

Circular From WOE**Date: 31 August 2016****Iran Sanctions - Effects on Travellers to the USA**

The Club's US attorneys Freehill Hogan & Mahar recently clarified with OFAC the impact of continuing US primary sanctions against Iran on non-US persons travelling to the United States.

OFAC's view was clear and unequivocal; any person in the US for any period of time becomes a "US person" for purposes of the US primary sanctions against Iran and as such they must not enter into any discussions or communications by telephone or e-mail or any other means which concern Iran or Iranian entities. To do so would be a violation of US primary sanctions. Even a person who is merely changing flights at a US airport for a few hours becomes a "US person" for these purposes and subject to the restrictions.

Members should therefore be aware that, for example, chartering or operations staff who are on business trips or holidays to the United States may not enter into any discussions or correspondence over Iranian fixtures.

Any Member with questions concerning the impact of these measures and any other sanctions matters should contact the Managers.

Source of Information: West of England P&I Club