

## US TREASURY REPORT

### WEEK 51 OF 2023

#### **A) OFAC / US TREASURY UPDATE: Issuance of new Russia-related Executive Order and related Determinations; Issuance of Russia-related General Licenses and Frequently Asked Questions; Publication of Russia-related Compliance Advisory**

On 22 December 2023, the US President signed a new [Russia-related Executive Order \(E.O.\), “Taking Additional Steps With Respect to the Russian Federation’s Harmful Activities.”](#)

The E.O. amends Executive Order 14024 to expand U.S. authority to sanction:

- Financial institutions determined to have conducted or facilitated any significant transaction for or on behalf of companies or individuals the United States has sanctioned for operating in sectors of the Russian economy that support its military industrial base; and
- Financial institutions determined to have conducted or facilitated any significant transaction, or provided any service, involving Russia’s military industrial base, including the sale, supply, or transfer to Russia of certain critical items.

OFAC issued a [Determination Pursuant to Section 11\(a\)\(ii\) of E.O. 14024, as amended by the E.O. of December 22, 2023](#), and a [Determination Pursuant to Section 1\(a\)\(i\)\(B\) of E.O. 14068, as amended by the E.O of December 22, 2023](#).

The determination includes a list of critical items. A financial institution sanctioned under one of these criteria will face either full blocking sanctions or the loss of, or strict conditions on, their U.S. correspondent accounts.

Additionally, OFAC has amended the [Determination issued on June 28, 2022, “Prohibitions Related to Imports of Gold of Russian Federation Origin.”](#)

The amendment provides the authority to ban, following a determination from appropriate U.S. departments and agencies, the importation of certain products mined, extracted, produced, or manufactured wholly or in part in Russia, even if these products are then transformed in a third country.

OFAC has also issued [Russia-related General License 83](#), "Authorizing Certain Transactions Related to the Imports of Certain Categories of Fish, Seafood, and Preparations Thereof Prohibited by Executive Order 14068," [General License 84](#), "Authorizing Transactions Related to Closing a Correspondent or Payable-Through Account," and [General License 85](#), "Authorizing the Wind Down of Transactions and the Closure of Accounts Involving Expobank Joint Stock Company."

**GENERAL LICENSE NO. 85** authorizes through 12:01 a.m. eastern daylight time, March 21, 2024, all transactions prohibited by Executive Order (E.O.) 14024 that are ordinarily incident and necessary to the wind down of any transaction involving Expobank Joint Stock Company (Expobank), or any entity in which Expobank owns, directly or indirectly, a 50 percent or greater interest, provided that any payment to a blocked person is made into a blocked account in accordance with the Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587 (RuHSR).

In addition, OFAC is issuing 12 new, Russia-related Frequently Asked Questions ([FAQs 1146-1157](#)) and amending several Russia related Frequently Asked Questions ([FAQs 973, 1070, and 1126](#)).

**FAQ 1151** explains that foreign financial institution means any foreign entity that is engaged in the business of accepting deposits, making, granting, transferring, holding, or brokering loans or credits, or purchasing or selling foreign exchange, securities, futures or options, or procuring purchasers and sellers thereof, as principal or agent and includes depository institutions, banks, savings banks, money services businesses, operators of credit card systems, trust companies, insurance companies, securities brokers and dealers, futures and options brokers and dealers, forward contract and foreign exchange merchants, securities and commodities exchanges, clearing corporations, investment companies, employee benefit plans, dealers in precious metals, stones, or jewels, and holding companies, affiliates, or subsidiaries of any of the foregoing.

**FAQ 1070** states that the [determination of June 28, 2022](#) (as amended by the determination of December 22, 2023) issued pursuant to subsection 1(a)(i)(A) of amended [E.O. 14068](#), "Prohibitions Related to Imports of Gold of Russian Federation Origin," prohibits the importation into the United States of gold of Russian Federation origin

Furthermore, OFAC has published a [Compliance Advisory](#) to provide guidance to foreign financial institutions on the amendments to E.O. 14024, including practical guidance on how to identify sanctions risks and implement corresponding controls.

**B) OFAC/ US TREASURY UPDATES: Settlement Agreement between the U.S. Department of the Treasury's Office of Foreign Assets Control and Privilege Underwriters Reciprocal Exchange**

On the 21<sup>st</sup> December 2023, announced a \$466,200 settlement with Privilege Underwriters Reciprocal Exchange (PURE), an insurance organization based in New York, which agreed to settle its potential civil liability for 39 apparent violations of OFAC's Ukraine-/Russia-Related sanctions.

In particular, PURE was engaged in transactions related to four insurance policies involving a blocked Panama-based company owned by Specially Designated National Viktor Vekselberg.

According to OFAC, this case demonstrates the importance of implementing and maintaining effective, risk-based sanctions compliance controls, while the settlement amount reflects its determination that PURE's apparent violations were not voluntarily self-disclosed and were non-egregious.

*Related Publication:*

[US Treasury/21.12.2023/Enforcement Notice/ OFAC Settlement with PURE](#)

**C) OFAC SDN List Update: Publication of Updated Guidance on Implementation of the Price Cap Policy for Crude Oil and Petroleum Products of Russian Federation Origin; Russia-related Designations; Counter Narcotics Designations Removals; General Licenses**

On the 20<sup>th</sup> December 2023 published [Updated Guidance on Implementation of the Price Cap Policy for Crude Oil and Petroleum Products of Russian Federation Origin](#).

OFAC updated the document originally issued on February 3, 2023 to provide additional guidance for certain service providers. This guidance outlines new expectations for those service providers to 1) receive attestations within a specified timeframe for each lifting or loading of Russian oil or Russian petroleum products, and 2) retain, provide, or receive itemized ancillary cost information as required.

OFAC'S actions are in line with [commitments made by Leaders of the Group of Seven \(G7\) on December 6, 2023](#) to tighten compliance and enforcement of the price cap policy on Russian oil, including by imposing sanctions on those engaged in deceptive practices and by updating compliance rules and regulations as necessary.

OFAC expects U.S. service providers to be in compliance with this updated guidance by February 19, 2024.

### **Related Publication**

[US Treasury/GUIDANCE ON IMPLEMENTATION OF PRICE CAP 20.12.2023](#)

Furthermore, **the OFAC SDN List has been updated with the Russia-related Designations of the following entities and vessel:**

BELLATRIX ENERGY LIMITED, Unit 601, 6/F of Mill 5 of the Mills, 45 Pak Tin Par Street, Hong Kong, China; Organization Established Date 09 Dec 2020; Registration Number 3000934 (Hong Kong) [RUSSIA-EO14024].

COVART ENERGY LIMITED, 5/F, Lee Garden Three, 1 Sunning Road, Causeway Bay, Hong Kong, China; Ofis 417, Ul. Maksima Gorkogo 276, Rostov-na-Donu 344019, Russia; Organization Established Date 08 Nov 2019; Identification Number IMO 6357849; Registration Number 2890985 (Hong Kong) [RUSSIA-EO14024].

SUN SHIP MANAGEMENT D LTD (a.k.a. SCF MANAGEMENT SERVICES DUBAI LTD), PO Box 507065, Unit OT 17-32, Central Park Towers, Office Tower, Dubai, United Arab Emirates; Organization Established Date 02 Aug 2012; UAE Identification 1244 (United Arab Emirates); Registration Number 11440513 (United Arab Emirates) [RUSSIA-EO14024].

VOLITON DMCC (a.k.a. PETROKIM TRADING MIDDLE EAST AND ASIA DMCC), Unit No: R29-33, Reef Tower, Plot No: JLT-PH2-O1A, Jumeirah Lakes Towers, Dubai, United Arab Emirates; Organization Established Date 22 May 2018; License DMCC-476388 (United Arab Emirates); Registration Number 124420 (United Arab Emirates) [RUSSIA-EO14024].

### **B. VESSEL**

SANAR 15 (UALW) Oil Products Tanker Russia flag; Vessel Registration Identification IMO 9777670; MMSI 273375360 (vessel) [RUSSIA-EO14024] (Linked To: COVART ENERGY LIMITED).

