

## US TREASURY REPORT

### WEEK 51 OF 2025

#### **1. OFAC SDN List Update: Venezuela-related Designations; Issuance of Venezuela-related General License; Publication of Amended Venezuela-related Frequently Asked Question**

On the 19<sup>th</sup> December 2025, **on the OFAC SDN List has been updated with the Venezuela-related Designations of the following individuals:**

CARRETERO NAPOLITANO, Roberto, Panama; DOB 20 Aug 1976; POB Colon, Panama; nationality Panama; Gender Male; Cedula No. 3701218 (Panama) (individual) [VENEZUELA-EO13850].

CARRETERO NAPOLITANO, Vicente Luis, Panama; DOB 06 Oct 1966; POB Colon, Panama; nationality Panama; Gender Male; Cedula No. 3901065 (Panama) (individual) [VENEZUELA-EO13850].

FLORES DE MALPICA, Eloisa, Venezuela; DOB 01 Dec 1948; POB Tinaquillo, Venezuela; nationality Venezuela; Gender Female; Cedula No. 3989591 (Venezuela) (individual) [VENEZUELA-EO13850].

HURTADO PEREZ, Damaris del Carmen, Venezuela; DOB 03 Jul 1975; POB Barinas, Venezuela; nationality Venezuela; Gender Female; Cedula No. 12207076 (Venezuela) (individual) [VENEZUELA-EO13850].

MALPICA FLORES, Iriamni, Venezuela; DOB 15 Oct 1975; POB Caracas, Venezuela; nationality Venezuela; Gender Female; Cedula No. 12761280 (Venezuela) (individual) [VENEZUELA-EO13850].

MALPICA HURTADO, Erica Patricia, Venezuela; DOB 14 Jun 2001; POB Valencia, Venezuela; nationality Venezuela; Gender Female; Cedula No. 28331171 (Venezuela) (individual) [VENEZUELA-EO13850].

MALPICA TORREALBA, Carlos Evelio, Venezuela; DOB 20 Feb 1947; POB Tinaquillo, Venezuela; nationality Venezuela; Gender Male; Cedula No. 3056173 (Venezuela) (individual) [VENEZUELA-EO13850].

OFAC sanctioned several family members and associates of the Maduro-Flores family. This action further targets the narco-corruption structure that sustains Nicolás Maduro's regime, namely the familial networks of Carlos Erik Malpica Flores (Malpica Flores) and Ramon Carretero Napolitano (Ramon Carretero).

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.

**Related Publication**

[Treasury Targets Family Members and Associates of Maduro Regime | U.S. Department of the Treasury](#)

Furthermore, OFAC issued [Venezuela-related General License 5T](#), "**Authorizing Certain Transactions Related to the Petr6leos de Venezuela, S.A. 2020 8.5 Percent Bond on or After February 3, 2026.**"

**GENERAL LICENSE NO. 5T**, which replaces and supersedes General License No. 5S, dated June 20, 2025, authorizes all transactions related to, the provision of financing for, and other dealings in the Petr6leos de Venezuela, S.A. 2020 8.5 Percent Bond that would be prohibited by subsection 1(a)(iii) of Executive Order (E.O.) 13835 of May 21, 2018, as amended by E.O. 13857 of January 25, 2019, and incorporated into the Venezuela Sanctions Regulations, 31 CFR part 591 (the VSR).

This general license does not authorize any transactions or activities otherwise prohibited by the VSR, or any other part of 31 CFR chapter V.

**Related Publication**

[Venezuela-related General License 5T](#)

In relation to the above License, OFAC published an amended Venezuela-related Frequently Asked Question, [FAQ 595](#).

**FAQ 595** explains what Venezuela-related General License 5T authorizes. It is explained that OFAC issued General License (GL) 5 on July 19, 2018, which removed E.O. 13835 as an obstacle to holders of the PdVSA 2020 8.5 percent bond gaining access to their collateral. General License 5T further delays the effectiveness of the authorization in GL 5 until February 3, 2026.

Between October 24, 2019 and February 3, 2026 (the date the authorization in General License 5T becomes effective), there is no authorization in effect that licenses against subsection 1(a)(iii) of E.O. 13835 applicable to the holders of the PdVSA 2020 8.5 percent bond. As a result, during such period, transactions

related to the sale or transfer of CITGO shares in connection with the PdVSA 2020 8.5 percent bond are prohibited, unless specifically authorized by OFAC.

