

U.S. Government Fully Re-Imposes Iran Sanctions, Announces “Unprecedented” Sanctions Effort

November 6, 2018 | Client Update

On November 5, 2018, the United States completed the process of fully re-imposing sanctions related to Iran that were waived or lifted pursuant to the Joint Comprehensive Plan of Action (“**JCPOA**”) with Iran, consistent with President Trump’s May 8, 2018 announcement terminating the United States’ participation in the JCPOA.

While public statements from the administration emphasized the breadth of the sanctions and the government’s determination to fully enforce sanctions going forward as part of an “unprecedented” economic pressure campaign intended to deprive the Iranian government of revenue to engage in malign activities, the actions of the Treasury Department’s Office of Foreign Assets Control were largely consistent with prior guidance and served mostly to establish the appropriate framework for administration and enforcement of the re-imposed sanctions. Now that this restored framework is fully in place, it remains to be seen whether the U.S. government will be able to leverage these authorities to force changes in the Iranian regime’s behavior, and whether and to what extent it will follow through on threats to enforce secondary sanctions against non-Iranian actors in order to achieve this goal.

If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

Neil H. MacBride

+1 202 962 7035
neil.macbride@davispolk.com

John B. Reynolds III

+1 202 962 7143
john.reynolds@davispolk.com

Will Schisa

+1 202 962 7129
will.schisa@davispolk.com

This communication, which we believe may be of interest to our clients and friends of the firm, is for general information only. It is not a full analysis of the matters presented and should not be relied upon as legal advice. This may be considered attorney advertising in some jurisdictions. Please refer to the firm's privacy notice for further details.

Related materials

[Read the full update](#)