

US TREASURY REPORT

WEEK 41 OF 2024

1. <u>OFAC SDN List Update: Iran-related Designations; Publication of Iran-related</u> <u>Determination</u>

On the 11th October 2024, OFAC published a <u>Determination pursuant to Section 1(a)(i) of</u> Executive Order 13902, "Petroleum and Petrochemical Sectors of the Iranian Economy"

According to the Determination, as of the 11th October 2024, Section 1 (a) of the Executive Order 13902 of the 10th January 2020 (Imposing Sanctions with respect to Additional Sectors of Iran") shall apply to the petroleum and petrochemical sectors of the Iranian Economy.

Therefore, any person determined to operate in the petroleum and petrochemical sectors, shall me subject to sanctions pursuant to the aforementioned Section 1 (a) of the Executive Order 13902, which imposes economic sanctions to any person determined by the OFAC Secretary, in consultation with Secretary of State, in sectors of the Iranian Economy as may be determined by the OFAC Secretary, in consultation with Secretary of State.

Related Publication

US Teasury/11.10.2025/Determination Pursuant to Section 1.a. of Executive Order 13902

In relation to the above, <u>the ODAC SDN List has been updated with the Iran-related</u> <u>Designations of the following entities and vessels</u>:

A. <u>ENTITIES</u>

ALYA MARINE SENDIRIAN BERHAD (a.k.a. ALYA MARINE SDN BHD), A-02-03, Block A, Radia Office, Persiaran Arked, Bukit Jelutong, Shah Alam, Selangor 40150, Malaysia; Executive Order 13846 information: BLOCKING PROPERTY AND INTERESTS IN PROPERTY. Sec. 5(a)(iv); Organization Established Date 15 Mar 2021; Identification Number IMO 6219142; Registration Number 1409544P/202101009245 (Malaysia) [IRAN-EO13846].



CATHAY HARVEST MARINE LTD (Chinese Traditional: 國豐海運有限公司), Room 1603, 16/F Lucky Centre No 165-171 Wan Chai Road, Wan Chai, Hong Kong, China; Organization Established Date 26 Aug 2022; Identification Number IMO 6350550; Company Number 3185362 (Hong Kong); Business Registration Number 74372180 (Hong Kong) [IRAN-EO13846] (Linked To: NATIONAL IRANIAN OIL COMPANY).

CELIA ARMAS LTD, Room 8, 11th Floor, Wang Fai Industrial Building, 29 Luk Hop Street, San Po Kong, Hong Kong, China; Executive Order 13846 information: BLOCKING PROPERTY AND INTERESTS IN PROPERTY. Sec. 5(a)(iv); Organization Established Date 10 May 2022; Identification Number IMO 642068; Company Number 3150768 (Hong Kong); Business Registration Number 74023931 (Hong Kong) [IRAN-EO13846].

DAVINA SHIPPING INC, Trust Company Complex, Ajeltake Road, Majuro, Ajeltake Island 96960, Marshall Islands; Identification Number IMO 6506091 [IRAN-EO13846] (Linked To: NATIONAL IRANIAN OIL COMPANY).

DELNAZ SHIP MANAGEMENT SDN BHD (a.k.a. DELNAZ SHIP MANAGEMENT), 5433-1, Jalan J9, Tamam Melawati, 53100, Kuala Lumpur, Malaysia; Identification Number IMO 6271661 [IRAN-EO13846] (Linked To: NATIONAL IRANIAN OIL COMPANY).

DERECTTOR COMPANY LIMITED (a.k.a. DERECTTOR CO LTD; a.k.a. DERECTTOR CO., LIMITED), Room 32, 11/F Lee Ka Industrial Building 8 NG Fong Street, San Po Kong, Kowloon, Hong Kong, China; 31-06, Fuli Center, 6, Gangxing Lu, Zhongshan Qu, Dalian, Liaoning 116001, China; Organization Established Date 29 Jan 2021; Identification Number IMO 9207391; Company Number 3016374 (Hong Kong); Business Registration Number 72621769 (Hong Kong) [IRAN-EO13846] (Linked To: NATIONAL IRANIAN OIL COMPANY).

