August 13, 2012

ATTN: Adam J. Szubin
Director
Office of Foreign Assets Control
United States Department of Treasury
1500 Pennsylvania Ave., N.W. – Annex
Washington D.C. 20220

Re: Impact of U.S. Sanctions on Earthquake Relief Efforts in Iran

Dear Mr. Szubin,

On Saturday, August 11, 2012, two earthquakes measuring 6.4 and 6.3 on the Richter Scale struck the northwestern region of Iran near the towns of Tabriz and Ahar. According to the most recent news reports from Reuters News Agency, at least 300 people have died, more than 5,000 have been injured, and over 130 villages have been destroyed as a result of these earthquakes.

Relief agencies inside Iran have reached the area and are beginning to assist the survivors. Some international organizations have pledged support to send supplies to help those in need. However, given the widespread devastation the earthquake has caused, much more aid and relief assistance is needed to reach these victims to assist in providing immediate relief and to rebuild destroyed homes. The Iranian American Bar Association (IABA) along with the Child Foundation, Children of Persia, Havaar-Iranian Initiative Against War, Sanctions, and State Repression, the Iranian Alliances Across Borders (IAAB), Moms Against Poverty, the National Iranian American Council (NIAC), Pars Equality Center, the Public Affairs Alliance of Iranian Americans (PAAIA), and United for Iran, are concerned that the current United States sanctions imposed on Iran will hinder efforts to provide immediate humanitarian relief to assist these victims. Accordingly, this coalition of organizations are reaching out to OFAC to request the following:

1. A public statement of OFAC’s licensing policy concerning the licensing of transactions by humanitarian agencies working on earthquake relief in Iran so that they may immediately begin providing aid to the victims of the earthquakes in Iran or begin applying for specific licenses to do so. We respectfully request that this statement reference any existing general licenses and exemptions under the International Emergency Economic Powers Act (IEEPA) that may apply to earthquake and/or humanitarian relief;
2. Expedited review of OFAC specific license applications submitted by organizations seeking to assist the earthquake victims, including, but not limited to, permitting the redevelopment of destroyed homes;

3. Issuance of a general license, similar to the one issued following the 2003 earthquake in Bam, Iran, to enable relief organizations to provide services in Iran to counter the destruction caused by the earthquakes; and

4. Public guidance to foreign and domestic financial institutions assuring them that they are permitted to process transactions on behalf of U.S. persons related to earthquake relief efforts in Iran.

This coalition will also issue a press statement to its members, reminding them that sending food and medicine to Iran are currently legal under the humanitarian exemption of the current sanctions. We also note that the victims need much more than food and medicine and the best way for Americans to assist is by sending money to relief organizations, which in turn allows the organizations to provide immediate supplies to the victims and assisting them in rebuilding the demolished homes and villages.

In this time of human need and tragedy we must ensure innocent victims are not hindered by the politics of sanctions. We hope that the Obama administration will act quickly on this urgent matter.

Sincerely,

Iranian American Bar Association

Child Foundation
Children of Persia
Havaar-Iranian Initiative Against War, Sanctions, and State Repression
Iranian Alliances Across Borders (IAAB)
Moms Against Poverty
National Iranian American Council (NIAC)
Pars Equality Center
Public Affairs Alliance of Iranian Americans (PAAIA)
United For Iran:

Cc: Linda Specht, Department of State
    Andrea Gacki, Department of Treasury
    Adam Smith, Department of Treasury