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## Alerts

### New Iran and Syria Information Technology Sanctions

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On April 23, 2012, in an effort to increase pressure on both the Syrian and Iranian regimes to cease ongoing and intensifying human rights violations facilitated by the abuse of information technology, President Obama issued a new Executive Order targeting individuals and entities that exploit information and communications technology to commit or aid in the commission of human rights abuses.

Executive Order 13606, entitled "Blocking the Property and Suspending Entry into the United States of Certain Persons with Respect to Grave Human Rights Abuses by the Governments of Iran and Syria Via Information Technology" (the "Order"), designates persons in Syria and Iran that the United States has determined to have operated, or directed the operation of, information and communications technology that facilitates computer or network disruption, monitoring or tracking that could enable human rights abuses by or on behalf of the Governments of Syria or Iran.

The Order blocks the property interests of these designated individuals and entities where such property interests are in the United States or come within the possession or control of US persons. This effectively prohibits US persons from engaging in transactions with such designated persons, directly or indirectly. The list of blocked individuals and entities includes: the Syrian General Intelligence Directorate (GID); the GID's Director, Ali Mamluk; Iran's Ministry of Intelligence and Security (MOIS); Iran's Islamic Revolutionary Guard Corps (IRGC); Iran's Law Enforcement Forces (LEF); the Iranian Internet service provider Datak Telecom; and the Syrian telecommunications firm Syriatel. Designated individuals are also blocked from receiving visas to enter the United States.

The Order also specifies criteria for future designations, potentially including persons outside Syria or Iran. Individuals and entities that could be designated in the future under this Order include: those that sell, lease or otherwise provide to Syria or Iran goods, services, or technology likely to be used to facilitate computer or network disruption, monitoring or tracking; those determined to have materially supported these activities or supported or assisted previously designated persons; and those owned or controlled by or acting on behalf of designated persons.

The Order supplements recent measures aimed at escalating sanctions against Syria and Iran. As a result of this Order, companies in the information technology sector risk sanctions if they provide Syria or Iran with the types of technologies targeted by the Order.

Click [here](#) to view Executive Order 13606.

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