DIAMANTE TANKERS INCORPORATED, Panama City, Panama; Identification Number IMO 6268146 [IRAN-EO13846] (Linked To: NATIONAL IRANIAN OIL COMPANY).

ELZA SHIPPING SA, 80 Broad Sheet, Monrovia, Liberia; Organization Established Date 2021; Company Number 6243757 (Liberia) [IRAN-EO13846] (Linked To: NATIONAL IRANIAN OIL COMPANY).



ENGEN MANAGEMENT NV, Postbus 149, Gravenberchstraat 33, Paramaribo, Suriname; Executive Order 13846 information: BLOCKING PROPERTY AND INTERESTS IN PROPERTY. Sec. 5(a)(iv); Identification Number IMO 6207811 [IRAN-EO13846].

GABBARO SHIP SERVICES PVT LTD, Office No. 512, B Wing, 5th Floor, Samartha Aishwarya KL, Walawalkar Road, Andheri W, Mumbai 400053, India; Executive Order 13846 information: BLOCKING PROPERTY AND INTERESTS IN PROPERTY. Sec. 5(a)(iv); Organization Established Date 12 Apr 2021; Identification Number IMO 6221903; Commercial Registry Number U74999MH2021OPC358769 (India); Registration Number 358769 (India) [IRAN-EO13846].

GLAZING FUTURE MANAGEMENT NV, 40C Keizer Street, Paramaribo, Suriname; Executive Order 13846 information: BLOCKING PROPERTY AND INTERESTS IN PROPERTY. Sec. 5(a)(iv); Identification Number IMO 6256801 [IRAN-EO13846].

HARRY VICTOR SHIP MANAGEMENT AND OPERATION L.L.C (Arabic: ماري فيكتور لإدارة 213), ماري فيكتور لإدارة Atrium Centre, Khalid Bin Waleed Road, PO Box 44432, Dubai, United Arab Emirates; Organization Established Date 27 Jan 2020; Identification Number IMO 6142171; Business Registration Number 874638 (United Arab Emirates); Economic Register Number (CBLS) 11494758 (United Arab Emirates) [IRAN-EO13846] (Linked To: TRILIANCE PETROCHEMICAL CO. LTD.).

JAZIRA DAS INTERNATIONAL REFINDED OIL PRODUCTS TRADING L.L.C (Arabic: جزيرة داس انتر ناشيو نال لتجارة مشتقات تكرير النفط ش.ذ.م.م (a.k.a. JAZIRADAS INTL COMPANY), Office 1803, Nassima Business Tower, Sheikh Zayed Road, Dubai, United Arab Emirates; Hong Kong, China; License 729177 (United Arab Emirates); Economic Register Number (CBLS) 10921430 (United Arab Emirates) [IRAN-EO13846] (Linked To: NATIONAL IRANIAN OIL COMPANY).

MAX MARITIME SOLUTIONS FZE (Arabic: ماكس ماريتايم سوليوشنز م م), Office G22, Building 1, Hamriyah Free Zone, Sharjah, United Arab Emirates; Organization Established Date 14 Jul 2022; Identification Number IMO 6340553; License 23186 (United Arab Emirates); Economic Register Number (CBLS) 11915229 (United Arab Emirates) [IRAN-EO13846] (Linked To: NATIONAL IRANIAN OIL COMPANY).

RITA SHIPPING INC, Trust Company Complex, Ajeltake Road, Majuro, Ajeltake 96960, Marshall Islands; Organization Established Date 06 Mar 2023; Identification Number IMO 6394782; Registration Number 118772 (Marshall Islands) [IRAN-EO13846] (Linked To: NATIONAL IRANIAN OIL COMPANY).



STRONG ROOTS PROVIDER NV, 40A Keizer Street, Paramaribo, Suriname; Executive Order 13846 information: BLOCKING PROPERTY AND INTERESTS IN PROPERTY. Sec. 5(a)(iv); Identification Number IMO 6215065 [IRAN-EO13846].

B. <u>VESSELS</u>

ANHONA (V3GK3) Oil Products Tanker Belize flag; Vessel Registration Identification IMO 9354521; MMSI 312171000 (vessel) [IRAN-EO13846] (Linked To: HARRY VICTOR SHIP MANAGEMENT AND OPERATION L.L.C).

