EXHIBIT A

THE EXCHANGE
FOUNDATION
POLITICS DIRECTLY

April 25, 2022

Dear OFAC,

1. The Foundation for Global Political Exchange is applying for a specific license to include among the speakers in a conference in Beirut, Lebanon the following designated individuals: **Usama Hamdan** (SDGT); **Gebran Bassil** (GLOMAG); **Jamil Sayyed** (LEBANON); as well as two non-designated individuals known to be members of Hizballah: **Ammar Moussawi** (Hezbollah head of international relations) and **Ali Fayyad** (Hezbollah Member of Lebanon's Parliament). While we believe that our proposed activity is not prohibited by any of sanctions regulations, an officer in the Licensing Division instructed us that we should apply for a specific license for any activity involving an SDN. We will give a brief background description of the Foundation for Global Political Exchange (the Exchange), our mission and the structure of each exchange, our rationale for including the above-mentioned speakers in our upcoming conference, and why we believe their inclusion is consistent with both U.S. sanctions law and U.S. foreign policy generally.

Background

2. The Foundation for Global Political Exchange has its origins in the first Beirut Exchange that took place in June 2008, only a few weeks after sustained violence across Lebanon led to a political settlement known as the Doha Accords. It was our belief at the time that Lebanon was in dire need of more direct and diversified understanding, especially for those who are studying the country, influencing public opinion and discourse, or shaping their own country's foreign policies. In the years following our first Exchange, and given the evident need regionally, we steadily expanded our efforts, hosting more than 40 different Exchanges across the Middle East and North Africa - including in Tunisia, Iraq, Syria and Turkey and on Libya as well as Yemen. Thirteen years later, over 1,000 people from 51 different countries have attended an Exchange, with many alumni returning in later years to join sessions once (or several times) again.

3. In 2019, in order to transparently organize and further professionalize our work, we established The Exchange as a U.S.-registered non-profit, under the aegis of The Foundation for Global Political Exchange, with the mission of promoting professional and academic enrichment through a variety of small group, direct engagement conferences in Western Asia and North Africa.

4. Over the years, participants in the Exchange have included senior U.S. officials in Lebanon, including Ambassador (Ret) Vincent M. Battle, Ambassador Michele J. Sison, Deputy Chief of Mission William Grant, and Ambassador Richard H. Jones.

Mission and Structure

5. The Exchange is an immersive direct dialogue conference that offers participants unique exposure to leading scholars, politicians and activists representing a range of different points of view on Lebanon. Our upcoming Beirut Exchange is aimed at NGO practitioners, foreign diplomats, researchers, journalists and professionals in general who are interested in gaining a deeper understanding of Lebanon. The Exchange gives participants a unique opportunity to directly engage and question leading intellectuals, activists and politicians from across the political spectrum.

6. As illustrated in Appendix A below (The 21th Beirut Exchange Summer 2022: Draft Schedule), each Exchange consists in 30-40 meetings with individual speakers, typically at their place of work. As the Draft Schedule indicates, speakers represent a very wide range of political viewpoints. Speakers give unprepared opening remarks on their analysis of a given situation (e.g. the political and economic crisis in Lebanon today), which is then followed by Q&A between the participants and the speaker. Each Exchange session consists entirely in private political dialogue held under the Chatham House Rule. Apart from sessions with academic speakers who may, exceptionally, use powerpoint slides, no informational materials are produced for, presented, distributed, or received at any session.

7. Although the Exchange does offer nominal honorariums to most speakers who are eligible to receive them, the Exchange **does not** offer an honorarium, or otherwise provide any good or service to, or accept any good or service from 1) government officials, 2) political party-affiliated individuals, or 3) anyone personally listed on the U.S. SDN list or who is associated with any person or organization listed as an SDN or otherwise subject to U.S. sanctions authorities (including non-SDN lists).

Rationale

8. The Exchange is committed to giving participants the opportunity to directly engage individuals from across the political spectrum, including those with policy views directly opposed to the official foreign policy of the U.S. As stated above, U.S. Ambassadors to Lebanon have been regular participants in Exchanges over the years. However, we also give participants the chance to critically engage politicians and officials who, while designated by the U.S. for corruption and links to terrorism, nevertheless play an influential role in Lebanese politics (and indeed may be members of Lebanon's Parliament or otherwise hold public office in Lebanon). We believe it is simply not possible to fully understand political developments in Lebanon without such broad-based critical engagement.

9. For the above stated reasons, we wish to include among the speakers in an upcoming conference in Beirut, Lebanon in the summer of 2022 the following designated individuals: **Usama Hamdan** (SDGT); **Gebran Bassil** (GLOMAG); **Jamil Sayyed** (LEBANON); as well as two non-designated individuals known to be members of Hizballah: **Ammar Moussawi** (Hizballah head of international relations) and **Ali Fayyad** (Hizballah Member of Lebanon's Parliament).

Agreement with U.S. Sanctions Law and Foreign Policy

10. We believe the inclusion of the above individuals as speakers in the upcoming Beirut Exchange is consistent with U.S. Sanctions law and U.S. foreign policy for the following reasons.

