



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

LICENSE No. IA-2015-322691-2

IRANIAN TRANSACTIONS AND SANCTIONS REGULATIONS

LICENSE AMENDMENT


(Granted under the authority of one or more of 22 U.S.C. §§ 2349aa-9, 8501-51, 8701-85, 50 U.S.C. §§ 1601-51, 1701-06, Executive Orders 12957, 12959, 13059, 13599, and 13628, and 31 C.F.R. Parts 501 and 560.)

To: **Paws and Nose, Inc.**  
**1524 Birchmeadow Ct., Unit I-1524**  
**San Jose, CA 95131**  
**ATTN: Guiti Zolfagharkhani, President**

1. Based upon the requests dated September 22, 2015 and April 9, 2017 to the Office of Foreign Assets Control (OFAC) and information otherwise available to OFAC (the "Application"), License No. IA-2015-322691-1 is hereby amended and replaced in its entirety by the transactions and activities delineated herein.
2. This License is subject to the condition, among others, that the Licensee(s) comply with its terms and with all regulations, rulings, orders, and instructions issued under one or more of the authorities cited above.
3. This License **expires on the earlier of the completion of the authorized transaction(s) or February 29, 2020**, and is not transferable. The transactions described in this License are subject to the authorities cited above and any regulations and rulings issued pursuant thereto. This License may be revoked or modified at any time. If this License was issued as a result of willful misrepresentation it may be declared void from the date of its issuance or from any other date.
4. This License does not authorize transactions prohibited under any law or regulation (including reporting requirements) administered by the Office of Foreign Assets Control other than those listed above.
5. This License does not excuse the Licensee(s) from the need to comply with any law or regulation (including reporting requirements) administered by any other agency or the need to obtain any required authorization(s) from any other agency.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By  February 12, 2018  
David J. Blackborow Date  
Assistant Director for Licensing

Attention is directed to, *inter alia*, 18 U.S.C. § 1001, 50 U.S.C. § 1705, and 31 C.F.R. § 560.701 for provisions relating to penalties.

**SECTION 1 - AUTHORIZATION:** Subject to the conditions and limitations stated herein, Paws and Nose Inc. (the “Licensee”) is authorized to engage in the following transactions in collaboration with the organizations, including animal shelters and veterinary clinics, veterinarians and other individual in Iran listed in the Application: (a) solicit and transfer up to \$500,000 annually to be used to relieve stray animal suffering; (b) donate medical services for stray animals in Iran; (c) donate sheltering and rehoming services for stray animals in Iran; and (d) donate supplies related to any of the foregoing activities, as described in the Application.

**SECTION 2 - CONDITIONS:** (a) This License does not authorize the donation or other provision of food or medicine not generally licensed for commercial sale pursuant to 31 C.F.R. § 560.530.

(b) Nothing in this license authorizes the employment by the Applicant of any person in Iran.

(c) This License only authorizes the exportation of goods, technology or software designated EAR99 by the United States Department of Commerce, and does not authorize the exportation of goods, technology or software classified by the United States Department of Commerce on the Commerce Control List under the Export Administration Regulations (15 C.F.R. Parts 730 et seq.), or controlled by the United States Department of State under the International Traffic in Arms Regulations (22 C.F.R. Parts 120 et seq.).

(d) Any payment or transfer of funds through the U.S. financial system ordinarily incident and necessary to give effect to a transaction authorized by **SECTION 1** hereof must be effected in a manner consistent with 31 C.F.R. § 560.516 and may not involve the debiting or crediting of an “Iranian account,” as such term is defined in 31 C.F.R. § 560.320.

(e) Except for transactions that may be prohibited by section 4 of Executive Order 13628, this License does not authorize any transactions otherwise prohibited by Executive Order 13628.

**SECTION 3 - WARNINGS:** (a) Except as authorized in **SECTION 1** hereof, nothing in this License authorizes transactions prohibited by the Iranian Transactions and Sanctions Regulations (31 C.F.R. Part 560), by Executive Orders 12957, 12959, 13059, 13599, or 13628, or by any other laws or regulations administered by the Office of Foreign Assets Control. In particular, please note that the Weapons of Mass Destruction Proliferators Sanctions Regulations (31 C.F.R. Part 544) and the Global Terrorism Sanctions Regulations (31 C.F.R. Part 594) may prohibit transactions ordinarily incident to activities authorized in **SECTION 1** of this License, including transactions with financial institutions or other persons whose property and interests in property are blocked pursuant to one or both of these authorities.

(b) The authorization set forth in this License applies only to laws and regulations administered by the Office of Foreign Assets Control, and should not be interpreted to excuse the Licensee from compliance with other laws, regulations, orders or rulings to which it may be subject.

(c) This License does not authorize any transactions that occurred prior to the date of its issuance.

(d) Any transfer of funds through the U.S. financial system pursuant to the authorizations set forth in **SECTION 1** hereof should reference the number of this License to avoid blocking or rejection of the transfer.

**SECTION 4 - RECORDKEEPING AND REPORTING REQUIREMENTS:** The Licensee is subject to the recordkeeping and reporting requirements of, *inter alia*, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain records concerning the transactions undertaken pursuant

to this License for a period of five years. Such records shall clearly demonstrate the applicability of the authorization set forth in **SECTION 1** hereof.

**SECTION 5 - PRECEDENTIAL EFFECT:** The authorization contained in this License is limited to the transactions specified in the Application.

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