



## President Trump Delays Decision on Sudanese Sanctions for Three Months

On July 11, 2017, President Trump issued an executive order that postpones any decision regarding whether to terminate the comprehensive sanctions regime against Sudan for an additional three months—until October 12, 2017.

As we reported in our January 2017 *Commentary*, "[Comprehensive Sanctions Against Sudan Largely Lifted](#)," President Obama signed Executive Order 13761 on January 17, 2017, which temporarily suspended the bulk of sanctions against Sudan for a period of six months. Those sanctions were to be permanently revoked, with certain exceptions, on July 12, 2017, provided that, upon review and formal determination, Sudan "sustained the positive actions" it has taken to reduce its offensive military activities, work towards reaching a cessation of internal hostilities, improve humanitarian access, and cooperate with the United States to address regional conflicts and international terrorism.

President Trump's executive order extends the period during which the United States will review and assess Sudan's efforts to satisfy the criteria set out by Executive Order 13761 for an additional three months in order "to establish that [Sudan] has sustained [its] positive actions." The Trump Administration indicated, however, that it remains "deeply committed" to engagement with Sudan and "working toward further progress on achieving a sustainable peace."

In light of the July 11 executive order, U.S. sanctions against Sudan will remain, as has been the case for the past six months, largely suspended until the United States revisits its assessment over the next three months. The suspension is implemented through a general license included at 31 C.F.R. § 538.540. In the meantime, companies engaged in or considering business opportunities in Sudan should (i) bear in mind that significant constituencies in the United States continue to oppose permanent revocation of the Sudanese sanctions regime; (ii) take into consideration the possibility that sanctions may yet be reimposed by October 12, 2017; and (iii) continue to observe export license requirements when exporting or reexporting items subject to the Export Administration Regulations, as those requirements are not affected by the suspension of the sanctions.

Jones Day will continue to monitor developments to assist our clients with their potential and ongoing business activities in compliance with U.S. law.

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