OFAC designated a Government of Russia-owned ship manager as well as oil traders who have emerged as frequent participants in the seaborne transportation of Russian-origin oil following the imposition of the price cap.

As a result of OFAC's action, all property and interests in property of the persons above that are in the United States or in the possession or control of U.S. persons are blocked and must be reported to OFAC. All transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or blocked persons are prohibited unless authorized by a general or specific license issued by OFAC, or exempt. These prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit

of any blocked person and the receipt of any contribution or provision of funds, goods, or services from any such person.

### **Related Publication**

[US Treasury 20.12.2023/press release/ Treasury Tightens the Price Cap with Sanctions and Updated Guidance](#)

In relation to the above designations. OFAC issued [Russia-related General License 81](#), "Authorizing Limited Safety and Environmental Transactions Involving Certain Persons or Vessels Blocked on December 20, 2023," and [Russia-related General License 82](#), "Authorizing the Wind Down of Transactions Involving SUN Ship Management D Ltd."

**GENERAL LICENSE NO. 81** authorizes through 12:01 a.m. eastern daylight time, March 19, 2024, all transactions prohibited by Executive Order (E.O.) 14024 that are ordinarily incident and necessary to one of the following activities involving the blocked persons, provided that any payment to a blocked person must be made into a blocked account in accordance with the Russian Harmful Foreign Activities Sanctions Regulations (RuHSR):

- (1) The safe docking and anchoring in port of any vessels in which any person or entity listed in paragraph (b) of this general license has a property interest ("blocked vessels");
- (2) The preservation of the health or safety of the crew of any of the blocked vessels; or
- (3) Emergency repairs of any of the blocked vessels or environmental mitigation or protection activities relating to any of the blocked vessels.

The authorization applies to the following blocked persons and any entity in which any of the following persons own, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest:

- (1) SUN Ship Management D Ltd;
- (2) Covart Energy Limited;
- (3) Voliton DMCC; and
- (4) Bellatrix Energy Limited.

### **RUSSIA GENERAL LICENSE 81**

**GENERAL LICENSE NO. 82** authorizes through 12:01 a.m. eastern daylight time, March 19, 2024, all transactions prohibited by Executive Order (E.O.) 14024 that are ordinarily incident and necessary to the wind down of any transaction involving SUN Ship Management D Ltd (SUN Ship), or any entity in which SUN Ship owns, directly or indirectly, a 50 percent or greater interest, provided that any payment to a blocked person is made into a blocked account in accordance with the Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587 (RuHSR).

### **RUSSIA GENERAL LICENSE 82**

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

OCHOA VASCO, Fabio Enrique (a.k.a. GONZALEZ ZAPATA, Antonio; a.k.a. MARTINEZ PEREZ, Juan Carlos; a.k.a. OCHOA VASCO, Carlos Mario; a.k.a. VEGA TOBON, Carlos Mario; a.k.a. "CARLOS MARIO"; a.k.a. "KIKO"; a.k.a. "KIKO EL CHIQUITO"), Medellin, Antioquia, Colombia; Av Miguel Angel 18, Real Vallarta, Zapopan, Jalisco 44020, Mexico; Av Mexico 2867-17, Col Vallarta, Norte, Guadalajara, Jalisco 44690, Mexico; DOB 20 Nov 1960; alt. DOB 20 Nov 1963; POB Medellin, Colombia; Cedula No. 79281039 (Colombia); alt. Cedula No. 15508422 (Colombia); Passport AE063894 (Colombia) (individual) [SDNT].

OCHOA VASCO, Carlos Mario (a.k.a. GONZALEZ ZAPATA, Antonio; a.k.a. MARTINEZ PEREZ, Juan Carlos; a.k.a. OCHOA VASCO, Fabio Enrique; a.k.a. VEGA TOBON, Carlos Mario; a.k.a. "CARLOS MARIO"; a.k.a. "KIKO"; a.k.a. "KIKO EL CHIQUITO"), Medellin, Antioquia, Colombia; Av Miguel Angel 18, Real Vallarta, Zapopan, Jalisco 44020, Mexico; Av Mexico 2867-17, Col Vallarta, Norte, Guadalajara, Jalisco 44690, Mexico; DOB 20 Nov 1960; alt. DOB 20 Nov 1963; POB Medellin, Colombia; Cedula No. 79281039 (Colombia); alt. Cedula No. 15508422 (Colombia); Passport AE063894 (Colombia) (individual) [SDNT].

MARTINEZ PEREZ, Juan Carlos (a.k.a. GONZALEZ ZAPATA, Antonio; a.k.a. OCHOA VASCO, Carlos Mario; a.k.a. OCHOA VASCO, Fabio Enrique; a.k.a. VEGA TOBON, Carlos Mario; a.k.a. "CARLOS MARIO"; a.k.a. "KIKO"; a.k.a. "KIKO EL CHIQUITO"), Medellin, Antioquia, Colombia; Av Miguel Angel 18, Real Vallarta, Zapopan, Jalisco 44020, Mexico; Av Mexico 2867-17, Col Vallarta, Norte, Guadalajara, Jalisco 44690, Mexico; DOB 20 Nov 1960; alt. DOB 20 Nov 1963; POB Medellin, Colombia; Cedula No. 79281039 (Colombia); alt. Cedula No. 15508422 (Colombia); Passport AE063894 (Colombia) (individual) [SDNT].

"CARLOS MARIO" (a.k.a. GONZALEZ ZAPATA, Antonio; a.k.a. MARTINEZ PEREZ, Juan Carlos; a.k.a. OCHOA VASCO, Carlos Mario; a.k.a. OCHOA VASCO, Fabio Enrique; a.k.a. VEGA TOBON, Carlos Mario; a.k.a. "KIKO"; a.k.a. "KIKO EL CHIQUITO"), Medellin, Antioquia, Colombia; Av Miguel Angel 18, Real Vallarta, Zapopan, Jalisco 44020, Mexico; Av Mexico 2867-17, Col Vallarta, Norte, Guadalajara, Jalisco 44690, Mexico; DOB 20 Nov 1960; alt. DOB 20 Nov 1963; POB Medellin, Colombia; Cedula No. 79281039 (Colombia); alt. Cedula No. 15508422 (Colombia); Passport AE063894 (Colombia) (individual) [SDNT].

"KIKO" (a.k.a. GONZALEZ ZAPATA, Antonio; a.k.a. MARTINEZ PEREZ, Juan Carlos; a.k.a. OCHOA VASCO, Carlos Mario; a.k.a. OCHOA VASCO, Fabio Enrique; a.k.a. VEGA TOBON, Carlos Mario; a.k.a. "CARLOS MARIO"; a.k.a. "KIKO EL CHIQUITO"), Medellin, Antioquia, Colombia; Av Miguel Angel 18, Real Vallarta, Zapopan, Jalisco 44020, Mexico; Av Mexico 2867-17, Col Vallarta, Norte, Guadalajara, Jalisco 44690, Mexico; DOB 20 Nov 1960; alt. DOB 20 Nov 1963; POB Medellin, Colombia; Cedula No. 79281039 (Colombia); alt. Cedula No. 15508422 (Colombia); Passport AE063894 (Colombia) (individual) [SDNT].

"KIKO EL CHIQUITO" (a.k.a. GONZALEZ ZAPATA, Antonio; a.k.a. MARTINEZ PEREZ, Juan Carlos; a.k.a. OCHOA VASCO, Carlos Mario; a.k.a. OCHOA VASCO, Fabio Enrique; a.k.a. VEGA TOBON, Carlos Mario; a.k.a. "CARLOS MARIO"; a.k.a. "KIKO"), Medellin, Antioquia, Colombia; Av Miguel Angel 18, Real Vallarta, Zapopan, Jalisco 44020, Mexico; Av Mexico 2867-17, Col Vallarta, Norte, Guadalajara, Jalisco 44690, Mexico; DOB 20 Nov 1960; alt. DOB 20 Nov 1963; POB Medellin, Colombia; Cedula No. 79281039 (Colombia); alt. Cedula No. 15508422 (Colombia); Passport AE063894 (Colombia) (individual) [SDNT].

