

File #: N00004678206

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
CORPORATIONS DIVISION



CERTIFICATE

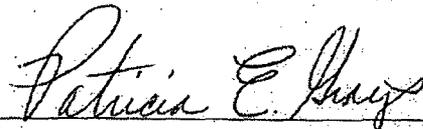
THIS IS TO CERTIFY that all applicable provisions of the District of Columbia NonProfit Corporation Act have been complied with and accordingly, this **CERTIFICATE OF INCORPORATION** is hereby issued to:

MISSION OF THE NATIONAL COALITION OF SYRIAN REVOLUTION AND OPPOSITION FORCES

IN WITNESS WHEREOF I have hereunto set my hand and caused the seal of this office to be affixed as of 02/13/2013



Business and Professional Licensing Administration



PATRICIA E. GRAYS
Superintendent of Corporations
Corporations Division

Vincent C. Gray
Mayor

Tracking #: 04GHPZANR

DCRA Corp. Div.

FEB 13 2013

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ARTICLES OF INCORPORATION

OF

MISSION OF THE NATIONAL COALITION OF SYRIAN REVOLUTION AND
OPPOSITION FORCES

We, the undersigned natural persons of the age of eighteen years or more, acting as incorporators of the above-named corporation, adopt the following Articles of Incorporation of such corporation pursuant to the District of Columbia Nonprofit Corporation Act of 2010, Title 29, Chapter 4, of the District of Columbia Code.

FIRST: The name of the corporation is MISSION OF THE NATIONAL COALITION OF SYRIAN REVOLUTION AND OPPOSITION FORCES (the "Corporation").

SECOND: The period of the Corporation's duration is perpetual.

THIRD: The purposes for which the Corporation is organized are as follows:

A. To operate exclusively for charitable and educational purposes, including, but not limited to, the following:

- to serve as the diplomatic mission and political representative in the United States of the National Coalition of Syrian Revolution and Opposition Forces;

- to provide services and representation on behalf of Syrians in the United States;

- to assist the people of Syria transition to a free and democratic country with a transparent and accountable government;

- to encourage and facilitate the participation of Syrian Americans and others in the establishment of a democratic Syria;

- to promote the causes of this organization and the interests of the Syrian people among the American public, foreign audiences, civil society, private businesses, and U.S. and foreign public officials, including legislative members and staff, executive personnel, and diplomatic officials and staff;

- to engage in fundraising events to generate charitable donations in the Corporation and to solicit, accept and hold contributions,

gifts and grants of every sort for the purposes set forth in these Articles;

- to acquire, lease, construct, own, operate and maintain property, buildings and/or premises which may be necessary or incidental to carrying out the purposes set forth in these articles;

- to hold, invest, reinvest or administer the Corporation's property of every kind and description, including, without limitation, its funds, and to use, apply, expend, disburse, grant and contribute the same for the purposes set forth in these Articles;

- to perform any acts, including, without limitation, the raising of funds, necessary or incidental to the carrying out any of the purposes set forth in these Articles; and

- to do and participate in all and everything necessary, suitable or proper for the accomplishment of the Corporation's purposes or powers and the attainment of its objectives, subject to the restrictions of all applicable laws.

B. To exercise any powers conferred upon corporations formed under the District of Columbia Nonprofit Corporation Act of 2010 as may be necessary or convenient in order to accomplish the above-described purposes, including, but not limited to, the power to accept donations of money or property, whether real or personal, or any interest therein, wherever situated, or any other thing of value.

FOURTH: The Corporation shall not have members, and shall not issue any capital stock.

FIFTH: Except for the initial Board of Directors, whose names are set forth in these Articles of Incorporation, the Board of Directors shall be chosen in the manner provided in the Bylaws.

SIXTH: Except as provided in these Articles of Incorporation, the internal affairs of the Corporation shall be regulated and determined as provided in the Bylaws.

SEVENTH: Upon the termination, dissolution or winding up of the Corporation in any manner or for any reason, voluntary or involuntary, its assets, if any, remaining after the payment or provision for payment of all liabilities of the Corporation shall be distributed to, and only to, one or more organizations described in the Code.

EIGHTH: The private property of the officers and directors of the Corporation shall not be subject to payment of debts of the Corporation to any extent whatever.

