

MEMO# 31177

April 20, 2018

ICI Letter to OFAC Regarding the April 6, 2018 Russia Sanctions

[31177]

April 20, 2018 TO: ICI Global Investing Subcommittee

ICI Global Regulated Funds Committee

SEC Rules Committee RE: ICI Letter to OFAC Regarding the April 6, 2018 Russia Sanctions

On April 6, 2018, the Office of Foreign Assets Control (OFAC) designated a number of Russian oligarchs, companies, and government officials and they were added to the List of Specially Designated Nationals and Blocked Persons (SDN List). The US Government also issued two general licenses to help minimize the impact of the new sanctions on US persons and allies. General License 12 authorizes US persons to engage until June 5, 2018, in all transactions and activities ordinarily incident and necessary to the maintenance or wind down of operations, contracts, or other agreements involving the twelve oligarch-related SDN companies and their subsidiaries. General License 13 authorizes US persons to divest or transfer to a non-US person, or to facilitate the transfer by a non-US person to another non-US person, of debt, equity, or other holdings of three of the twelve entities also covered by General License 12 until May 7, 2018. Such divestment, transfer or facilitation cannot be to, in or with any SDN. Detailed information on the sanctions is available on Treasury's website - <https://home.treasury.gov/news/press-releases/sm0338> [home.treasury.gov].

The sanctions and general licenses have raised numerous questions and concerns for fund managers and the industry more broadly. We sent the attached letter to OFAC on April 19 raising the most pressing issues that we and members have identified thus far for which additional guidance from OFAC is needed. We will continue to update members on developments related to this matter.

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[Attachment](#)

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