### **Related Publication**

[595 Office of Foreign Assets Control](#)

## **2. US Treasury: Issuance of Amended Russia-related Frequently Asked Questions**

On the 18<sup>th</sup> December 2025, OFAC issued two amended Russia-related Frequently Asked Questions, FAQ [1224](#) and [1225](#).

**FAQ 1224** explains what activities are authorized by [Russia-related General License 131A](#), and what transaction conditions will OFAC consider when evaluating requests for further authorization to effectuate a sale of Lukoil International GmbH (LIG) assets.

According to the FAQ, [Russia-related General License \(GL\) 131A](#), authorizes negotiations and entry into contingent contracts with Lukoil for the sale of LIG or any of LIG's majority-owned subsidiaries. Authorized activities include negotiations on terms for definitive agreements and financial, legal, or operational due diligence, including engagement of outside counsel or advisors.

[GL 131A](#) does not authorize transactions to effectuate the actual sale, disposition, or transfer of any LIG entity or asset. Any contract entered into pursuant to GL 131A must expressly be made contingent upon the receipt of a separate authorization from OFAC.

As such, Treasury would evaluate any proposed sale of LIG based on factors that support U.S. national security and foreign policy objectives. OFAC expects that, at a minimum, the proposed transaction must: completely sever LIG's ties with Lukoil; block any funds owed to Lukoil until sanctions are lifted by placing them in an account subject to U.S. jurisdiction; and not provide a windfall to Lukoil, such as by providing up-front value to Lukoil, including through asset or share swaps. Further, as a condition of any future license for effectuating a sale of LIG, OFAC expects that it will require persons purchasing LIG's assets to seek OFAC review before further divestment of material LIG assets.

### **Related Publication**

FAQ: [1224 | Office of Foreign Assets Control](#)

**FAQ 1225** states what activities Russia-related General License 128B and General License 131A authorize related to Lukoil International GmbH (LIG).

GL 128B and GL 131A expressly authorize transactions undertaken in the ordinary course of business, provided that the transactions do not involve any blocked persons other than the LIG Entities described in GL 128B and GL 131A. 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; legal services and proceedings; payments to suppliers, landlords, lenders, and partners; the preservation and upkeep of pre-existing tangible property; and activities associated with maintaining pre-existing capital investments. Also, both GL 128B and GL 131A authorize transactions ordinarily incident and necessary to performing pre-existing agreements and conducting intracompany transfers, provided that such transactions are consistent with previously established practices and support pre-existing projects or operations, consistent with the terms of the respective authorizations.

Both GL 128B and GL 131A also authorize financial institutions, payment processors, and other entities to use, debit, and credit the accounts of the relevant LIG Entities to effectuate the respective authorizations, but both GLs are also expressly limited by the condition that no funds may be transferred to a person or account in the Russian Federation.

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, including for those authorized by GL 128B and GL 131A.

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

### **Related Publications**

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

[Issuance of Amended Russia-related Frequently Asked Questions | Office of Foreign Assets Control](#)

**3. US Treasury: Iran-related Designations; International Criminal Court-related Designations; Russia-related Designations Removals; Foreign Sanctions Evaders Determination Removal; Issuance of Iran-related and International Criminal Court-related General Licenses**

On the 18<sup>th</sup> December 2025, **the OFAC SDN List has been updated with the Iran-related Designations of the following individual, entities and vessels:**

**A. INDIVIDUAL**

SAKR, Hatem Elsaid Farid Ibrahim (Arabic: **حاتم السعيد فرید ابراهيم صقر**), Al Mizhar 1, Dubai, United Arab Emirates; DOB 14 Apr 1984; POB Kafr El Sheikh, Egypt; nationality Egypt; Gender Male; Passport A28342914 (Egypt) expires 14 Jul 2028; Identification Number 784198495048732 (United Arab Emirates) (individual) [IRAN-EO13902].

**B. ENTITIES**

ADONIS SHIPPING INC, Trust Company Complex, Ajeltake Road, Majuro, Ajeltake Island 96960, Marshall Islands; Organization Established Date 05 Apr 2024; Identification Number IMO 6490991; Registration Number 125282 (Marshall Islands) [IRAN-EO13902].