NINTH: The Corporation shall indemnify any director or officer or former director or officer of the Corporation against expenses actually and necessarily incurred by him or her in connection with the defense of any action, suit or proceeding in which he or she is made a party by reason of being or having been such a director or officer, except in relation to matters as to which he or she shall be adjudged in such action, suit or proceeding to be liable for negligence or misconduct in the performance of a duty, matters as to which he or she shall be adjudged liable for receiving a financial benefit to which he or she was not entitled, proceedings by or in the right of the Corporation, or matters as to which he or she shall be adjudged liable for intentional infliction of harm or an intentional violation of criminal law. The indemnification provided by this Article shall not be deemed exclusive of any other rights to which such director or officer may be entitled under any bylaw, agreement, vote of the Board of Directors or otherwise. No payment shall be made under this Article if such payment would result in any liability for tax under chapter 42 of the Code.

TENTH: All references contained in these Articles of Incorporation to the Internal Revenue Code of 1986, or to the "Code," shall be deemed to refer to the Internal Revenue Code of 1986 and to the Regulations established pursuant thereto as they now exist or as they may hereafter be amended. Any reference contained in these Articles of Incorporation to a specific section or chapter of the Code shall be deemed to refer to such section or chapter and the Regulations established pursuant thereto as they now exist or as they may hereafter be amended, and to any corresponding provision of any future United States Internal Revenue law and any Regulations established pursuant thereto.

ELEVENTH: The name and address, including street number and zip code, of the initial registered agent of the Corporation are:

Oubab Khalil
National Coalition of Syrian Revolution and Opposition Forces
1101 Pennsylvania Ave. NW
Washington, DC 20036

TWELFTH: The number of directors constituting the initial Board of Directors of the Corporation is three. The name and address, including street number and zip code, of the individuals who are to constitute the initial Board of Directors are:

<u>Name:</u>	<u>Address:</u>
<u>Dr. Najib Ghadbian</u>	_____
<u>Oubab Khalil</u>	_____
<u>Bassel C. Korkor, Esq.</u>	_____

THIRTEENTH: The name and address, including street number and zip code, of the incorporators are:

Name:

Address:

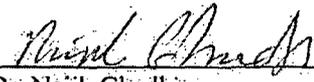
Dr. Najib Ghadbian

Oubab Khalil

Bassel C. Korkor, Esq.

[Redacted address information]

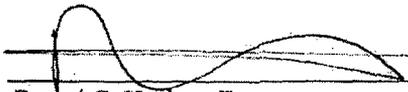
IN WITNESS WHEREOF, I have signed these Articles of Incorporation this 12th day of February, 2013.


Dr. Najib Ghadbian

IN WITNESS WHEREOF, I have signed these Articles of Incorporation this 12th day of February, 2013.


Oubab Khalil

IN WITNESS WHEREOF, I have signed these Articles of Incorporation this 12 day of February, 2013.


Bassel C. Korkor, Esq.

Washington, D.C.
I acknowledge that Dr. Najib Ghadbian, Oubab Khalil, and Bassel C. Korkor appeared before me and that they are the persons named herein, on this 12th day of Feb., 2013.

ELLEN L. OWENS
Notary Public, District of Columbia
My Commission Expires August 31, 2015


Notary Public

BYLAWS
OF
MISSION OF THE NATIONAL COALITION
OF SYRIAN REVOLUTION AND OPPOSITION FORCES

Article I

Name

The name of the corporation is Mission of the National Coalition of Syrian Revolution and Opposition Forces ("the Mission").

Article II

Purposes of the Mission

The Mission has been organized to operate exclusively for charitable and educational purposes, including, but not limited to, the following:

- to serve as the diplomatic mission and political representative in the United States of the National Coalition of Syrian Revolution and Opposition Forces;
- to provide services and representation to and on behalf of Syrians in the United States;
- to assist the people of Syria transition to a free and democratic country with a transparent and accountable government;
- to encourage and facilitate the participation of Syrian Americans and others in the establishment of a democratic Syria;
- to promote the causes of this organization and the interests of the Syrian people among the American public, foreign audiences, civil society, private businesses, and U.S. and foreign public officials, including legislative members and staff, executive personnel, and diplomatic officials and staff;

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- to engage in fundraising events to generate charitable donations in the Mission and to solicit, accept and hold contributions, gifts and grants of every sort for the purposes set forth in these Articles;
- to acquire, lease, construct, own, operate and maintain property, buildings and/or premises which may be necessary or incidental to carrying out the purposes set forth in these articles;
- to hold, invest, reinvest or administer the Mission's property of every kind and description, including, without limitation, its funds, and to use, apply, expend, disburse, grant and contribute the same for the purposes set forth in these Articles;
- to perform any acts, including, without limitation, the raising of funds, necessary or incidental to the carrying out any of the purposes set forth in these Articles; and
- to do and participate in all and everything necessary, suitable or proper for the accomplishment of the Mission's purposes or powers and the attainment of its objectives, subject to the restrictions of all applicable laws.

