
Congress Extends Statute of Limitations for Violations of U.S. Sanctions to Ten Years

Date: 05/02/24

On April 24, 2024, President Biden signed into law [H.R. 815](#), a foreign aid bill that has received much media attention for its authorization of foreign aid appropriations to U.S. allies, including Ukraine, Israel, and Taiwan, and the proposed ban or sale of TikTok. Notably, the bill also includes a change to U.S. sanctions laws that has received much less attention: the statute of limitations for civil and criminal violations under the two primary sanctions laws, the International Emergency Economic Powers Act ("IEEPA") and the Trading with the Enemy Act ("TWEA"), has been doubled from five to ten years. Though it does not appear to apply retroactively based on the text of the bill, the new statute of limitations became effective immediately upon the signing of the bill for violations that were not yet time-barred. It remains to be seen how this change will be implemented with respect to potential civil enforcement, though the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") has indicated that it may provide further guidance on this point.

Attorneys

- Brian T. Markley
- Brockton B. Bosson
- Jennifer Potts