AGAPE SHIPPING INC, Trust Company Complex, Ajeltake Road, Majuro, Ajeltake Island 96960, Marshall Islands; Organization Established Date 13 Mar 2024; Identification Number IMO 6483853; Registration Number 124804 (Marshall Islands) [IRAN-EO13902].

ALEAH SHIPPING INC, Intershore Chambers, Road Town, Tortola, Virgin Islands, British; Organization Established Date 2024; Identification Number IMO 0115648 [IRAN-EO13902].

ARIHANT SHIPPING INC., Panama City, Panama; Organization Established Date 29 Nov 2019; Identification Number IMO 6137793; Folio Mercantil No. 155688452 (Panama) [IRAN-EO13902].

CONCORD SHIPPING INC., Trust Company Complex, Ajeltake Road, Majuro, Ajeltake Island 96960, Marshall Islands; Organization Established Date 17 Sep 2021; Identification Number IMO 6255216; Registration Number 110904 (Marshall Islands) [IRAN-EO13902].

DARYA SHIPPING PRIVATE LIMITED (a.k.a. DARYA SHIPPING PVT LTD), No. 421, 422, and 423, Fourth Floor, Vipul Plaza, Golf Course Road, Gurgaon 122011, India; Website [www.daryashipping.in](http://www.daryashipping.in); Organization Established Date 16 Nov 2017; Identification Number IMO 6017001; Trade License No. U74999HR2017PTC071501 (India); Company Number 98450007AWFB9BFC6A06 (India) [IRAN-EO13902].

EVEREST SEA NAVIGATION SA, 80 Broad Street, Monrovia, Liberia; Organization Established Date 2023; Identification Number IMO 6452167 [IRAN-EO13902].

GOLDEN GATE SHIP MANAGEMENT, Office No A-301, Mahavir Icon, CBD Belapur, Plot 89, Sector 15, Thane, Navi Mumbai, Maharashtra 400614, India; Organization Established Date 01 Oct 2024; Identification Number IMO 0029112; Company Number UDYAM-MH-33-0532049 (India) [IRAN-EO13902].

HEMERA LINES INC., Trust Company Complex, Ajeltake Road, Majuro, Ajeltake Island 96960, Marshall Islands; Organization Established Date 07 Sep 2022; Identification Number IMO 6358714; Company Number 116070 (Marshall Islands) [IRAN-EO13902].

HIGH SEAS PETROLEUM LLC (Arabic: هاي سيز للنفط ذ م م) (a.k.a. PETROFLEET ENERGY TRADING LLC (Arabic: بيتروفليت انبرجي للتجارة ذ م م)), Office 102, Al Zarooni Tower, Al-Mamzar, Dubai, United Arab Emirates; Office No 306, Al Mamzer, Deira, Dubai, United Arab Emirates; Organization Established Date 15 Jul 2021; Identification Number IMO 6243669; License 968668 (United Arab Emirates); Economic Register Number (CBLS) 11708243 (United Arab Emirates) [IRAN-EO13902] (Linked To: SAKR, Hatem Elsaid Farid Ibrahim).

J M A SHIPPING INC., Panama City, Panama; Organization Established Date 27 Apr 2021; Identification Number IMO 6225751; Folio Mercantil No. 155705332 (Panama) [IRAN-EO13902].

KURDOS SHIPPING INC., Suites D&E, 20th Floor, Global Plaza Tower, Calle 50, Panama City, Panama; Organization Established Date 17 Jul 2008; Identification Number IMO 5409641; Registration Number 625159 (Panama) [IRAN-EO13902].

M K A SHIPPING INC, Trust Company Complex, Ajeltake Road, Majuro, Ajeltake Island 96960, Marshall Islands; Organization Established Date 24 May 2022; Identification Number IMO 6323643; Registration Number 114584 (Marshall Islands) [IRAN-EO13902].

MARUTI SHIPPING INC., Trust Company Complex, Ajeltake Road, Majuro, Ajeltake Island 96960, Marshall Islands; Organization Established Date 31 May 2024; Identification Number IMO 6506573; Registration Number 126286 (Marshall Islands) [IRAN-EO13902].