VEGA TOBON, Carlos Mario (a.k.a. GONZALEZ ZAPATA, Antonio; a.k.a. MARTINEZ PEREZ, Juan Carlos; a.k.a. OCHOA VASCO, Carlos Mario; a.k.a. OCHOA VASCO, Fabio Enrique; a.k.a. "CARLOS MARIO"; a.k.a. "KIKO"; a.k.a. "KIKO EL CHIQUITO"), Medellin, Antioquia, Colombia; Av Miguel Angel 18, Real Vallarta, Zapopan, Jalisco 44020, Mexico; Av Mexico 2867-17, Col Vallarta, Norte, Guadalajara, Jalisco 44690, Mexico; DOB 20 Nov 1960; alt. DOB 20 Nov 1963; POB Medellin, Colombia; Cedula No. 79281039 (Colombia); alt. Cedula No. 15508422 (Colombia); Passport AE063894 (Colombia) (individual) [SDNT].

GONZALEZ ZAPATA, Antonio (a.k.a. MARTINEZ PEREZ, Juan Carlos; a.k.a. OCHOA VASCO, Carlos Mario; a.k.a. OCHOA VASCO, Fabio Enrique; a.k.a. VEGA TOBON, Carlos Mario; a.k.a. "CARLOS MARIO"; a.k.a. "KIKO"; a.k.a. "KIKO EL CHIQUITO"), Medellin, Antioquia, Colombia; Av Miguel Angel 18, Real Vallarta, Zapopan, Jalisco 44020, Mexico; Av Mexico 2867-17, Col Vallarta, Norte, Guadalajara, Jalisco 44690, Mexico; DOB 20 Nov 1960; alt. DOB 20 Nov 1963; POB Medellin, Colombia; Cedula No. 79281039 (Colombia); alt. Cedula No. 15508422 (Colombia); Passport AE063894 (Colombia) (individual) [SDNT].

INVERSIONES MPS S.A. (f.k.a. EQUIPOS MPS S.A.), Avenida 13 No. 100-12 Ofc. 302, Bogota, Colombia; NIT # 800231392-5 (Colombia) [SDNT].

EQUIPOS MPS S.A. (a.k.a. INVERSIONES MPS S.A.), Avenida 13 No. 100-12 Ofc. 302, Bogota, Colombia; NIT # 800231392-5 (Colombia) [SDNT].

PROYECTOS Y SOLUCIONES INMOBILIARIA LTDA. (f.k.a. PROMOTORA DE PROYECTOS Y SOLUCIONES LTDA.), Avenida 13 No. 100-12 Ofc. 302, Bogota, Colombia; NIT # 800014349-8 (Colombia) [SDNT].

PROMOTORA DE PROYECTOS Y SOLUCIONES LTDA. (a.k.a. PROYECTOS Y SOLUCIONES INMOBILIARIA LTDA.), Avenida 13 No. 100-12 Ofc. 302, Bogota, Colombia; NIT # 800014349-8 (Colombia) [SDNT].

GERENCIA DE PROYECTOS Y SOLUCIONES LTDA., Avenida 13 No. 100-12 Ofc. 302, Bogota, Colombia; NIT # 800231600-2 (Colombia) [SDNT].

ORIMAR LTDA., Carrera 19 No. 57-33, Bogota, Colombia; NIT # 801076804-7 (Colombia) [SDNT].

AUDITORES ESPECIALIZADOS LTDA., Calle 93 No. 14-20 Ofc. 611, Bogota, Colombia; NIT # 830041980-1 (Colombia) [SDNT].

HOTEL LA CASCADA S.A. (f.k.a. CENTRO RECREACIONAL LA CASCADA LTDA.), Carrera 12 Avenida 25 Esquina, Girardot, Colombia; NIT # 890601336-8 (Colombia) [SDNT].

CENTRO RECREACIONAL LA CASCADA LTDA. (a.k.a. HOTEL LA CASCADA S.A.), Carrera 12 Avenida 25 Esquina, Girardot, Colombia; NIT # 890601336-8 (Colombia) [SDNT].

TRANSPORTES MICHAEL LTDA. (a.k.a. TRANSMIKE LTDA.), Calle 30 No. 10-50, Barranquilla, Colombia; Sitio Nuevo, Magdalena, Colombia; NIT # 802024118-3 (Colombia) [SDNT].

TRANSMIKE LTDA. (a.k.a. TRANSPORTES MICHAEL LTDA.), Calle 30 No. 10-50, Barranquilla, Colombia; Sitio Nuevo, Magdalena, Colombia; NIT # 802024118-3 (Colombia) [SDNT].

COOPERATIVA DE SERVICIO DE TRANSPORTE DE CARGA DE COLOMBIA LTDA. (a.k.a. COOPERATIVA DE SERVICIO DE TRANSPORTE DE CARGA MULTIMODAL DE COLOMIBA LTDA.; a.k.a. COOTRANSMULTI H.H. LTDA.), Calle 30 No. 10-50, Barranquilla, Colombia; Calle 35 No. 36-68, Barranquilla, Colombia; NIT # 802019665-0 (Colombia) [SDNT].

COOTRANSMULTI H.H. LTDA. (a.k.a. COOPERATIVA DE SERVICIO DE TRANSPORTE DE CARGA DE COLOMBIA LTDA.; a.k.a. COOPERATIVA DE SERVICIO DE TRANSPORTE DE CARGA MULTIMODAL DE COLOMIBA LTDA.), Calle 30 No. 10-50, Barranquilla, Colombia; Calle 35 No. 36-68, Barranquilla, Colombia; NIT # 802019665-0 (Colombia) [SDNT].

COOPERATIVA DE SERVICIO DE TRANSPORTE DE CARGA MULTIMODAL DE COLOMIBA LTDA. (a.k.a. COOPERATIVA DE SERVICIO DE TRANSPORTE DE CARGA DE COLOMBIA LTDA.; a.k.a. COOTRANSMULTI H.H. LTDA.), Calle 30 No. 10-50, Barranquilla, Colombia; Calle 35 No. 36-68, Barranquilla, Colombia; NIT # 802019665-0 (Colombia) [SDNT].

CASTRO CURE Y CIA. S. EN C., Calle 111 No. 34-139, Barranquilla, Colombia; NIT # 802001885-5 (Colombia) [SDNT].

CURE SABAGH Y CIA. S.C.S., Calle 32 No. 43A-89, Barranquilla, Colombia; NIT # 802000463-6 (Colombia) [SDNT].



FUDIA LTDA., Calle 111 No. 36B-17, Barranquilla, Colombia; NIT # 800230555-4 (Colombia) [SDNT].

CABLES NACIONALES S.A. (a.k.a. CANAL S.A.), Calle 111 No. 34-139, Barranquilla, Colombia; NIT # 802005017-7 (Colombia) [SDNT].

CANAL S.A. (a.k.a. CABLES NACIONALES S.A.), Calle 111 No. 34-139, Barranquilla, Colombia; NIT # 802005017-7 (Colombia) [SDNT].

INVERSIONES AGROPECUARIA ARIZONA LTDA., Calle 82 No. 43-21 Ofc. 1C, Barranquilla, Colombia; NIT # 802019694-4 (Colombia) [SDNT].

VERANILLO DIVE CENTER LTDA. (a.k.a. CLUB DE PESCA VERANILLO), Via 40 No. 67-42, Barranquilla, Colombia; NIT # 802008393-5 (Colombia) [SDNT].

CLUB DE PESCA VERANILLO (a.k.a. VERANILLO DIVE CENTER LTDA.), Via 40 No. 67-42, Barranquilla, Colombia; NIT # 802008393-5 (Colombia) [SDNT].

MARTIN HODWALKER M. & CIA. S. EN C. (a.k.a. MARTIN HODWALKER M. AND CIA. S. EN C.; n.k.a. VERANILLO S.A.; f.k.a. VERANILLO Y CIA. S. EN C.), Via 40 No. 67-20/42, Barranquilla, Colombia; NIT # 802007314-9 (Colombia) [SDNT].

VERANILLO Y CIA. S. EN C. (a.k.a. MARTIN HODWALKER M. & CIA. S. EN C.; a.k.a. MARTIN HODWALKER M. AND CIA. S. EN C.; n.k.a. VERANILLO S.A.), Via 40 No. 67-20/42, Barranquilla, Colombia; NIT # 802007314-9 (Colombia) [SDNT].

