



CLIENTBRIEF

Economic Sanctions & Humanitarian Activities









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The Eren Law Firm Assists US NGOs and Humanitarian Organizations in Obtaining US Government (OFAC and BIS) Licenses to Export Food, Medicine and other Relief Shipments to and Conduct Activities in Cuba, Sudan, Iran, Burma and other countries

Humanitarian and relief organizations face many challenges in their noble and indispensable mission to alleviate humanitarian crises and suffering around the world. Government regulation of such activities adds to these challenges. For example, under economic sanctions administered by the U.S. Treasury's Office of Foreign Assets Control (OFAC), humanitarian and religious activities in and shipments and donations to countries subject to U.S. economic sanctions require exemption from regulation or prior OFAC authorization.

Cuba, Iran, Burma, Sudan and Syria are countries subject to U.S. economic sanctions. Additionally, certain humanitarian shipments from the United States, or by U.S. persons (or involving U.S. origin items) to various countries may require separate and/or additional authorization from the U.S. Commerce Department and also involve consultations with the U.S. State Department.

The Eren Law Firm has unparalleled capabilities and strengths in the area of financial and trade regulation, particularly when it comes to dealing with laws and regulations administered by OFAC, which impact NGOs and humanitarian organizations. Mr. Eren and Mr. Pinter, who jointly served at OFAC for 25 years prior to coming to the firm, both dealt with issues involving, among others, the activities of NGOs and humanitarian organizations in countries subject to U.S. economic sanctions. Mr. Pinter was the Chief of Licensing at OFAC for many years.

As Chief of Licensing at OFAC, Mr. Pinter oversaw and was involved in all aspects of OFAC licensing, including but not limited to, inter-agency policy deliberations. At OFAC, Mr. Pinter was the prime arbiter of all OFAC licensing decisions. Counsel to The Eren Law Firm, Mr. Victor Comras, is a retired career diplomat of the United States. Mr. Comras served at the U.S. State Department (the U.S. foreign ministry) for 35 years until his retirement in 2001 with the permanent rank of Minister, and while at the State Department was responsible for the formulation and implementation the policies underlying economic sanctions and trade controls. After the State Department, Mr. Comras served as a consultant to the UN. Mr. Comras is a leading expert on the larger, big-picture aspects international trade embargoes and economic sanctions, and the global effort to combat terrorism financing and money laundering. Mr. Eren





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served at OFAC between 1992 and 2000 with Mr. Pinter and concentrated on the complex financial aspects of licensing matters.

The Eren Law Firm advises and represents clients with respect to all aspects of federal regulation, including but not limited to, those aspects which impact clients' activities involving countries subject to U.S. economic sanctions. The firm advises clients on exemptions and ensures that clients take the proper and most efficient approach to obtaining required approvals and that required registrations and/or license applications are prepared and submitted correctly the first time. Our experience and knowledge reduces the time and other costs, including fees for legal services, associated with obtaining legal opinions and procuring approvals or clearances from various U.S. government agencies such as the U.S Treasury, State and Commerce Departments. The firm also keeps clients apprised of changes to sanctions and export control laws and regulations.

We know that hunger, disease relief, and spiritual mission should not be unduly delayed, hampered or prevented from being delivered, and we stand ready to do our utmost to ensure that U.S. NGOs and humanitarian organizations are able to provide humanitarian assistance as quickly as possible in full compliance with the law.

The Eren Law Firm is a leading boutique firm that specializes in the areas of economic sanctions, export controls, anti-money laundering, bank regulation and supervision, and related enforcement defense. The Firm also represents clients in courts and arbitration fora in connection with disputes involving banking, finance and investment matters. The Firm's select and diverse group of clients includes U.S. and non-U.S. financial institutions, U.S. and non-U.S. companies, U.S. NGOs, and sovereign governments.

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