

## **US TREASURY REPORT**

### **WEEK 39 OF 2024**

#### **1. Treasury Sanctions Iranian Regime Agents Attempting to Interfere in U.S. Elections - Iran-related Designation; Foreign Interference in U.S. Election Designations**

On 27 September 2024, OFAC designated seven individuals as part of a coordinated U.S. government response to Iran's operations that sought to influence or interfere in the 2024 and 2020 presidential elections. Iranian state-sponsored actors undertook a variety of malicious cyber activities, such as hack-and-leak operations and spear-phishing, in an attempt to undermine confidence in the United States' election processes and institutions and to interfere with political campaigns. The designations undertaken today pursuant to Executive Order (E.O.) 13848, complement law enforcement actions taken by the Department of Justice against a variety of Iranian election interference actors.

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

#### **The following individuals have been added to OFAC's SDN List:**

ABDOLRAHIMI, Mohammad Hosein, Tehran, Iran; DOB 29 Aug 1988; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; National ID No. 0493278222 (Iran) (individual) [ELECTION-EO13848] (Linked To: EMENNET PASARGAD).

ASKARIZADEH, Rahmatollah, Tehran, Iran; DOB 14 May 1992; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; National ID No. 0014603667 (Iran) (individual) [ELECTION-EO13848] (Linked To: EMENNET PASARGAD).

JALILI, Masoud, Number 3, Kagzar Alley, Shahid Hedayeti Avenue, Shahid Soleimani Expressway, Tehran 1675646611, Iran; DOB 08 Dec 1987; POB Tehran, Iran; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; National ID No. 0079491391 (Iran); Birth Certificate Number 49332 (Iran) (individual) [IRGC] [IFSR] [ELECTION-EO13848] (Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS).

MAHDAVIAN, Ali (Arabic: علی مهدویان) (a.k.a. HADIAN, Ali), Karaj, Shahrak Behdari Kh Faajr 13, Rejayi 21, Tehran 3148634998, Iran; DOB 11 Dec 1992; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; National ID No. 0015252434 (Iran) (individual) [ELECTION-EO13848] (Linked To: EMENNET PASARGAD).

RAHIMI HAJJIABADI, Sayyed Mehdi (Arabic: سيد مهدي رحيمي حاجي آبادي) (a.k.a. RAHIMI, Seyyed Mehdi), Kh Majidieh Southern K Salehi P 64, Iran; DOB 21 Jul 1980; POB Tehran, Iran; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male (individual) [ELECTION-EO13848] (Linked To: EMENNET PASARGAD).

SADEGHI, Fatemeh (Arabic: فاطمه صادقي) (a.k.a. SAOEGHI, Fatemeh), Iran; DOB 28 Nov 1995; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Female (individual) [ELECTION-EO13848] (Linked To: EMENNET PASARGAD).

YAZDI, Elaheh (Arabic: الهه يزدي) (a.k.a. YAZDIABBASABADI, Elaheh), Bozorgrah Basij She, Road Takhti Bolvar Hejrat, Square Motahhari, Town Motahhari, Boluk 1 and 2, Tehran, Iran; DOB 23 Apr 1985; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Female; National ID No. 1262121973 (Iran) (individual) [ELECTION-EO13848] (Linked To: EMENNET PASARGAD).

As a result of this action, all property and interests in property of the designated persons described 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, individually or in the aggregate, 50% or more by one or more blocked persons are also blocked. 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 Articles:*

*[OFAC 27/09 - Iran-related Designation; Foreign Interference in U.S. Election Designations](#)*

*[OFAC 27/09 - Treasury Sanctions Iranian Regime Agents Attempting to Interfere in U.S. Elections](#)*

## **2. OFAC SDN List Update: Russia-related Designations; Cyber-related Designation**

On the 26<sup>th</sup> September 2024, the OFAC SDN List has been updated with the Russia-related Designations and Cyber – related designation of the following individual and entity:

### **A. INDIVIDUAL**

IVANOV, Sergey Sergeevich (Cyrillic: ИВАНОВ, Сергей Сергеевич) (a.k.a. OMELNITSKII, Sergey Sergeevich (Cyrillic: ОМЕЛЬНИЦКИЙ, Сергей Сергеевич); a.k.a. "Taleon"; a.k.a. "UAPS"), St. Petersburg, Russia; DOB 02 Jun 1980; POB Russia; nationality Russia; Gender Male; Secondary sanctions risk: See Section 11 of Executive Order 14024.; Passport 4015431802 (Russia) (individual) [RUSSIA-EO14024].