VERANILLO S.A. (a.k.a. MARTIN HODWALKER M. & CIA. S. EN C.; a.k.a. MARTIN HODWALKER M. AND CIA. S. EN C.; f.k.a. VERANILLO Y CIA. S. EN C.), Via 40 No. 67-20/42, Barranquilla, Colombia; NIT # 802007314-9 (Colombia) [SDNT].

MARTIN HODWALKER M. AND CIA. S. EN C. (a.k.a. MARTIN HODWALKER M. & CIA. S. EN C.; n.k.a. VERANILLO S.A.; f.k.a. VERANILLO Y CIA. S. EN C.), Via 40 No. 67-20/42, Barranquilla, Colombia; NIT # 802007314-9 (Colombia) [SDNT].

DESARROLLO GEMMA CORPORATION, Calle 52 Bella Vista, Chalet # 17, Panama City, Panama; RUC # 25544701403775 (Panama) [SDNT].

ROCK FISH IMPORT EXPORT E.U., Avenida Juan XXIII, San Andres, Colombia; NIT # 827000913-1 (Colombia) [SDNT].

AQUAMARINA ISLAND INTERNATIONAL CORPORATION, Avenida Cuba Calle 38, Edificio Los Cristales Piso 3, Panama City, Panama; Calle 93 No. 14-20 Ofc. 611, Bogota, Colombia; Avenida del Pastelillo 24-46, Edificio Fadia - Manga, Cartagena, Colombia; RUC # 2120851397079 (Panama) [SDNT].

FISHING ENTERPRISE HOLDING, INC., Avenida Samuel Lewis, Edificio Comosa, Piso 16, Panama City, Panama; RUC # 2120741397076 (Panama) [SDNT].

COMERCIALIZADORA MOR GAVIRIA S.A. (a.k.a. ALFOMBRAS DURATEX DE COLOMBIA; a.k.a. "DURATEX ECUADOR"), Avenida Pedro Vicente Maldonado N229 y Rivas, Edificio Centro Comercial El Recreo, Local 24F, Pichincha, Quito, Ecuador; RUC # 1791813359001 (Ecuador) [SDNT].

ALFOMBRAS DURATEX DE COLOMBIA (a.k.a. COMERCIALIZADORA MOR GAVIRIA S.A.; a.k.a. "DURATEX ECUADOR"), Avenida Pedro Vicente Maldonado N229 y Rivas, Edificio Centro Comercial El Recreo, Local 24F, Pichincha, Quito, Ecuador; RUC # 1791813359001 (Ecuador) [SDNT].

"DURATEX ECUADOR" (a.k.a. ALFOMBRAS DURATEX DE COLOMBIA; a.k.a. COMERCIALIZADORA MOR GAVIRIA S.A.), Avenida Pedro Vicente Maldonado N229 y Rivas, Edificio Centro Comercial El Recreo, Local 24F, Pichincha, Quito, Ecuador; RUC # 1791813359001 (Ecuador) [SDNT].

COMERCIALIZADORA MORDUR S.A., Avenida Pedro Vicente Maldonado 14-205, Edificio Centro Comercial El Recreo, Local 22F, Pichincha, Quito, Ecuador; RUC # 1791315820001 (Ecuador) [SDNT].

INTERNACIONAL DE PROYECTOS INMOBILIARIA IPI S.A. (a.k.a. IPI S.A.), Avenida Pedro Vicente Maldonado 744, Edificio Centro Comercial El Recreo, Local 24I, Pichincha, Quito, Ecuador; RUC # 1791843436001 (Ecuador) [SDNT].

IPI S.A. (a.k.a. INTERNACIONAL DE PROYECTOS INMOBILIARIA IPI S.A.), Avenida Pedro Vicente Maldonado 744, Edificio Centro Comercial El Recreo, Local 24I, Pichincha, Quito, Ecuador; RUC # 1791843436001 (Ecuador) [SDNT].

MC OVERSEAS TRADING COMPANY SA DE CV, Justo Sierra 1963, Guadalajara, Jalisco, Mexico [SDNT].

OVERSEAS TRADING COMPANY (a.k.a. "DURATEX GUATEMALA"; a.k.a. "DURATEX S.A."), 7A Avenida 9-15, Zona 12 Colonia La Reformita, Guatemala City, Guatemala; Barrio del Monte 1 Avenida 2-51, Zona 1 Colonia ViCanales No. 4, Guatemala City, Guatemala; 20 Calle 20-81 Zona 10, Guatemala City, Guatemala; NIT # 2500971-0 (Guatemala) [SDNT].

"DURATEX GUATEMALA" (a.k.a. OVERSEAS TRADING COMPANY; a.k.a. "DURATEX S.A."), 7A Avenida 9-15, Zona 12 Colonia La Reformita, Guatemala City, Guatemala; Barrio del Monte 1 Avenida 2-51, Zona 1 Colonia ViCanales No. 4, Guatemala City, Guatemala; 20 Calle 20-81 Zona 10, Guatemala City, Guatemala; NIT # 2500971-0 (Guatemala) [SDNT].

"DURATEX S.A." (a.k.a. OVERSEAS TRADING COMPANY; a.k.a. "DURATEX GUATEMALA"), 7A Avenida 9-15, Zona 12 Colonia La Reformita, Guatemala City, Guatemala; Barrio del Monte 1 Avenida 2-51, Zona 1 Colonia ViCanales No. 4, Guatemala City, Guatemala; 20 Calle 20-81 Zona 10, Guatemala City, Guatemala; NIT # 2500971-0 (Guatemala) [SDNT].

INMOBILIUM INVESTMENT CORP., Avenida Frederico Boyd y Calle 51, Edificio Torre Universal, Piso 3, Panama City, Panama; RUC # 4055231267286 (Panama) [SDNT].

LAVADERO EL CASTILLO, Carrera 84 No. 32B-40, Medellin, Colombia [SDNT].

YAMAHA VERANILLO DISTRIBUIDORES, Via 40 No. 67-42, Barranquilla, Colombia [SDNT].

CENTRO DE BELLEZA SHARY VERGARA, Carrera 54 No. 72-80 Local 25, Barranquilla, Colombia [SDNT].

GIMNASIO BODY AND HEALTH, Calle 80 No. 75-210, Barranquilla, Colombia [SDNT].

LIZZY MUNDO INTERIOR, Justo Sierra 1963, Guadalajara, Jalisco, Mexico [SDNT].

CASTRO GARZON, Ricardo (a.k.a. LINEROS GARZON, Rodolfo; a.k.a. "CAYO"), c/o CASTRO CURE Y CIA. S.C.S., Barranquilla, Colombia; c/o CURE SABAGH Y CIA. S.C.S., Barranquilla, Colombia; c/o FUDIA LTDA., Barranquilla, Colombia; c/o CABLES NACIONALES S.A., Barranquilla, Colombia; c/o INVERSIONES AGROPECUARIA ARIZONA LTDA., Barranquilla, Colombia; DOB 13 Dec 1960; POB Barranquilla, Colombia; Cedula No. 8715520 (Colombia) (individual) [SDNT].

"CAYO" (a.k.a. CASTRO GARZON, Ricardo; a.k.a. LINEROS GARZON, Rodolfo), c/o CASTRO CURE Y CIA. S.C.S., Barranquilla, Colombia; c/o CURE SABAGH Y CIA. S.C.S., Barranquilla, Colombia; c/o FUDIA LTDA., Barranquilla, Colombia; c/o CABLES NACIONALES S.A., Barranquilla, Colombia; c/o INVERSIONES AGROPECUARIA ARIZONA LTDA., Barranquilla, Colombia; DOB 13 Dec 1960; POB Barranquilla, Colombia; Cedula No. 8715520 (Colombia) (individual) [SDNT].

