

US TREASURY REPORT

WEEK 20 OF 2024

1. North Korea Designations; Amendment to the Iranian Transactions and Sanctions Regulations; Issuance of Iran-Related Frequently Asked Questions

On the 16th May 2024, the OFAC SDN List has been updated with the **North Korea Designations of the following individuals and entities:**

A. INDIVIDUALS

BUDNEV, Aleksey (a.k.a. BUDNEV, Aleksei Viktorovich; a.k.a. BUDNEV, Aleksey Viktorovich (Cyrillic: БУДНЕВ, Алексей Викторович); a.k.a. BUDNEV, Alexey; a.k.a. BUDNEV, Alexey Viktorovich), 34 Zolotorozhskiy Val, Building 2, Moscow 111033, Russia; DOB 09 Jul 1964; POB Krymskaya Region, Russia; nationality Russia; citizen Russia; Gender Male; Secondary sanctions risk: North Korea Sanctions Regulations, sections 510.201 and 510.210; Transactions Prohibited For Persons Owned or Controlled By U.S. Financial Institutions: North Korea Sanctions Regulations section 510.214; Tax ID No. 504217593565 (Russia) (individual) [DPRK].

GAZARYAN, Rafael Anatolyevich (Cyrillic: ГАЗАРЯН, Рафаэль Анатольевич) (a.k.a. GAZARYAN, Rafael' Anatol'evich; a.k.a. GAZARYAN, Rafael Anatolievich), Russia; DOB 02 Oct 1954; nationality Russia; citizen Russia; Gender Male; Secondary sanctions risk: North Korea Sanctions Regulations, sections 510.201 and 510.210; Transactions Prohibited For Persons Owned or Controlled By U.S. Financial Institutions: North Korea Sanctions Regulations section 510.214; Passport 6102814100 (Russia); Tax ID No. 622800585633 (Russia) (individual) [DPRK] (Linked To: MKRTYCHEV, Ashot).

B. ENTITIES

RAFORT LIMITED LIABILITY COMPANY (Cyrillic: ОБЩЕСТВО С ОГРАНИЧЕННОЙ ОТВЕТСТВЕННОСТЬЮ РАФОРТ) (a.k.a. LIMITED LIABILITY COMPANY RAFORT; a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU RAFORT; a.k.a. RAFORT, OOO (Cyrillic: ООО РАФОРТ); a.k.a. "LIMITED LIABILITY COMPANY RUBIN" (Cyrillic: "ОБЩЕСТВО С ОГРАНИЧЕННОЙ ОТВЕТСТВЕННОСТЬЮ РУБИН"); a.k.a. "RAFORT"; a.k.a. "RUBIN, OOO" (Cyrillic: "ООО РУБИН")), Apartment 40, Building 43, Tatarskaya Street, Ryazan, Ryazan Oblast 390005, Russia; Secondary sanctions risk: North Korea

Sanctions Regulations, sections 510.201 and 510.210; Transactions Prohibited For Persons Owned or Controlled By U.S. Financial Institutions: North Korea Sanctions Regulations section 510.214; Tax ID No. 6234061793 (Russia); Business Registration Number 1086234013051 (Russia) issued 16 Oct 2008 [DPRK] (Linked To: GAZARYAN, Rafael Anatolyevich).

ТЕХНОЛОГИЯ, ООО (Cyrillic: ООО ТЕХНОЛОГИЯ) (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU ТЕХНОЛОГИЯ; a.k.a. "TECHNOLOGY COMPANY LIMITED"; a.k.a. "TECHNOLOGY LIMITED LIABILITY COMPANY" (Cyrillic: "ОБЩЕСТВО С ОГРАНИЧЕННОЙ ОТВЕТСТВЕННОСТЬЮ ТЕХНОЛОГИЯ"); a.k.a. "TECHNOLOGY LLC"), Building 2, Sadovniki Street, Nagatino-Sadovniki Municipal District, Moscow 115487, Russia; Part of Room 453, Letter A, Housing 2, Building 11, Staroderevenskaya Street, Saint Petersburg 197374, Russia; Letter A, Office 402, Building 5, Aleksandr Blok Street, Saint Petersburg 190121, Russia; Apartment 7, Building 21, Mashkova Street, Basmanniy Municipal District, Moscow 101000, Russia; Secondary sanctions risk: North Korea Sanctions Regulations, sections 510.201 and 510.210; Transactions Prohibited For Persons Owned or Controlled By U.S. Financial Institutions: North Korea Sanctions Regulations section 510.214; Organization Established Date 14 Aug 2008; Tax ID No. 7839388531 (Russia); Government Gazette Number 87375823 (Russia); Business Registration Number 1089847320188 (Russia) issued 14 Aug 2008 [DPRK] (Linked To: BUDNEV, Aleksey).

