



CLIENT ALERT:

SUDAN SANCTIONS RELIEF EXTENDED THREE MONTHS

July 14, 2017

Introduction

On January 13, 2017 President Obama issued Executive Order 13761 which gave Sudan relief from U.S. sanctions for six months and which envisioned a permanent revocation of the U.S. sanctions against Sudan on July 12, 2017, provided that Sudan sustained certain positive actions regarding humanitarian efforts and reducing violence in Sudan. However, the U.S. sanctions were not permanently revoked on July 12th. Instead, the temporary relief contained in Executive Order 13761 has been extended for three months.

Background

Over the last six months of 2016 the U.S. government engaged with the Government of Sudan in an effort to end that government's offensive military operations, to improve humanitarian access in Sudan, to end Sudan's destabilizing role in South Sudan, to end the threat of the Lord's Resistance Army and to counter terrorist groups. Because Sudan met benchmarks set by the U.S. in all five areas, and made further commitments, on January 13, 2017 Executive Order 13761 lifted the U.S. sanctions against Sudan for six months, with the potential for a revocation of those sanctions on July 12, 2017.

Current Action

On July 11, 2017 President Trump issued an Executive Order extending the sanctions relief until October 12, 2017, in order to permit additional fact-finding and a more comprehensive analysis of the Government of Sudan's actions. This means that while the sanctions have not been permanently revoked, U.S. persons continue to be largely free to engage in transactions with and relating to Sudan, at least until October 12, 2017.

The impact of the sanctions relief provided in Executive Order 13761, and now extended, was described more fully in our Client Alert of January 17, 2017, which can be found on page 2 of the News section of our website (www.freehill.com). In addition, that prior Client Alert also contained notes of caution for those commencing trade with Sudan. Those notes of caution still apply during this three month extension of the sanctions relief.

Disclaimer: This Client Alert provides only a general summary of the current extended easing of certain U.S. regulations relating to Sudan, and is not intended to constitute comprehensive legal advice. Specific legal advice should be taken with respect to each individual inquiry regarding trade with Sudan. For additional clarification, please feel free to contact Bill Juska (juska@freehill.com), Gina Venezia (venezia@freehill.com) or Bill Pallas (pallas@freehill.com).

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