### **B. ENTITY**

CRYPTEX (a.k.a. INTERNATIONAL PAYMENT SERVICE PROVIDER LLC), Euro House, Richmond Hill Road, P.O. Box 2897, Kingstown, Saint Vincent and the Grenadines; Website cryptex.net; Digital Currency Address - XBT 13JtX4h7G5ZuNK5mFudKq9DHLvvMFuNuz; Digital Currency Address - ETH 0x0931cA4D13BB4ba75D9B7132AB690265D749a5E7; Secondary sanctions risk: See Section 11 of Executive Order 14024.; Digital Currency Address - LTC M8yFL6SFC6TreATegTyuSYkDfDRbisdpT3; Organization Established Date 01 Dec 2021; Digital Currency Address - TRX TTUDyVhhpCC1xJoPmWzdjLAzeoPwbSABdr; Business Registration Number 1628 (Saint Vincent and the Grenadines) [CYBER2] [RUSSIA-EO14024].

The above designations are subject to Secondary Sanctions Risk.

### **Related Publication**

[US Treasury/2024.09.26/Russia-related Designations; Cyber-related Designation](https://www.treasury.gov/2024.09.26/Russia-related-Designations;Cyber-related-Designation)

Treasury’s Financial Crimes Enforcement Network (FinCEN) is issuing an order that identifies PM2BTC—a Russian virtual currency exchanger associated with Russian individual Sergey Sergeevich Ivanov (Ivanov)—as being of “primary money laundering concern” in connection with Russian illicit finance. Concurrently, OFAC is sanctioning Ivanov, pursuant to E.O. 14024, for operating or having operated in the financial services sector of the Russian Federation economy, and Cryptex—a virtual currency exchange registered in St. Vincent and the Grenadines and operating in Russia, pursuant to Executive Order (E.O.) 13694, as amended by E.O. 13757 (“E.O. 13694, as amended”), for being responsible for or complicit in, or for having engaged in, directly

or indirectly, a cyber-enabled activity, and pursuant to E.O. 14024 for operating or having operated in the financial services sector of the Russian Federation economy.

As a result of today's action by OFAC, all property and interests in property of the designated persons that are in the United States or in the possession or control of U.S. 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, 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.

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. Foreign financial institutions that conduct or facilitate significant transactions or provide any service involving Russia's military-industrial base run the risk of being sanctioned by OFAC.

### **Related Publication**

[US Treasury/press release/26.09.2024/Treasury Takes Coordinated Actions Against Illicit Russian Virtual Currency Exchanges and Cybercrime Facilitator](#)

### **3. OFAC: Treasury Sanctions Former Haitian Politician and Gang Leader for Their Connections to Serious Human Rights Abuse/ Treasury Sanctions Networks Enabling Illicit Trade that Benefits IRGC-QF and Hizballah**

On 25 September 2024, OFAC sanctioned a former member of Haiti's parliament, Propane Victor, for his role in forming, supporting, and arming gangs and their members that have committed serious human rights abuse in Haiti. OFAC has also designated Luckson Elan, the current leader of the Gran Grif gang, for his involvement in serious human rights abuse related to gang activity in Haiti's Artibonite department.

As a result of this action, all property and interests in property of the designated persons described 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, individually or in the aggregate, 50% or more by one or more blocked persons are also blocked. 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. U.S. persons may face civil or criminal penalties for violations of E.O. 13818. Non-U.S. persons are also prohibited from causing or conspiring to cause U.S. persons to wittingly or unwittingly violate U.S. sanctions, as well as engaging in conduct that evades U.S. sanctions.

