



# U.S. Sanctions Update

as of October 2023

Country	Guidance	Practice Pointers
In General	U.S. Persons prohibited from transactions with anyone on the <b>OFAC SDN List</b> without a license, <i>regardless of country</i> . <sup>1</sup> Includes entities <i>owned</i> in excess of 50-percent by one or more SDNs (33-percent for select Russian nationals). Exports to those on the <b>BIS Entity List</b> prohibited without export license. <sup>2</sup>	<b>Identify ownership</b> of parties and <b>screen on a regular basis</b> . <b>Understand export categorizations</b> and <b>screen</b> all international customers.
Russia	<b>Significant restrictions across critical Russian industries</b> , including oil & gas, energy, finance & banking, technology, metals and mining, and more. Subject to <b>price cap on Russia-origin crude</b> . Threat of <b>potential secondary sanctions</b> on certain activities. <b>Expanded license requirements</b> on export controls on all items on the CCL.	<b>Stay current on regulations</b> and <b>carefully screen all parties</b> . <b>Vet all parties thoroughly</b> for ultimate beneficial ownership. Work with counsel to ensure <b>transactions properly structured</b> .
Crimea, LNR/DNR regions	<b>Near complete embargos</b> of Ukrainian regions subject to Russian occupation, prohibiting nearly all transactions without a license.	Consider these areas <b>blacklisted</b> .
China	Escalating <b>tensions</b> leading to continued increase in restrictions. <i>Expect this trend to continue</i> in the foreseeable future. Various restrictions between <b>export controls and sanctions prohibitions</b> . Increasing number of <b>SDNs</b> under various programs, including further designations in <b>Hong Kong</b> . Significant <b>BIS export controls</b> , including restrictions on China’s ability to acquire <b>advanced computing capabilities</b> .	<b>Vet all parties thoroughly</b> for ultimate beneficial ownership. Work with counsel to <b>identify export classifications</b> and <b>obtain proper licenses</b> .
Cuba, Syria, & South Sudan	<b>Severely restrictive embargos</b> prohibiting most transactions without a license. <b>Prohibition on direct/indirect financial transactions</b> , for which the ultimate beneficiaries are Restricted Entities and Subentities Associated with Cuba.	Consider these areas <b>effectively blacklisted</b> . <b>Cuba</b> has some <b>limited exceptions</b> .
Iran & North Korea	<b>Near complete embargos</b> , prohibiting nearly all transactions without a license. <b>Secondary sanctions</b> restrict foreign entities from engaging.	Consider these areas <b>blacklisted</b> .
Venezuela	Transactions with <b>Venezuelan government and related entities</b> effectively <b>blocked or extremely limited</b> . General Licenses may authorize <i>limited</i> transactions. <b>General License 44</b> authorizes transactions with the <b>Venezuelan oil and gas industry</b> (including PdVSA), subject to certain limitations.	<b>Vet all parties thoroughly</b> for ultimate beneficial ownership. Work with counsel to ensure <b>transactions properly structured</b> .
Other Notes	Other <b>country specific sanctions programs</b> : Balkans, Belarus, Burma, Central African Republic, Darfur, Democratic Republic of the Congo, Ethiopia, Hong Kong, Iraq, Lebanon, Libya, Mali, Nicaragua, Somalia, Sudan, Western Balkans Region, Yemen, & Zimbabwe. <b>Policy for denial on export of defense items</b> : Belarus, Burma, China, Cuba, Iran, North Korea, Syria, & Venezuela. <b>Policy for denial on export of defense items &amp; services with some exceptions</b> : Afghanistan, Central African Republic, Cyprus, Democratic Republic of Congo, Eritrea, Haiti, Iraq, Lebanon, Libya, Somalia, Sudan/South Sudan, Zimbabwe. <b>OFAC sanctions compliance program guidance</b> "A Framework for OFAC Compliance Commitments." <sup>3</sup>	
Recent Updates	<b>Sanctions relief for Venezuela</b> in the form of various General Licenses. <b>General License 44</b> authorizes transactions related to the <b>Venezuelan oil and gas industry</b> (including with PdVSA), subject to certain limitations. Release of Russia-related guidance titled “Advisory for the Maritime Oil Industry and Related Sectors.” <b>Significant strengthening of export controls</b> related to the <b>provision of semiconductor technology to China</b> . <b>Conflict in the Middle East</b> will likely lead to <b>new regulations</b> , including potential sanctions designations, export controls, and a <b>rise in anti-boycott enforcement</b> .	

<sup>1</sup> The SDN List is available at: <https://sdnsearch.ofac.treas.gov/>.

<sup>2</sup> BIS Entity List available at: <https://www.bis.doc.gov/index.php/documents/regulations-docs/2326-supplement-no-4-to-part-744-entity-list-4/file>

<sup>3</sup> “A Framework for OFAC Compliance Commitments” available at: [https://home.treasury.gov/system/files/126/framework\\_ofac\\_cc.pdf](https://home.treasury.gov/system/files/126/framework_ofac_cc.pdf)