

US TREASURY REPORT

WEEK 4 OF 2024

A. OFAC SDN List Update: Counter Terrorism Designations

On the 25th January 2024, **the OFAC SDN List has been updated with the Counter Terrorism Designations of the following individuals:**

AL-ATIFI, Mohamed (a.k.a. AL-ATIFI, Mohammad; a.k.a. AL-ATIFI, Mohammed; a.k.a. AL-ATIFI, Muhammad Nasser), Yemen; DOB 1969; POB Bani Atef Village, Sanaa Governorate, Yemen; nationality Yemen; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (individual) [SDGT].

AL-NABI, Muhammad Fadl Abd (a.k.a. NABI, Mohammed Fadl Abdul), Yemen; DOB 01 Jan 1952; nationality Yemen; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (individual) [SDGT].

AL-QADIRI, Muhammad Ali (a.k.a. AL-QADIRI, Muhammad; a.k.a. AL-QADRI, Muhammad), Yemen; DOB 1970; POB Hudaydah Governorate, Yemen; nationality Yemen; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (individual) [SDGT].

AL-TALIBI, Muhammad Ahmad (a.k.a. "AL-TALIBI, Abi Ja'far"), Yemen; DOB 01 Jan 1983; POB Dhahyan, Sa'dah, Yemen; nationality Yemen; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport 01197425 (Yemen) (individual) [SDGT].

The above-mentioned designations are subject to Secondary sanctions risk.

Related Publication:

[US Treasury/2024.01.25/ Counter Terrorism Designations](#)

The above – mentioned individuals are being designated pursuant to Executive Order (E.O.) 13224, as amended, which targets terrorist groups, their supporters, and those who aid acts of terrorism, for supporting the Houthis' recent attacks against commercial vessels in the Red Sea and Gulf of Aden, including holding civilian crews hostage.

As a result of OFAC's 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. Unless authorized by a general or specific license issued by OFAC, or exempt, OFAC's regulations generally prohibit all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons.

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

Related Publication:

[US Treasury/ 25.01.2024/press release/US and UK Target Houthi Leadership](#)

B. OFAC/ US TREASURY UPDATES: OFAC SDN List Update: Cyber-related Designation

On 23rd January 2024 the OFAC SDN List has been updated with the Cyber-related Designation of the following individual:

ERMAKOV, Aleksandr (Cyrillic: ЕРМАКОВ, Александр) (a.k.a. "blade_runner"; a.k.a. "GistaveDore"; a.k.a. "GustaveDore"; a.k.a. "JimJones"), Moscow, Russia; DOB 16 May 1990; nationality Russia; Email Address ae.ermak@yandex.ru; Gender Male; Secondary sanctions risk: Ukraine-/Russia-Related Sanctions Regulations, 31 CFR 589.201 (individual) [CYBER2].

The above – mentioned Designation is subject to Secondary sanctions risk.

Related Publication:

[US Treasury/2024.01.23/Cyber Related Designation](#)

The sanctioned individual has been designated by OFAC in coordination with Australia and the United Kingdom pursuant to Executive Order (E.O.) 13694, as amended by E.O. 13757, for being responsible for or complicit in, or to have engaged in, directly or indirectly, an activity described in subsection (a)(ii) of section 1 of E.O. 13694, as amended, by playing a pivotal in the 2022 ransomware attack against Medibank Private Limited, an Australian healthcare insurer.

As a result of OFAC's action, all property and interests in property of the individual described above 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 (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, persons that engage in certain transactions with the designated individual may themselves be exposed to sanctions.

Related Publication:

[US Treasury/press release/US, Australia and UK Sanction Russian Cyber Actor](#)

C. OFAC/ US TREASURY UPDATE: OFAC SDN List Update: Counter Terrorism Designations; Issuance of Counter Terrorism General License and Frequently Asked Question

On the 22nd January 2024, the OFAC SDN List has been updated with the Counter Terrorism Designations of the following Individuals, Entities and Aircrafts:

A. INDIVIDUALS

AL-AZZAWI, Riyadh Ali Hussein, Baghdad, Iraq; DOB 07 Jun 1976; nationality Iraq; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport A14704969 (Iraq) expires 02 Dec 2026 (individual) [SDGT] (Linked To: KATA'IB HIZBALLAH).

AL-HAMIDAWI, Awqad Muhsin Faraj (a.k.a. AL-HAMADAWI, Aogad Mohsin Faraj), Baghdad, Iraq; DOB 03 Feb 1982; nationality Iraq; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport A10361950 (Iraq); alt. Passport A13384189 (Iraq) expires 26 May 2026; National ID No. AG2915616 (Iraq) expires 29 Jan 2028 (individual) [SDGT] (Linked To: KATA'IB HIZBALLAH).

