



November 2015

U.S. Imposes Burundi Sanctions

On Nov. 23, 2015, President Obama issued an Executive Order to establish a new Burundi sanctions program prohibiting U.S. persons from engaging in most transactions with certain designated individuals and entities who contributed to the recent violence in Burundi. Specifically, the new U.S. sanctions against Burundi target individuals and entities deemed to “threaten peace and security in Burundi, undermine democratic processes, or who are responsible for or complicit in human rights abuses.” In a corresponding action, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) imposed targeted sanctions on four individuals pursuant to the president’s order. The sanctions added the four individuals to OFAC’s list of Specially Designated Nationals (SDN). The Executive Order and corresponding list of designated individuals are available [here](#).

The individuals added to the SDN list include Burundi’s minister of public security, the deputy director-general of the national police, and the former Burundian defense minister and intelligence chief of staff, who were both leaders of a coup attempt against Burundi’s elected government in May 2015. U.S. persons are prohibited from engaging in all transactions, including donating, contributing, providing, or receiving funds, goods, or services by, to, from, or for the benefit of the designated persons. Furthermore, the new measures suspend entry of the designated persons into the U.S. by means of State Department visa bans.

The U.S. action follows the imposition of targeted EU sanctions on four individuals (including one of those targeted under U.S. sanctions) involved in the violence in Burundi on Oct. 2, 2015. The EU sanctions froze the targeted individuals’ assets and imposed a travel ban.

Anyone doing business in or with Burundi or Burundians who may be subject to U.S. sanctions should assess, in conjunction with counsel, their existing and proposed international transactions to determine whether the activities are permissible. We note that due to the dynamic state of affairs in Burundi, additional sanctions are possible if the situation in Burundi continues to deteriorate.

Based in Washington, D.C., our Export Controls team advises and represents clients on a full range of international goods, software and technology transfer issues. We have broad experience providing export controls and related regulatory counsel to both U.S. and foreign businesses. Our industry-specific experience includes assisting companies in a wide range of industries such as aerospace, defense, firearms and ammunition, electronics, software and information technology, financial services, food, consumer products, biotechnology, medical device, and engineering services.

This *GT Alert* was prepared by **Sandra K. Jorgensen**, **Cyril T. Brennan**, and **Kara M. Bombach**. **Questions about this information can be directed to:**

- > [Kara M. Bombach](#) | +1 202.533.2334 | bombachk@gtlaw.com
- > [Michael X. Marinelli](#) | +1 512.320.7236 | marinellimx@gtlaw.com
- > [Renee A. Latour](#) | +1 202.533.2358 | latourr@gtlaw.com
- > [Julia P. Sorrentino](#) | +1 202.533.2376 | sorrentinoj@gtlaw.com
- > [Cyril T. Brennan](#) | +1 202.533.2342 | brennanct@gtlaw.com
- > [Sandra D. Gonzalez](#) | +1 512.320.7234 | gonzalezsd@gtlaw.com
- > [Sandra K. Jorgensen](#) | +1 202.530.8569 | jorgensens@gtlaw.com
- > Or your [Greenberg Traurig](#) attorney

Albany +1 518.689.1400	Delaware +1 302.661.7000	New York +1 212.801.9200	Silicon Valley +1 650.328.8500
Amsterdam + 31 20 301 7300	Denver +1 303.572.6500	Northern Virginia +1 703.749.1300	Tallahassee +1 850.222.6891
Atlanta +1 678.553.2100	Fort Lauderdale +1 954.765.0500	Orange County +1 949.732.6500	Tampa +1 813.318.5700
Austin +1 512.320.7200	Houston +1 713.374.3500	Orlando +1 407.420.1000	Tel Aviv^ +03.636.6000
Berlin- +49 (0) 30 700 171 100	Las Vegas +1 702.792.3773	Philadelphia +1 215.988.7800	Tokyo +81 (0)3 3216 7211
Berlin-GT Restructuring~ +49 (0) 30 700 171 100	London* +44 (0)203 349 8700	Phoenix +1 602.445.8000	Warsaw~ +48 22 690 6100
Boca Raton +1 561.955.7600	Los Angeles +1 310.586.7700	Sacramento +1 916.442.1111	Washington, D.C. +1 202.331.3100
Boston +1 617.310.6000	Mexico City+ +52 55 5029.0000	San Francisco +1 415.655.1300	Westchester County +1 914.286.2900
Chicago +1 312.456.8400	Miami +1 305.579.0500	Seoul∞ +1 82-2-369-1000	West Palm Beach +1 561.650.7900
Dallas +1 214.665.3600	New Jersey +1 973.360.7900	Shanghai +86 21 6391 6633	

*This Greenberg Traurig Alert is issued for informational purposes only and is not intended to be construed or used as general legal advice nor as a solicitation of any type. Please contact the author(s) or your Greenberg Traurig contact if you have questions regarding the currency of this information. The hiring of a lawyer is an important decision. Before you decide, ask for written information about the lawyer's legal qualifications and experience. Greenberg Traurig is a service mark and trade name of Greenberg Traurig, LLP and Greenberg Traurig, P.A. -Greenberg Traurig's Berlin office is operated by Greenberg Traurig Germany, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. - Berlin - GT Restructuring is operated by Köhler-Ma Geiser Partnerschaft Rechtsanwälte, Insolvenzverwalter. *Operates as Greenberg Traurig Maher LLP. **Greenberg Traurig is not responsible for any legal or other services rendered by attorneys employed by the strategic alliance firms. +Greenberg Traurig's Mexico City office is operated by Greenberg Traurig, S.C., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ∞Operates as Greenberg Traurig LLP Foreign Legal Consultant Office. ^Greenberg Traurig's Tel Aviv office is a branch of Greenberg Traurig, P.A., Florida, USA. ⌘Greenberg Traurig Tokyo Law Offices are operated by GT Tokyo Horitsu Jimusho, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ~Greenberg Traurig's Warsaw office is operated by Greenberg Traurig Grzesiak sp.k., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. Certain partners in Greenberg Traurig Grzesiak sp.k. are also shareholders in Greenberg Traurig, P.A. Images in this advertisement do not depict Greenberg Traurig attorneys, clients, staff or facilities. No aspect of this advertisement has been approved by the Supreme Court of New Jersey. ©2015 Greenberg Traurig, LLP. All rights reserved.*