PHOENIX SHIP MANAGEMENT FZE (Arabic: فينيكس لإدارة السفن م م ح), Office No E-39F-09, (P1-ELOB), Hamriyah Free Zone, Sharjah, United Arab Emirates; Website <https://phoenixfze.com/>; Organization Established Date 23 Apr 2025; Identification Number IMO 0226749; License 38883 (United Arab Emirates) [IRAN-EO13902].

QATRAT ALNADA ALMASI SHIP MANAGEMENT L.L.C, Office 604, Green Tower, Rigga Albuteen, Deira, Dubai, United Arab Emirates; Organization Established Date 15 Feb 2024; Identification Number IMO 6479652; Commercial Registry Number 2226924 (United Arab Emirates); License 1312327 (United Arab Emirates); Chamber of Commerce Number 519528 (United Arab Emirates) [IRAN-EO13902].

RED SEA SHIP MANAGEMENT LLC (Arabic: ريد سي لإدارة السفن ذ م م), Office No 306, Parcel 133-251, Al Mamzar, Deira, Dubai, United Arab Emirates; Organization Established Date 05 Dec 2023; Identification Number IMO 6454999; License 1272054 (United Arab Emirates); Chamber of Commerce Number 503160 (United Arab Emirates) [IRAN-EO13902] (Linked To: SAKR, Hatem Elsaid Farid Ibrahim).

RUKBAT MARINE SERVICES CO, Unit 1905, Haware Infotech, Sector 30A, Vashi, Navi Mumbai, Maharashtra 410210, India; Organization Established Date 2025; Identification Number IMO 0156125 [IRAN-EO13902].

S M A SHIPPING INC., Office 703, 6th Floor, Centennial Center, Panama City, Panama; Organization Established Date 29 Jan 2021; Identification Number IMO 6206261; Folio Mercantil No. 155701731 (Panama) [IRAN-EO13902].

SINOSTAR MARINE GROUP LIMITED, Trust Company Complex, Ajeltake Road, Majuro, Ajeltake Island 96960, Marshall Islands; Organization Established Date 19 Mar 2024; Identification Number IMO 0059859; Company Number 124911 (Marshall Islands) [IRAN-EO13902].

### **C. VESSELS**

AETHER SAIL (T8A4543) Chemical/Products Tanker Palau flag; Vessel Year of Build 2003; Vessel Registration Identification IMO 9277371; MMSI 511101256 (vessel) [IRAN-EO13902] (Linked To: PHOENIX SHIP MANAGEMENT FZE).

ARIHANT (T8A3376) Products Tanker Palau flag; Vessel Year of Build 2009; Vessel Registration Identification IMO 9464156; MMSI 511100268 (vessel) [IRAN-EO13902] (Linked To: ARIHANT SHIPPING INC.).

AUOURA (3E3982) Oil Products Tanker Panama flag; Vessel Year of Build 2004; Vessel Registration Identification IMO 9262912; MMSI 352001225 (vessel) [IRAN-EO13902] (Linked To: GOLDEN GATE SHIP MANAGEMENT).

DIANA (6YWV8) Crude Oil Tanker Jamaica flag; Vessel Year of Build 2004; Vessel Registration Identification IMO 9255945; MMSI 339000161 (vessel) [IRAN-EO13902] (Linked To: ALEAH SHIPPING INC.).

FLORA DOLCE (8PZQ8) Chemical/Products Tanker Barbados flag; Vessel Year of Build 2004; Vessel Registration Identification IMO 9258595; MMSI 314001081 (vessel) [IRAN-EO13902] (Linked To: RUKBAT MARINE SERVICES CO).

FOSHAN (3E2124) Chemical/Products Tanker Panama flag; Vessel Year of Build 2007; Vessel Registration Identification IMO 9404572; MMSI 352001366 (vessel) [IRAN-EO13902] (Linked To: SINOSTAR MARINE GROUP LIMITED).

GOLDEN EAGLE Crude Oil Tanker Unknown flag; Former Vessel Flag Gambia; Vessel Year of Build 2004; Vessel Registration Identification IMO 9255684; MMSI 341313001 (vessel) [IRAN-EO13902] (Linked To: EVEREST SEA NAVIGATION SA).

