

US TREASURY REPORT

WEEK 42 OF 2024

1. Treasury Targets Hizballah Finance Network and Syrian Captagon Trafficking

On 16 October 2024, OFAC has designated three individuals and four associated companies involved in a Lebanon-based sanctions evasion network that generates millions of dollars in revenue for Hizballah. Hizballah's finance team is responsible for the establishment and operation of Hizballah commercial projects throughout Lebanon, some of which are financed and facilitated by Iran. OFAC has also designated three individuals involved in the illegal production and trafficking of Captagon that has benefitted Bashar al-Assad's regime and its allies, including Hizballah. The illegal trade in Captagon, a dangerous, highly addictive amphetamine, has become a billion-dollar illicit enterprise operated by senior members of the Syrian regime.

As a result of this 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.

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. OFAC's [Economic Sanctions Enforcement Guidelines](#) provide more information regarding OFAC's enforcement of U.S. sanctions, including the factors that OFAC generally considers when determining an appropriate response to an apparent violation.

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. The prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any blocked 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:

ATWI, Silvana (Arabic: سلفانا عطوي) (a.k.a. 'UTWI, Silvana Rida), Kaafat Atwi Building, Baabda, Lebanon; DOB 13 Jan 1995; POB Markaba, Marjayoun, Nabatieh, Lebanon; nationality Lebanon; Additional Sanctions Information - Subject to Secondary Sanctions Pursuant to the Hizballah Financial Sanctions Regulations; Gender Female; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; National ID No. 000020552228 (Lebanon) (individual) [SDGT] (Linked To: HIZBALLAH).

FALHOUT, Raji, Syria; DOB 03 Oct 1985; POB Atil, Syria; nationality Syria; Gender Male (individual) [SYRIA] (Linked To: SYRIAN MILITARY INTELLIGENCE DIRECTORATE).

GHAFFAR, Haidar Houssam Al-Din Abdul (Arabic: حيدر حسام الدين عبد الغفار) (a.k.a. 'ABD-AL-GHAFFAR, Haydar Husam-al-Din; a.k.a. ABDELGHAFAR, Haidar H.; a.k.a. GHAFFAR, Haidar Houssein Eddine Abdul), Baabda, Lebanon; DOB 25 Apr 1991; POB Damascus, Syria; nationality Lebanon; Additional Sanctions Information - Subject to Secondary Sanctions Pursuant to the Hizballah Financial Sanctions Regulations; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport LR2661263 (Lebanon); alt. Passport LR0747845 (Lebanon); National ID No. 000027844263 (Lebanon) (individual) [SDGT] (Linked To: HIZBALLAH).

HAMADI, Houssam Hasan (Arabic: حسام حسن حمادي), Beirut, Lebanon; DOB 24 Aug 1986; nationality Lebanon; Additional Sanctions Information - Subject to Secondary Sanctions Pursuant to the Hizballah Financial Sanctions Regulations; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport LR2070754 (Lebanon); National ID No. 000020043068 (Lebanon) (individual) [SDGT] (Linked To: HIZBALLAH).

HAMIDEH, Abdellatif (Arabic: عبد اللطيف حميده) (a.k.a. HAMID, Abdul Latif), Syria; DOB 12 Jan 1977; POB Aleppo, Syria; nationality Syria; Gender Male; National ID No. 02020194015 (Syria) (individual) [SYRIA].

HAMIEH, Khaldoun, Syria; DOB 25 Dec 1973; nationality Lebanon; Gender Male; Passport LR1939852 (Lebanon) (individual) [SYRIA] [SYRIA-CAESAR].

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

GLOBAL TRADELINE SARL, Al Mahmul Street, Al Hadath, Lebanon; Additional Sanctions Information - Subject to Secondary Sanctions Pursuant to the Hizballah Financial Sanctions Regulations; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 08 Nov 2019; Organization Type: Non-specialized wholesale trade; Commercial Registry Number 2058236 (Lebanon) [SDGT] (Linked To: HIZBALLAH).

GM FARM (a.k.a. G.M. FARM SARL; a.k.a. JM PHARM), Al Ghubayri, Beirut, Lebanon; Website gmfarmco.com; Additional Sanctions Information - Subject to Secondary Sanctions Pursuant to the Hizballah Financial Sanctions Regulations; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 26 Mar 2016; Organization Type: Non-specialized wholesale trade [SDGT] (Linked To: ATWI, Silvana).

LIBAN OUI SARL, 1 Ouzai St, Beirut, Lebanon; Additional Sanctions Information - Subject to Secondary Sanctions Pursuant to the Hizballah Financial Sanctions Regulations; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 [SDGT] (Linked To: GHAFAR, Haidar Houssam Al-Din Abdul).

UNITED SONS (Arabic: الأبناء المتحدون), Lebanon; Additional Sanctions Information - Subject to Secondary Sanctions Pursuant to the Hizballah Financial Sanctions Regulations; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Commercial Registry Number 3312742 (Lebanon) issued 27 Jan 2024 [SDGT] (Linked To: HAMADI, Houssam Hasan).

Related Press Release:

[Treasury Targets Hizballah Finance Network and Syrian Captagon Trafficking | U.S. Department of the Treasury](#)

2. OFAC SDN List Update: Counter Terrorism Designations

On the 15th October 2024, **the OFAC SDN List has been updated with the Counter Terrorism Designations of the following individual and entity:**

A. INDIVIDUAL

BARAKAT, Khaled (a.k.a. "Rabah"), Canada; DOB 01 Jun 1972; POB Ramallah, Palestinian Territories; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport AG669835 (Canada) expires 25 May 2028 (individual) [SDGT] (Linked To: POPULAR FRONT FOR THE LIBERATION OF PALESTINE).

B. ENTITY

SAMIDOUN PALESTINIAN PRISONER SOLIDARITY NETWORK (a.k.a. LE RESEAU DE SOLIDARITE AUX PRISONNIERS PALESTINIENS SAMIDOUN; a.k.a. SAMIDOUN; a.k.a. "HIRAK"), Vancouver, British Columbia, Canada; London, United Kingdom; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 2011 to 2012; National ID No. 12793741 (Canada); UK Company Number 13885242 (United Kingdom) [SDGT] (Linked To: POPULAR FRONT FOR THE LIBERATION OF PALESTINE).

The above designations are subject to Secondary Sanctions Risk.

Related Publication:

[US Treasury/2024.10.15/Counter Terrorism Designations](https://www.treasury.gov/press-releases/2024/10/15/Counter-Terrorism-Designations)

In a joint action with Canada, OFAC designated the Samidoun Palestinian Prisoner Solidarity Network, or "Samidoun," a sham charity that serves as an international fundraiser for the Popular Front for the Liberation of Palestine (PFLP) terrorist organization, pursuant to the counterterrorism authority Executive Order (E.O.) 13224, as amended.

Furthermore, OFAC designated a sham fundraiser whose efforts have supported terrorism.

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, 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.

Related Publication:

[US Treasury/press release/United States and Canada Target Key International Fundraiser for Foreign Terrorist Organization PFLP](#)