



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

LICENSE No. IA-2017-347391-1

IRANIAN TRANSACTIONS AND SANCTIONS REGULATIONS

LICENSE

(Granted under the authority of one or more of 22 U.S.C. § 2349aa-9, 8501-51, 8701-85, 50 U.S.C. §§ 1601-51, 1701-06, Executive Orders 12957, 12959, 13059, 13599, and 13628, and 31 C.F.R. Parts 501 and 560.)

To: **Omid Foundation (USA)**
c/o Kirkland and Ellis LLP
655 Fifteenth Street NW
Washington, DC 20005
Attn: Joanna Ritcey-Donohue

1. Based upon the request dated **August 30, 2017**, to the Office of Foreign Assets Control (the "Application"), License No. IA-2015-316211-1 is hereby renewed and the transactions and activities delineated herein are hereby authorized.
2. This License is subject to the condition, among others, that the Licensee comply with its terms and with all regulations, rulings, orders, and instructions issued under one or more of the authorities cited above.
3. This License **expires on the earlier of the completion of the authorized transaction(s) or March 31, 2020**, and is not transferable. The transactions described in this License are subject to the authorities cited above and any regulations and rulings issued pursuant thereto. This License may be revoked or modified at any time. If this License was issued as a result of willful misrepresentation it may be declared void from the date of its issuance or from any other date.
4. This License does not authorize transactions prohibited under any law or regulation (including reporting requirements) administered by the Office of Foreign Assets Control other than those listed above.
5. This License does not excuse the Licensee from the need to comply with any law or regulation (including reporting requirements) administered by any other agency or the need to obtain any required authorization(s) from any other agency.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

12/08/2017

By

Jeanette A. Miller
Deputy Assistant Director for Licensing

Date

Attention is directed to, *inter alia*, 18 U.S.C. § 1001, 50 U.S.C. § 1705, and 31 C.F.R. § 560.701 for provisions relating to penalties.

SECTION 1 - AUTHORIZATION: Subject to the conditions and limitations stated herein, the Omid Foundation (USA) (the “Licensee”) is hereby authorized to engage in transactions related to the provision of humanitarian assistance to disadvantaged young Iranian and Afghani women in Iran through the transfer of up to \$1.5 million, per each 12 month period covered by this License, as described in the Application.

SECTION 2 - CONDITIONS: (a) This License does not authorize the exportation or reexportation to Iran of any goods, technology or software, including any goods, technology or software controlled by the United States Department of Commerce under the Export Administration Regulations (15 C.F.R. Parts 730 et seq.), or by the United States Department of State under the International Traffic in Arms Regulations (22 C.F.R. Parts 120 et seq.).

(b) Any payment or transfer of funds through the U.S. financial system ordinarily incident and necessary to give effect to a transaction authorized by **SECTION 1** hereof must be effected in a manner consistent with 31 C.F.R. § 560.516 and may not involve the debiting or crediting of an “Iranian account,” as such term is defined in 31 C.F.R. § 560.320.

(c) Except for transactions that may be prohibited by section 4 of Executive Order 13628, this License does not authorize any transactions otherwise prohibited by Executive Order 13628.

SECTION 3 - WARNINGS: (a) Except as authorized in **SECTION 1** hereof, nothing in this License authorizes transactions prohibited by the Iranian Transactions and Sanctions Regulations (31 C.F.R. Part 560), by Executive Orders 12957, 12959, 13059, 13599, or 13628, or by any other laws or regulations administered by the Office of Foreign Assets Control. In particular, please note that the Weapons of Mass Destruction Proliferators Sanctions Regulations (31 C.F.R. Part 544) and the Global Terrorism Sanctions Regulations (31 C.F.R. Part 594) may prohibit transactions ordinarily incident to activities authorized in **SECTION 1** of this License, including transactions with financial institutions or other persons whose property and interests in property are blocked pursuant to one or both of these authorities.

(b) The authorization set forth in this License applies only to laws and regulations administered by the Office of Foreign Assets Control, and should not be interpreted to excuse the Licensee from compliance with other laws, regulations, orders or rulings to which it may be subject.

(c) This License does not authorize any transactions that occurred prior to the date of its issuance.

(d) Any transfer of funds through the U.S. financial system pursuant to the authorizations set forth in **SECTION 1** hereof should reference the number of this License to avoid blocking or rejection of the transfer.

SECTION 4 - RECORDKEEPING AND REPORTING REQUIREMENTS: (a) The Licensee is subject to the recordkeeping and reporting requirements of, *inter alia*, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain records concerning the transactions undertaken pursuant to this License for a period of five years. Such records shall clearly demonstrate the applicability of the authorization set forth in **SECTION 1** hereof.

(b) The Licensee is required to submit reports on a quarterly basis, providing information including, but not limited to, a detailed description of the services exported or reexported to Iran, any Iranian NGOs, Government of Iran entities, Iranian financial institutions, or other Iranian persons involved in the activities; the dollar amounts of any transfers to Iran; and the beneficiaries of those transfers. Reports should reference this **License No. IA-2017-347391-1** and must be filed with the Licensing Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, N.W., The Freedman’s Bank

Building, Washington, D.C. 20220, and with the Office of Sanctions Policy and Implementation, U.S. Department of State, 2201 C Street, NW, Washington, DC 20520.

SECTION 5 - PRECEDENTIAL EFFECT: The authorization contained in this License is limited to the transactions specified in the Application.