HEMERA (T8A4764) Asphalt/Bitumen Tanker Palau flag; Vessel Year of Build 2006; Vessel Registration Identification IMO 9263954; MMSI 511101408 (vessel) [IRAN-EO13902] (Linked To: HEMERA LINES INC.).

INTAN PREMIER (T8A5105) Chemical/Products Tanker Palau flag; Vessel Year of Build 2009; Vessel Registration Identification IMO 9358802; MMSI 511101645 (vessel) [IRAN-EO13902] (Linked To: RED SEA SHIP MANAGEMENT LLC).

J M A (E5U4180) Oil Products Tanker Cook Islands flag; Vessel Year of Build 2001; Vessel Registration Identification IMO 9246487; MMSI 518998202 (vessel) [IRAN-EO13902] (Linked To: J M A SHIPPING INC.).

KASSIA (3E2726) Chemical/Products Tanker Panama flag; Vessel Year of Build 2008; Vessel Registration Identification IMO 9409986; MMSI 352001708 (vessel) [IRAN-EO13902] (Linked To: ADONIS SHIPPING INC.).

KHADIGA (T8A4125) Chemical/Products Tanker Palau flag; Vessel Year of Build 2006; Vessel Registration Identification IMO 9321469; MMSI 511100904 (vessel) [IRAN-EO13902] (Linked To: RED SEA SHIP MANAGEMENT LLC).

KURDOS (T8A5448) Chemical/Products Tanker Palau flag; Vessel Year of Build 2001; Vessel Registration Identification IMO 9236731; MMSI 511101920 (vessel) [IRAN-EO13902] (Linked To: KURDOS SHIPPING INC.).

KURDOS II (T8A4469) Chemical/Products Tanker Palau flag; Vessel Year of Build 2008; Vessel Registration Identification IMO 9453729; MMSI 511101194 (vessel) [IRAN-EO13902] (Linked To: KURDOS SHIPPING INC.).

KURDOS III (T8A5317) Chemical/Products Tanker Palau flag; Vessel Year of Build 2008; Vessel Registration Identification IMO 9380570; MMSI 511101819 (vessel) [IRAN-EO13902] (Linked To: KURDOS SHIPPING INC.).

M K A (E5U4496) Chemical/Products Tanker Cook Islands flag; Vessel Year of Build 2003; Vessel Registration Identification IMO 9269403; MMSI 518998516 (vessel) [IRAN-EO13902] (Linked To: M K A SHIPPING INC.).

MAJESTY (E5U4288) Chemical/Products Tanker Cook Islands flag; Vessel Year of Build 2012; Vessel Registration Identification IMO 9430715 (vessel) [IRAN-EO13902] (Linked To: CONCORD SHIPPING INC.).

MARUTI (E5U4438) Products Tanker Cook Islands flag; Vessel Year of Build 2010; Vessel Registration Identification IMO 9546710; MMSI 518998458 (vessel) [IRAN-EO13902] (Linked To: MARUTI SHIPPING INC.).

NEBULA DRIFT (T8A5231) Products Tanker Palau flag; Vessel Year of Build 2002; Vessel Registration Identification IMO 9233973; MMSI 511101749 (vessel) [IRAN-EO13902] (Linked To: PHOENIX SHIP MANAGEMENT FZE).

NOMIKI (3E7581) Chemical/Products Tanker Panama flag; Vessel Year of Build 2002; Vessel Registration Identification IMO 9242443; MMSI 352004062 (vessel) [IRAN-EO13902] (Linked To: AGAPE SHIPPING INC.).

RAMYA (8PZQ3) Chemical/Products Tanker Barbados flag; Vessel Year of Build 2006; Vessel Registration Identification IMO 9363182; MMSI 314001076 (vessel) [IRAN-EO13902] (Linked To: DARYA SHIPPING PRIVATE LIMITED).

S M A (E5U3873) Asphalt/Bitumen Tanker Cook Islands flag; Vessel Year of Build 2003; Vessel Registration Identification IMO 9273002; MMSI 518100962 (vessel) [IRAN-EO13902] (Linked To: S M A SHIPPING INC.).