AVENTUS I (3E2078) Crude Oil Tanker Panama flag; Vessel Registration Identification IMO 9280873; MMSI 352898820 (vessel) [IRAN-EO13846] (Linked To: DIAMANTE TANKERS INCORPORATED).

BENDIGO (a.k.a. LEONOR) (8P2397) Crude Oil Tanker Barbados flag; Vessel Registration Identification IMO 9289491; MMSI 314925000 (vessel) [IRAN-EO13846] (Linked To: MAX MARITIME SOLUTIONS FZE).

BERG 1 (3DCZ1) Crude Oil Tanker Panama flag; Vessel Registration Identification IMO 9262168 (vessel) [IRAN-EO13846] (Linked To: STRONG ROOTS PROVIDER NV).

CARINA (8P2232) Crude Oil Tanker Barbados flag; Vessel Registration Identification IMO 9240512; MMSI 314872000 (vessel) [IRAN-EO13846] (Linked To: DERECTTOR COMPANY LIMITED).



CARNATIC (a.k.a. ANNICK; a.k.a. KIONI; a.k.a. TOBA) (8P2398) Crude Oil Tanker Barbados flag; Vessel Registration Identification IMO 9304655; MMSI 314926000 (vessel) [IRAN-EO13846] (Linked To: MAX MARITIME SOLUTIONS FZE).

CAROL (V4BC4) LPG Tanker St. Kitts and Nevis flag; Vessel Registration Identification IMO 9070072; MMSI 341575000 (vessel) [IRAN-EO13846] (Linked To: ALYA MARINE SENDIRIAN BERHAD).

CROSS OCEAN (3E4640) Crude Oil Tanker Panama flag; Vessel Registration Identification IMO 9251810; MMSI 352002860 (vessel) [IRAN-EO13846] (Linked To: DELNAZ SHIP MANAGEMENT SDN BHD).

CRYSTAL ROSE (3E4037) Crude Oil Tanker Panama flag; Vessel Registration Identification IMO 9292228; MMSI 352001298 (vessel) [IRAN-EO13846] (Linked To: DERECTTOR COMPANY LIMITED).

DAVINA (T8A4843) Crude Oil Tanker Palau flag; Vessel Registration Identification IMO 9259367; MMSI 511101471 (vessel) [IRAN-EO13846] (Linked To: DAVINA SHIPPING INC).

DIMITRA II (T7BI5) Crude Oil Tanker San Marino flag; Vessel Registration Identification IMO 9208215; MMSI 268249801 (vessel) [IRAN-EO13846] (Linked To: DELNAZ SHIP MANAGEMENT SDN BHD).

ELZA (D5SE4) Crude Oil Tanker Liberia flag; Vessel Registration Identification IMO 9221671; MMSI 636018950 (vessel) [IRAN-EO13846] (Linked To: ELZA SHIPPING SA).



GOODWIN (E5U5022) Crude Oil Tanker Cook Islands flag; Vessel Registration Identification IMO 9379703; MMSI 518999041 (vessel) [IRAN-EO13846] (Linked To: HARRY VICTOR SHIP MANAGEMENT AND OPERATION L.L.C).

HORNET Crude Oil Tanker Eswatini flag; Vessel Registration Identification IMO 9197844; MMSI 6987100 (vessel) [IRAN-EO13846] (Linked To: GABBARO SHIP SERVICES PVT LTD).

LUNA PRIME (a.k.a. SELENE) (3E2167) Crude Oil Tanker Panama flag; Vessel Registration Identification IMO 9174220; MMSI 352001994 (vessel) [IRAN-EO13846] (Linked To: CATHAY HARVEST MARINE LTD).

OCTANS (S9A15) Crude Oil Tanker Sao Tome and Principe flag; Vessel Registration Identification IMO 9224295 (vessel) [IRAN-EO13846] (Linked To: CELIA ARMAS LTD).