On a separate action, OFAC sanctioned more than a dozen entities and vessels for their involvement in the shipment of Iranian crude oil and liquid petroleum gas to Syria and East Asia on behalf of the Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) and Hizballah. Among the vessels sanctioned today are four ships associated with the fleet of illicit shipping Syrian magnate Abdul Jalil Mallah (Abdul Jalil) and his brother Luay al-Mallah. Since Abdul Jalil's June 10, 2021 designation for his support to the network of IRGC-QF-backed Houthi financial official Sa'id al-Jamal, Luay al-Mallah has continued to use their shipping empire to support Iran's malign activities and those of its proxies. Luay al-Mallah is also being designated in this action.

As a result of this action, all property and interests in property of the designated persons described 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, individually or in the aggregate, 50% or more by one or more blocked persons are also blocked. 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. U.S. persons may face civil or criminal penalties for violations of E.O. 13224, as amended. Non-U.S. persons are also prohibited from causing or conspiring to cause U.S. persons to wittingly or unwittingly violate U.S. sanctions, as well as engaging in conduct that evades U.S. sanctions.

Furthermore, engaging in certain transactions with the individuals designated above **entails risk of secondary sanctions pursuant to E.O. 13224, as amended**. Pursuant to this authority, OFAC can prohibit or impose strict conditions on the opening or maintaining in the United States of a correspondent account or a payable-through account of a foreign financial institution that knowingly conducted or facilitated any significant transaction on behalf of an SDGT.

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.

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

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

AL-MALLAH, Luay (a.k.a. MALAH, Louay Abu Bakr; a.k.a. MALLAH, Luay), Peiraias, Attica, Greece; DOB 02 Jan 1982; POB Tartus, Syria; nationality Turkey; alt. nationality Syria; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport U24015191 (Turkey) expires 25 Jan 2031 (individual) [SDGT] (Linked To: MALLAH, Abdul Jalil).

ELAN, Luckson (Latin: ÉLAN, Luckson) (a.k.a. ELAN, Lucson; a.k.a. "GENERAL LUCKSON"; a.k.a. "JENERAL LUCKSON"), Artibonite Department, Haiti; DOB 06 Jan 1988; nationality Haiti; Gender Male (individual) [GLOMAG].

VICTOR, Prophane (a.k.a. PROFANE, Victor; a.k.a. PROPHANE, Victor), 64 Pelerin 5, Petion-Ville, West, HT6142, Haiti; 3, Rue Marcelin, Tabarre 61, Tabarre, Ouiest, HT6125, Haiti; DOB 08 Feb 1969; POB Port-au-Prince, Haiti; nationality Haiti; citizen Haiti; Gender Male; Passport R10097145 (Haiti) expires 09 May 2031; National ID No. 0033760991 (Haiti) (individual) [GLOMAG].

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

DRAGON ROAD LTD, Trust Company Complex, Ajeltake Road, Ajeltake, Majuro MH 96960, Marshall Islands; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 11 Apr 2023; Identification Number IMO 6421332; Business Number 119410 (Marshall Islands) [SDGT] (Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS (IRGC)-QODS FORCE).

ORYX DENIZCILIK LIMITED SIRKETI (a.k.a. ORYX DENIZ CILIK LTD), Maslak Mahallesi Eski Buyukdere Cad Giz 2000 Plaza Apt No. 7/33, Sariyer, Istanbul, Turkey; Ataturk Mah.Ertugrul Gazi Sk. A Block No. 2E Ic Kapi No. 542 Atasehir, Istanbul, Turkey; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 10 Oct 2018; Istanbul Chamber of Comm. No. 1149115 (Turkey); Registration Number 159266-5 (Turkey); Central Registration System Number 0648-1179-9800-0001 (Turkey) [SDGT] (Linked To: AL-MALLAH, Luay).

STAR OCEAN SHIPMANAGE LTD, Room 1706A, 17th Floor, Building A, World Trade Tower 6, Xianggang Zhonglu, Shinan Qu, Qingdao, Shandong, China; Trust Company Complex, Ajeltake Road, Majuro, Ajeltake Island, Marshall Islands; Secondary sanctions risk: section 1(b)

of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 20 Oct 2021; Identification Number IMO 6272611; Registration Number 111373 (Marshall Islands) [SDGT] (Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS).

TAI FENG HAI SHIPPING LIMITED, Rm 06,17/F., Wellborne Commercial Centre, 8 Java Road North Point, Hong Kong, China; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 16 Jan 2023; Identification Number IMO 6388418; Business Registration Number 74777887 (Hong Kong) [SDGT] (Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS (IRGC)-QODS FORCE).

