

## US TREASURY REPORT

### WEEK 48 OF 2025

#### 1. US Treasury: Issuance of Amended Russia-related General License; Publication of Russia-related Frequently Asked Question

On the 4<sup>th</sup> December 2025, OFAC) issued [Russia-related General License 128B](#), "Authorizing Certain Transactions Involving Lukoil Retail Service Stations Located Outside of Russia."

**GENERAL LICENSE NO. 128B**, which replaces and supersedes in its entirety General License No. 128A, dated November 14, 2025, authorizes through 12:01 a.m. eastern daylight time, April 29, 2026, all transactions prohibited by Executive Order (E.O.) 14024 involving Lukoil International GmbH (LIG) or any entity in which LIG owns, directly or indirectly, a 50 percent or greater interest, including Lukoil North America LLC and Lukoil Americas Corporation, (collectively, "LIG Entities") that are ordinarily incident and necessary to the purchase of goods and services from, or the maintenance, operation, or wind down of, physical retail service stations located outside of the Russian Federation.

According to the General License, all blocked accounts of LIG Entities may be used, debited, or credited for the transactions authorized in the above paragraph.

This general license does not authorize:

- (1) Any transactions prohibited by Directive 2 under E.O. 14024, Prohibitions Related to Correspondent or Payable-Through Accounts and Processing of Transactions Involving Certain Foreign Financial Institutions;
- (2) Any transactions prohibited by Directive 4 under E.O. 14024, Prohibitions Related to Transactions Involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, and the Ministry of Finance of the Russian Federation;
- (3) Any transactions otherwise prohibited by the Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587 (RuHSR), including transactions involving any person blocked pursuant to the RuHSR other than the LIG Entities described in paragraph (a) of this general license, unless separately authorized; or
- (4) The transfer of funds to any person or account located in the Russian Federation.

## **Related Publication**

### **Russia-related General License 128B**

In relation to the above, OFAC published one new Russia-related Frequently Asked Question, [FAQ 1225](#).

**FAQ 1225** explains what activities are authorized by Russia-related General Licenses 128B and 131.

According to the FAQ, Russia-related General License (GL) 128B, authorizes transactions involving Lukoil International GmbH (LIG), or any of its majority-owned subsidiaries, including Lukoil North America LLC and Lukoil Americas Corporation, (collectively, "LIG Entities") that are ordinarily incident and necessary to the purchase of goods and services from; the provision of goods to; or the maintenance, operation, or wind down of physical retail service stations located outside of the Russian Federation. These transactions may involve the entities that own, lease, franchise, or operate retail service stations, including LIG Entities whose primary business involves the operation of such retail service stations.

GL 128B also authorizes financial institutions, payment processors, and other entities to debit and credit the accounts of LIG Entities involved in the operations of retail service stations to effect transactions authorized by GL 128B. GL 128B expressly authorizes transactions undertaken in the ordinary course of business for retail service stations, provided that the transactions do not involve any blocked persons other than the LIG Entities described in GL 128B or the transfer of funds to any person or account located in the Russian Federation. Transactions undertaken in the ordinary course of business may involve (but are not limited to): supply of motor fuel and lubricants; lease payments; insurance payments; property maintenance and environmental services; employee payroll, benefits, severance, and reimbursements; information technology services; payments to government authorities; and legal services and proceedings.

OFAC notes that the amendments to GL 128B have no effect on Russia-related GL 131.

Regarding the applicability of General Licenses issued under OFAC's Russia Sanctions Program, non-U.S. persons generally do not risk exposure to U.S. sanctions under E.O. 14024 for engaging in transactions with blocked persons that are generally authorized for U.S. persons.

**Similarly, non-U.S. persons may rely upon GLs 128B and 131 regardless of whether a foreign financial institution maintains blocked accounts, provided the non-U.S. person's activities are consistent with the terms of GLs 128B and 131, including the requirement that no payments may be transmitted to any person or account located in the Russian Federation.**



For example, non-U.S. persons may process payments relating to the supply of gasoline and provision of electricity and other utility services to Lukoil retail service stations, provided that no funds are transmitted to any blocked persons other than the LIG Entities described in GL 128B or any person or account located in the Russian Federation.

**Related Publication**

[1225 | Office of Foreign Assets Control](#)

[Issuance of Amended Russia-related General License; Publication of Russia-related Frequently Asked Question | Office of Foreign Assets Control](#)

## **2. OFAC SDN List Update: Counter Terrorism Designations; Transnational Criminal Organization Designations**

On the 3<sup>rd</sup> December 2025, **the OFAC SDN List has been updated with the Counter Terrorism and Transnational Criminal Organization Designations of the following individuals and entities:**

### **A. INDIVIDUALS**

APONTE CORDOVA, Noe Manases (a.k.a. "El Noe"), Venezuela; DOB 30 May 1988; POB Venezuela; nationality Venezuela; citizen Venezuela; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Cedula No. 19554865 (Venezuela) (individual) [SDGT] [TCO] (Linked To: TREN DE ARAGUA).