SEA CITRINE VI (T8A4765) Products Tanker Palau flag; Vessel Year of Build 1999; Vessel Registration Identification IMO 9207273; MMSI 511101409 (vessel) [IRAN-EO13902] (Linked To: QATRAT ALNADA ALMASI SHIP MANAGEMENT L.L.C.).

SEA ROCK Products Tanker; Former Vessel Flag Palau; Vessel Year of Build 1996; Vessel Registration Identification IMO 9140451 (vessel) [IRAN-EO13902] (Linked To: QATRAT ALNADA ALMASI SHIP MANAGEMENT L.L.C.).

SEA WISE (T8A3980) Products Tanker Palau flag; Vessel Year of Build 2001; Vessel Registration Identification IMO 9224570; MMSI 511100774 (vessel) [IRAN-EO13902] (Linked To: QATRAT ALNADA ALMASI SHIP MANAGEMENT L.L.C.).

SEAMULL (T8A3433) Products Tanker Palau flag; Vessel Year of Build 2001; Vessel Registration Identification IMO 9204776; MMSI 511100317 (vessel) [IRAN-EO13902] (Linked To: QATRAT ALNADA ALMASI SHIP MANAGEMENT L.L.C.).

SKYLIGHT (T8A4356) Chemical/Products Tanker Palau flag; Vessel Year of Build 2006; Vessel Registration Identification IMO 9330020; MMSI 511101102 (vessel) [IRAN-EO13902] (Linked To: RED SEA SHIP MANAGEMENT LLC).

TIDAL RHYTHM (3E6978) Asphalt/Bitumen Tanker Panama flag; Vessel Year of Build 2004; Vessel Registration Identification IMO 9297101; MMSI 352004719 (vessel) [IRAN-EO13902] (Linked To: PHOENIX SHIP MANAGEMENT FZE).

VOYAGER HAVEN (3E6786) Chemical/Products Tanker Panama flag; Vessel Year of Build 2004; Vessel Registration Identification IMO 9271896; MMSI 352004496 (vessel) [IRAN-EO13902] (Linked To: PHOENIX SHIP MANAGEMENT FZE).

Pursuant to Executive Order (E.O.) 13902, which targets Iran's petroleum and petrochemical sectors. OFAC sanctioned 29 shadow fleet vessels and their respective management firms that have transported Iranian petroleum products, as well as an Egyptian businessman whose companies are associated with seven of the 29 shadow fleet vessels included in this action and multiple shipping companies.

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 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.

**Related Publication**

[Treasury Increases Pressure on Iran's Sanctions-Evading Shadow Fleet | U.S. Department of the Treasury](#)

In relation to the above designations, OFAC issued [Iran-related General License S](#), "Authorizing Limited Safety and Environmental Transactions and the Offloading of Cargo Involving Certain Persons or Vessels Blocked on December 18, 2025."

**GENERAL LICENSE S** authorizes through 12:01 a.m. eastern standard time, January 18, 2026, all transactions prohibited by Executive Order (E.O.) 13902 that are ordinarily incident and necessary to one or more of the following activities involving the blocked vessels or blocked persons listed in the Annex to this general license, and any entity in which the listed blocked persons own, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest, provided that any payment to a blocked person must be made into a blocked interest-bearing account located in the United States:

- (1) The safe docking and anchoring in any port, excluding ports located in Iran or the Russian Federation or Venezuela, or under the control of the Government of Iran or the Government of the Russian Federation or the Government of Venezuela, of the blocked vessels listed in the Annex to this general license (the “Blocked Vessels”);
- (2) The preservation of the health or safety of the crew of any of the Blocked Vessels;
- (3) Emergency repairs of any of the Blocked Vessels or environmental mitigation or protection activities relating to any of the Blocked Vessels; or
- (4) The delivery and offloading of cargo involving the Blocked Vessels, provided that the cargo is not of Iranian-origin and was loaded on or before December 18, 2025, and that the delivery and offloading of cargo does not occur at any port located in Iran or the Russian Federation or Venezuela, or under the control of the Government of Iran or the Government of the Russian Federation or the Government of Venezuela.