Article III

Offices and Registered Agent

Section 1. Offices. The principal office of the Mission and such other offices as it may establish shall be located at such place(s), either within or without the District of Columbia, as may be designated by the Board of Directors.

Section 2. Agent. The Mission shall maintain continuously within the District of Columbia an office or a registered agent, which agent shall be designated by the Board of Directors or the Chief of Staff.

Section 3. Changes. Any change in the name or address of the registered agent of the Mission shall be accomplished in compliance with the District of Columbia Nonprofit

Corporation Act of 2010, Title 29, Chapter 4, of the District of Columbia Code, and as provided in these Bylaws.

Article IV

Board of Directors

Section 1. General Powers and Duties. The affairs and property of the Mission shall be managed, controlled and directed by a Board of Directors. The Board of Directors shall have, and may exercise, any and all powers provided in the Articles of Incorporation or the District of Columbia Nonprofit Corporation Act of 2010 which are necessary or convenient to carry out the purposes of the Mission.

Section 2. Composition of the Board of Directors

A. The number of Directors constituting the Board of Directors shall be set by the Board of Directors, but shall not be less than three.

B. The term of a Director shall be 2 years, or until a successor is appointed or elected. The term of a Director shall also expire by his or her death, resignation or removal in accordance with these Bylaws.

C. Any vacancy in the Board of Directors, including a vacancy caused by an increase in the number of Directors comprising the Board of Directors, shall be filled by a majority vote of the remaining Directors in office, even though less than a quorum. The expiration of a Director's stated term of office shall be treated as a vacancy to be filled in accordance with this section.

D. A Director may resign at any time by giving notice thereof in writing to the Head of Mission and Chief of Staff.

E. A Director may be removed, with or without cause, by a two-thirds vote of the other Directors in office.

F. One Director shall serve as Chairman of the Board of Directors of the Mission ("Head of Mission"). The Head of Mission shall be the person who is designated, elected, or appointed as the US Special Representative, Envoy, Ambassador, or similar head of mission of the designating body and authority of the National Coalition of Syrian Revolution and Opposition Forces, for the duration of his or her term in that capacity. The Head of Mission shall preside at all meetings of the Board of Directors at which he or she is present, and shall perform such other duties as may be required of him or her by the Board of Directors, or by the National Coalition of Syrian Revolution and Opposition Forces.

Section 3. Meetings of the Board of Directors.

A. Regular meetings of the Board of Directors shall be held at least 1 time each year, or more often as directed by the Board of Directors in accordance with these Bylaws. Special meetings shall be called at the discretion of the Head of Mission, at the request of one-third of the Directors in office (at least 2 Directors), or at the request of the Chief of Staff.

B. The time and place of all meetings of the Board of Directors shall be designated by the Head of Mission. The meetings may be held within or without the District of Columbia.

C. At least three days' notice shall be given to each Director of a regular meeting of the Board of Directors. A special meeting of the Board of Directors may be held upon notice of at least twenty-four hours. Notice of a meeting of the Board of Directors shall specify the date, time and place of the meeting, but, except as provided in Article IX of these Bylaws, need not specify the purpose for the meeting or the business to be

conducted. Notice must be either delivered personally to each Director, mailed to his or her business address as it appears on the records of the Mission, sent by facsimile to his or her facsimile number as it appears on the records of the Mission, or sent to his or her email address as it appears on the records of the Mission. If such notice is given by mail, it shall be deemed delivered when deposited in the mail properly addressed and with postage prepaid thereon. If such notice is given by facsimile or email, it shall be deemed delivered upon receipt of confirmation that the transmittal has been successful.

Notwithstanding the foregoing, a Director may waive notice of any regular or special meeting of the Board of Directors by written statement filed with the Board of Directors, or by oral statement at any such meeting. Attendance at a meeting of the Board of Directors shall also constitute a waiver of notice, except where a Director states that he or she is attending for the purpose of objecting to the conduct of business on the ground that the meeting was not lawfully called or convened.