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

CONFIDENCE P (3FGV5) Crude/Oil Products Tanker Panama flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9178044; MMSI 357747000 (vessel) [SDGT] (Linked To: MALLAH, Abdul Jalil).

ETERNAL 8 (3E3694) Crude Oil Tanker Panama flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9232448; MMSI 352001640 (vessel) [SDGT] (Linked To: STAR OCEAN SHIPMANAGE LTD).

ETERNAL PEACE (3E3831) Crude Oil Tanker Panama flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9259745; MMSI 352002158 (vessel) [SDGT] (Linked To: STAR OCEAN SHIPMANAGE LTD).

ETERNAL SUCCESS (3E4722) Crude Oil Tanker Panama flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9307633; MMSI 352002970 (vessel) [SDGT] (Linked To: STAR OCEAN SHIPMANAGE LTD).

FENG TAI (3E4959) Crude Oil Tanker Panama flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9248473; MMSI 352002635 (vessel) [SDGT] (Linked To: TAI FENG HAI SHIPPING LIMITED).

NOVA (a.k.a. QUEEN REEM) (S9U17) Crude/Oil Products Tanker Sao Tome and Principe flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order

13886; Vessel Registration Identification IMO 9141259; MMSI 668116245 (vessel) [SDGT] (Linked To: MALLAH, Abdul Jalil).

RIVAL (3FZA2) Chemical/Products Tanker Panama flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9117818; MMSI 3708590000 (vessel) [SDGT] (Linked To: MALLAH, Abdul Jalil).

SERENE I (3EFX8) Crude Oil Tanker Panama flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9197832; MMSI 374483000 (vessel) [SDGT] (Linked To: DRAGON ROAD LTD).

TIYARA (a.k.a. EMERALD) (EPUN7) Crude Oil Tanker; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9231224; MMSI 422471300 (vessel) [SDGT] (Linked To: MALLAH, Abdul Jalil).

Related Articles:

[\*Treasury Sanctions Former Haitian Politician and Gang Leader for Their Connections to Serious Human Rights Abuse\*](#)

[\*Treasury Sanctions Networks Enabling Illicit Trade that Benefits IRGC-QF and Hizballah\*](#)

**4. In Dual Actions, Treasury Sanctions Clan Del Golfo Leadership in Colombia and Businesses Owned by Sinaloa Cartel Fentanyl Traffickers in Mexico - Counter Narcotics Designations; Issuance of New Russia-related Frequently Asked Questions**

On 24 September 2024 OFAC sanctioned five Colombian nationals and two Mexico-based businesses pursuant to Executive Order (E.O.) 14059, “Imposing Sanctions on Foreign Persons Involved in the Global Illicit Drug Trade”.

The Colombian individuals sanctioned, are leaders within Colombia’s Clan del Golfo (CDG)—also known as Los Urabeños—which is one of the country’s largest drug trafficking organizations and a key contributor to human smuggling through the Darién Gap. The companies sanctioned today are located in Mexico and owned by designated Sinaloa Cartel fentanyl traffickers. One of the most notorious and pervasive drug trafficking organizations in the world, the Sinaloa Cartel is responsible for a significant portion of the illicit fentanyl and other deadly drugs trafficked into the United States.



**Therefore the following individuals have been added to OFAC's SDN List:**

ALCARAZ MORALES, Wilder de Jesus (a.k.a. "El Indio"), Colombia; DOB 28 Feb 1989; POB Turbo, Antioquia, Colombia; Gender Male; Cedula No. 1040763025 (Colombia) (individual) [ILLICIT-DRUGS-EO14059] (Linked To: CLAN DEL GOLFO).

CELIS DURANGO, Alexander (a.k.a. "Bayron"), Colombia; DOB 05 Aug 1978; POB Necocli, Antioquia, Colombia; nationality Colombia; Gender Male; Cedula No. 10933010 (Colombia) (individual) [ILLICIT-DRUGS-EO14059].

CORDOBA QUINTO, Jose Emilson (a.k.a. "Negro Perea"), Colombia; DOB 31 Aug 1969; POB Istmina, Choco, Colombia; nationality Colombia; Gender Male; Cedula No. 11710361 (Colombia) (individual) [ILLICIT-DRUGS-EO14059] (Linked To: CLAN DEL GOLFO).

