



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

Case No. IA-13049

Mr. John Jackson, III, Esquire
Conservation Force
3240 S I-10 Service Rd. W.
Suite 200
Metairie, LA 70001-6911

Dear Mr. Jackson:

This is in response to your letter dated December 22, 2009, to the Office of Foreign Assets Control ("OFAC") on behalf of three individuals: Dennis Campbell, Ron Roderick, Sr., and Gary Hansen. In your letter you request a license for these individuals authorizing the import of hunting trophies obtained from recreational sport hunts in Iran. Your letter indicates that license and trophy fees will be paid to the Department of the Environment of Iran.

The Iranian Transactions Regulations, 31 C.F.R. Part 560 (the "ITR"), prohibit the importation into the United States of any goods or services of Iranian-origin or owned or controlled by the Government of Iran. ITR, § 560.201. The importation of hunting trophies is prohibited by this regulation. The ITR further prohibit U.S. persons, wherever located, from engaging in any transaction or dealing in or related to goods or services of Iranian origin. ITR, § 560.206(a)(1). However, please note that the ITR authorize U.S. persons to purchase Iranian-origin goods or services for personal use or consumption in Iran. ITR, § 560.518 (c)(3).

Pursuant to § 560.201(d), the payment of license and trophy fees, travel to Iran, and payments ordinarily incident to travel, e.g., the importation of accompanied baggage for personal use, the maintenance within any country including payment of living expenses, and acquisition of goods or services for personal use, are exempt from prohibitions in the ITR. However, the importation of hunting trophies would not be covered by the exemptions in § 560.210 and would thus be prohibited unless specifically licensed. As it would be contrary to current U.S. government policy to authorize the proposed transaction, your request for a specific license to import hunting trophies is denied at this time.

With regard to your proposed conservation program in Iran, should you wish to move forward with that project, you would need to submit a formal license request to our office seeking appropriate authorization. If you have any additional questions about the ITR or about the economic sanctions programs administered by OFAC, you may refer to our web site at www.treas.gov/ofac or call our office at (202) 622-2480.

Sincerely,

Aug. 26, 2010

Andrea Gacki
Assistant Director for Licensing
Office of Foreign Assets Control