AL-'IBUDI, Hossein Moanes (a.k.a. AL-'IBUDI, Husayn Mu'nis; a.k.a. MOANES, Hossein), Baghdad, Iraq; DOB 24 Oct 1971; nationality Iraq; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport A17308762 (Iraq) expires 10 Dec 2027 (individual) [SDGT] (Linked To: KATA'IB HIZBALLAH).

AL-SHABBANI, Basheer Abdulkadhim Alwan (a.k.a. AL-SHABANI, Bashir Abd al Kazim Alwan; a.k.a. ALSHABBANI, Basheer; a.k.a. SHABBAN, Basheer), Baghdad, Iraq; DOB 01 May 1986; nationality Iraq; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport A14930891 (Iraq) expires 27 Jan 2027; alt. Passport A9836915 (Iraq) expires 19 Aug 2024; National ID No. AA2889593 (Iraq) expires 21 Oct 2026 (individual) [SDGT] (Linked To: FLY BAGHDAD AIRLINES COMPANY).

HIRZALLAH, Muhammad Fallah Kamil (Arabic: محمد فلاح كمال حرز الله) (a.k.a. HARZALLAH, Mohamed; a.k.a. HERZAL ALLAH, Mohamed; a.k.a. HERZALLAH, Mohamed; a.k.a. HERZALLAH, Mohamed Falah; a.k.a. HERZALLAH, Mohammed Falah; a.k.a. HERZALLAH, Mohammed Falah Kamel; a.k.a. HERZALLAH, Muhammad; a.k.a. HIRZALLAH, Muhammad Fallah), Gaza; DOB 09 Sep 1989; POB Gaza Strip; nationality Palestinian; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; National ID No. 802413112 (Palestinian) (individual) [SDGT] (Linked To: HAMAS).

HIRZALLAH, Na'im Kamil Raghil (Arabic: نعم كمال راغب حرز الله) (a.k.a. HERZALLAH, Naem Kamel; a.k.a. HIRZ-ALLAH, Na'im Kamil Raghil), Gaza; DOB 16 Sep 1966; nationality Palestinian; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; National ID No. 911395275 (Palestinian) (individual) [SDGT] (Linked To: HAMAS).

HIRZALLAH, Salah Kamil Raghil (Arabic: صالح كمال راغب حرز الله) (a.k.a. HARAZALLAH, Salah Kamel; a.k.a. HERZALLAH, Salah Kamel; a.k.a. HERZALLAH, Salah Kamel Raghil; a.k.a. HIRZALLAH, Salah Kamel), Gaza; DOB 08 Jan 1960; POB Gaza Strip; nationality Palestinian; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; National ID No. 911395259 (Israel); Electoral Registry No. 8105411 (Israel) (individual) [SDGT] (Linked To: HAMAS).

HIRZALLAH, Samir 'Abd Al-Mu'in 'Abd (Arabic: سمير عبدالمين عبد حرز الله) (a.k.a. HERZALLAH, Sameer Abdel Mueen Abed; a.k.a. HERZALLAH, Sameer Abdulmooti; a.k.a. HERZALLAH, Samer Abdulmoaien Abed; a.k.a. HERZALLAH, Samir; a.k.a. HIRZALLAH, Abd al-Mu'in 'Abd Ismail (Arabic: عبدالمعين عبد إسماعيل حرز الله)), Gaza; DOB 11 Jan 1978; POB Gaza Strip; nationality Palestinian; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; National ID No. 900511445 (Palestinian) (individual) [SDGT] (Linked To: HAMAS).

HIRZALLAH, Thair Abd Al Raziq Shukri (Arabic: ثائر عبدالرازق شكري حرز الله) (a.k.a. HIRZALLAH, Thafir; a.k.a. HIRZALLAH, Thair Abd Al Razzaq Shukri; a.k.a. HIRZALLAH, Tha'ir 'Abd-al-Raziq Shukri), Gaza; DOB 14 Oct 1973; POB Israel; nationality Israel; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; National ID No. 2001052383 (Israel); Electoral Registry No. 7602061 (Israel); Identification Number 700154933 (Palestinian) (individual) [SDGT] (Linked To: HAMAS).

SHAMLAKH, Ahmed (a.k.a. SHAMALLAKH, Ahmad; a.k.a. SHAMLAKH, Ahmad Shabbir; a.k.a. SHAMLAKH, Ahmed Abd al-Rahman Ahmed), Gaza; DOB 09 Feb 1986; nationality Palestinian; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; National ID No. 80148715 (Palestinian) (individual) [SDGT] (Linked To: HAMAS).