SALVIA (a.k.a. YANNIS) (T7BJ6) Crude Oil Tanker San Marino flag; Vessel Registration Identification IMO 9297319; MMSI 268240702 (vessel) [IRAN-EO13846] (Linked To: MAX MARITIME SOLUTIONS FZE).

SATINA (3E2250) Products Tanker Panama flag; Vessel Registration Identification IMO 9308778; MMSI 352002316 (vessel) [IRAN-EO13846] (Linked To: DELNAZ SHIP MANAGEMENT SDN BHD).

SHANAYE QUEEN (9WNN6) Crude Oil Tanker Malaysia flag; Vessel Registration Identification IMO 9242118; MMSI 533132105 (vessel) [IRAN-EO13846] (Linked To: ALYA MARINE SENDIRIAN BERHAD).



SPIRIT OF CASPER (a.k.a. MARIA GRACE) (3E6116) Crude Oil Tanker Panama flag; Vessel Registration Identification IMO 9224271; MMSI 352003872 (vessel) [IRAN-EO13846] (Linked To: RITA SHIPPING INC).

TYCHE I (3E5017) Crude Oil Tanker Panama flag; Vessel Registration Identification IMO 9247390; MMSI 352002704 (vessel) [IRAN-EO13846] (Linked To: DELNAZ SHIP MANAGEMENT SDN BHD).

VORAS (TJM8VO) Crude Oil Tanker Cameroon flag; Vessel Registration Identification IMO 9203265; MMSI 613916701 (vessel) [IRAN-EO13846] (Linked To: GLAZING FUTURE MANAGEMENT NV).

WEN YAO (E5U5189) Crude Oil Tanker Cook Islands flag; Vessel Registration Identification IMO 9288095; MMSI 518999208 (vessel) [IRAN-EO13846] (Linked To: HARRY VICTOR SHIP MANAGEMENT AND OPERATION L.L.C).

Related Publication

US Treasury/2024.10.11/Iran-related Designations; Publication of Iran-related Determination

As can be seen in the aforementioned Determination, the Secretary of the Treasury, in consultation with the Secretary of State, is identifying the petroleum and petrochemical sectors of the Iranian economy pursuant to section 1(a)(i) of Executive Order (E.O.) 13902, which allows Treasury to target a broader range of activities relating to Iran's trade in petroleum and petrochemical products. E.O. 13902 provides authority to identify and impose sanctions on key sectors of Iran's economy to deny the Iranian government financial resources that may be used to fund and support its nuclear program, missile development, terrorism and terrorist proxy networks, and malign regional influence.

Therefore, OFAC is designating 10 entities in multiple jurisdictions and identifying 17 vessels as blocked property, pursuant to E.O. 13846, for their involvement in shipments of Iranian petroleum and petrochemical products in support of the U.S.-designated National Iranian Oil Company



(NIOC) and Triliance Petrochemical Co. Limited (Triliance). The U.S. Department of State is also designating six entities and identifying six vessels as blocked property pursuant to E.O. 13846 for knowingly engaging in a significant transaction for the purchase, acquisition, sale, transport, or marketing of petroleum or petroleum products from Iran. Collectively, these actions target a significant portion of the shadow fleet of tankers and illicit operators that move the Iranian regime's petroleum exports. NIOC was designated pursuant to the counterterrorism authority E.O. 13224, as amended, on October 26, 2020, for its financial support to Iran's Islamic Revolutionary Guard Corps – Qods Force. Triliance was designated pursuant to E.O. 13846 on January 23, 2020 for facilitating the sale of Iranian petroleum products from NIOC.

As a result of OFAC's action, all property and interests in property of these targets that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. In addition, any entities that are owned, directly or indirectly, 50 percent or more by one or more blocked persons are also blocked. 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 or designated persons.

In addition, persons that engage in certain transactions with the designated entities and vessels may themselves be exposed to sanctions or subject to an enforcement action.

<u>Non-U.S. persons are also prohibited from causing or conspiring to cause U.S. persons to</u> <u>wittingly or unwittingly violate U.S. sanctions, as well as engaging in conduct that evades</u> <u>U.S. sanctions</u>.

