

Mr Ryan Jones

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25 July 2019

Dear Mr Jones

Ref: FOI2019/09952

## Freedom of Information Act 2000: Financial sanctions

Thank you for your enquiry of 2 July 2019, which we have considered under the terms of the Freedom of Information Act 2000 (the FOI Act).

You asked for the following information:

*"To whom it may concern at the Office of Financial Sanctions Implementation (OFSI), HM Treasury in the UK.*

*Do the following companies have special licenses to represent people or entities on UK or EU sanctions lists?*

*Bryan Cave, US offices, <https://www.bclplaw.com> Bryan Cave, United Kingdom offices, <https://www.bclplaw.com/en-GB/offices/london.html>*

*Four Square Chambers in the UK <https://www.4newsquare.com> The RPC law firm - <https://www.rpc.co.uk>."*

We are unable to comment on whether the companies named in the request hold OFSI licences. Under section 41(2) of the FOI Act, we are not required to confirm whether or not information is held in circumstances where the information, if held, would have been obtained from a third party with an expectation of confidence and disclosure would give rise to an actionable breach of confidence. Section 41 is an absolute exemption, which means that the public interest test does not apply.

The following explanation is being provided to be helpful. Law firms can provide legal advice to, or act on behalf of, a designated person. However, they cannot receive any payment for that advice without obtaining a licence from OFSI. Information about OFSI and financial sanctions, including the licensing process can be found in our general guidance available from the following link:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/685308/financial\\_sanctions\\_guidance\\_march\\_2018\\_final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685308/financial_sanctions_guidance_march_2018_final.pdf).

If you have any queries about this letter, please contact us. Please quote the reference number above in any future communications. Further, if you have any further queries about financial sanctions, you can contact OFSI directly at [ofsi@hmtreasury.gov.uk](mailto:ofsi@hmtreasury.gov.uk).

Yours sincerely



Information Rights Unit

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Email: [foirequests@hmtreasury.gov.uk](mailto:foirequests@hmtreasury.gov.uk)

It would assist our review if you set out which aspects of the reply concern you and why you are dissatisfied.

If you are not content with the outcome of the review, you may apply directly to the Information Commissioner for a decision. Generally, the Commissioner will not make a decision unless you have exhausted the complaints procedure provided by HM Treasury which is outlined above.

The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF (or via their website at: <https://ico.org.uk>).