TRANS KAPITAL LIMITED LIABILITY COMPANY (Cyrillic: ОБЩЕСТВО С ОГРАНИЧЕННОЙ ОТВЕТСТВЕННОСТЬЮ ТРАНС КАПИТАЛ) (a.k.a. OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU ТРАНС КАПИТАЛ; a.k.a. TRANS KAPITAL LLC (Cyrillic: ООО ТРАНС КАПИТАЛ); a.k.a. TRANS KAPITAL, ООО), Room 1, Building 1, Fire Lane, Noginsk, Borodskiy Urban District, Moscow Oblast 142400, Russia; Building 29, SNT Poltevo Territory, Noginsk, Borodskiy Urban District, Moscow Oblast, Russia; Room 1, 3 Lenin Avenue, Balashikha, Moscow Oblast 143900, Russia; Letter B, Office 10, Plot 68, Proyektynaya Street, Balashikha, Moscow Oblast 143921, Russia; Secondary sanctions risk: North Korea Sanctions Regulations, sections 510.201 and 510.210; Transactions Prohibited For Persons Owned or Controlled By U.S. Financial Institutions: North Korea Sanctions Regulations section 510.214; Tax ID No. 5001101089 (Russia); Government Gazette Number 34892010 (Russia); Business Registration Number 1145001004378 (Russia) issued 06 Nov 2014 [DPRK] (Linked To: GAZARYAN, Rafael Anatolyevich).

The above designations are subject to Secondary Sanctions Risk.

Two Russian individuals and three Russia-based entities were designated pursuant to Executive Order 13551 (E.O. 13551) for facilitating weapons transfers between Russia and the Democratic People's Republic of Korea (DPRK).

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, financial institutions and other persons that engage in certain transactions or activities with the sanctioned entities and individuals may expose themselves to sanctions 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 designated person, or the receipt of any contribution or provision of funds, goods, or services from any such person.

Related Publication:

[US Treasury/press release/Treasury Designates Sanctions Evaders Facilitating Illicit Arms Transfers between the DPRK and Russia](#)

Furthermore, the Department of the Treasury's Office of Foreign Assets Control (OFAC) is [amending the Iranian Transactions and Sanctions Regulations \(ITSR\)](#) to incorporate Iran-related General License D-2. that was previously published on OFAC's website. In particular, the rule incorporates, with amendments, a general license relating to the export, reexport, and provision of certain services, software, and hardware incident to communications over the internet. This amendment also makes additional conforming changes.

In particular, the amendments authorize the exportation or reexportation to Iran of certain no-cost or fee-based services and software that are incident to, and software that enables services incident to, the exchange of communications over the internet, as well as cloud-based services in support of the foregoing services or of any other transactions authorized or exempt under the Regulations, subject to certain conditions. Furthermore, they authorize the exportation, reexportation, or provision of certain software, hardware, and related services not authorized by § 560.540(a)(1) or (2) of the Regulations.

OFAC also published an associated [List of Services, Software, and Hardware Incident to Communications](#), which can be found under the General Licenses and Federal Register Notices sections of the Iran Sanctions page.

Related Publication:

[31 CFR Part 560 - Iranian Transactions and Sanctions Regulations](#)

In relation to the above, OFAC is publishing a new Frequently Asked Question (FAQ) [1173](#) and amending [26 ITSR-related FAQs](#).

FAQ 1173 explains that user authentication services are services used to login or verify the identity of a user to a particular software or service, such as a user identification account often used to login to email, mobile app stores, or other activities.

[Faq 1173](#)

FAQ 1110 states that OFAC amended 31 CFR § 560.540 of the Iranian Transactions and Sanctions Regulations (ITSR) to incorporate the provisions of General License (GL) D-2 into 31 CFR § 560.540, to further support the provision of communication tools to ordinary Iranians and assist in their efforts to resist repressive internet censorship and surveillance tools deployed by the Iranian government.