D. One-third of the number of Directors, or two Directors, whichever is greater, shall constitute a quorum for the transaction of business at any meeting of the Board of Directors.

E. Except as otherwise provided by law, the Articles of Incorporation or these Bylaws, all matters before the Board of Directors shall be decided by a majority vote of the Directors present at a meeting at which a quorum exists.

F. Any action required or permitted to be taken at any meeting of the Board of Directors may be taken without a meeting if the text of the resolution or matter agreed upon is sent to all the Directors in office and all the Directors in office consent to such action in writing, setting forth the action taken. Such consent in writing shall have the

same force and effect as a vote of the Board of Directors at a meeting and may be described as such in any document executed by the Mission.

G. Any or all Directors may participate in a meeting of the Board of Directors, or a committee of the Board of Directors, by means of conference telephone or by any means of communication by which all persons participating in the meeting are able to hear one another, and such participation shall constitute presence in person at the meeting.

Article V

Committees

Section 1. Executive Committee. By a majority vote of the Directors in office, the Board of Directors may designate an Executive Committee consisting of at least three Directors, one of whom shall be the Head of Mission, who shall also be Chairman of the Executive Committee. The Board of Directors may designate one or more of the Directors as alternate members of the Executive Committee, who may replace any absent or disqualified member at any meeting of the Committee upon the request of the Head of Mission. Except as otherwise required by law or these Bylaws, the Executive Committee shall have such authority as the Board of Directors shall grant to it for the management of the Mission, including the power to authorize the seal of the Mission to be affixed to all papers that may require it. The Executive Committee shall keep regular minutes of its proceedings and shall report the same to the Board of Directors when required. Vacancies in the Executive Committee shall be filled by the Board of Directors at a regular or special meeting.

Section 2. Other Committees. The Board of Directors may create other committee(s) consisting of Directors or other persons, which committee(s) shall have such authority as the Board of Directors may by law direct.

Section 3. Attendance by the Chief of Staff. The Chief of Staff shall be entitled to participate in meetings of the Board of Directors, the Executive Committee and all other committees, but shall not be entitled to vote in his or her capacity as Chief of Staff (but shall be entitled to vote as a Director if he/she is a Director).

Section 4. Meetings of Committees. The following shall apply to committee meetings unless otherwise provided in a committee charter, as approved by the Board of Directors.

A. One-third of the number of Directors in a committee, or two Directors, whichever is greater, shall constitute a quorum for the transaction of business at any meeting of such committee.

B. Except as otherwise provided by law, the Articles of Incorporation, or these Bylaws, all matters before a committee shall be decided by a majority vote of the Directors present at a meeting at which a quorum exists.

C. Any action required or permitted to be taken at any meeting of a committee may be taken without a meeting if the text of the resolution or matter agreed upon is sent to all the Directors of the committee and all the Directors of the committee consent to such action in writing, setting forth the action taken. Such consent in writing shall have the same force and effect as a vote of the committee at a meeting and may be described as such in any document executed by the Mission.

D. Any or all Directors may participate in a meeting of a committee by means of conference telephone or by any means of communication by which all persons participating in the meeting are able to hear one another, and such participation shall constitute presence in person at the meeting.

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Article VI

Officers

Section 1. The Officers of the Mission shall be a Chief of Staff, a Treasurer and such other Officers as may from time to time be enacted by the Board of Directors. Officers shall be chosen by the Board of Directors. Officers may, but need not, be Directors. Any two or more offices may be held by the same individual, except no person shall serve as both Head of Mission and Treasurer concurrently.

Section 2. All of the Officers of the Mission shall hold their offices for such terms, not in excess of three years without re-election, as shall be determined from time to time by the Board of Directors, and shall exercise such powers, perform such other duties and receive such compensation as shall be determined from time to time by the Board of Directors.

Section 3. The Officers of the Mission shall hold office until their successors are chosen and qualified. Any Officer of the Mission may be removed, with or without cause, at any time by a two-thirds majority of the Directors in office. Any vacancy occurring in any office of the Mission may be filled by the Board of Directors.