Related Publication:

<u>US Treasury/press releases/11.10.2024/Treasury Expands Targeted Sanctions on Iranian</u> Petroleum and Petrochemical Sectors in Response to Attack on Israel



2. OFAC SDN List Update: Sudan Designation

On the 8th October 2024, <u>the OFAC SDN List has been updated with the Sudan Designation</u> <u>of the following individual</u>:

MUSA, Algoney Hamdan Daglo (Arabic: القوني حمدان دقلو موسى) (a.k.a. DAGALO, Algoney Hamdan; a.k.a. DAGALO, Al-Qoni Hamdan), Dubai, United Arab Emirates; DOB 07 Aug 1990; POB Nayala North, Sudan; nationality Sudan; Gender Male; Passport B00017334 (Sudan); alt. Passport B00024943 (Sudan) expires 27 Sep 2031 (individual) [SUDAN-EO14098].

Related Publication:

US Treasury/2024.10.08/Sudan Designation

The above individual was designed pursuant to Executive Order (E.O.) 14098, for leading efforts to supply weapons to continue the war in Sudan.

As a result of OFAC's action, all property and interests in property of the designated person described above 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 the blocked person, 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:

<u>US Treasury/press release/08.10.2024/Treasury Sanctions Sudanese Rapid Support Forces</u> <u>Procurement Director</u>



3. OFAC SDN List Update: Counter Terrorism Designations; Issuance of Counter <u>Terrorism General Licenses; Amendment of the Reporting, Procedures and Penalties</u> <u>Regulations and Issuance of Related Frequently Asked Question</u>

On the 7th October 2024, <u>the OFAC SDN List has been updated with the Counter Terrorism</u> Designations of the following individuals and entities:

A. <u>INDIVIDUALS</u>

AL AHMAR, Hamid Abdullah Hussein (Arabic: حميد بن عبد الله الأحمر) (a.k.a. AHMAR, Hamid Abdullah; a.k.a. AHMAR, Hamid Abdullah Hussain; a.k.a. AL AHMAR, Hamid A. H.; a.k.a. AL-AHMAR, Hamid), Istanbul, Turkey; DOB 27 Dec 1967; alt. DOB 01 Jan 1967; POB Sanaa, Yemen; nationality Yemen; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport 00030140 (Yemen) expires 09 Apr 2022; Identification Number 99727522148 (Turkey) (individual) [SDGT] (Linked To: HAMAS; Linked To: AL-QUDS INTERNATIONAL FOUNDATION).

AL-ZEER, Majed (a.k.a. ALZEER, Majed; a.k.a. AL-ZEER, Majed Khalil Moussa; a.k.a. AL-ZEER, Majid), Germany; DOB 12 Aug 1962; alt. DOB 1961 to 1962; POB Bethlehem, West Bank, Palestinian Territories; nationality United Kingdom; alt. nationality Jordan; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport 133670754 (United Kingdom) issued 09 Nov 2022; alt. Passport Q721863 (Jordan) issued 28 Sep 2021 (individual) [SDGT] (Linked To: HAMAS).

DOUGHMAN, Adel Saad al-Din Hassan, Austria; DOB 1963; nationality Austria; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (individual) [SDGT] (Linked To: HAMAS).

HANOUN, Muhammad Mahoud Ahmad Awad (a.k.a. HANNOUN, Mahid Ahmad Mohammad; a.k.a. HANNOUN, Mohammad Mahmoud Ahmad; a.k.a. HANNOUN, Mohammad Mah'd Ahmed), Via Bartolomeo Parodi N. 79 int. 1a, 16014 Ceranesi, Genoa, Italy; DOB 15 Jun 1962; POB Bodros, Jordan; nationality Jordan; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport T1005028 (Italy) expires 21 Jul 2027; National ID No. AX1539488 (Italy); Italian Fiscal Code HNNMM62H15Z220R (Italy); Residency Number I19693469 (Italy) issued 07 Nov 2023 expires 16 Jun 2033 (individual) [SDGT] (Linked To: HAMAS).



