

**PUBLICATIONS**

# ‘Implementation Day’ Marks Rollback of Significant Nuclear-Related Sanctions on Iran

## Business Crimes Bulletin

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On Jan. 16, 2016, Secretary of State John Kerry confirmed the International Atomic Energy Agency’s determination that Iran implemented its key nuclear-related measures as described in the Joint Comprehensive Plan of Action (JCPOA). Thus, Jan. 16, 2016 was “Implementation Day” under the JCPOA. As a result of Iran verifiably meeting its nuclear commitments, the United States lifted certain sanctions primarily applicable to non-U.S. persons, including foreign entities owned or controlled by U.S. persons. In this article, lawyers Betty Santangelo, Gary Stein, Peter White and former SRZ lawyers Seetha Ramachandran, Lisa A. Prager, Lara Covington, Matthew Moses and Michael Court examine the details of the rollback of sanctions.

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