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May 25, 2011

The Honorable Timothy F. Geithner
Secretary of the Treasury
United States Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

VIA FAX: 202-622-0073

RE: Executive Order 13566 of February 25, 2011
Blocking Property and Prohibiting Certain Transactions
Related to Libya
Recommendation for Licenses to Release Funds to
Libyan Students and Exchange Visitors in the United
States

Dear Secretary Geithner:

We write on behalf of the American Immigration Lawyers Association to recommend that the Department of the Treasury, Office of Foreign Assets Control, grant such licenses as may be necessary to allow Libyan students and exchange visitors engaged in study and research to receive scholarship funds and other financial support in order to continue their educational and research activities in the United States.

AILA is a voluntary bar association of more than 11,000 attorneys and law professors practicing, researching and teaching in the field of immigration and nationality law. The organization has been in existence since 1946 and is affiliated with the American Bar Association. Our mission includes the advancement of the law pertaining to immigration and nationality and the facilitation of justice in the field. AILA members regularly advise and represent businesses, U.S. citizens, U.S. lawful permanent residents, and foreign nationals, including foreign students and exchange visitors, regarding the application and interpretation of U.S. immigration laws. Our collective experience provides us with a unique perspective and expertise on issues involving the immigration laws.

According to information provided through the Department of Homeland Security's (DHS) Student and Exchange Visitor Program, there are approximately 2,000 Libyan students and exchange visitors at colleges and universities in the United States. Funds for educational

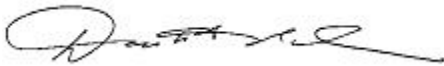
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expenses and personal support are subject to sanctions under Executive Order 13566. We are aware that the Office of Foreign Assets Controls (OFAC) has granted licenses allowing access to some of those funds. We encourage OFAC to view favorably additional requests for licenses to permit uninterrupted access to such funds.

If there is a significant interruption in access to funds, these students and exchange visitors may find themselves unable to maintain lawful visa statuses in the United States under the applicable regulations of the DHS, because they will be unable to maintain enrollment in the academic institutions where they are studying and conducting research. Failure to maintain enrollment may be treated by DHS as a violation of student or exchange visitor status, which may render the students and exchange visitors subject to immigration enforcement actions, including removal. Though a number of organizations have approached DHS to request administrative relief and the favorable exercise of discretion on behalf of the affected population, the release of funds through appropriate licensing would alleviate much of the problem.

Thank you in advance for your consideration of this recommendation. Should you need further information, please contact Robert P. Deasy, Director of Liaison and Information, at 202-507-7612, or by e-mail at rdeasy@aila.org.

For the American Immigration Lawyers Association:



David W. Leopold
President



Crystal L. Williams
Executive Director

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