ARAYA NAVARRO, Jimena Romina (a.k.a. "ARAYA, Jimena"; a.k.a. "Rosita"), Venezuela; Colombia; DOB 05 Sep 1983; nationality Venezuela; Gender Female; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Cedula No. 16011070 (Venezuela) (individual) [SDGT] [TCO] (Linked To: TREN DE ARAGUA).

ESCOBAR CABRERA, Asdrubal Rafael (a.k.a. "El Asdrubal"), Venezuela; DOB 04 Aug 1992; POB Venezuela; nationality Venezuela; citizen Venezuela; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Cedula No. 21269516 (Venezuela) (individual) [SDGT] [TCO] (Linked To: TREN DE ARAGUA).

ESPINAL QUINTERO, Richard Jose (a.k.a. ESPINEL QUINTERO, Richard Jose; a.k.a. "El Coty"), Venezuela; DOB 19 Apr 1996; POB Venezuela; nationality Venezuela; citizen Venezuela; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Cedula No. 24419648 (Venezuela) (individual) [SDGT] [TCO] (Linked To: TREN DE ARAGUA).

GUERRERO PALMA, Cheison Royer (a.k.a. "Arabe Negro"; a.k.a. "Mexicali"), Chile; DOB 16 Feb 1985; POB Maracay, Aragua, Venezuela; nationality Venezuela; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Cedula No. 17984659 (Venezuela) (individual) [SDGT] [TCO] (Linked To: TREN DE ARAGUA).

LANDAETA HERNANDEZ, Eryk Manuel (a.k.a. "Eryk"), Colombia; DOB 29 Aug 1982; nationality Venezuela; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Cedula No. 15978329 (Venezuela) (individual) [SDGT] [TCO] (Linked To: TREN DE ARAGUA).

SEVILLA ARTEAGA, Kenffersso Jhosue (a.k.a. MARTINEZ LOPEZ, Jose Daniel; a.k.a. SEVILLA ARTEGA, Kenffersso Jhosue; a.k.a. SEVILLA ATEAGA, Kenfferson; a.k.a. "El Flipper"; a.k.a. "Flypper"),

Colombia; DOB 29 Apr 1993; POB Venezuela; nationality Venezuela; citizen Venezuela; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Cedula No. 21098983 (Venezuela); alt. Cedula No. 1047240759 (Colombia) (individual) [SDGT] [TCO] (Linked To: TREN DE ARAGUA).

## **B. ENTITIES**

ERYK PRODUCCIONES SAS, Bogota, Colombia; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 23 Jun 2023; Organization Type: Creative, arts and entertainment activities; NIT # 901726321-4 (Colombia) [SDGT] [TCO] (Linked To: LANDAETA HERNANDEZ, Eryk Manuel).

GLOBAL IMPORT SOLUTIONS S.A., Anaco, Anzoategui, Venezuela; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 20 Jul 2021; Tax ID No. J411408778 (Venezuela) [SDGT] [TCO] (Linked To: ARAYA NAVARRO, Jimena Romina).

MAIQUETIA VIP BAR RESTAURANT (a.k.a. MAIQUETIA VIP; a.k.a. "DISCOTECA MAIQUETIA VIP"), Cl. 17 Sur #16-54, Bogota, Colombia; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 17 Dec 2020; Organization Type: Beverage serving activities; Matricula Mercantil No 3319256 (Colombia) [SDGT] [TCO] (Linked To: LANDAETA HERNANDEZ, Eryk Manuel).

YAKERA Y LANE SAS (a.k.a. YAKERA YLANE S.A.S.), Cucuta, Norte de Santander, Colombia; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 20 Jun 2019; Organization Type: Wholesale and retail trade; NIT # 901296366-9 (Colombia) [SDGT] [TCO] (Linked To: SEVILLA ARTEAGA, Kenffersso Jhosue)

**The above designations are subject to Secondary Sanctions Risk.**

## **Related Publication**

[Counter Terrorism Designations; Transnational Criminal Organization Designations | Office of Foreign Assets Control](#)

Furthering Trump administration's policy to crack down on international cartels and transnational criminal organizations and, as a result of ongoing collaboration with U.S. government counterparts, including the U.S. Department of Justice's Joint Task Force Vulcan, the Drug Enforcement Administration, and the Federal Bureau of Investigation, OFAC sanctioned key affiliates of the designated Foreign Terrorist Organization (FTO), Tren de Aragua (TdA).

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

**Violations of U.S. sanctions may result in the imposition of civil or criminal penalties on U.S. and foreign persons.**

OFAC may impose civil penalties for sanctions violations on a strict liability basis. In addition, financial institutions and other persons may risk exposure to sanctions for engaging in certain transactions or activities involving designated or otherwise blocked persons. The prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any designated or blocked person, or the receipt of any contribution or provision of funds, goods, or services from any such person.

Furthermore, engaging in certain transactions involving the persons designated may risk the imposition of secondary sanctions on participating foreign financial institutions. OFAC can prohibit or impose strict conditions on opening or maintaining, in the United States, a correspondent account or a payable-through account of a foreign financial institution that knowingly conducts or facilitates any significant transaction on behalf of a person who is designated pursuant to the relevant authority.

**Related Publication**

[Treasury Targets Money Laundering Network Supporting Venezuelan Terrorist Organization Tren de Aragua | U.S. Department of the Treasury](#)