B. <u>ENTITIES</u>

AL AHMAR, Hamid Abdullah Hussein (Arabic: حميد بن عبد الله الأحمر) (a.k.a. AHMAR, Hamid Abdullah; a.k.a. AHMAR, Hamid Abdullah Hussain; a.k.a. AL AHMAR, Hamid A. H.; a.k.a. AL-AHMAR, Hamid), Istanbul, Turkey; DOB 27 Dec 1967; alt. DOB 01 Jan 1967; POB Sanaa, Yemen; nationality Yemen; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport 00030140 (Yemen) expires 09 Apr 2022; Identification Number 99727522148 (Turkey) (individual) [SDGT] (Linked To: HAMAS; Linked To: AL-QUDS INTERNATIONAL FOUNDATION).

AL-ZEER, Majed (a.k.a. ALZEER, Majed; a.k.a. AL-ZEER, Majed Khalil Moussa; a.k.a. AL-ZEER, Majid), Germany; DOB 12 Aug 1962; alt. DOB 1961 to 1962; POB Bethlehem, West Bank, Palestinian Territories; nationality United Kingdom; alt. nationality Jordan; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport 133670754 (United Kingdom) issued 09 Nov 2022; alt. Passport Q721863 (Jordan) issued 28 Sep 2021 (individual) [SDGT] (Linked To: HAMAS).

DOUGHMAN, Adel Saad al-Din Hassan, Austria; DOB 1963; nationality Austria; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (individual) [SDGT] (Linked To: HAMAS).

HANOUN, Muhammad Mahoud Ahmad Awad (a.k.a. HANNOUN, Mahid Ahmad Mohammad; a.k.a. HANNOUN, Mohammad Mahmoud Ahmad; a.k.a. HANNOUN, Mohammad Mah'd Ahmed), Via Bartolomeo Parodi N. 79 int. 1a, 16014 Ceranesi, Genoa, Italy; DOB 15 Jun 1962; POB Bodros, Jordan; nationality Jordan; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport T1005028 (Italy) expires 21 Jul 2027; National ID No. AX1539488 (Italy); Italian Fiscal Code HNNMMM62H15Z220R (Italy); Residency Number I19693469 (Italy) issued 07 Nov 2023 expires 16 Jun 2033 (individual) [SDGT] (Linked To: HAMAS).

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



AL AHMAR OILS SUPPLY AND DISTRIBUTION (Arabic: الأحمر لتموين والتوزيع الزيوت), Sanaa, Yemen; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Commercial Registry Number 2008050146 (Yemen) [SDGT] (Linked To: AL AHMAR, Hamid Abdullah Hussein).

AL AHMAR TRADING GROUP (Arabic: مجموعة الأحمر التجارة) (a.k.a. AHMAR GROUP FOR TRADING; a.k.a. AL-AHMAR GROUP FOR TRADE), Sanaa, Yemen; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Commercial Registry Number 960363 (Yemen) [SDGT] (Linked To: AL AHMAR, Hamid Abdullah Hussein).

AL SALAM TRADING AND AGENCIES GENERAL ESTABLISHMENT (Arabic: مؤسسة السلام للتجارة), Sanaa, Yemen; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Commercial Registry Number 8718 (Yemen) [SDGT] (Linked To: AL AHMAR, Hamid Abdullah Hussein).

AL-INTAJ BANK (a.k.a. PALESTINIAN PRODUCTION BANK), Gaza City, Gaza; Khan Younis, Gaza; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 19 May 2013 to 31 May 2013; Target Type Financial Institution [SDGT] (Linked To: HAMAS).

ASSOCIAZIONE BENEFICA DI SOLIDARIETA CON IL POPOLO PALESTINESE (Latin: ASSOCIAZIONE BENEFICA DI SOLIDARIETÀ CON IL POPOLO PALESTINESE) (a.k.a. CHARITY ASSOCIATION OF SOLIDARITY WITH THE PALESTINIAN PEOPLE; a.k.a. "ABSPP"), Genova, Italy; Rome, Italy; Milan, Italy; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 01 Jan 1994 to 31 Dec 1994; Target Type Charity or Nonprofit Organization [SDGT] (Linked To: HAMAS).

