

MEMO# 14014

October 3, 2001

OFAC PROVIDES FURTHER INFORMATION FOR COMPLIANCE WITH SEPTEMBER 24, 2001 EXECUTIVE ORDER

URGENT [14014] October 3, 2001 TO: INTERNATIONAL OPERATIONS ADVISORY COMMITTEE No. 6-01 RE: OFAC PROVIDES FURTHER INFORMATION FOR COMPLIANCE WITH SEPTEMBER 24, 2001 EXECUTIVE ORDER Last week, President Bush signed an executive order freezing the assets of 27 known or suspected terrorists or terrorist organizations.¹ Today, the Office of Foreign Assets Control (OFAC)² issued a bulletin for immediate implementation providing further descriptive information on the individuals and entities whose assets were frozen by that executive order. This information is critical in determining the disposition of interdicted items and accounts. A copy of the OFAC bulletin is attached and also is available on the OFAC web site at <http://www.treas.gov/ofac/bulletin.txt>. 1 See Memorandum dated September 24, 2001 to Bank and Trust Advisory Committee (No. 17-01), Broker/Dealer Associate Members (No. 6-01), Compliance Advisory Committee (No. 38-01), International Members (No. 14-01), Primary Contacts – Member Complex (No. 68-01), SEC Rules Members (No. 61-01) and Transfer Agent Advisory Committee (No. 65-01). 2 OFAC regulations require US persons, including investment companies, to block all accounts and assets of Specially Designated Nationals (SDNs). For an overview of OFAC regulations and a description of the various measures that mutual fund organizations may wish to consider adopting to ensure compliance with those regulations, refer to the Institute’s paper entitled “Foreign Assets Control Compliance for Mutual Funds.” This paper is available on the Institute’s members’ website at <http://members.ici.org>. The members’ website is password-protected; staff at Institute member firms may request access codes by filling out the enrollment form on the website. 2 If you have questions about OFAC compliance please contact Frances Stadler (phone 202-326-5822; e-mail frances@ici.org) or me (phone 202-371-5430; e-mail rcg@ici.org), or contact OFAC Compliance directly at 202-622-2490. Robert C. Grohowski Associate Counsel Attachment (in .pdf format)