LINEROS GARZON, Rodolfo (a.k.a. CASTRO GARZON, Ricardo; a.k.a. "CAYO"), c/o CASTRO CURE Y CIA. S.C.S., Barranquilla, Colombia; c/o CURE SABAGH Y CIA. S.C.S.,

Barranquilla, Colombia; c/o FUDIA LTDA., Barranquilla, Colombia; c/o CABLES NACIONALES S.A., Barranquilla, Colombia; c/o INVERSIONES AGROPECUARIA ARIZONA LTDA., Barranquilla, Colombia; DOB 13 Dec 1960; POB Barranquilla, Colombia; Cedula No. 8715520 (Colombia) (individual) [SDNT].

HOOKER TAYLOR, Javier Arnulfo (a.k.a. HOOKER POMARE, Javier), c/o COOPERATIVA DE SERVICIO DE TRANSPORTE DE CARGA DE COLOMBIA LTDA., Barranquilla, Colombia; c/o ROCK FISH IMPORT EXPORT E.U., San Andres, Colombia; DOB 19 Feb 1971; POB San Andres, Colombia; Cedula No. 18001893 (Colombia) (individual) [SDNT].

HOOKER POMARE, Javier (a.k.a. HOOKER TAYLOR, Javier Arnulfo), c/o COOPERATIVA DE SERVICIO DE TRANSPORTE DE CARGA DE COLOMBIA LTDA., Barranquilla, Colombia; c/o ROCK FISH IMPORT EXPORT E.U., San Andres, Colombia; DOB 19 Feb 1971; POB San Andres, Colombia; Cedula No. 18001893 (Colombia) (individual) [SDNT].

VARELA SERNA, Carlos Heneris (a.k.a. "COLITAS"), c/o TRANSPORTES MICHAEL LTDA., Barranquilla, Colombia; c/o COOPERATIVA DE SERVICIO DE TRANSPORTE DE CARGA DE COLOMBIA LTDA., Barranquilla, Colombia; c/o CENTRO DE BELLEZA SHARY VERGARA, Barranquilla, Colombia; DOB 11 Jan 1956; POB Cali, Colombia; Cedula No. 16632290 (Colombia) (individual) [SDNT].

"COLITAS" (a.k.a. VARELA SERNA, Carlos Heneris), c/o TRANSPORTES MICHAEL LTDA., Barranquilla, Colombia; c/o COOPERATIVA DE SERVICIO DE TRANSPORTE DE CARGA DE COLOMBIA LTDA., Barranquilla, Colombia; c/o CENTRO DE BELLEZA SHARY VERGARA, Barranquilla, Colombia; DOB 11 Jan 1956; POB Cali, Colombia; Cedula No. 16632290 (Colombia) (individual) [SDNT].

GARCIA BUITRAGO, Miyer Alberto (a.k.a. "CHIQUI"); DOB 13 Jul 1970; POB Manzanares, Caldas, Colombia; Cedula No. 10287969 (Colombia); Passport AH132212 (Colombia) (individual) [SDNT].

"CHIQUI" (a.k.a. GARCIA BUITRAGO, Miyer Alberto); DOB 13 Jul 1970; POB Manzanares, Caldas, Colombia; Cedula No. 10287969 (Colombia); Passport AH132212 (Colombia) (individual) [SDNT].

CASTRO GARZON, Victor Hugo (a.k.a. "CABEZON"), Guadalajara, Jalisco, Mexico; DOB 10 May 1965; POB Barranquilla, Colombia; Cedula No. 72137257 (Colombia) (individual) [SDNT].

"CABEZON" (a.k.a. CASTRO GARZON, Victor Hugo), Guadalajara, Jalisco, Mexico; DOB 10 May 1965; POB Barranquilla, Colombia; Cedula No. 72137257 (Colombia) (individual) [SDNT].

DE MARTINI TAMAYO, Sergio Rene (a.k.a. "CANOSO"); DOB 14 Sep 1962; POB Medellin, Colombia; Cedula No. 71622812 (Colombia) (individual) [SDNT].

"CANOSO" (a.k.a. DE MARTINI TAMAYO, Sergio Rene); DOB 14 Sep 1962; POB Medellin, Colombia; Cedula No. 71622812 (Colombia) (individual) [SDNT].

PALACIO ADARVE, John Ricardo; DOB 11 Mar 1969; POB Itagui, Antioquia, Colombia; Cedula No. 70697538 (Colombia) (individual) [SDNT].

FERNANDEZ CASTRO, Fernando Alberto (a.k.a. "FERCHO"), c/o GIMNASIO BODY AND HEALTH, Barranquilla, Colombia; DOB 12 May 1966; POB Colombia; Cedula No. 72137518 (Colombia) (individual) [SDNT].

"FERCHO" (a.k.a. FERNANDEZ CASTRO, Fernando Alberto), c/o GIMNASIO BODY AND HEALTH, Barranquilla, Colombia; DOB 12 May 1966; POB Colombia; Cedula No. 72137518 (Colombia) (individual) [SDNT].

VALENCIA MARIN, Libardo Elias; DOB 23 Mar 1946; POB Colombia; Cedula No. 8225623 (Colombia) (individual) [SDNT].

RINCONES MENDOZA, Henry Juvenal; DOB 25 Sep 1976; POB Colombia; Cedula No. 79863543 (Colombia) (individual) [SDNT].

CHOW RIOS, Harding Elvis; DOB 02 Apr 1962; POB San Andres, Colombia; Cedula No. 15243752 (Colombia) (individual) [SDNT].

HODWALKER MARTINEZ, Martin David (a.k.a. "TILO"); DOB 26 Dec 1968; POB Colombia; Cedula No. 8534760 (Colombia); Passport AF465508 Colombia (individual) [SDNT] (Linked To: YAMAHA VERANILLO DISTRIBUIDORES; Linked To: VERANILLO DIVE CENTER LTDA.; Linked To: MARTIN HODWALKER M. & CIA. S. EN C.; Linked To: DESARROLLO GEMMA CORPORATION; Linked To: HODWALKER Y LEAL Y CIA. S.C.A.).

"TILO" (a.k.a. HODWALKER MARTINEZ, Martin David); DOB 26 Dec 1968; POB Colombia; Cedula No. 8534760 (Colombia); Passport AF465508 Colombia (individual) [SDNT] (Linked To: YAMAHA VERANILLO DISTRIBUIDORES; Linked To: VERANILLO DIVE CENTER LTDA.; Linked To: MARTIN HODWALKER M. & CIA. S. EN C.; Linked To: DESARROLLO GEMMA CORPORATION; Linked To: HODWALKER Y LEAL Y CIA. S.C.A.).

BODDEN GALE, Elvert Dowie (a.k.a. "TIO BODDEN"), Roatan, Honduras; DOB 24 Apr 1956; POB Honduras; Passport A046090 (Honduras) (individual) [SDNT].

"TIO BODDEN" (a.k.a. BODDEN GALE, Elvert Dowie), Roatan, Honduras; DOB 24 Apr 1956; POB Honduras; Passport A046090 (Honduras) (individual) [SDNT].

HYDE, Clive Norman (a.k.a. HYDE SR., Clive Norman; a.k.a. "MR. HYDE"); DOB 08 Apr 1956; POB Belize (individual) [SDNT].

"MR. HYDE" (a.k.a. HYDE SR., Clive Norman; a.k.a. HYDE, Clive Norman); DOB 08 Apr 1956; POB Belize (individual) [SDNT].

HYDE SR., Clive Norman (a.k.a. HYDE, Clive Norman; a.k.a. "MR. HYDE"); DOB 08 Apr 1956; POB Belize (individual) [SDNT].

WORRELL, Gareth Bruce (a.k.a. WORRELL MURRAY, Gareth Bruce; a.k.a. WORRELL MURRAY, Garrett; a.k.a. "GARETH MOREY"); DOB 19 Jun 1971; alt. DOB 19 Jan 1971; POB Belize; Passport 0159817 (Belize) (individual) [SDNT].

WORRELL MURRAY, Gareth Bruce (a.k.a. WORRELL MURRAY, Garrett; a.k.a. WORRELL, Gareth Bruce; a.k.a. "GARETH MOREY"); DOB 19 Jun 1971; alt. DOB 19 Jan 1971; POB Belize; Passport 0159817 (Belize) (individual) [SDNT].

