

US TREASURY REPORT

WEEK 19 OF 2024

1. <u>Issuance of Venezuela-related General License</u>

On the 10th May 2024, OFAC issued <u>Venezuela General License 8N</u>, "Authorizing Transactions Involving Petróleos de Venezuela, S.A. (PdVSA) Necessary for the Limited Maintenance of Essential Operations in Venezuela or the Wind Down of Operations in Venezuela for Certain Entities".

According to this, all transactions and activities prohibited by Executive Order (E.O.) 13850 of November 1, 2018, as amended by E.O. 13857 of January 25, 2019, or E.O. 13884 of August 5, 2019, each as incorporated into the Venezuela Sanctions Regulations, 31 CFR part 591 (the VSR), that are ordinarily incident and necessary to the limited maintenance of essential operations, contracts, or other agreements, that: (i) are for safety or the preservation of assets in Venezuela; (ii) involve PdVSA or any entity in which PdVSA owns, directly or indirectly, a 50% or greater interest; and (iii) were in effect prior to July 26, 2019, **are authorized through 12:01 a.m. eastern standard time, November 15, 2024**, for the following entities and their subsidiaries (collectively, the "Covered Entities"):

- Halliburton;
- Schlumberger Limited;
- Baker Hughes Holdings LLC;
- Weatherford International, Public Limited Company

Note :

Transactions and activities necessary for safety or the preservation of assets in Venezuela that are authorized above include: transactions and activities necessary to ensure the safety of personnel, or the integrity of operations and assets in Venezuela; participation in shareholder and board of directors meetings; making payments on third-party invoices for transactions and activities authorized above, or incurred prior to April 21, 2020, provided such activity was authorized at the time it occurred; payment of local taxes and purchase of utility services in Venezuela; and payment of salaries for employees and contractors in Venezuela.



Moreover, all transactions and activities prohibited by E.O. 13850, as amended, or E.O. 13884, each as incorporated into the VSR, that are ordinarily incident and necessary to the wind down of operations, contracts, or other agreements in Venezuela involving PdVSA or any entity in which PdVSA owns, directly or indirectly, a 50% or greater interest, and that were in effect prior to July 26, 2019, are authorized through 12:01 a.m. eastern standard time, November 15, 2024, for the Covered Entities.

This general license does not authorize:

(1) The drilling, lifting, or processing of, purchase or sale of, or transport or shipping of any Venezuelan-origin petroleum or petroleum products;

(2) The provision or receipt of insurance or reinsurance with respect to the transactions and activities described above;

(3) The design, construction, installation, repair, or improvement of any wells or other facilities or infrastructure in Venezuela or the purchasing or provision of any goods or services, except as required for safety;

(4) Contracting for additional personnel or services, except as required for safety; or

(5) The payment of any dividend, including in kind, to PdVSA, or any entity in which PdVSA owns, directly or indirectly, a 50% or greater interest.

Furthermore, this general license does not authorize:

(1) Any transactions or dealings related to the exportation or reexportation of diluents, directly or indirectly, to Venezuela;

(2) Any loans to, accrual of additional debt by, or subsidization of PdVSA, or any entity in which PdVSA owns, directly or indirectly, a 50% or greater interest, including in kind, prohibited by E.O. 13808 of August 24, 2017, as amended by E.O. 13857, and incorporated into the VSR; or

(3) Any transactions or activities otherwise prohibited by the VSR, or any other part of 31 CFR chapter V, or any transactions or activities with any blocked person other than the blocked persons identified above.

Effective May 10, 2024, General License No. 8M, dated November 16, 2023, is replaced and superseded in its entirety by this General License No. 8N.



<u>Relevant Article:</u> <u>Issuance of Venezuela-related General License (govdelivery.com)</u>

2. <u>United States Sanctions Senior Leader of the LockBit Ransomware Group</u>

On 7 May 2024, the United States designated Dmitry Yuryevich Khoroshev, a Russian national and a leader of the Russia-based LockBit group, for his role in developing and distributing LockBit ransomware. This designation is the result of a collaborative effort with the U.S. Department of Justice, Federal Bureau of Investigation, the United Kingdom's National Crime Agency, the Australian Federal Police, and other international partners. Concurrently, the Department of Justice is unsealing an indictment and the Department of State is announcing a reward offer for information leading to the arrest and/or conviction of Khoroshev. The United Kingdom and Australia are also announcing the designation of Khoroshev.

As a result of this action, all property and interests in property of this individual that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. OFAC's regulations generally prohibit all dealings 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 persons. In addition, persons that engage in certain transactions with the individual designated, may themselves be exposed to designation.

In this respect, OFAC's SDN List has been updated accordingly:

The following individual has been added to OFAC's SDN List:

KHOROSHEV, Dmitry Yuryevich (a.k.a. KHOROSHEV, Dmitrii Yuryevich; a.k.a. KHOROSHEV, Dmitriy Yurevich; a.k.a. YURIEVICH, Dmitry; a.k.a. "LOCKBITSUPP"), Russia; DOB 17 Apr 1993; POB Russian Federation; nationality Russia; citizen Russia; Email Address <u>khoroshev1@icloud.com</u>; alt. Email Address <u>sitedev5@yandex.ru</u>; Gender Male; Digital Currency Address - XBT bc1qvhnfknw852ephxyc5hm4q520zmvf9maphetc9z; Secondary sanctions risk: Ukraine-/Russia-Related Sanctions Regulations, 31 CFR 589.201; Passport 2018278055 (Russia); alt. Passport 2006801524 (Russia); Tax ID No. 366110340670 (Russia) (individual) [CYBER2].

Related Article:

<u>United States Sanctions Senior Leader of the LockBit Ransomware Group | U.S. Department of the Treasury</u>