INVESTRADE PORTFOY YONETIMI ANONIM SIRKETI (Latin: INVESTRADE PORTFÖY YÖNETİMİ ANONIM ŞIRKETI) (a.k.a. INVESTRADE PORTFOY YONETIMI A.S. (Latin: INVESTRADE PORTFÖY YÖNETIMI A.Ş.)), A Girisi, Imrahor Cadessi No. 23 A/1 Gursel Mahallesi 34400 Kagithane, Istanbul, Turkey; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 10 Nov 2017; Tax ID No. 4650572633



(Turkey); Trade License No. 107406 (Turkey) [SDGT] (Linked To: AL AHMAR, Hamid Abdullah Hussein).

SABA, TRADE & INVESTMENT S.R.O. (a.k.a. SABA, TRADE AND INVESTMENT S.R.O.), Prague, Czech Republic; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 22 Oct 2014; Organization Type: Real estate activities with own or leased property; Identification Number 035 09 184 (Czech Republic); Trade License No. 3509184 (Czech Republic); File Number C 232697/MSPH (Czech Republic) [SDGT] (Linked To: AL AHMAR, Hamid Abdullah Hussein).

SABAFON INTERNATIONAL SAL OFFSHORE (Arabic: سابفون انترناشونال لیمتید ش.م.ل اوف شور), Sami Al Solh Street, Makram Building, 6th Floor, Property No. 4110/ Chiyah Section No. 20, Beirut, Lebanon; Beirut, Lebanon; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 15 May 2013; Organization Type: Other business support service activities n.e.c.; Registration Number 1806771 (Lebanon) [SDGT] (Linked To: AL AHMAR, Hamid Abdullah Hussein).

SABATURK DIS TICARET ANONIM SIRKETI (Latin: SABATURK DIŞ TİCARET ANONİM ŞİRKETİ) (a.k.a. SABATURK FOREIGN TRADE JOINT STOCK COMPANY; a.k.a. SABATURK GAYRIMENKUL GELISTIRME ANONIM SIRKETI; a.k.a. SABATURK REAL ESTATE DEVELOPMENT JOINT STOCK COMPANY), Bagcilar, Mahmut Bey District, Istanbul, Turkey; Altunizade Mah. Kisikli Cad. Haluk Turksoy Arkasi Sok. N:2/1 Uskudar, Istanbul, Turkey; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 21 Dec 2015; Organization Type: Real estate activities with own or leased property; Tax ID No. 7360642469 (Turkey); Chamber of Commerce Number 14375-5 (Turkey); Registration Number 0736-0642-4690-0018 (Turkey) [SDGT] (Linked To: AL AHMAR, Hamid Abdullah Hussein).

SAMA INTERNATIONAL MEDIA (Arabic: سماء للإعلام الدولي), Sanaa, Yemen; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Type: Other business support service activities n.e.c.; Business Registration Number 239978 (Yemen) [SDGT] (Linked To: AL AHMAR, Hamid Abdullah Hussein).



VIVID ENERJI YATIRIMLARI ANONIM SIRKETI (Latin: VİVİD ENERJİ YATIRIMLARI ANONİM ŞİRKETİ), Gursel Mah. Imrahor CAD. No:23 A/1 Kagithane, Istanbul, Turkey; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 21 Mar 2019; Organization Type: Other business support service activities n.e.c.; Identification Number 0925084467700001 (Turkey); Chamber of Commerce Number 185388-5 (Turkey) [SDGT] (Linked To: AL AHMAR, Hamid Abdullah Hussein).

The above Designations are subject to Secondary Sanctions Risk.

Pursuant to the counterterrorism authority Executive Order (E.O.) 13224, OFAC designated three individuals and one sham charity that are prominent international financial supporters of Hamas, as well as one Hamas-controlled financial institution in Gaza. Furthermore, OFAC designated a longstanding Hamas supporter and nine of his businesses.

As a result of OFAC's action, all property and interests in property of the designated persons described 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 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.

U.S. persons must comply with OFAC regulations, including all U.S. citizens and permanent resident aliens regardless of where they are located, all persons within the United States, and all U.S.-incorporated entities and their foreign branches. Non-U.S. persons are also subject to certain OFAC prohibitions. For example, non-U.S. persons are 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. Violations of OFAC regulations may result in civil or criminal penalties.