DEMOYA HERNANDEZ, Jose Miguel (a.k.a. DEMOYA, JOSE MIGUEL; a.k.a. "Chirimoya"), Colombia; DOB 19 Sep 1984; nationality Colombia; Gender Male; Cedula No. 78115749 (Colombia) (individual) [ILLICIT-DRUGS-EO14059].

SANCHEZ SANCHEZ, Jose Gonzalo (a.k.a. "Gonzalito"), Colombia; DOB 30 Dec 1974; POB Monteria, Cordoba, Colombia; nationality Colombia; Gender Male; Cedula No. 11002977 (Colombia) (individual) [ILLICIT-DRUGS-EO14059].

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

FARMACIA Y MINI SUPER TRINIDAD (a.k.a. FARMACIA TRINIDAD; a.k.a. "FARMACIATRINIDADNOGALES"), Calle Orizaba 81, Col. Empalme, Nogales, Sonora 84080, Mexico; Email Address [farmaciatrinidadnogales@gmail.com](mailto:farmaciatrinidadnogales@gmail.com); Phone Number +52 631 104 2274; alt. Phone Number +52 631 172 1037; Organization Type: Retail sale of pharmaceutical and medical goods, cosmetic and toilet articles in specialized stores; R.F.C. MOHA720319GT3 (Mexico) [ILLICIT-DRUGS-EO14059] (Linked To: MORGAN HUERTA, Jose Arnoldo).

NIEVES Y PALETAS EVI (a.k.a. "NIEVESYPALETASEVI"), Boulevard San Angel 3270, Estrella Nueva Galicia, San Benito, Culiacan, Sinaloa 80280, Mexico; Culiacan, Sinaloa, Mexico; Pueblos Unidos, Sinaloa, Mexico; Tacuichamona, Sinaloa, Mexico; Organization Established Date 09 Sep 2019; Organization Type: Retail sale of food in specialized stores [ILLICIT-DRUGS-EO14059] (Linked To: LARRANAGA HERRERA, Jesus Norberto; Linked To: LIZARRAGA SANCHEZ, Karla Gabriela).

As a result of this action, all property and interests in property of the designated persons described 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, individually or in the aggregate, 50% or more by one or more blocked persons are also blocked. 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. U.S. persons may face civil or criminal penalties for violations of E.O. 14059 and the Kingpin Act. Non-U.S. persons are also prohibited from causing or conspiring to cause U.S. persons to wittingly or unwittingly violate U.S. sanctions, as well as engaging in conduct that evades U.S. sanctions.

On the same date OFAC issued three new, Russia-related Frequently Asked Questions (FAQs): [FAQ 1193](#), [FAQ 1194](#), and [FAQ 1195](#).

1193. I am a U.S. company with a subsidiary organized and located in Russia. Can I provide the employees or contractors of my Russian subsidiary who are located in Russia with the services prohibited by the Information Technology (IT) and Software Services Determination under the exclusion "(1) any service to an entity located in the Russian Federation that is owned or controlled, directly or indirectly, by a U.S. person?"

1194. I am a U.S. company with a subsidiary located in a third country (other than Russia). My third-country subsidiary has an employee or contractor located in Russia. Can I provide that employee or contractor located in Russia with the services prohibited by the Information Technology (IT) and Software Services Determination under the exclusion "(1) any service to an entity located in the Russian Federation that is owned or controlled, directly or indirectly, by a U.S. person"?

1195. A U.S. company located in the United States has an employee or contractor located in Russia working directly for the U.S. company. Can the U.S. company provide that employee or contractor located in Russia with the services prohibited by the Information Technology (IT) and Software Services Determination under the exclusion "(1) any service to an entity located in the Russian Federation that is owned or controlled, directly or indirectly, by a U.S. person"?

Related Articles:

[\*OFAC 24/09 - Counter Narcotics Designations; Issuance of New Russia-related Frequently Asked Questions\*](#)

[\*More information on the Colombian individuals and Mexico-based entities designated\*](#)

[\*View the chart on the Mexico-based entities designated\*](#)