

## US TREASURY REPORT

### WEEK 15 OF 2024

#### A. United States and United Kingdom Take Action to Reduce Russian Revenue from Metals - Publication of Russia-related Determinations; Issuance of Russia-related General License and Frequently Asked Questions

On Friday, 12 April 2024, the US Treasury in coordination with the United Kingdom, issued two new prohibitions to disrupt the revenue that Russia earns from its export of aluminum, copper, and nickel. This new action prohibits the import of Russian-origin aluminum, copper, and nickel into the United States, and limits the use of Russian-origin aluminum, copper, and nickel on global metal exchanges and in over-the-counter derivatives trading.

To implement this policy, the Treasury has issued a [new determination](#) under E.O. 14068 prohibiting the importation into the United States of aluminum, copper, and nickel of Russian Federation origin produced on or after April 13, 2024 (the “metals”). Treasury also issued a [complementary determination](#) under Executive Order (E.O.) 14071 that prohibits the exportation, reexportation, sale, or supply to any person located in the Russian Federation of (1) warranting services for the metals produced on or after April 13, 2024 on a global metal exchange and (2) services to acquire the metals produced on or after April 13, 2024 as part of the physical settlement of a derivative contract.

As a result of these collective actions, metal exchanges, like the London Metal Exchange (LME) and Chicago Mercantile Exchange (CME), will be prohibited from accepting new aluminum, copper, and nickel produced by Russia. Metal exchanges provide a central role in facilitating the trading of industrial metals around the globe. By taking joint action, the United States and UK are depriving Russia and its metals producers of an important source of revenue.

Additionally, OFAC issued [Russia-related General License 13I, "Authorizing Certain Administrative Transactions Prohibited by Directive 4 under Executive Order 14024"](#), pursuant to which U.S. persons, or entities owned or controlled, directly or indirectly, by a U.S. person, are authorized to pay taxes, fees, or import duties, and purchase or receive permits, licenses, registrations, certifications, or tax refunds to the extent such transactions are prohibited by Directive 4 under Executive Order 14024, Prohibitions Related to Transactions Involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, and

the Ministry of Finance of the Russian Federation, provided such transactions are ordinarily incident and necessary to the day-to-day operations in the Russian Federation of such U.S. persons or entities, through 12:01 a.m. eastern daylight time, July 11, 2024.

This general license does not authorize: (1) Any debit to an account on the books of a U.S. financial institution of the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, or the Ministry of Finance of the Russian Federation; or (2) Any transactions otherwise prohibited by the Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587 (RuHSR), including transactions involving any person blocked pursuant to the RuHSR, unless separately authorized.

Thin GL is effective as of 12 April, 2024.

OFAC has also issues five new, Russia-related Frequently Asked Questions ([FAQs 1168 - 1172](#)):

**[1172. Does the determination “Prohibitions on Certain Services for the Acquisition of Aluminum, Copper, or Nickel of Russian Federation Origin” pursuant to Executive Order \(E.O.\) 14071 \(the “Metals Services Determination”\) impose new prohibitions on banks acting as intermediaries for payments related to Russian metals?](#)**

**[1171. Do the determinations “Prohibitions Related to Imports of Aluminum, Copper, and Nickel of Russian Federation Origin” pursuant to Executive Order \(E.O.\) 14068, as amended by E.O. 14114, \(the “Metals Import Determination”\) and the determination “Prohibitions on Certain Services for the Acquisition of Aluminum, Copper, or Nickel of Russian Federation Origin” pursuant to Executive Order \(E.O.\) 14071 \(the “Metals Services Determination”\) apply to aluminum, copper, or nickel that has been incorporated or substantially transformed into other products outside of the Russian Federation?](#)**

**[1170. For the purposes of the determination “Prohibitions Related to Imports of Aluminum, Copper, and Nickel of Russian Federation Origin” pursuant to Executive Order \(E.O.\) 14068, as amended by E.O. 14114, \(the “Metals Import Determination”\) and the determination “Prohibitions on Certain Services for the Acquisition of Aluminum, Copper, or Nickel of Russian Federation Origin” pursuant to Executive Order \(E.O.\) 14071 \(the “Metals Services Determination”\), what is meant by the terms “aluminum,” “nickel,” and “copper”?](#)**

**1169. What is prohibited by the determination “Prohibitions on Certain Services for the Acquisition of Aluminum, Copper, or Nickel of Russian Federation Origin” pursuant to Executive Order (E.O.) 14071 (the “Metals Services Determination”)?**

Furthermore, OFAC has amended two Russia-related Frequently Asked Questions (FAQs [1019](#) and [1128](#)).

**Relevant Links:**

[Publication of Russia-related Determinations; Issuance of Russia-related General License and Frequently Asked Questions \(govdelivery.com\)](#)

[United States and United Kingdom Take Action to Reduce Russian Revenue from Metals | U.S. Department of the Treasury](#)

**B. Counter Terrorism Designations; Balkans-related Designation Removal; Cyber-related Designation Update**

On the 12<sup>th</sup> April 2024, **the OFA SDN List has been updated with the Counter Terrorism Designations of the following individuals:**

ABU SHANAB, William (Arabic: ويليام أبة شنب) (a.k.a. ABU SHANAB, William Mahmud), Sidon, Lebanon; DOB 1985; nationality Lebanon; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (individual) [SDGT] (Linked To: HAMAS).

