EXHIBIT B

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

Case No. MUL-2022-904838-1

The Foundation for Global Political Exchange, Inc.
c/o Joshua Andersen
Scientia Guidance
10A Clandon Rd.
Guildford GU1 2DR
United Kingdom

Mr. Andersen:

This responds to your application dated April 25, 2022 and supplemented on June 23, 2022 (together, the "Application"), submitted on behalf of The Foundation for Global Political Exchange, Inc. ("GPE"), to the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). According to the Application, GPE requests authorization to include five specially designated individuals as speakers at the 21st Beirut Exchange Summer 2022, which was rescheduled to December 4-10, 2022 (the "Conference"). The proposed speakers for the Conference include Usama Hamdan, who OFAC has designated as a Specially Designated Global Terrorist ("SDGT"), Ammar Moussawi and Ali Fayyad, representing Hizballah in their capacities as Hizballah leaders and therefore also SDGTs, Gebran Bassil, who is blocked by OFAC under the Global Magnitsky program, and Jamil Sayyed, who is blocked by OFAC under the Lebanon program (together, the "Blocked Speakers").

The Global Terrorism Sanctions Regulations, 31 C.F.R. Part 594 ("GTSR") generally prohibit U.S. persons from engaging in any transaction or dealing in property or interests in property of SDGTs whose property or interests in property are blocked pursuant to section 594.201(a), including, but not limited to, the making or receiving of any contribution of funds, goods, or services to or for the benefit of persons whose property or interests in property are blocked pursuant to the GTSR. GTSR § 594.204. The Global Magnitsky Sanctions Regulations, 31 C.F.R. Part 583 ("GMSR"), prohibit all transactions prohibited pursuant to Executive Order 13818 "Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption." ("EO 13818"). Section 4 of EO 13818 describes the prohibitions to include: (a) the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant this order and (b) the receipt of any contribution of provision of funds, goods, or services from any such person. The Lebanon Sanctions Regulations, 31 C.F.R. Part 549 ("LSR"), prohibit the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to section § 549.201(a), as well as the receipt of any contribution or provision of funds, goods, or services from any such person. See § 549.201(b).

The inclusion of the Blocked Speakers in the Conference and the provision of a platform for them to speak is considered to be a service by OFAC, which is prohibited pursuant to the GTSR, GMSR, and the LSR. After careful consideration, including consultation with the U.S. Department of State, OFAC has determined that it would be inconsistent with current licensing policy to issue a specific license authorizing GPE to include the Blocked Speakers in the Conference, as described in the Application. Accordingly, your request for a specific license is hereby denied.

If you have any additional questions, you may refer to the OFAC website at www.treasury.gov/ofac or call our office at (202) 622-2480.

Sincerely,



Nikole Thomas
Assistant Director, Licensing Division
Office of Foreign Assets Control