[US TREASURY/ Iran Faqs/updated/2024-05-16](#)

2. Nicaragua-related Designations; Sudan Designations; Policy Alert on Disrupting Irregular Migration: Best Practices in Response to Recent Developments in the Aviation Sector

On the 15th May 2024, OFAC imposed sanctions on a Nicaragua-Based Russian Institution and Gold Companies, pursuant to Executive Order (E.O.) 13851, as amended, in response to the Ortega-Murillo regime's continued repression of the people of Nicaragua and continued exploitation of vulnerable migrants, including via the facilitation and profiting off of irregular migration to the United States.

In this respect, the OFAC SDN List has been updated with the **Nicaragua-related Designations of the following entities:**

CAPITAL MINING INVESTMENT NICARAGUA, SOCIEDAD ANONIMA (a.k.a. "CAPITAL MINING"), Managua, Nicaragua; Organization Type: Support activities for other mining and quarrying; Business Number MC-XFKHF1 (Nicaragua) [NICARAGUA].

COMPANIA MINERA INTERNACIONAL, SOCIEDAD ANONIMA (a.k.a. "COMINTSA"; a.k.a. "COMPANIA MINERA INTERNACIONAL"; a.k.a. "COMPANIA MINERA INTERNACIONAL, S.A."), Managua, Nicaragua; Organization Type: Mining and Quarrying; RUC # J0310000400210 (Nicaragua); Public Registration Number MG00-22-012292 (Nicaragua); Business Number MC-XFOU0Q (Nicaragua); alt. Business Number UAF-RSO-C-XII-615-2022 (Nicaragua) [NICARAGUA].

TRAINING CENTER OF THE RUSSIAN MINISTRY OF INTERNAL AFFAIRS IN MANAGUA (Cyrillic: УЧЕБНЫЙ ЦЕНТР МИНИСТЕРСТВА ВНУТРЕННИХ ДЕЛ РОССИИ В МАНАГУА) (a.k.a. CENTRO DE CAPACITACION DEL MINISTERIO DEL INTERIOR DE LA FEDERACION DE RUSIA EN MANAGUA; a.k.a. TRAINING CENTER OF THE MINISTRY OF THE INTERIOR OF THE RUSSIAN FEDERATION IN MANAGUA; a.k.a. "CENTRO DE CAPACITACION ANTINARCOTICO RUSIA-NICARAGUA"; a.k.a. "MVD TRAINING CENTER" (Cyrillic: "УЧЕБНЫЙ ЦЕНТР МВД"); a.k.a. "RUSSIA-NICARAGUA ANTI-NARCOTICS TRAINING CENTER"), Las Colinas, 3a Etapa, Managua 14199, Nicaragua; Organization Established Date 01 Oct 2017; Target Type Government Entity [NICARAGUA] (Linked To: NICARAGUAN NATIONAL POLICE).

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, financial institutions and other persons that engage in certain transactions or activities with the sanctioned entities may expose themselves to sanctions 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 designated person, or the receipt of any contribution or provision of funds, goods, or services from any such person.

Related Publication:

[US Treasury/press release/15.05.2024/Treasury Sanctions Nicaragua-Based Russian Institution and Gold Companies](#)

Furthermore, the OFAC SDN List has been updated with **the Sudan Designations of the following individuals:**

GIBRIL, Ali Yagoub (a.k.a. JIBRIL, Ali Yagoub; a.k.a. JIBRIL, Ali Yaqoub), Sudan; DOB 01 Jan 1964; POB Zalingei, Central Darfur, Sudan; nationality Sudan; Gender Male; National ID No. 20510589109 (Sudan) (individual) [SUDAN-EO14098].

MOHAMED, Osman Mohamed Hamid (a.k.a. HAMID, Osman Mohamed; a.k.a. MOHAMED, Osman Mohamed Hamed), Sudan; DOB 01 Jan 1966; POB Kadiqali, Sudan; nationality Sudan; Gender Male; Passport P05557591 (Sudan) expires 03 Mar 2024; National ID No. 11540384888 (Sudan) (individual) [SUDAN-EO14098].

The above individuals were designated pursuant to Executive Order (E.O.) 14098, for leading the Rapid Support Forces' (RSF) war campaign.

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, financial institutions and other persons that engage in certain transactions or activities with the sanctioned individuals may expose themselves to sanctions 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 designated person, or the receipt of any contribution or provision of funds, goods, or services from any such person.

