

Travel to Iran

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QUICK REVIEW

EXPORT CONTROLS

The **federal laws and regulations** that have been established by the U.S. government to control:

- The export of sensitive equipment, software, and technology
- Trade and financial transactions

These controls are in place to promote national security interests and foreign policy objectives.

REGULATING AGENCIES



THE STORY

AT ANOTHER UC . . .

- A faculty member travelled to Iran **WITHOUT A LICENSE** to accept an award
- Upon his return, he contacted the campus' export control officer to collect the award money
- Campus had to voluntarily disclose the trip and activities to OFAC

WHY DISCLOSE?

IRANIAN TRANSACTIONS and SANCTIONS REGULATIONS (ITSR)

- Almost all direct or indirect commercial, financial, or trade transactions with Iran by U.S. persons or within the United States are prohibited
- These transactions require written authorization (license) from OFAC

THE CAUTIONARY LETTER

THREE VIOLATIONS – 31 C.F.R 560

- Accepting the prize
- Agreeing to attend the award ceremony
- Travelling to Iran for the purpose of attending the ceremony

THE WARNING

- Each violation of the ITSR ≤ **\$289,238**
- OFAC can take future enforcement action and impose civil monetary penalties if additional information warrants renewed attention
- OFAC will “forgive” but will not forget

CONCLUSIONS

- Vice Chancellor for Research sent a memo to all Deans in September 2017
- Contact RPC to discuss proposed travel to or engagements with Iran – conference, award ceremony, teaching, research
- OFAC licenses can take up to six months

CONTACT

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