OFAC Office of Foreign Assets Control

LEBANON SANCTIONS PROGRAM

This document is explanatory only and does not have the force of law. Please see particularly Executive Order 13441 and the implementing regulations pertaining to Lebanon (31 C.F.R. Part 549) for legally binding provisions governing the sanctions. This document does not supplement or modify the Executive Order or the regulations.



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SANCTIONS RELATING TO LEBANON

I. INTRODUCTION

The Office of Foreign Assets Control (OFAC) has implemented a Lebanon sanctions program since August 1, 2007, when the President issued Executive Order (E.O.) 13441, "Blocking Property of Persons Undermining the Sovereignty of Lebanon or Its Democratic Processes and Institutions."

II. OVERVIEW OF AUTHORITIES

On August 1, 2007, the President issued E.O. <u>13441</u> pursuant to, *inter alia*, the <u>International Emergency Economic Powers Act</u>, (50 U.S.C. 1701 *et seq.*), and the <u>National Emergencies Act</u>, (50 U.S.C. 1601 *et seq.*). In E.O. 13441, the President determined that the actions of certain persons to undermine Lebanon's legitimate and democratically elected government or democratic institutions, to contribute to the deliberate breakdown in the rule of law in Lebanon, including through politically motivated violence and intimidation, to reassert Syrian control or contribute to Syrian interference in Lebanon, or to infringe upon or undermine Lebanese sovereignty contribute to political and economic instability in that country and the region and constitute an unusual and extraordinary threat to U.S. national security and foreign policy.

On July 30, 2010, OFAC issued the Lebanon Sanctions Regulations (the "Regulations"), implementing E.O. 13441. See 31 C.F.R. Part 549 for details.

This fact sheet is a broad summary of the sanctions currently in place. For an updated list of authorities and sanctions please refer to the OFAC's website at: http://www.treasury.gov/resource-center/sanctions/Programs/pages/leb.aspx.

III. PROHIBITED TRANSACTIONS

E.O. 13441 and the Regulations block the property and interests in property of persons (which includes individuals and entities) determined by the Secretary of the Treasury, in consultation with the Secretary of State:

- To have taken, or to pose a significant risk of taking, actions, including acts of violence, that have the
 purpose or effect of undermining Lebanon's democratic processes or institutions, contributing to the
 breakdown of the rule of law in Lebanon, supporting the reassertion of Syrian control or otherwise
 contributing to Syrian interference in Lebanon, or infringing upon or undermining Lebanese sovereignty;
- To have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, such actions, including acts of violence, or any person whose property and interests in property are blocked pursuant to E.O. 13441;
- To be a spouse or dependent child of any person whose property and interests in property are blocked pursuant to E.O. 13441; or
- To be owned or controlled by, or acting or purporting to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to E.O. 13441.

The names of individuals and entities designated pursuant to E.O. 13441 or the Regulations, whose property and interests in property are therefore blocked, are published in the *Federal Register* and incorporated into OFAC's Specially Designated Nationals and Blocked Persons List (SDN List) with the identifier "[LEBANON]." The SDN List is available through the following page on OFAC's website at http://www.treasury.gov/sdn.

Unless otherwise authorized or exempt, transactions by U.S. persons or in or involving the United States are prohibited if they involve transferring, paying, exporting, withdrawing, or otherwise dealing in the property or interests in property of an entity or individual listed on the SDN List. The property and interests in property of an

entity that is 50% or more owned, whether individually or in the aggregate, directly or indirectly, by a person on the SDN List are also blocked, regardless of whether the entity itself is listed.

IV. AUTHORIZED TRANSACTIONS

GENERAL LICENSES

OFAC may authorize certain types or categories of activities and transactions, which would otherwise be prohibited by the Regulations, by issuing a general license. General licenses may be published in the Regulations or on OFAC's website. For example, the provision of certain legal services to or on behalf of persons whose property and interests in property are blocked pursuant to 31 C.F.R. § 549.201(a) is authorized, provided that all receipts of payment of professional fees and reimbursement of incurred expenses must be specifically licensed. See 31 C.F.R. § 549.507. For an updated list of general licenses relating to the Lebanon sanctions program, please see 31 C.F.R. Part 549, Subpart E, and visit: http://www.treasury.gov/resource-center/sanctions/Programs/pages/leb.aspx.

SPECIFIC LICENSES

On a case-by-case basis, OFAC considers applications for specific licenses to authorize transactions that are neither exempt nor covered by a general license. Requests for a specific license must be submitted to OFAC's Licensing Division. License requests may be submitted using any of these three methods:

- Online: http://www.treasury.gov/resource-center/sanctions/Pages/licensing.aspx
- Fax: (202) 622-1657
- U.S. mail: Assistant Director for Licensing, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, NW, Washington, DC 20220

V. PENALTIES

Civil monetary penalties of up to the greater of \$250,000 or twice the amount of the underlying transaction may be imposed administratively against any person who violates, attempts to violate, conspires to violate, or causes a violation of E.O. 13441 or the Regulations. Upon conviction, criminal fines of up to \$1,000,000, imprisonment for up to 20 years, or both, may be imposed on any person who willfully commits or attempts to commit, or willfully conspires to commit, or aids or abets in the commission of a violation of E.O. 13441 or the Regulations.

This document is explanatory only and does not have the force of law. Please see particularly E.O. 13441 and the Regulations, among other authorities, for the legally binding provisions governing the sanctions. This document does not supplement or modify E.O. 13441 or the Regulations.

The Treasury Department's Office of Foreign Assets Control also administers sanctions programs involving the Balkans, Belarus, Burma, the Central African Republic, Côte d'Ivoire, Cuba, Democratic Republic of the Congo, Rough Diamond Trading (Kimberly Process), Iran, Iraq, Liberia, Libya, the Magnitsky Act, North Korea, Somalia, South Sudan, Syria, Ukraine, Yemen, and Zimbabwe, as well as highly enriched uranium, persons who commit, threaten to commit, or support terrorism, international narcotics traffickers, Foreign Terrorist Organizations, Terrorism List Governments, transnational criminal organizations, and proliferators of weapons of mass destruction and their supports. For additional information about these programs or about sanctions relating to Lebanon, please contact:

OFFICE OF FOREIGN ASSETS CONTROL

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