Section 4. The Chief of Staff, Treasurer, and such other Officers as may be authorized by the Board of Directors may enter into and execute on behalf of the Mission contracts, leases, debt obligations and all other forms of agreements or instruments, whether under seal or otherwise, permitted by law, the Articles of Incorporation and these Bylaws, except where such documents are required by law to be otherwise signed and executed, or where the signing and execution thereof shall be exclusively delegated to some other Officer or agent of the Mission.

Section 5. The duties and powers of the Officers of the Mission shall be as provided in these Bylaws or as provided pursuant to these Bylaws, or (except to the extent they are inconsistent with these Bylaws or with any provision made pursuant hereto) shall be those customarily exercised by corporate officers holding such offices.

Section 6. The Chief of Staff. The Chief of Staff shall be the chief operating officer of the Mission and, subject to the control of the Board of Directors, shall perform all duties customary to that office and shall supervise and control all of the affairs of the Mission in accordance with any policies and directives approved by the Board of Directors.

Section 7. The Treasurer.

A. The Treasurer shall perform all duties customary to that office, shall have the custody of and be responsible for all corporate funds and securities and shall keep full and accurate accounts of receipts and disbursements in the books of the Mission. He or she shall deposit or cause to be deposited all monies or other valuable effects in the name of the Mission in such depositories as shall be selected by the Board of Directors.

B. The Treasurer shall disburse the funds of the Mission as may be ordered by the Board of Directors or its duly authorized delegate, taking proper vouchers for such disbursements, and shall render an account of all his or her transactions as Treasurer and of the financial condition of the Mission to the Head of Mission, Chief of Staff and the Board of Directors at its regular meetings or when the Board of Directors so requires.

Article VII

Indemnification

Section 1. The Mission does hereby indemnify to the maximum extent legally permissible each Director and Officer and former Director and Officer of the Mission, and

each individual who served at its request as a director, officer or trustee of another corporation, partnership, joint venture, trust, other enterprise or employee benefit plan, against expenses (including attorneys' fees), judgments, fines and amounts paid in settlement actually and reasonably incurred by him or her in connection with or arising out of any threatened, pending or completed claim, action, suit, proceeding, issue or matter of whatever nature, whether civil, criminal, legislative, administrative or investigative, in which he or she may be involved as a party or otherwise by reason of his or her being or having been such Director, Officer, director, officer or trustee.

Section 2. This indemnification includes amounts paid or incurred in connection with reasonable settlements if made with a view to the curtailment of the costs of litigation.

Section 3. This indemnification includes amounts paid or incurred in connection with acts of negligence, whether liability on the part of such Director, Officer, director, officer or trustee exists as to its Directors, Officers, agents or employees or as to third parties, including creditors, provided that the conduct complained of on the part of the Director, Officer, director, officer or trustee was done in good faith and with the belief that it was in the best interest of the Mission and on the reasonable assumption of its legality.

Section 4. This indemnification also extends to any criminal action, suit, investigation or proceeding, provided that the same shall be dismissed against such Director, Officer, director, officer or trustee or that he or she shall have been found not guilty. Such indemnification likewise extends to a criminal action, suit, investigation or proceeding that is terminated by a plea of *nolo contendere*, or its equivalent, to a charge of

misdemeanor, provided that the conduct complained of on the part of the Director, Officer, director, officer or trustee was done in good faith and with the belief that it was in the best interest of the Mission and on the reasonable assumption of its legality.

Section 5. No such reimbursement or indemnification shall relate to any expense incurred in connection with:

(A) with any matter as to which such Director, Officer, director, officer or trustee has been adjudged to be liable for gross negligence or misconduct in the performance of his or her duty to the Mission,

(B) a proceeding by or in right of the Mission,

(C) with any matter as to which such Director, Officer, director, officer or trustee has been adjudged to be liable for receiving a financial benefit to which the individual was not entitled, or

(D) with any matter as to which such Director, Officer, director, officer or trustee has been adjudged liable for intentional infliction of harm or an intentional violation of criminal law,

exclusive of issues or matters not related to the conduct on which the judgment was based, unless and only to the extent that the court in which the action or suit was brought shall determine that, despite such adjudication of liability and in view of all the circumstances of the case, such Director, Officer, director, officer or trustee is fairly and reasonably entitled to indemnification for those expenses that the court shall deem proper.

Section 6. The indemnification provided by this Article VII shall not be deemed exclusive of any other rights which such Director, Officer, or trustee may have under any agreement, vote of the Board of Directors or otherwise.