Related Publication:

[US Treasury/press release/Treasury Sanctions Sudanese Rapid Support Forces Commanders Expanding War](#)

Finally, the U.S. Departments of Treasury, State and Homeland Security, are jointly issuing a business advisory titled "[Policy Alert on Disrupting Irregular Migration: Best Practices in Response to Recent Developments in the Aviation Sector](#)." This advisory reflects the U.S. government's efforts to promote responsible practices in the industry, prevent and disrupt illicit activity, and enhance compliance with lawful immigration and migration pathways.

Related Publication:

[US Treasury/2024.05.15/ Nicaragua and Sudan Designations](#)

3. U.S. Exposes Attempted Sanctions Evasion Scheme Connected to Russian Oligarch

On 14 May 2024, OFAC designated one Russian individual and three Russia-based companies involved in an attempted sanctions evasion scheme in which an opaque and complex supposed divestment could have unfrozen more than \$1.5 billion worth of shares belonging to U.S.-designated Russian oligarch [Oleg Vladimirovich Deripaska](#) (Deripaska).

OFAC designated Deripaska on April 6, 2018 pursuant to Executive Order (E.O.) 13661 for having acted or purported to act for or on behalf of, directly or indirectly, a senior official of the Government of the Russian Federation as well as pursuant to E.O. 13662 for operating in the energy sector of the Russian Federation economy. Deripaska is also sanctioned by Australia, Canada, the European Union, New Zealand, and the United Kingdom.

In June 2023, Deripaska coordinated with Russian national **Dmitrii Aleksandrovich Beloglazov** (Beloglazov), the owner of Russia-based financial services firm **Obshchestvo S Ogranichennoi Otvetstvennostiu Titul** (Titul), on a planned transaction to sell Deripaska's frozen shares in a European company. Within weeks of this coordination, Russia-based financial services firm **Aktsionernoe Obshchestvo Iliadis** (Iliadis) was established as a subsidiary of Titul. In early 2024, Iliadis acquired Russia-based investment holding company **International Company Joint Stock Company Rasperia Trading Limited** (Rasperia), which holds Deripaska's frozen shares.

Beloglazov, Titul, and Iliadis were designated pursuant to E.O. 14024 for operating or having operated in the financial services sector of the Russian Federation economy. Rasperia was designated pursuant to E.O. 14024 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Iliadis.

In this respect, [OFAC's SDN List](#) has been updated accordingly:

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

BELOGLAZOV, Dmitrii Aleksandrovich, Russia; DOB 18 Feb 1968; POB Russia; nationality Russia; Gender Male (individual) [RUSSIA-EO14024].

The following entities have been added to OFAC's SDN List:

AKTSIONERNOE OBSHCHESTVO ILIADIS (a.k.a. JOINT STOCK COMPANY ILIADIS), Per. 3-1 Syromyatnicheskii D. 3/9 Str. 1, Moscow 105120, Russia; Tax ID No. 9709096348 (Russia); Registration Number 1237700470842 (Russia) [RUSSIA-EO14024].

INTERNATIONAL COMPANY JOINT STOCK COMPANY RASPERIA TRADING LIMITED (Cyrillic: МЕЖДУНАРОДНАЯ КОМПАНИЯ АКЦИОНЕРНОЕ ОБЩЕСТВО РАСПЕРИА ТРЕЙДИНГ ЛИМИТЕД) (a.k.a. МКАО RASPERIA TREIDING LIMITED), B-R Solnechnyi D. 25 Pomeshch, A/60, Kaliningrad 236006, Russia; Organization Established Date 22 Nov 2006; Tax ID No. 3906380371 (Russia); Legal Entity Number 253400ENFDC2JU84CJ30; Registration Number 1193926007153 (Russia) [RUSSIA-EO14024] (Linked To: AKTSIONERNOE OBSHCHESTVO ILIADIS).

OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTIU TITUL (a.k.a. LIMITED LIABILITY COMPANY TITUL), Ul. Krasina, 7 str. 2, kom. 3, Moscow 123056, Russia; Tax ID No. 7703474952 (Russia); Registration Number 1197746281897 (Russia) [RUSSIA-EO14024].

As a result of this 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. In addition, any entities that are owned, directly or indirectly, 50% or more by one or more blocked persons are also blocked. 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. In addition, sufficient due diligence should be conducted to determine that any purported divestment in fact occurred and that the transfer of ownership interests was not merely a sham transaction.

Relevant Link:

[U.S. Exposes Attempted Sanctions Evasion Scheme Connected to Russian Oligarch | U.S. Department of the Treasury](#)