WORRELL MURRAY, Garrett (a.k.a. WORRELL MURRAY, Gareth Bruce; a.k.a. WORRELL, Gareth Bruce; a.k.a. "GARETH MOREY"); DOB 19 Jun 1971; alt. DOB 19 Jan 1971; POB Belize; Passport 0159817 (Belize) (individual) [SDNT].

"GARETH MOREY" (a.k.a. WORRELL MURRAY, Gareth Bruce; a.k.a. WORRELL MURRAY, Garrett; a.k.a. WORRELL, Gareth Bruce); DOB 19 Jun 1971; alt. DOB 19 Jan 1971; POB Belize; Passport 0159817 (Belize) (individual) [SDNT].

MARKS, Martin Gregory (a.k.a. "GORDON, Howard A."); DOB 30 Oct 1958; POB Jamaica; Passport 217720 (Jamaica) (individual) [SDNT].

"GORDON, Howard A." (a.k.a. MARKS, Martin Gregory); DOB 30 Oct 1958; POB Jamaica; Passport 217720 (Jamaica) (individual) [SDNT].

CASTRILLON VASCO, Jhon Jairo; DOB 30 Mar 1960; POB Medellin, Colombia; Cedula No. 71603587 (Colombia) (individual) [SDNT] (Linked To: HOTEL LA CASCADA S.A.; Linked To: INVERSIONES Y REPRESENTACIONES S.A.).

CAICEDO ROJAS, Jorge Ernesto, Calle 82 No 11-37 Ofc. 504, Bogota, Colombia; DOB 21 Oct 1955; POB Bogota, Colombia; Cedula No. 3227987 (Colombia) (individual) [SDNT] (Linked To: HOTEL LA CASCADA S.A.).

YEPES VELEZ, Silvio (a.k.a. YEPEZ VELEZ, Silvio), Carrera 30 No. 77-26, Bogota, Colombia; c/o HOTEL LA CASCADA S.A., Girardot, Colombia; DOB 09 Nov 1948; POB Manizales, Caldas, Colombia; Cedula No. 19065009 (Colombia); NIT # 19065009-4 (Colombia) (individual) [SDNT].

YEPEZ VELEZ, Silvio (a.k.a. YEPES VELEZ, Silvio), Carrera 30 No. 77-26, Bogota, Colombia; c/o HOTEL LA CASCADA S.A., Girardot, Colombia; DOB 09 Nov 1948; POB Manizales, Caldas, Colombia; Cedula No. 19065009 (Colombia); NIT # 19065009-4 (Colombia) (individual) [SDNT].

MALDONADO ESCOBAR, Fernando; DOB 16 May 1961; POB Bogota, Colombia; Cedula No. 19445721 (Colombia); Passport AH330349 (Colombia) (individual) [SDNT] (Linked To: AUDITORES ESPECIALIZADOS LTDA.; Linked To: AQUAMARINA ISLAND INTERNATIONAL CORPORATION).

CALVO LOMBANA, Gabriel Andres, c/o ORIMAR LTDA., Bogota, Colombia; c/o AQUAMARINA ISLAND INTERNATIONAL CORPORATION, Panama City, Panama; c/o FISHING ENTERPRISE HOLDING INC., Panama City, Panama; DOB 20 Aug 1935; POB Bogota, Colombia; Cedula No. 2859105 (Colombia) (individual) [SDNT].

MAR SEM, Maria Gloria, c/o MC OVERSEAS TRADING COMPANY S.A. DE C.V., Guadalajara, Jalisco, Mexico; DOB 19 Aug 1944; POB Mexico; Passport 97140093454 (Mexico) (individual) [SDNT].

TRUJILLO MOLINA, Maria Helena (a.k.a. TRUJILLO MOLINA, Maria Elena), c/o HOTEL LA CASCADA S.A., Girardot, Colombia; c/o INVERSIONES Y REPRESENTACIONES S.A., Medellin, Colombia; POB Colombia; Cedula No. 42875026 (Colombia) (individual) [SDNT].

TRUJILLO MOLINA, Maria Elena (a.k.a. TRUJILLO MOLINA, Maria Helena), c/o HOTEL LA CASCADA S.A., Girardot, Colombia; c/o INVERSIONES Y REPRESENTACIONES S.A., Medellin, Colombia; POB Colombia; Cedula No. 42875026 (Colombia) (individual) [SDNT].

LEAL LOPEZ, Janey Farides, c/o MARTIN HODWALKER M. Y CIA. S. EN C., Barranquilla, Colombia; c/o VERANILLO DIVE CENTER LTDA., Barranquilla, Colombia; c/o HODWALKER Y LEAL Y CIA. S.C.A., Barranquilla, Colombia; DOB 06 Nov 1972; POB Colombia; Cedula No. 32779104 (Colombia); Passport AF665724 (Colombia) (individual) [SDNT].

CURE SABAGH, Diana Maria, c/o CASTRO CURE Y CIA. S.C.S., Barranquilla, Colombia; c/o CURE SABAGH Y CIA. S.C.S., Barranquilla, Colombia; c/o FUDIA LTDA., Barranquilla, Colombia; c/o CABLES NACIONALES CANAL S.A., Barranquilla, Colombia; DOB 24 Oct 1967; POB Barranquilla, Colombia; Cedula No. 22443685 (Colombia) (individual) [SDNT].

CASTRO PAEZ, Gerardo, c/o CABLES NACIONALES CANAL S.A., Barranquilla, Colombia; c/o ORIMAR LTDA., Bogota, Colombia; DOB 16 Mar 1974; POB Barranquilla, Colombia; Cedula No. 72196638 (Colombia) (individual) [SDNT].

GARCIA RODRIGUEZ, Martha, c/o TRANSPORTES MICHAEL LTDA., Barranquilla, Colombia; c/o COOPERATIVA DE SERVICIO DE TRANSPORTE DE CARGA DE COLOMBIA LTDA., Barranquilla, Colombia; c/o CENTRO DE BELLEZA SHARY VERGARA, Barranquilla, Colombia; POB Colombia; Cedula No. 32761805 (Colombia) (individual) [SDNT].

MOLINA MOLINA, Jesus Dagoberto, c/o TRANSPORTES MICHAEL LTDA., Barranquilla, Colombia; c/o COOPERATIVA DE SERVICIO DE TRANSPORTE DE CARGA MULTIMODAL, Barranquilla, Colombia; POB Colombia; Cedula No. 8233532 (Colombia) (individual) [SDNT].

CADENAS VIRAMONTES, Porfirio Miguel, Calle Nelson 421-B, Guadalajara, Jalisco, Mexico; Calle Justo Sierra 1963, Colonia Ladron de Guevara, Guadalajara, Jalisco, Mexico; Calle Mar del Sur No 2075 Int. 1, Colonia Fraccionamiento Country Club, Guadalajara, Jalisco, Mexico; c/o MC OVERSEAS TRADING COMPANY S.A. DE C.V., Guadalajara, Mexico; c/o OVERSEAS TRADING COMPANY S.A., Guatemala City, Guatemala; c/o INMOBILIUM INVESTMENT CORP., Panama City, Panama; DOB 12 Jun 1959; POB Guadalajara, Jalisco, Mexico; Passport 97140096573 (Mexico); NIT # 2665307-9 (Guatemala); C.U.R.P. CAUP590612HJCDDR09 (Mexico); RFC CAVP-590612-AD1 (Mexico) (individual) [SDNT].

CASTELLANOS SANCHEZ, Federico Ernesto, Calle Tauro No. 4090, Colonia Juan Manuel Vallarte, Zapopan, Jalisco, Mexico; c/o MC OVERSEAS TRADING COMPANY S.A. DE C.V., Guadalajara, Mexico; DOB 11 Jan 1947; POB Tototlan, Jalisco, Mexico (individual) [SDNT].

