
Reminder about Iran Sanctions

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What are Sanctions?

Trade and Economic Sanctions: limitations that the federal government imposes on countries or individuals that restrict certain transactions and activities that U.S. persons and entities – like UCLA – can undertake.

There are several types of sanctions programs:

- **Selective:** prohibitions directed against named individuals or entities within a country often via published lists (e.g., “Entity List” “Specially Designated Nationals” “Unverified List”), and
- **Comprehensive:** broad prohibitions on all transactions occurring within a named country
- **Comprehensively sanctioned countries:** [Iran](#), [Cuba](#), [North Korea](#), [Syria](#), and the [Crimea Region of Ukraine](#)

OFAC: Office of Foreign Assets Control; responsible for enforcing sanctions programs

A Reminder about Sanctions

The Export Control Team will help determine if a specific OFAC license is required for a particular activity. If so, we will apply for one.

OFAC license: grants permission for a U.S. person or entity to undertake an otherwise restricted activity or transaction

- **General:** broadly authorizes the performance of certain categories of prohibited activities (requires specific terms and conditions are met and documented)
- **Specific:** written authorization issued on a case-by-case basis to a particular person/entity authorizing a particular transaction (can take 6-12 months to obtain)

Good news! Depending on the country-specific regulations, some activities may require a specific license. If a specific license is needed, our office will prepare and submit a license request on your behalf. Contact us so we can review your plans in advance to make the right determinations: export.controls@research.ucla.edu.

A Reminder about Iran Sanctions

Iran Transactions and Sanctions Regulations (ITSR) are broad and may impact many UCLA activities. Email export.controls@research.ucla.edu for assistance.

ITSR: a decades-old sanctions program the U.S. government has imposed on Iran that impacts many UCLA activities and transactions; not related to U.N. sanctions

In August 2020, Deans distributed a reminder memo to Schools describing the types of activities restricted under ITSR. Examples of prohibited activities (non-exhaustive):

- **attending or presenting** (*virtual or in-person*) at a conference or ceremony in Iran
- **conducting research or teaching** in Iran or for an Iranian entity
- **transferring funds, goods, or unpublished data** to or from Iranian entities

Good news! Under ITSR, some activities may require a specific license. If a specific license is needed, our office will prepare and submit a license request on your behalf. Please contact us at export.controls@research.ucla.edu so we can review your plans in advance to make the right determinations.

Summary

Federal trade and economic sanctions programs are broad and impact many UCLA activities and transactions.

Transactions involving comprehensively sanctioned countries (Iran, Cuba, North Korea, Syria, Crimea Region of Ukraine) require a case-by-case review by our office to safeguard the institution and UCLA individuals from civil and criminal penalties.

The Export Control Team in RPC can help you determine if an OFAC license is required for an activity, and then apply for it.

For assistance, please email export.controls@research.ucla.edu or call 310-794-6856.

We are here to help the UCLA community! Thank you.