



## **NEW SANCTIONS WITH RESPECT TO IRAN**

In yet another step within the sanctions' approach adopted by the Trump administration to bring Iran to renegotiate the JCPOA, President Trump signed on 24 June 2019 an executive order blocking and prohibiting the transfers, payments, export or withdrawal or otherwise any dealing with:

1. The Supreme Leader of the Islamic Republic of Iran and the Iranian Supreme Leader's office (SLO);  
or,
2. Any person determined by the Secretary of the Treasury, in consultation with the Secretary of State:
  - a. To be a person appointed by the supreme leader or the SLO as a state official or the head of any entity located in Iran or any entity or as the head of any entity located in Iran or any entity located outside of Iran that is owned or controlled by one or more entities in Iran, by any person appointed by the Supreme Leader of Iran or the SLO;
  - b. To be a person who has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of any person whose property and interests in property are blocked pursuant to this section;
  - c. To be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly any person whose property and interests in property are blocked pursuant to this section; and,
  - d. To be a member of the board of directors or a senior executive officer of any person whose property and interests in property are blocked pursuant to this section.

These prohibitions include making any contributions or provision of funds, goods or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order.

The Secretary of the Treasury, in consultation with the Secretary of State, is authorized to impose sanctions on a foreign financial institution upon determining that such foreign financial institution has knowingly conducted or facilitated any significant financial transaction for or on behalf of any person whose property and interests in property are blocked pursuant to this order

Also, the Treasury Department updated the OFAC Specially Designated Nationals List adding the names and designations of 9 individuals believed to be relevant to the recent events in the Sea of Oman area.

**DS Avocats Customs & Trade team is at your disposal to provide you with any additional information.**

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**LES BRÈVES**

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FAIRE**

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Les Brèves ont pour but de donner un aperçu des développements juridiques récents. Leur contenu n'exprime pas un avis juridique et ne saurait se substituer à une consultation juridique.