LOPEZ RODRIGUEZ, Jorge Octavio, c/o CIMIENTOS LA TORRE S.A. DE C.V., Guadalajara, Jalisco, Mexico; c/o CUMBRES SOLUCIONES INMOBILIARIAS S.A. DE C.V., Zapopan, Jalisco, Mexico; Calle Aurora y Andres, Benito Juarez, Quintana Roo, Mexico; Calle Boyero No. 3500, Torre 4, Dpto. 2, Fraccionamiento La Calma, Zapopan, Jalisco, Mexico; DOB 01 Apr 1976; alt. DOB 01 Jan 1976; POB Guadalajara, Jalisco, Mexico; nationality Mexico; citizen Mexico; Passport 98140145654 (Mexico); alt. Passport 01140405557 (Mexico); C.U.R.P. LORJ760401HJCPDR08 (Mexico) (individual) [SDNT].

ARAMBULA GARCIA, Luz del Rocio (a.k.a. ARAMBULA DE FLORES, Luz del Rocio), C. Las Palmas No. 2700 Int. 14, Colonia Atlas Colomos, Zapopan, Jalisco, Mexico; Avenida Hidalgo 1890, Colonia Ladron de Guevara, Guadalajara, Jalisco, Mexico; DOB 06 Jan 1949; alt. DOB 05 Jan 1949; POB Jalisco, Mexico; nationality Mexico; citizen Mexico; Passport 98140030684 (Mexico); R.F.C. AAGL-490105 (Mexico); alt. R.F.C. AAGL-490105-9F9 (Mexico); C.U.R.P.



AAGL490106MJCRRZ00 (Mexico); alt. C.U.R.P. AAGL490106HJCRRZ00 (Mexico) (individual) [SDNT].

ARAMBULA DE FLORES, Luz del Rocio (a.k.a. ARAMBULA GARCIA, Luz del Rocio), C. Las Palmas No. 2700 Int. 14, Colonia Atlas Colomos, Zapopan, Jalisco, Mexico; Avenida Hidalgo 1890, Colonia Ladron de Guevara, Guadalajara, Jalisco, Mexico; DOB 06 Jan 1949; alt. DOB 05 Jan 1949; POB Jalisco, Mexico; nationality Mexico; citizen Mexico; Passport 98140030684 (Mexico); R.F.C. AAGL-490105 (Mexico); alt. R.F.C. AAGL-490105-9F9 (Mexico); C.U.R.P. AAGL490106MJCRRZ00 (Mexico); alt. C.U.R.P. AAGL490106HJCRRZ00 (Mexico) (individual) [SDNT].

ACOSTA URUETA, Yaneth (a.k.a. ACOSTA URUETA, Janeth; a.k.a. ACOSTA URUETA, Yaneth del Socorro), c/o HODWALKER Y LEAL Y CIA. S.C.A., Barranquilla, Colombia; c/o MARTIN HODWALKER M. & CIA. S. EN C., Barranquilla, Colombia; DOB 10 Nov 1965; POB Colombia; nationality Colombia; citizen Colombia; Cedula No. 57411214 (Colombia) (individual) [SDNT].

ACOSTA URUETA, Janeth (a.k.a. ACOSTA URUETA, Yaneth; a.k.a. ACOSTA URUETA, Yaneth del Socorro), c/o HODWALKER Y LEAL Y CIA. S.C.A., Barranquilla, Colombia; c/o MARTIN HODWALKER M. & CIA. S. EN C., Barranquilla, Colombia; DOB 10 Nov 1965; POB Colombia; nationality Colombia; citizen Colombia; Cedula No. 57411214 (Colombia) (individual) [SDNT].

ACOSTA URUETA, Yaneth del Socorro (a.k.a. ACOSTA URUETA, Janeth; a.k.a. ACOSTA URUETA, Yaneth), c/o HODWALKER Y LEAL Y CIA. S.C.A., Barranquilla, Colombia; c/o MARTIN HODWALKER M. & CIA. S. EN C., Barranquilla, Colombia; DOB 10 Nov 1965; POB Colombia; nationality Colombia; citizen Colombia; Cedula No. 57411214 (Colombia) (individual) [SDNT].

FLORES SALINAS, Mario Antonio, C. Las Palmas No. 2700 Int. 14, Colonia Atlas Colomos, Zapopan, Jalisco, Mexico; Paseo Lomas del Bosque No. 2700 Int. 14, Colonia Lomas del Bosque, Guadalajara, Jalisco, Mexico; Avenida Hidalgo 1890, Colonia Ladron de Guevara, Guadalajara, Jalisco, Mexico; Tarascos No. 3469-114, Fraccionamiento Monraz, Guadalajara, Jalisco, Mexico; DOB 16 Mar 1937; alt. DOB 16 Mar 1940; alt. DOB 06 Mar 1940; POB Zacatecas, Mexico; nationality Mexico; citizen Mexico; Passport 98140065448 (Mexico); R.F.C. FOSM-370316-K24 (Mexico); alt. R.F.C. FOSM-400316-K27 (Mexico); alt. R.F.C. FOSM-370316-K12 (Mexico); alt. R.F.C. FOSM-400316 (Mexico); C.U.R.P. FOSM370316HZSLLR06 (Mexico) (individual) [SDNT].

CUMBRES SOLUCIONES INMOBILIARIAS S.A. DE C.V., Avenida Miguel Angel 18, Colonia Real Vallarta, Zapopan, Jalisco, Mexico; Calle del Menhir Sur 661-2, Colonia Altamira, Zapopan, Jalisco, Mexico [SDNT].

CIMIENTOS LA TORRE S.A. DE C.V. (f.k.a. ACTIVOS PARA EL DESARROLLO ISLA BLANCA S.A. DE C.V.), Calle San Uriel 690, Interior 10, Piso 4, Colonia Chapalita, Guadalajara, Jalisco, Mexico [SDNT].

ACTIVOS PARA EL DESARROLLO ISLA BLANCA S.A. DE C.V. (a.k.a. CIMIENTOS LA TORRE S.A. DE C.V.), Calle San Uriel 690, Interior 10, Piso 4, Colonia Chapalita, Guadalajara, Jalisco, Mexico [SDNT].

CORPORACION DE CONSULTORIA, ASESORIA, PRESTACION DE SERVICIOS Y DOTACION DE ELEMENTOS Y SUMINISTROS CIA. LIMITADA (a.k.a. CORDES CIA. LIMITADA; f.k.a. CORPORACION DE CONSULTORIA ASESORIA Y DOTACION DE ELEMENTOS Y SUMINISTROS CIA. LIMITADA), Calle 71C No. 4N-19, Cali, Colombia; NIT # 830502730-4 (Colombia) [SDNT].

CORPORACION DE CONSULTORIA ASESORIA Y DOTACION DE ELEMENTOS Y SUMINISTROS CIA. LIMITADA (a.k.a. CORDES CIA. LIMITADA; a.k.a. CORPORACION DE CONSULTORIA, ASESORIA, PRESTACION DE SERVICIOS Y DOTACION DE ELEMENTOS Y SUMINISTROS CIA. LIMITADA), Calle 71C No. 4N-19, Cali, Colombia; NIT # 830502730-4 (Colombia) [SDNT].

CORDES CIA. LIMITADA (f.k.a. CORPORACION DE CONSULTORIA ASESORIA Y DOTACION DE ELEMENTOS Y SUMINISTROS CIA. LIMITADA; a.k.a. CORPORACION DE CONSULTORIA, ASESORIA, PRESTACION DE SERVICIOS Y DOTACION DE ELEMENTOS Y SUMINISTROS CIA. LIMITADA), Calle 71C No. 4N-19, Cali, Colombia; NIT # 830502730-4 (Colombia) [SDNT].

HODWALKER Y LEAL Y CIA. S.C.A., Via 40 No. 67-20/42, Barranquilla, Colombia; NIT # 900074434-5 (Colombia) [SDNT].

*Related Publication:*

[US Treasury/2023.12.20/ Russia related designations, General Licenses, Price Cap](#)

**D) OFAC/ US TREASURY UPDATES: SDN List Update: Iran-related Designations; Non-Proliferation Designations**

On the 21<sup>st</sup> December 2023, the OFAC SDN List has been updated with the Iran / Non – Proliferation Designations of the following individuals and entities:

**A. INDIVIDUALS**

ARDAKANI, Gholamreza Ebrahimzadeh (a.k.a. ARDAKANI HOSEIN, Gholamreza Ebrahimzadeh; a.k.a. ARDAKANI, Gholam Reza Ebrahimzadeh; a.k.a. "Denise Lee"), Iran; DOB 20 Aug 1992; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport M34961597 (Iran) expires 27 Sep 2020; National ID No. 4440049443 (Iran) (individual) [NPWMD] [IRGC] [IFSR] (Linked To: ARDAKANI, Hossein Hatefi).