Section 7. No indemnification shall be made under this Article VII if such indemnification would result in any liability for tax under chapter 42 of the Internal Revenue Code of 1986.

Section 8. Every provision of this Article VII is intended to be severable, and, if any term or provision is invalid for any reason whatsoever, such invalidity shall not affect the validity of the remainder of this Article VII.

Article VIII

Miscellaneous Provisions

Section 1. Seal. The seal of the Mission shall be as designated by the Board of Directors and in compliance with applicable law.

Section 2. Checks. All checks, drafts or other orders for the payment of money shall be signed by such Officer or Officers or such other person or persons as the Board of Directors may from time to time designate.

Section 3. Fiscal Year. The fiscal year of the Mission shall be determined by resolution of the Board of Directors.

Article IX

Amendments

Section 1. Amendment of Bylaws. These Bylaws may be altered, amended or repealed, or new Bylaws may be adopted, at any meeting of the Board of Directors, by a majority vote of the Directors in office, if at least seven days' written notice is given of the intention to take such action at such meeting.

Section 2. Amendment of Articles of Incorporation. The Articles of Incorporation may be altered or amended, or new Articles of Incorporation may be adopted, at any

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meeting of the Board of Directors, by a majority vote of the Directors in office, if at least ten days' written notice is given of the intention to take such action at such meeting.



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

Office of Foreign Assets Control

Executive Order 13582 of August 17, 2011
Blocking Property of the Government of Syria and
Prohibiting Certain Transactions With Respect to Syria

GENERAL LICENSE NO. 16

Authorizing Certain Services to the
National Coalition of Syrian Revolutionary and Opposition Forces

(a) Subject to the restrictions and conditions set forth in paragraphs (b), (c), and (d) of this general license, U.S. persons are authorized to export, reexport, sell, or supply, directly or indirectly, to the National Coalition of Syrian Revolutionary and Opposition Forces ("the Coalition") services otherwise prohibited by section 2(b) of Executive Order 13582 of August 17, 2011 ("E.O. 13582").

Note to paragraph (a): For additional guidance regarding the exportation of items to Syria and the exportation of services that are ordinarily incident to the exportation of items to Syria, see General License No. 4A, "Exports or Reexports to Syria of Items Licensed or Otherwise Authorized by the Department of Commerce Authorized; Exports or Reexports of Certain Services Authorized."

(b) This general license does not authorize:

- (1) Any transaction with a person whose property and interests in property are blocked pursuant to Executive Order 13338 of May 11, 2004, Executive Order 13399 of April 25, 2006, Executive Order 13460 of February 13, 2008, Executive Order 13572 of April 29, 2011, Executive Order 13573 of May 18, 2011, E.O. 13582, or Executive Order 13606 of April 22, 2012, or any transaction with a person sanctioned pursuant to Executive Order 13608 of May 1, 2012; or
- (2) The exportation, reexportation, sale, or supply, directly or indirectly, of any services in support of the exportation or reexportation to Syria of any item listed on the United States Munitions List (22 C.F.R. part 121).

(c) Any transfer of funds to or from the Coalition under this general license must be conducted through the Coalition's U.S. office through an account of the Coalition at a U.S. financial institution specifically licensed for that purpose by the Office of Foreign Assets Control.

Note to paragraph (c): For additional information on the bank account that is specifically licensed for receipt of funds transfers, please contact the U.S. office of the Coalition at 1101 Pennsylvania Avenue NW, Ste # 6620, Washington, DC 20004, ATTN: Oubab Khalil or by phone at (202) 800-1130.

(d) Consistent with sections 542.101 and 542.502 of the Syrian Sanctions Regulations, 31 CFR Part 542, this general license does not authorize any transaction prohibited by any part of 31 CFR Chapter V or any Executive order other than Executive Order 13582. For example, this general license does not authorize any transaction with a person whose property and interests in property are blocked pursuant to Executive Order 13224 of May 23, 2001, such as al-Nusrah.

Note to General License No. 16: Financial institutions transferring funds to or from the Coalition pursuant to this general license may rely on the originator of a funds transfer with regard to compliance with paragraph (b), provided that the transferring institution does not know or have reason to know that the funds transfer is not in compliance with paragraph (b).


Adam J. Szubin
Director
Office of Foreign Assets Control

Dated: March 14, 2013