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, of funds, goods, or services from any such person.

OFAC may impose civil penalties for sanctions violations based on strict liability, meaning that a person subject to U.S. jurisdiction may be held civilly liable even if such person did not know or have reason to know that it was engaging in a transaction that was prohibited under sanctions laws and regulations administered by OFAC.

<u>Furthermore, engaging in certain transactions with the individuals designated today entails risk of</u> 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 a Specially Designated Global Terrorist.

Related Publication

<u>US Treasury/press release/07.10.2024/Treasury Targets Significant International Hamas Fundraising Network</u>

In relation to the above, OFAC is issuing <u>Counter Terrorism General License 30</u>, "Authorizing the Wind Down of Transactions Involving Certain Entities Blocked on October 7, 2024," and <u>Counter Terrorism</u> <u>General License 31</u>, "Authorizing Certain Transactions Related to Debt or Equity of, or Derivative Contracts Involving, Certain Entities Blocked on October 7, 2024."

<u>Counter Terrorism General License 30</u> authorizes through 12:01 a.m. eastern standard time, November 21, 2024, all transactions prohibited by the Global Terrorism Sanctions Regulations, 31 CFR part 594 (GTSR), that are ordinarily incident and necessary to the wind down of any transaction involving one or more of the following blocked persons:

- (1) Al Ahmar Trading Group;
- (2) Al Salam Trading and Agencies General Establishment;
- (3) Sabaturk Dis Ticaret Anomin Sirketi;
- (4) Vivid Enerji Yatirimlari Anonim Sirketi;
- (5) Investrade Portfoy Yonetimi Anomim Sirketi; or

(6) Any entity in which one or more of the above persons own, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest.

Related Publication

COUNTER TERRORISM GL 30

<u>Counter Terrorism General License 31</u> authorizes through 12:01 am eastern standard time November 21, 2024:

1. All transactions prohibited by the Global Terrorism Sanctions Regulations, 31 CFR part 594 (GTSR), that are ordinarily incident and necessary to the divestment or transfer, or the facilitation of the divestment or transfer, of debt or equity of Investrade Portfoy Yonetimi Anomim Sirketi



(Investrade Portfoy), and any entity in which Investrade Portfoy owns, directly or indirectly, a 50 percent or greater interest ("Covered Debt or Equity"), to a non-U.S. person.

All transactions prohibited by the GTSR that are ordinarily incident and necessary to the wind down of derivative contracts entered into prior to 4:00 p.m. eastern daylight time, October 7, 2024, that (i) include a blocked person described in paragraph (a) of this general license as a counterparty or (ii) are linked to Covered Debt or Equity.

Related Publication:

COUNTER TERRORISM GENERAL LICENSE 31

Furthermore, OFAC is <u>amending the Reporting</u>, <u>Procedures and Penalties Regulations (RPPR</u>). The RPPR sets forth standard reporting and recordkeeping requirements and license application and other procedures relevant to the economic sanctions programs administered by OFAC. This final rule adds three exceptions to the reporting requirement for any blocked property that is unblocked or transferred.

Related Publication:

US TREASURY - REPORTING, PROCEDURES AND PENALTIES REGULATIONS

In relation to the above, OFAC is issuing a new RPPR-related Frequently Asked Question (FAQ 1196)

FAQ 1196, explains what should be one if a person blocks and reports property in error due to mistaken identity or typographical or similar errors. Such property can be unblocked by filing an unblocking report with OFAC consistent with the procedures described in 31 CFR 501.603(b)(3). With respect to the information described in 31 CFR 501.603(b)(3)(ii)(F), the reporting person can cite FAQ 1196 in their unblocking report to indicate that the property was released due to mistaken identity or typographical errors, rather than an OFAC authorization like a general or specific license. It should be noted that unblocking property in which a blocked person does in fact have an interest without authorization from OFAC could expose U.S. persons to civil penalties.

FAQ 1196

Related Publication:

US Treasury/2024.10.07/Counter Terrorism Designations; Issuance of Counter Terrorism General Licenses; Amendment of the Reporting, Procedures and Penalties Regulations and Issuance of Related Frequently Asked Question