research

Cc: Ann Pollack, Assistant Vice Chancellor - Research
    Claudia Modlin, Assistant Director, RPC
    Ann Pham, Export Control Administrator