

US TREASURY REPORT

WEEK 7 OF 2024

A. <u>Update to OFAC's list of Specially Designated Nationals (SDN) and Blocked Persons;</u>
<u>Issuance of Counter Terrorism General License; Sanctions Compliance Guidance for the Provision of Humanitarian-Related Assistance and Critical Commodities</u>

On the 16th February 2024, issued an <u>OFAC Compliance Communiqué</u>: <u>Guidance for the Provision of Humanitarian-Related Assistance and Critical Commodities to the Yemeni People</u> in response to questions from the NGO community and the general public on how to ensure humanitarian assistance and trade continue to flow to the Yemeni people while complying with OFAC sanctions.

The Guidance states that the shipping of commercial goods into ports and airports in Houthi-controlled areas, including transactions normally incident to such shipments (e.g., port fees), is not prohibited and that commercial shipments that were not prohibited prior to the designation of Ansarallah, such as shipments of food and other commodities to the Yemeni people, are not covered by these new sanctions. This relief is available for private sector shippers as well as nongovernmental and humanitarian actors. Furthermore. OFAC points out that Shippers should be aware that nothing in the general licenses authorizes or carves out shipments that are otherwise prohibited under other existing sanctions programs (such as our Iran sanctions program) or U.S. export controls.

Related Publication

US Treasury/Guidance for the Provision of Humanitarian-Related Assistance

Furthermore, the OFAC SDN List has been updated with the Counter Terrorism Designation of the following entity:

ANSARALLAH (a.k.a. ANSAR ALLAH; a.k.a. ANSARULLAH; a.k.a. "HOUTHI GROUP"; a.k.a. "PARTISANS OF GOD"; a.k.a. "SUPPORTERS OF GOD"), Yemen; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 [SDGT].

The above designation is subject to Secondary Sanctions Risk.



In the relation to the aforementioned Designation, OFAC also issued <u>Counter Terrorism General License 28</u>, "Authorizing Transactions for Third-Country Diplomatic and Consular Missions Involving Ansarallah."

GENERAL LICENSE 28 authorizes all transactions prohibited by the Global Terrorism Sanctions Regulations, 31 CFR part 594 (GTSR), involving Ansarallah, or any entity in which Ansarallah owns, directly or indirectly, a 50 percent or greater interest, that are ordinarily incident and necessary to the official business of third-country diplomatic or consular missions to Yemen.

Related Publications

US Treasury/Counter Terrorism GL 28

US Treasury/2024.02.16/Counter Terrorism Designation, GL, Guidance

B. <u>Publication of Regulatory Amendment to the North Korea Sanctions Regulations;</u> Issuance of North Korea-related Frequently Asked Questions

On the 15th February 2024, OFAC announced that it is <u>amending the North Korea Sanctions</u> Regulations to amend or add general licenses to facilitate certain humanitarian-related and journalistic activities.

Specifically, OFAC is amending an existing general license for nongovernmental organizations and adding general licenses to authorize certain transactions related to the exportation and reexportation of items authorized by the U.S. Department of Commerce, the provision of certain agricultural commodities, medicine, and medical devices and certain journalistic activities in North Korea.

This regulatory amendment will take effect upon publication in the Federal Register on February 16, 2024.

Related Publication

US Treasury/North Korea Sanctions Regulations

In relation to the above – mentioned amendment of the North Korea Regulations, OFAC has issued several new North Korea-related Frequently Asked Questions (<u>1160</u>, <u>1161</u>, <u>1162</u>, <u>1163</u>) and amended FAQs <u>459</u>, <u>463</u>, <u>558</u>.

<u>FAQ 1160</u> explains that the changes to the North Korea Sanctions Regulations include additional non-governmental organization (NGO) activities, the Removal of dual licensing burden, the



expansion of authorization for the exportation or reexportation of certain food, medicine, and other agricultural and medical items and the authorization of Journalistic activities.

US Treasury/faq 1160

<u>FAQ 1161</u> states that the general license for non-governmental organization (NGO) activities at section 510.512 of the North Korea Sanctions Regulations, 31 CFR part 510 (NKSR), authorizes NGOs to engage in transactions involving the Government of North Korea subject to certain conditions and limitations.

US Treasury/faq 1161

<u>FAQ 1162</u> states that to be eligible for the NGO GL, an NGO must first submit a report to the U.S. Department of State via email to <u>DPRK-NGO-GL-Notification-DL@state.gov</u> no fewer than 30 days before the commencement of their activities.

US Treasury/faq 1162

<u>FAQ 1163</u> clarifies that the general license for the exportation or reexportation of certain agricultural and medical items at § 510.521 of the North Korea Sanctions Regulations, 31 CFR part 510, does not authorize the exportation or reexportation to North Korea of luxury goods, including tobacco.

