



Memorandum

VIA EMAIL

Date: February 24, 2011
To: Clients and Friends
From: Stanley J. Marcuss
Re: Sanctions Against Libya Coming

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At a luncheon today with Adam Szubin, the Director of the Office of Foreign Assets Control, I learned that sanctions against Libya are under active consideration within the Administration. This is, of course, not surprising given developments in that country. Whether they are actually imposed, however, depends on whether Qaddafi survives and, if he does not, the nature of the government that takes his place. Those with business interests in or relating to Libya need to be prepared to deal with the possibility that business as usual with Libya may not be possible in the future.