SHAMLAKH, Alaa (a.k.a. SHAMALLAKH, Ala' Yunis Hamid; a.k.a. SHAMALLAKH, Alla Y. H.), Istanbul, Turkey; DOB 07 Apr 1974; nationality Palestinian; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport 3596875 (Palestinian) issued 23 Nov 2014 expires 22 Nov 2019; National ID No. 900222415 (Palestinian) (individual) [SDGT] (Linked To: HAMAS).

SHAMLAKH, Imad Younes (Arabic: عماد يونس شملخ) (a.k.a. SHAMALLAKH, Imad Y. H.), Gaza; DOB 19 May 1972; POB Gaza Strip; nationality Palestinian; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport 5173596 (Palestinian) issued 22 Apr 2021 expires 21 Apr 2026; National ID No. 919264366 (Palestinian) (individual) [SDGT] (Linked To: HAMAS).

SHAMLAKH, Zuhair (Hebrew: זוהיר יונס שמלח) (a.k.a. SHAMALCH, Zuhir Yunes Hammed (Arabic: زهير يونس حامد شملخ); a.k.a. SHAMLAKH, Zuheir; a.k.a. SHMALACH, Zahir Younes), Gaza; DOB 15 Nov 1980; nationality Palestinian; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; National ID No. 905396560 (Palestinian) (individual) [SDGT] (Linked To: HAMAS).

B. ENTITIES

AL-MARKAZIYA LI-SIARAFIYA (Arabic: شركة المركزية للصرافة) (a.k.a. AL MUTAHADUN COMPANY; a.k.a. AL MUTAHADUN FOR EXCHANGE), Gaza; Aksaray Mah. Cerrahpasa Cad. Muratpasa, Apt. No: 3/12, Fatih, Istanbul, Turkey; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Commercial Registry Number 563157932 (Palestinian); Istanbul Chamber of Comm. No. 142520-5 (Turkey); Business Registration Number 267113103200001 (Turkey) [SDGT] (Linked To: SHAMLAKH, Zuhair).

AL-MASSAL LAND TRAVEL AND TOURISM COMPANY (a.k.a. ARD AL-MUSAL COMPANY FOR TOURISM AND TRAVEL LLC), Property Number 20362/4, Street 7, Sector 714, Zayuna, Baghdad, Iraq; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 2014; Organization Type: Travel agency activities [SDGT] (Linked To: AL-HAMIDAWI, Awqad Muhsin Faraj).

ARAB CHINA TRADING COMPANY (a.k.a. "ARAB COMPANY TO STATE TRADING"; a.k.a. "ARAB TRADING COMPANY CHINA"), Gaza; Aksaray MAH. Cerrahpasa CAD.

Muratpasa Apt. No 3/12 Fatih, Istanbul, Turkey; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Commercial Registry Number 563157932 (Palestinian) [SDGT] (Linked To: SHAMLAKH, Zuhair).

FLY BAGHDAD AIRLINES COMPANY (a.k.a. FLY BAGHDAD (Arabic: فلاي بغداد); a.k.a. IRAQ EXPRESS), Hurriya Square, Building 66, Street 25, Sector 925, Babil Neighborhood, Baghdad, Iraq; Jamia Street, Jadriya, Baghdad, Iraq; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 2014; Organization Type: Passenger air transport [SDGT] (Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS (IRGC)-QODS FORCE).

HERZALLAH EXCHANGE AND GENERAL TRADING COMPANY LLC (Arabic: شركة حرزالله للتجارة العامة والمساهمة الخصوصية المحدودة) (a.k.a. HARAZULLAH EXCHANGE AND GENERAL TRADING COMPANY LLC; a.k.a. HERZALLA EXCHANGE CO.; a.k.a. HERZALLAH COMPANY FOR MONEY; a.k.a. HERZALLAH COMPANY FOR MONEY - EXCHANGE; a.k.a. HERZALLAH EXCHANGE AND GENERAL TRADING; a.k.a. HERZALLAH EXCHANGE AND GENERAL TRADING COMPANY (Arabic: شركة حرزالله للتجارة العامة); a.k.a. HERZALLAH EXCHANGE COMPANY; a.k.a. HERZALLAH EXCHANGE COMPANY AND TRANSFER), Gaza; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 24 Apr 2006; Organization Type: Other monetary intermediation; Identification Number 563141746 (Palestinian) [SDGT] (Linked To: HAMAS).