US Treasury/faq 1163

C. OFAC SDN List Update: Counter Terrorism Designations; Iran-related Designation

On the 14th February 2024, <u>the OFAC SDN has been updated with the Counter Terrorism and Iran-related Designations of the following individuals and entities:</u>

I. INDIVIDUALS

KHADEMI, Mohammad Reza (a.k.a. KHADEMI, Mohammad; a.k.a. KHADEMI, Mohammad Rida Esfandiar (Arabic: محمد رضا اسفندیار خادمی)), Dubai, United Arab Emirates; DOB 05 Apr 1966; nationality Iran; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (individual) [SDGT] (Linked To: INFORMATICS SERVICES CORPORATION).



MIRDAMADI, Pouria (a.k.a. ESFAHANI, Pouria Mir Damadi), Iran; DOB 20 Sep 1979; POB Tehran, Iran; nationality France; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; National ID No. 0703THR00011 (France) (individual) [SDGT] (Linked To: INFORMATICS SERVICES CORPORATION).

NAJAFI, Seyed Abotaleb (Arabic: سيد ابوطالب نجفي) (a.k.a. NAJAFI, Aboutaleb; a.k.a. NAJAFI, Nasser), Iran; DOB 25 Sep 1956; POB Iran; nationality Iran; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; National ID No. 2063167788 (Iran) (individual) [SDGT] (Linked To: INFORMATICS SERVICES CORPORATION).

II. <u>ENTITIES</u>

ADVANCE BANKING SOLUTION TRADING DMCC (Arabic: ارم.د.م.س) (a.k.a. ADVANCE BANKING SOLUTIONS DMCC; a.k.a. "ABS CORPORATION"), 804 Jumeirah Bay Tower X3, Dubai, United Arab Emirates; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; License DMCC-402070 (United Arab Emirates); alt. License JLT-66110 (United Arab Emirates); Economic Register Number (CBLS) 11459098 (United Arab Emirates); alt. Economic Register Number (CBLS) 11464855 (United Arab Emirates) [SDGT] (Linked To: INFORMATICS SERVICES CORPORATION).

FREEDOM STAR GENERAL TRADING CO. L.L.C. (Arabic: شركة نجم الحرية للتجارة العامة ذات) (a.k.a. FREEDOM STAR GENERAL TRADING; a.k.a. FREEDOM STAR GENERAL TRADING CO. LLC; a.k.a. STAR OF FREEDOM GENERAL TRADING COMPANY LIMITED LIABILITY), P.O. Box 33237, Dubai, United Arab Emirates; Shop No. 5, Al Ras, Dubai, United Arab Emirates; Deira Al Ras, Dubai, United Arab Emirates; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 09 Jan 1997; License 244911 (United Arab Emirates); Chamber of Commerce Number 41962 (United Arab Emirates); Economic Register Number (CBLS) 10795786 (United Arab Emirates) [SDGT] (Linked To: INFORMATICS SERVICES CORPORATION).

INFORMATICS SERVICES CORPORATION (Arabic: شرکت خدمات انفورماتیک) (a.k.a. INFORMATICS AND SERVICES CORPORATION; a.k.a. INFORMATICS SERVICES COMPANY), Marjan Building, No. 6, Madadkaran Street, Shahnazari Street, Mother Square, Mirdamad Boulevard, Tehran 1545654311, Iran; Website www.isc.co.ir; Secondary sanctions



risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 15 Dec 1993; National ID No. 10101455520 (Iran); Business Registration Number 101605 (Iran) [SDGT] [IFSR] (Linked To: BANK MARKAZI JOMHOURI ISLAMI IRAN).

TED TEKNOLOJI GELISTIRME HIZMETLERI SANAYI TICARET ANONIM SIRKETI (a.k.a. TED TEKNOLOJI; a.k.a. TEDTEKNOLOJI), Cobancesme Mah. Sanayi Cad. Nish Residence D Blok, Kapi No. 44, D Daire No. 173, Bahcelievler, Istanbul, Turkey; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 28 Aug 2019; National ID No. 833094273300001 (Turkey); Trade License No. 205413-5 (Turkey) [SDGT] (Linked To: INFORMATICS SERVICES CORPORATION).

The above designations are subject to Secondary sanctions risk.

Related Publication:

US Treasury/2024.02.14/ Counter Terrorism and Iran Designations

OFAC sanctioned a procurement network responsible for facilitating the illegal export of goods and technology from over two dozen U.S. companies to end-users in Iran, including the Central Bank of Iran (CBI), which is designated for its role in providing financial support to the Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) and Hizballah. These designations, pursuant to the counterterrorism authority Executive Order (E.O.) 13224, target three individuals and four entities tied to the procurement of sophisticated U.S. technology for use by CBI in violation of U.S. export restrictions and sanctions.

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:

<u>US Treasury/press release/Treasury Sanctions Network Smuggling U.S. Technology to Central Bank of Iran</u>