AL-KAHLUT, Hudhayfa Samir 'Abdallah (Arabic: حذيفة سمير عبدالله الكلوت) (a.k.a. AL-KAHLUT, Hudayfa Samir Abdullah (Arabic: حوديفه سمير عبدالله الكلوت); a.k.a. AL-KAHLUT, Hudifah Samir 'Abdallah), Gaza; DOB 11 Feb 1985; nationality Palestinian; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; National ID No. 800894164 (Palestinian) (individual) [SDGT] (Linked To: HAMAS).

'AZZAM, Khalil Muhammad (a.k.a. AZAM, Khalil Mouhamad; a.k.a. AZZAM, Khalil Mohammed; a.k.a. 'AZZAM, Khalil Muhammad Khalil (Arabic: خليل محمد خليل عزام)), Tripoli, Lebanon; DOB 01 Jan 1968; nationality Palestinian; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (individual) [SDGT] (Linked To: HAMAS).

FARHAT, Bara'a Hasan (Arabic: براء حسن فرحات), Sidon, Lebanon; DOB 1988; nationality Palestinian; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (individual) [SDGT] (Linked To: HAMAS).

The above designations are subject to Secondary Sanctions Risk.

The aforementioned persons are being designated pursuant to Executive Order (E.O.) 13224, as amended, which targets terrorist groups and their supporters.

As a result of OFAC's action, all property and interests in property of the designated persons, or any entities that are owned, directly or indirectly, individually or in the aggregate, 50 percent or more by one or more blocked persons, that are in the United States or in the possession or control of U.S. persons are blocked and must be reported to OFAC. Unless authorized by a general or specific license issued by OFAC, or exempt, OFAC's regulations generally prohibit all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons.

In addition, non-U.S. financial institutions and other persons that engage in certain transactions or activities with the sanctioned persons may expose themselves to sanctions risk or be subject to an enforcement action. The prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any blocked person, or the receipt of any contribution or provision of funds, goods, or services from any such person.

**Related Publication:**

[US Treasury/press release/12.04.2024/Treasury Targets Hamas UAV Unit Officials and Cyber Actor](#)

Furthermore, **the following deletions have been made to OFAC's SDN List:**

STANKOVIC, Slobodan, Bosnia and Herzegovina; DOB 01 Jan 1949; POB Banja Luka, Bosnia and Herzegovina; nationality Bosnia and Herzegovina; Gender Male (individual) [BALKANS-EO14033] (Linked To: DODIK, Milorad).

INTEGRAL INZENJERING A.D. LAKTASI (a.k.a. INTEGRAL INZENJERING A.D. INZENJERING-PROMET-EXPORT-IMPORT, LAKTASI; a.k.a. INTEGRAL INZENJERING PLC), Omladinska ulica 44, Laktasi 78250, Bosnia and Herzegovina; Organization Established Date 20 Nov 1989; Tax ID No. 440114505005 (Bosnia and Herzegovina); Registration Number 1-91-00 (Bosnia and Herzegovina) [BALKANS-EO14033] (Linked To: STANKOVIC, Slobodan).

INTEGRAL INZENJERING A.D. INZENJERING-PROMET-EXPORT-IMPORT, LAKTASI (a.k.a. INTEGRAL INZENJERING A.D. LAKTASI; a.k.a. INTEGRAL INZENJERING PLC), Omladinska ulica 44, Laktasi 78250, Bosnia and Herzegovina; Organization Established Date 20 Nov 1989; Tax ID No. 440114505005 (Bosnia and Herzegovina); Registration Number 1-91-00 (Bosnia and Herzegovina) [BALKANS-EO14033] (Linked To: STANKOVIC, Slobodan).

INTEGRAL INZENJERING PLC (a.k.a. INTEGRAL INZENJERING A.D. INZENJERING-PROMET-EXPORT-IMPORT, LAKTASI; a.k.a. INTEGRAL INZENJERING A.D. LAKTASI), Omladinska ulica 44, Laktasi 78250, Bosnia and Herzegovina; Organization Established Date 20 Nov 1989; Tax ID No. 440114505005 (Bosnia and Herzegovina); Registration Number 1-91-00 (Bosnia and Herzegovina) [BALKANS-EO14033] (Linked To: STANKOVIC, Slobodan).

Finally, **the following update has been made to the OFAC SDN List:**

PERETYATKO, Ruslan Aleksandrovich (Cyrillic: ПЕРЕТЯТЬКО, Руслан Александрович), Syktyvkar, Komi Republic, Russia; DOB 03 Aug 1985; nationality Russia; Gender Male; Secondary sanctions risk: Ukraine-/Russia-Related Sanctions Regulations, 31 CFR 589.201; Passport 8708321052 (Russia); Tax ID No. 111601632100 (Russia) (individual) [CYBER2].

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PERETYATKO, Ruslan Aleksandrovich (Cyrillic: ПЕРЕТЯТЬКО, Руслан Александрович), Syktyvkar, Komi Republic, Russia; DOB 03 Aug 1985; nationality Russia; Gender Male; Secondary sanctions risk: Ukraine-/Russia-Related Sanctions Regulations, 31 CFR 589.201; Passport 8705080546 (Russia); Tax ID No. 111601632100 (Russia) (individual) [CYBER2].

**Related Publication:**

[US Treasury/2024.04.12/Counter Terrorism Designations](#)