11. The inclusion of an individual as a speaker does not involve any financial transaction, no payment given or received, no transmission of information, nor any service given or received. For

example, speaking at an Exchange does not involve anything like the prohibited services listed at 31 CFR §594.406(b).

12. The activity involved with the individuals listed above consists entirely in private political speech that is protected by the First Amendment of the U.S. Constitution and championed around the world as a fundamental tenet of U.S. foreign policy.

Conclusions and Plea

13. We understand that **Usama Hamdan** (SDGT), **Gebran Bassil** (GLOMAG), and **Jamil Sayyed** (LEBANON) are designated by OFAC under different authorities and subject to different U.S. legal restrictions and requirements. We nevertheless believe that the proposed activity the Exchange seeks to undertake with these individuals (i.e. political dialogue) is lawful under each of the different legal authorities by which the individuals are designated. If, however, contrary to our belief, OFAC finds that our proposed activity is lawful for some, but not other individuals, we would be grateful for a clarification of those differences and the legal rationale for OFAC's different legal conclusion for the different individuals or authorities.

14. With respect to **Ammar Moussawi** (Hizballah head of international relations) and **Ali Fayyad** (Hizballah Member of Lebanon's Parliament), our reading of 31 CFR §594.316 "Otherwise associated with" and §594.320 "Hizballah" leads us to the conclusion that neither Mr. Moussawi nor Mr. Fayyad are "otherwise associated with" or "members of Hizballah" as a matter of U.S. law or for OFAC's purposes. We have arrived at that conclusion because they are not specifically designated under U.S. law, or by OFAC or the U.S. Department of State as such. We have thus included their names in our application out of an abundance of caution. If, however, contrary to our belief, Mr. Moussawi and/or Mr. Fayyad are subject to U.S. sanctions law, we would be grateful for a clarification of the legal basis for their inclusion, as well as a determination of whether our proposed activity is consistent with or prohibited by any of those authorities.

15. Although we believe the that proposed political dialogue we aim to undertake with the above named individuals is fully consistent with U.S. sanctions law and foreign policy, we would be grateful for a statement from OFAC to that effect. In the event that OFAC deems our proposed activity of political dialogue with any of the above named individuals would run afoul of U.S. sanctions law, we would be grateful for a specific license authorizing that activity for our upcoming Beirut Exchange. In essence, we are asking either for a specific license or clarification that none is required for our proposed activity.

Sincerely,



Joshua Andresen, on behalf of the Foundation for Global Political Exchange
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Appendix A: The 21th Beirut Exchange Summer 2022: Draft Schedule

June 5
7:00pm – Opening Orientation & Security Briefing @ Cavalier Hotel

June 6
9:30am – Nicholas Noe, Mideastwire.com
12:00pm – Ghattas Khoury, Minister of Culture
1:00pm – Lunch (at the participants discretion)
2:00pm – Karim Makdisi, American University of Beirut
4:00pm – Nour Samaha, Journalist
7:00pm – Ahmad Fatfat, Future Movement

June 7
9:30am – Ammar Moussawi, Hezbollah
12:00pm – Bassam Khawaja, Human Rights Watch
1:30pm – Yassine Jabber, Liberation & Development Bloc
3:00pm – Lunch
4:00pm – Lea Yammine, Lebanon Support
5:30pm – Nicholas Blanford, Journalist

June 8
9:30am – Jihad Yazigi, The Syria Report
11:00am – The International NGO Safety Organisation
1:00pm – Lokman Slim, Umam Documentation & Research (w/Lunch)
3:00pm – Sami Gemayel, Kateab
4:30pm – Omar Nashabe, Consultant for Defense Counsel, STL
6:30pm – Walid Jumblatt, Progressive Socialist Party

June 9
9:00am – Antoine Habchi, Lebanese Forces
11:30am – Ali Fadlallah, Mabarrat Foundation
1:00pm – Lunch
2:00pm – Imran Khan, UNIFIL
3:30pm – Alain Aoun, Free Patriotic Movement
5:30pm – The Syrian Social Nationalist Party
7:30pm – Nicolas Pouillard, IFPO

June 10
8:30am – Claudio Cordone, UNRWA, & Camp Visit
1:30pm – Osama Hamdan, HAMAS
3:00pm – Lunch
4:00pm – Ayman Mhanna, Samir Kassir Foundation
6:00pm – Shadi Karam, Former Senior Adviser to the Prime Minister

Appendix A: Draft Schedule (cont.)

June 11
10:30am – May Akl, Free Patriotic Movement
1:00pm – Lunch
2:00pm – Malek Al-Shaar, Mufti of Tripoli & The North
3:30pm – Faisal Karami, Arab Liberation Party
5:00pm – Achraf Rifi, Former Minister of Justice
7:00pm – Mustapha Alloush, Future Movement

June 12
11:00am – Marwan Maalouf, Menapolis/#YouStink
1:00pm – Sami Moubayed, The Damascus History Foundation