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September 11, 2026

Sudha Setty
President and Chief Executive Officer
Law School Admission Council
662 Penn Street
Newtown, PA 18940

Re: Urgent Request to Correct LSAC Restrictions Affecting Iranian Americans
and Lawful Permanent Residents

Dear Sudha:

I write on behalf of the Public Affairs Alliance of Iranian Americans (PAAIA) regarding LSAC's implementation of recent changes to U.S. sanctions policy toward Iran and reports that U.S. citizens and lawful permanent residents are consequently being denied access to LSAC services.

On August 24, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) suspended General License G, which had authorized certain academic exchanges and educational services involving individuals located in Iran or ordinarily resident there. We recognize that this change requires LSAC to reassess certain services and comply fully with U.S. sanctions law.

What we are seeing, however, extends significantly beyond what those restrictions require.

Over the past several days, PAAIA has become aware of numerous individuals who have received personalized notices from LSAC stating: "LSAC is prohibited from providing any products or services to Iranian citizens or residents." That formulation appears to conflate Iranian citizenship with residence in Iran, and the manner in which LSAC appears to be implementing the restrictions is deeply troubling.

The suspension of General License G does not create a categorical prohibition on providing LSAC services to individuals simply because they are of Iranian heritage or hold Iranian citizenship. The applicable sanctions framework distinguishes between nationality and residence. General License G addressed, among others, educational services involving individuals located in Iran or located outside Iran but ordinarily resident in Iran. Iranian nationality or heritage, standing alone, does not render an individual residing in the United States categorically ineligible to receive LSAC services.

Yet the reports reaching PAAIA indicate that LSAC has restricted accounts belonging to **U.S. citizens—including individuals who have never set foot in Iran—as well as lawful U.S. permanent residents. These reports raise serious questions about whether LSAC's screening process is improperly treating Iranian nationality, heritage, or other Iran-related information as a proxy for current residence or sanctions status.**

In at least one documented case, an individual opened his LSAC account while living in Iran more than a decade ago. In the intervening years, he immigrated to the United States, attended an American law school, became a practicing attorney, and became a U.S. citizen. Nevertheless, LSAC sent him a notice stating that it was prohibited from providing him services, apparently relying on residency information that was more than a decade out of date.

This is not a minor administrative problem. American citizens and lawful permanent residents who are not prohibited from receiving these services appear to be affected by compliance measures that extend beyond what U.S. sanctions require.

There is a broader human consequence that should not be overlooked. Iranian Americans have repeatedly confronted circumstances in which their heritage or national origin results in additional scrutiny, restricted access to ordinary services, or treatment as though a familial connection to Iran itself creates a legal or security concern. **Applying sanctions restrictions to American citizens and lawful permanent residents because of outdated information about their former residence—or because of their heritage—only compounds that marginalization.**

Whatever LSAC's intent, a compliance process that results in American citizens and lawful permanent residents with Iranian nationality or heritage being denied services raises serious concerns about bias and discrimination. Sanctions compliance must be based on applicable law and accurate, current information about the individual involved—not assumptions derived from nationality, national origin, heritage, or outdated records.

Compliance with U.S. sanctions cannot become a proxy for exclusion based on Iranian nationality or heritage.

This outcome is especially difficult to reconcile with LSAC's own stated commitment to advancing access, equity, and fairness in law school admission. An organization entrusted with facilitating access to American legal education has a particular responsibility to ensure that compliance measures do not unnecessarily or erroneously prevent eligible individuals from pursuing that education.

I therefore ask LSAC to take immediate action to:

1. Correct its characterization of the applicable sanctions restrictions and make clear that Iranian citizenship or heritage, standing alone, does not make an individual ineligible for LSAC services;
2. Immediately review all accounts restricted following the suspension of General License G, including the data and criteria LSAC used to identify those accounts;
3. Restore access without delay to U.S. citizens, lawful permanent residents, and others who are legally eligible to receive LSAC services;
4. Establish an expedited and readily accessible review process through which affected individuals can correct inaccurate or outdated information and demonstrate their eligibility for LSAC services, with determination made within 48 hours of submission;
5. Notify every individual who received LSAC's original communication of any correction to LSAC's characterization or implementation of the applicable restrictions and provide clear instructions for obtaining immediate review;
6. Ensure that no affected applicant suffers any disadvantage relating to LSAT registration, Credential Assembly Service, applications, scholarships, or other deadlines as a consequence of

an erroneous restriction, including by providing appropriate deadline accommodations or remedial measures necessary to restore the applicant to the position they would have occupied absent the restriction;

7. Review LSAC's sanctions-compliance procedures to identify and correct any nationality- or national-origin-based bias and implement safeguards to ensure that Iranian heritage, citizenship, place of birth, or historical account information is not improperly used as a proxy for current residence or sanctions status; and
8. Designate a named point of contact at LSAC whom affected individuals, like PAAIA, and like-minded organizations can reach directly to resolve account restrictions on an expedited basis.

I would welcome the opportunity to speak with you and your legal team directly. We also ask LSAC to provide information regarding the criteria used to identify affected accounts, the number of accounts restricted, the basis on which U.S. citizens and lawful permanent residents were identified for restriction, the process available for reviewing erroneous determinations, and the steps LSAC is taking to ensure that eligible individuals are restored to full access without delay.

PAAIA recognizes LSAC's obligation to comply with federal law. But sanctions compliance must be accurate, proportionate, and grounded in what the law actually requires. A federal restriction concerning transactions involving the Islamic Republic of Iran should not result in American citizens and lawful permanent residents being denied access to legal education based on nationality, national origin, heritage, or inaccurate assumptions about their residency or sanctions status. We ask LSAC to correct these apparent errors and ensure that its compliance measures go no further than federal law requires.

Given the time-sensitive nature of law school admissions, I would appreciate LSAC's response to these concerns and requested corrective actions by Friday, September 18.

Sincerely,



Neda Bolourchi, JD, PhD
Executive Director
Public Affairs Alliance of Iranian Americans (PAAIA)

cc: Amy Beth Dambeck, Vice President for Legal and Corporate Affairs and General Counsel
Angela Winfield, Vice President and Chief Impact Officer