

Sanctions Update: The Iran Nuclear Deal in the Trump Administration and the 115th Congress

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The advent of a Trump Administration and Republican control of both houses of Congress opens the door to a period of intense debate on U.S. policy toward Iran generally and sanctions relief under the Iran nuclear deal (the “Joint Comprehensive Plan of Action” or “JCPOA”) specifically. President-elect Trump harshly criticized the JCPOA during the Presidential campaign, and some of his early nominees for national security positions are also noted opponents. Many lawmakers in Congress have opposed the deal and have introduced bills proposing additional sanctions on Iran or limiting the executive branch’s ability to authorize certain Iran-related transactions. Nonetheless, unilateral U.S. abrogation of the JCPOA is not a foregone conclusion. This memorandum reviews the general courses of action open to the next President with respect to the JCPOA, representative Iran sanctions bills in Congress, and some of the key implications for the private sector. The memorandum is the most recent entry on Davis Polk’s new blog, FinRegReform.com, which is designed to help our clients keep up with the reorientation of the financial regulatory framework expected in the Trump administration.

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.

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