DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

Case No. ICC-EO14203-2025-1429692-1

Xiangnong Wang
Middle East Studies Association
c/o Knight First Amendment Institute
at Columbia University
475 Riverside Drive, Suite 302
New York, NY 10115

Dear Mr. Wang:

This responds to your request to the Office of Foreign Assets Control (OFAC) dated October 14, 2025 (the "Application"), submitted on behalf of Middle East Studies Association ("MESA"), requesting interpretive guidance to provide confirmation that including Francesca Albanese as a speaker at the MESA's upcoming January 28, 2026 virtual event (the "Event") is not prohibited under Executive Order 14203 (E.O. 14203), "Imposing Sanctions on the International Criminal Court" or the International Criminal Court-Related Sanctions Regulations, 31 C.F.R. § 528 (the "ICCSR").

According to the Application, MESA was established in 1966 and is a U.S. nonprofit membership association of faculty, students, and researchers interested in the study of the Middle East, including Southwest Asia, the Arab world, and North Africa. MESA's mission is to foster the study of the Middle East, promote high standards of scholarship and teaching, and encourage public understanding of the region and its peoples. As part of its programming, MESA regularly invites experts to speak to members on issues relevant to its mission and its members' interests.

According to the Application, the Event is scheduled for January 28, 2026 and will be held virtually. Ms. Albanese will deliver a keynote address over Zoom to MESA's members. Ms. Albanese will then participate in a moderated conversation with an interlocutor from MESA. Finally, MESA's members will be invited to engage with Ms. Albanese directly during an open-ended question and answer session.

E.O. 14203, as incorporated into the ICCSR, blocks all property and interests in property of persons listed, designated or otherwise blocked pursuant to E.O. 14203 that are in the United States, that come within the United States, or that come within the possession or control of any United States person. On July 9, 2025, the U.S. Department of State designated Francesca Albanese pursuant to section 1(a)(ii)(A) of E.O. 14203.

The International Emergency Economic Powers Act (IEEPA), the statute pursuant to which E.O. 14203 was issued, provides that the authority granted to the President by IEEPA "does not include the authority to regulate or prohibit, directly or indirectly … any postal, telegraphic, telephonic, or other personal communication, which does not involve a transfer of anything of value … or, the importation from any country, or the exportation to any country, whether commercial or otherwise, … of any information or informational materials." 50 U.S.C. § 1702(b)(1)(3).

Furthermore, public guidance available on OFAC's website, (FAQ 1190), https://ofac.treasury.gov/faqs, provides that "no authorization is necessary for U.S. persons to engage in activities that are not prohibited or are otherwise exempt from sanctions."

- Upon review of the information you have provided, OFAC has determined that including Ms. Albanese as a speaker in a virtual format at the Event, under the circumstances described in the Application, is not prohibited under IEEPA, and thus no authorization is necessary. In making this determination, OFAC has considered the following facts and representations set forth in the Application: MESA will not engage in any financial transaction, directly or indirectly, with or for the benefit of Francesca Albanese or any other sanctioned party. Specifically, MESA will not offer Francesca Albanese an honorarium for her participation in the event, and she will not incur any reimbursable expenses for her virtual participation.

- MESA will not provide any specialized training or assistance to Francesca Albanese, or receive from Francesca Albanese any specialized training or assistance.

Please note that this determination is based upon the facts and representations you have provided. OFAC does not prohibit the type of conduct described here. However, OFAC is aware of instances where sanctioned persons have used conferences to engage in conduct that threatens U.S. national security, such as using conferences as a platform to recruit and collect intelligence on attendees, facilitate connections among those who would seek to harm U.S. persons or interests, or provide training or instruction in how to launder money, evade U.S. sanctions, or otherwise violate U.S. sanctions. We urge due diligence by U.S. persons to guard against such abuse.

If you have any additional questions, you may refer to the OFAC website at https://ofac.treasury.gov.

Sincerely,

Kelly M. Falconi Digitally signed by Kelly M. Falconi
Date: 2025.12.10 14:58:18 -05'00'

Kelly M. Falconi
Chief, Licensing
Office of Foreign Assets Control