

MEEKS, SHEPPARD, LEO & PILLSBURY

TO: NYSBA International Section and Friends

FROM: Robert J. Leo
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DATE: May 6, 2019

RE: Russian Sanctions Program

U.S. EXPORT LAWS

“CAATSA” – Countering America’s Adversaries Through Sanctions Act
Public Law No. 115-44

Department of Treasury, Office of Foreign Assets Control (OFAC)

Import and Export Bans

50 USC § 1701 International Emergency Economic Powers Act (IEEPA)

-Also affects U.S. export controls (15 CFR Part 300 *et seq.*)

22 USC § 2349aa-9 International Security and Development Cooperation Act (ISDCA)

31 CFR §§ 500-599

Ukraine Related Sanctions Regulations – 31 CFR Part 589

Bureau of Industry and Security, Department of Commerce

IEEPA – 50 USC § 1701

15 CFR Part 730 *et seq.*

Department of State, ITAR

Arms Export Control Act – 22 USC §2778

22 USC § 401

22 CFR Parts 120 - 130