ARDAKANI, Hossein Hatefi (a.k.a. ARDAKANI, Hosein Hatefi; a.k.a. ARDAKANI, Hussein Hatefi; a.k.a. ARDEKANI, Hossein Hatafi; a.k.a. "Seatha Murugiah"), Tehran, Iran; DOB 21 Sep 1985; POB Ardakan, Iran; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport U34290111 (Iran); National ID No. 4449916581 (Iran) (individual) [NPWMD] [IRGC] [IFSR] (Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS AEROSPACE FORCE SELF SUFFICIENCY JIHAD ORGANIZATION).

DEWANTO, Agung Surya, Indonesia; DOB 17 Apr 1973; nationality Indonesia; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport R248877 (Indonesia); alt. Passport M765751 (Indonesia) expires 28 Mar 2008; alt. Passport A2935714 (Indonesia); Identification Number 1398039 (Indonesia) (individual) [NPWMD] [IRGC] [IFSR] (Linked To: SURABAYA HOBBY CV).

MOHAMMADABADI, Mehdi Dehghani (a.k.a. MOHAMMADABADI ABOLGHASEM, Mehdi Dehghani), Tehran, Iran; DOB 23 Sep 1982; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; National ID No. 4433172081 (Iran) (individual) [NPWMD] [IRGC] [IFSR] (Linked To: KAVAN ELECTRONICS BEHRAD LIMITED LIABILITY COMPANY).

## **B. ENTITIES**

ARTA WAVE SDN BHD, No. 46-1, Jalan Tasik Utama, 5 Medan, Niaga, Kuala Lumpur 57000, Malaysia; 26-2, Jalan 9/23 E, Taman Danau Kota, Off Jalan Genting Klang, Kuala Lumpur 53300, Malaysia; Rm. 1014, Favor Industrial Centre, 2-6 King Hong Street, Kwai Chung, Hong Kong, China; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 10 Dec 2018; Commercial Registry Number 1306915A (Malaysia); Registration Number 201801044883 (Malaysia) [NPWMD] [IRGC] [IFSR] (Linked To: ARDAKANI, Hossein Hatefi).

BASAMAD ELECTRONIC POUYA ENGINEERING LIMITED LIABILITY COMPANY (a.k.a. DYNAMIC ELECTRONIC FREQUENCY ENGINEERING LIMITED LIABILITY COMPANY), No. 63, Unit 4, Shahrara, Patrice Lumumba St., Abshori St., Tehran 1445934911, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 20 Jan 2015; National ID No. 14004684489 (Iran); Registration Number 466887 (Iran) [NPWMD] [IRGC] [IFSR] (Linked To: ARDAKANI, Hossein Hatefi).

DIRAC TECHNOLOGY HK LIMITED, Rm 2304 Ho King, Commercial Bldg 2-16, Fa Yuen St., Mongkok, Kowloon, Hong Kong, China; Website <https://dirac-tech.com/>; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 15 Dec 2021; Registration Number 3112845 (Hong Kong) [NPWMD] [IRGC] [IFSR] (Linked To: ARDAKANI, Hossein Hatefi).

INTEGRATED SCIENTIFIC MICROWAVE TECHNOLOGY SDN BHD (a.k.a. INTEGRATED SCIENTIFIC MICROWAVE TECHNOLOGY; a.k.a. "ISM TECH"), 1-11 1st Floor, Jalan Padan Perdana 2 Dataran Pandan Prima, Kuala Lumpur 55100, Malaysia; Rm. 1014, Favor Industrial Centre 2-6 Kin Hong Street, Kwai Chung, Hong Kong, China; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 09 May 2019; Registration Number 201901016612 (Malaysia) [NPWMD] [IRGC] [IFSR] (Linked To: ARDAKANI, Hossein Hatefi).

KAVAN ELECTRONICS BEHRAD LIMITED LIABILITY COMPANY (a.k.a. KAVAN ELECTRONIC CO., LTD; a.k.a. KAVAN ELECTRONIC COMPANY; a.k.a. KAVAN ELECTRONIC SADR ARIA ENGINEERING LIMITED LIABILITY COMPANY), No. 63, Unit 4, Shahrara, Patrice Lumumba St., Abshori Sharghi St., Tehran 1445934911, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 13 Jul 2016; National ID No. 14005997725 (Iran); Registration Number 495080 (Iran) [NPWMD] [IRGC] [IFSR] (Linked To: ARDAKANI, Hossein Hatefi; Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS AEROSPACE FORCE SELF SUFFICIENCY JIHAD ORGANIZATION).

NAVA HOBBIES SDN BHD, Floor 25, Unit 29-25, No. 685, Jalan Damansara, Kuala Lumpur 60000, Malaysia; Website <https://www.nahb.my/>; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 2022; Registration Number 202201040867 (Malaysia) [NPWMD] [IRGC] [IFSR] (Linked To: ARDAKANI, Hossein Hatefi).

SAMAN INDUSTRIAL GROUP, West Bound of Azadi Stadium Boulevard, Next to 1 Aftab Street, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Type: Defense activities [NPWMD] [IRGC] [IFSR] (Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS AEROSPACE FORCE SELF SUFFICIENCY JIHAD ORGANIZATION).

SKYLINE ADVANCED TECNOLOGIES SDN BHD, Suite 18.08, 18th Floor, Plaza Permata, 6 Jalan Kampar, Kuala Lumpur 50400, Malaysia; Website <https://satech.com.my/>; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 2021; Registration Number 202101041127 (Malaysia) [NPWMD] [IRGC] [IFSR] (Linked To: ARDAKANI, Hossein Hatefi).

SURABAYA HOBBY CV, Jl. Barata Jaya Xix/57-b, Surabaya, East Java, Indonesia; Jl. Raya Kendangsari Industri No. 2, Kendangsari, KEC, Tenggilis, Mejoyo, Surabaya, East Java, Indonesia; Website <https://www.surabayahobby.com/>; Additional Sanctions Information - Subject to Secondary Sanctions; Identification Number 4242110 (Indonesia) [NPWMD] [IRGC] [IFSR] (Linked To: PISHGAM ELECTRONIC SAFEH COMPANY).

TEYF TADBIR ARYA ENGINEERING COMPANY (a.k.a. TEIF TADBIR ARYA; a.k.a. TEYF TADBIR ARIA), Unit 10, No. 1, End of Bahar, Kardan Street, Patrice Street, Tehran 1445964433, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 26 Jun 2012; National ID No. 10320792753 (Iran); Registration Number 427320 (Iran) [NPWMD] [IRGC] [IFSR] (Linked To: ARDAKANI, Hossein Hatefi).

The above designations are subject to Secondary Sanctions.

### **Related Publication**

#### [US Treasury/2023.12.19/ Iran and Non Proliferation Designations](#)

The above 10 entities and four individuals based in Iran, Malaysia, Hong Kong, and Indonesia, were designated for supporting Iran's unmanned aerial vehicle (UAV) production. This network has facilitated the procurement of U.S.- and foreign-origin components worth hundreds of thousands of dollars for the Islamic Revolutionary Guard Corps Aerospace Force Self Sufficiency Jihad Organization (IRGC ASF SSJO) and its UAV program.

As a result of OFAC's action, all property and interests in property of the individuals and entities named above, and of any entities that are owned, directly or indirectly, 50 percent or more by them, individually, or with other blocked persons, that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. All transactions by U.S. persons or within the United States (including transactions transiting the United States) that involve any property or interests in property of blocked or designated persons are prohibited.

In addition, persons that engage in certain transactions with the designated individuals or entities may themselves be exposed to sanctions. Furthermore, any foreign financial institution that knowingly facilitates a significant transaction or provides significant financial services for any of the designated individuals or entities could be subject to U.S. sanctions.

#### *Related Publication:*

[US Treasury/press releases/19.12.2023/Treasury Targets Program Supporting Iran's UAV Program](#)