Please see below the list of persons and vessels included in the Annex of the License:

Phoenix Ship Management FZE NEBULA DRIFT 9233973

Phoenix Ship Management FZE AETHER SAIL 9277371

Phoenix Ship Management FZE TIDAL RHYTHM 9297101

Phoenix Ship Management FZE VOYAGER HAVEN 9271896

Arihant Shipping Inc. ARIHANT 9464156

Kurdos Shipping Inc. KURDOS 9236731

Kurdos Shipping Inc. KURDOS II 9453729

Kurdos Shipping Inc. KURDOS III 9380570

Adonis Shipping Inc. KASSIA 9409986

Concord Shipping Inc. MAJESTY 9430715

Rukbat Marine Services Co. FLORA DOLCE 9258595  
Aleah Shipping Inc. DIANA 9255945  
J M A Shipping Inc. J M A 9246487  
S M A Shipping Inc. S M A 9273002  
M K A Shipping Inc. M K A 9269403  
Golden Gate Ship Management AUROURA 9262912  
Darya Shipping Private Limited RAMYA 9363182  
Sinostar Marine Group Limited FOSHAN 9404572  
Hemera Lines Inc. HEMERA 9263954  
Agape Shipping Inc. NOMIKI 9242443  
Maruti Shipping Inc. MARUTI 9546710  
Everest Sea Navigation SA GOLDEN EAGLE 9255684  
Red Sea Ship Management LLC SKYLIGHT 9330020  
Red Sea Ship Management LLC KHADIGA 9321469  
Red Sea Ship Management LLC INTAN PREMIER 9358802  
High Seas Petroleum LLC  
Qatrat Alnada Almasi Ship Management SEA WISE 9224570  
Qatrat Alnada Almasi Ship Management SEAMULL 9204776  
Qatrat Alnada Almasi Ship Management SEA ROCK 9140451  
Qatrat Alnada Almasi Ship Management SEA CITRINE VI 9207273

This general license does not authorize:

(1) The entry into any new commercial contracts involving the property or interests in property of any blocked persons, including the blocked persons described in paragraph (a) of this general license, except as authorized by paragraph (a); or

(2) Any transactions or activities prohibited by E.O. 13902, except as authorized by paragraph (a) of this general license, or any transaction or activity prohibited by any other E.O. or any part of 31 CFR chapter V, including any transaction or activity involving Iran, the Government of Iran, or Iranian-origin goods or services that is prohibited by the Iranian Transactions and Sanctions Regulations (31 CFR part 560)

### **Related Publication**

#### [Iran-related General License S](#)

Furthermore, **the OFAC SDN List has been updated with the Criminal Court-related Designation of the following individuals:**

DAMDIN, Erdenebalsuren, Netherlands; DOB 07 Aug 1967; POB Ulaanbaatar, Mongolia; nationality Mongolia; Gender Male; Diplomatic Passport D00004977 (Mongolia) expires 25 Dec 2027 (individual) [ICC-EO14203].

LORDKIPANIDZE, Gocha, Netherlands; DOB 03 Feb 1964; POB Poti, Georgia; nationality Georgia; Gender Male; Diplomatic Passport 10DP04141 (Georgia) expires 18 Feb 2026 (individual) [ICC-EO14203].

Two judges of ICC were sanctioned pursuant to Executive Order 14203, “Imposing Sanctions on the International Criminal Court”, for having directly engaged in efforts by the ICC to investigate, arrest, detain, or prosecute Israeli nationals, without Israel’s consent, including voting with the majority in favor of the ICC’s ruling against Israel’s appeal on December 15.

### **Related Publication**

#### [Sanctioning ICC Judges Directly Engaged in the Illegitimate Targeting of Israel - United States Department of State](#)

In relation to the above designations, OFAC issued [International Criminal Court-related General License 11](#), "Authorizing the Wind Down of Transactions Involving Certain Persons Blocked on December 18, 2025".

**GENERAL LICENSE NO. 11** authorizes through 12:01 a.m. eastern standard time, January 17, 2026, all transactions prohibited by the International Criminal Court-Related Sanctions Regulations (ICCSR), 31 CFR part 528, that are ordinarily incident and necessary to the wind down of any transaction involving one or more of the following blocked persons, in accordance with the ICCSR:

- (1) Gocha Lordkipanidze;
- (2) Erdenebalsuren Damdin; or
- (3) 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.

