



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

Case No. IA-2012-297091-2

International Society for Children with Cancer
c/o Ali M. M. Mojdehi, Esq.
Cooley LLP
4401 Eastgate Mall
San Diego, CA 92121

Dear Mr. Mojdehi:

This responds to your request dated May 16, 2014 (the "Application"), submitted on behalf of the International Society for Children with Cancer (ISCC), to the Office of Foreign Assets Control (OFAC), requesting a renewal of License No. IA-2012-297091-1 to transfer up to USD\$800,000 to Mahak, the Society to Support Children Suffering from Cancer, in Iran over a two-year period.

On September 10, 2013, OFAC issued General License E (GL E) under the Iranian Transactions and Sanctions Regulations (ITSR), 31 C.F.R. Part 560, with respect to certain services in support of nongovernmental organizations' activities in Iran. Specifically, GL E authorizes nongovernmental organizations (NGOs) to export or reexport services to or related to Iran in support of certain not-for-profit activities that are designed to directly benefit the Iranian people. GL E, subsection (a). These activities include those related to humanitarian projects to meet basic human needs in Iran, including, but not limited to, the provision of donated health-related services and the donated training associated with the provision of these health-related services. GL E, subsection (a)(1). Additionally, GL E authorizes all transfers of funds in support of the activities included therein by the NGO provided that the total sum of all transfers does not exceed USD\$500,000 in the aggregate over a 12-month period. GL E, subsection (b). NGOs that engage in conduct pursuant to this general license must submit reports on a quarterly basis, providing information including, but not limited to, a detailed description of the services exported or reexported to Iran; any Iranian NGOs, Government of Iran entities, Iranian financial institutions, or other Iranian persons involved in the activities; the dollar amounts of any transfers to Iran; and the beneficiaries of those transfers. These reports must be filed with the Licensing Division at OFAC as outlined in GL E. GL E, subsection (c). Please note that GL E does not authorize the exportation or reexportation of services to any person whose property and interests in property are blocked pursuant to any part of 31 C.F.R. chapter V other than part 560; any activities in furtherance of Iranian military or industrial infrastructure or potential, or in connection with the Iranian energy, automobile, shipping, and shipbuilding sectors; and any transaction by a U.S.-owned or -controlled foreign entity otherwise prohibited by 31 C.F.R. § 560.215 if the transaction would be prohibited by any other part of chapter V if engaged by a U.S. person or in the United States. GL E, subsection (d).

Further, the ITSR authorize United States depository institutions to process transfers of funds to or from Iran, or for the direct or indirect benefit of persons in Iran or the Government of Iran, if the transfer arises from, and is ordinarily incident and necessary to give effect to, an underlying transaction that has been authorized by a general license, such as GL E, and does not involve debiting or crediting an Iranian account. ITSR, § 560.516(a). Please be advised further that the ITSR do not authorize transactions that would be prohibited by a different sanctions program administered by OFAC, such as current restrictions under the Weapons of Mass Destruction Proliferators Sanctions Regulations (31 C.F.R. Part 544) or the

Global Terrorism Sanctions Regulations (31 C.F.R. Part 594), pursuant to which certain banks are designated, including but not limited to Ansar Bank, Bank of Industry and Mine, Bank Mellat, Bank Melli, Bank Refah, Bank Saderat, Bank Sepah, Bank Tejarat, Europaisch-Iranische Handelsbank, Export Development Bank of Iran, Future Bank B.S.C., Kargoshaee Bank, Mehr Bank, or Post Bank of Iran. *See* ITSR, § 560.101; *see also* 31 C.F.R. §§ 544.201 and 594.201.

Based on the information provided in the Application, it appears that your request on behalf of the ISCC, a U.S. NGO, to transfer funds to Iran, falls within the general authorizations set forth in GL E and section 560.516 of the ITSR. Provided the transfers do not exceed USD\$500,000 in aggregate over a 12-month period and that the reporting requirements of GL E are satisfied, you may proceed without further authorization from OFAC.

If you have any additional questions, you may refer to the OFAC website at www.treasury.gov/ofac or call our office at (202) 622-2480.

Sincerely,



Andrea Gacki
Assistant Director of Licensing
Office of Foreign Assets Control

August 14, 2014

Date