



SANCTIONS —LAW CENTER—

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September 10, 2026

Delivered Via Email

Law School Admission Council
c/o: Amy Beth Dambeck, General Counsel
662 Penn Street
Newtown, PA 18940

Re: Demand to Correct LSAC's Iran Sanctions Compliance Policy

Counsel Dambeck,

The Sanctions Law Center (“SLC”) writes regarding LSAC’s apparent decision, following OFAC’s August 24, 2026, suspension of Iran General License G (“GL G”), to broadly deny services to persons based on Iranian nationality. **That interpretation is overbroad and should be corrected immediately.**

OFAC’s suspension of GL G withdraws the authorization previously provided by that license. It does not create a new prohibition based on Iranian nationality.¹ Importantly, GL G expressly authorized educational services to persons located in Iran or located outside Iran but ordinarily resident in Iran.² Accordingly, the relevant sanctions analysis turns on a person’s location or ordinary residence and the transaction at issue—not a mere nationality nexus.³

The distinction is significant. Suspension of GL G means that transactions that previously relied on that authorization must now be assessed under the underlying Iranian Transactions and Sanctions Regulations (“ITSR”) and any other applicable authorizations. It does not categorically prohibit services to Iranian nationals wherever located. An Iranian passport holder residing in the United States or another third country is not rendered a prohibited recipient merely by virtue of Iranian nationality. The ITSR prohibits the export of services to Iran or the Government of Iran; it does not establish Iranian nationality as an independent prohibition.⁴

Competent legal judgment means identifying the legal line precisely and preserving lawful activity up to it. A categorical policy based on Iranian nationality extends restrictions beyond what the law proscribes and imposes discriminatory effects on individuals whom the law does not require LSAC to exclude.

¹ <https://ofac.treasury.gov/media/7966/download?inline>

² General License G(b)(4) (suspended indefinitely Aug. 24, 2026).

³ <https://ofac.treasury.gov/faqs/118>

⁴ 31 C.F.R. § 560.204

Our center's work includes OFAC compliance as well as the design, implementation, and reform of economic sanctions. This kind of overcompliance is therefore squarely within our concern: it distorts the legal boundaries of sanctions programs, imposes unnecessary harms on individuals, and restricts activity the law permits.

We therefore join the wider legal and Iranian-American communities in condemning this policy and call on LSAC to promptly revise its compliance policy, restore access to those improperly excluded, and issue a public correction acknowledging the discriminatory effect of its current approach.

We ask that LSAC confirm within five business days that it has undertaken review of the policy and advise SLC of the corrective action it intends to take. SLC is available to discuss the applicable OFAC framework with LSAC and its counsel.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Farshneshani', with a long horizontal flourish extending to the right.

M. Mohsen Farshneshani, Esq.
Principal Attorney & Founder