SAMIR HERZALLAH AND BROTHERS FOR MONEY EXCHANGE AND REMITTANCES (Arabic: شركة سمير حرزالله وإخوانه للصرافة والحوالات المالية) (a.k.a. SAMEER ABED ALMOEEN HERZALLAH AND HIS BROTHERS COMPANY FOR MONEY - EXCHANGE AND TRANSFERS; a.k.a. SAMEER ABED AL-MOEEN HERZALLAH AND HIS BROTHERS COMPANY FOR MONEY - EXCHANGE AND TRANSFERS; a.k.a. SAMEER HERZALLAH AND BROTHERS CO FOR MONEY EXCHANGE AND TRANSFER; a.k.a. SAMEER HERZALLAH AND BROTHERS CO.; a.k.a. SAMEER HERZALLAH BROTHERS CO; a.k.a. SAMEER HERZALLAH COMPANY; a.k.a. SAMEER HERZALLAH FOR MONEY EXCHANGE & REMMITTANCES; a.k.a. SAMEER HERZALLAH FOR MONEY EXCHANGE AND REMMITTANCES; a.k.a. SAMIR HERZALLAH COMPANY), Gaza; Website <https://www.herzallah.ps/>; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Type: Other monetary intermediation; Identification Number 563478999 (Palestinian) [SDGT] (Linked To: HAMAS).

C. AIRCRAFTS

YI-BAF; Aircraft Manufacture Date 24 May 2002; Aircraft Model B 737; Aircraft Operator Fly Baghdad; Aircraft Manufacturer's Serial Number (MSN) 32412; Aircraft Tail Number YI-BAF;

Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (aircraft) [SDGT] (Linked To: FLY BAGHDAD AIRLINES COMPANY).

YI-BAN; Aircraft Manufacture Date 08 Jan 2008; Aircraft Model B 737; Aircraft Operator Fly Baghdad; Aircraft Manufacturer's Serial Number (MSN) 35064; Aircraft Tail Number YI-BAN; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (aircraft) [SDGT] (Linked To: FLY BAGHDAD AIRLINES COMPANY).

The above designations are subject to Secondary Sanctions Risk.

Several of the above - mentioned individuals and entities were designated pursuant to Executive Order (E.O.) 13224, as amended, which targets terrorist groups and their supporters, for playing key roles in funds transfers, including cryptocurrency transfers, from the Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) to Hamas and Palestinian Islamic Jihad (PIJ) in Gaza.

Related Publication:

[US Treasury/press release/22.01.2024/ US, UK AND AUSTRALIA TARGET HAMAS FINANCIAL NETWORKS](#)

Furthermore, OFAC designated Iraqi airline Fly Baghdad and its CEO for providing assistance to the Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) and its proxy groups in Iraq, Syria, and Lebanon. OFAC is also designating three leaders and supporters of one of the IRGC-QF's main Iran-aligned militias in Iraq, Kata'ib Hizballah (KH), as well as a business that moves and launders funds for KH.

The above action is being taken pursuant to Executive Order (E.O.) 13224, as amended, which targets terrorists and their supporters.

Related Publication:

[US Treasury/press release/US Treasury Targets Hizballah Leaders and Airline](#)

As a result of OFAC's 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. Unless authorized by a general or specific license issued by OFAC, or exempt, OFAC's regulations generally prohibit all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons.

In addition, non-U.S. financial institutions and other persons that engage in certain transactions or activities with sanctioned entities and individuals may expose themselves to sanctions risk or be subject to an enforcement action. The prohibitions include the making of any contribution or

provision of funds, goods, or services by, to, or for the benefit of any designated person, or the receipt of any contribution or provision of funds, goods, or services from any such person.

In relation to the designation of the above-mentioned airline, OFAC issued Counter Terrorism [General License 27](#), "Authorizing Civil Aviation Safety and Wind Down Transactions Involving Fly Baghdad."

GENERAL LICENSE 27 authorizes through 12:01 a.m. eastern daylight time, March 22, 2024, all transactions prohibited by the Global Terrorism Sanctions Regulations, 31 CFR part 594 (GTSR), that are ordinarily incident and necessary to the provision, exportation, or reexportation of goods, technology, or services to ensure the safety of civil aviation involving Fly Baghdad, provided that the goods, technology, or services that are provided, exported, or reexported are for use on aircraft operated solely for civil aviation purposes.

OFAC is also issuing one new Counter Terrorism Frequently Asked Question ([1159](#)), which explains that GL 27 authorizes all transactions prohibited by the GTSR that are ordinarily incident and necessary to the wind down of any transaction involving Fly Baghdad through 12:01 a.m. eastern daylight time, March 22, 2024, provided that any payment to Fly Baghdad must be made into a blocked account in accordance with the GTSR. This includes transactions necessary to wind down leases, refueling contracts, and other commercial agreements with Fly Baghdad or to repossess aircraft leased to Fly Baghdad.

Related Publication:

[US Treasury/2024.01.22/ Counterterrorism Designations, GL, FAQ](#)