This general license does not authorize any transactions otherwise prohibited by the ICCSR, including transactions involving any person blocked pursuant to the ICCSR other than the blocked persons described in paragraph (a) of this general license, unless separately authorized.

### **Related Publication**

[International Criminal Court-related General License 11](#)

Additionally, **the following Russia-related Designations Removals have been made to OFAC's SDN List:**

VELES INTERNATIONAL LIMITED, Globe House, Floor No. 5, 23 Kennedy, Nicosia 1075, Cyprus; Secondary sanctions risk: See Section 11 of Executive Order 14024.; Organization Established Date 21 Sep 2005; Tax ID No. 10165706H (Cyprus); Identification Number M9DR4T.99999.SL.196 (Cyprus); Legal Entity Number 213800HFBG8GID98ID84; Registration Number C165706 (Cyprus) [RUSSIA-EO14024] (Linked To: BUGAYENKO, Dmitry Vitalyevich).

HADLERCO LIMITED, Marilena Building, Flat No 101, No 1, Prigkipissas Zinas Kanther 12, Nicosia 1065, Cyprus; Secondary sanctions risk: See Section 11 of Executive Order 14024.; Organization Established Date 11 Aug 2000; Tax ID No. 10113889S (Cyprus); Legal Entity Number 213800MRUA23SZCWPO15; Registration Number C113889 (Cyprus) [RUSSIA-EO14024] (Linked To: BUGAYENKO, Dmitry Vitalyevich).

BUGAYENKO, Dmitry Vitalyevich (a.k.a. BUGAENKO, Dmitrii Vitalyevich; a.k.a. BUGAENKO, Dmitry), 6/1 Michurinsky Prospekt, 187-188, Moscow 119295, Russia; DOB 15 Dec 1966; POB Moscow, Russia; nationality Russia; alt. nationality Cyprus; Gender Male; Secondary sanctions risk: See Section 11 of Executive Order 14024.; Passport K00148307 (Cyprus) issued 26 Sep 2013 expires 26 Sep 2023; National ID No. 1274836 (Cyprus) (individual) [RUSSIA-EO14024].

BUGAENKO, Dmitry (a.k.a. BUGAENKO, Dmitrii Vitalyevich; a.k.a. BUGAYENKO, Dmitry

Vitalyevich), 6/1 Michurinsky Prospekt, 187-188, Moscow 119295, Russia; DOB 15 Dec 1966; POB Moscow, Russia; nationality Russia; alt. nationality Cyprus; Gender Male; Secondary sanctions risk: See Section 11 of Executive Order 14024.; Passport K00148307 (Cyprus) issued 26 Sep 2013 expires 26 Sep 2023; National ID No. 1274836 (Cyprus) (individual) [RUSSIA-EO14024].

BUGAENKO, Dmitrii Vitalyevich (a.k.a. BUGAENKO, Dmitry; a.k.a. BUGAYENKO, Dmitry Vitalyevich), 6/1 Michurinsky Prospekt, 187-188, Moscow 119295, Russia; DOB 15 Dec 1966; POB Moscow, Russia; nationality Russia; alt. nationality Cyprus; Gender Male; Secondary sanctions risk: See Section 11 of Executive Order 14024.; Passport K00148307 (Cyprus) issued 26 Sep 2013 expires 26 Sep 2023; National ID No. 1274836 (Cyprus) (individual) [RUSSIA-EO14024].

DREMOVA, Evgenia, Finland; DOB 26 Aug 1977; nationality Finland; Gender Female; Secondary sanctions risk: See Section 11 of Executive Order 14024.; Identification Number 260877 (Finland) (individual) [RUSSIA-EO14024].

HI-TECH KONEISTO INTERNATIONAL OY, Hirsalantie 11, Jorvas 02420, Finland; Secondary sanctions risk: See Section 11 of Executive Order 14024.; Organization Established Date 21 Jul 2021; V.A.T. Number FI32114731 (Finland); Identification Number 3211473-1 (Finland) [RUSSIA-EO14024] (Linked To: DREMOVA, Evgenia).

365 DAYS FREIGHT SERVICES FZCO, Warehouse No. F24, Dubai Airport Free Zone, PO Box 99083, Dubai, United Arab Emirates; Secondary sanctions risk: See Section 11 of Executive Order 14024.; License 1303 (United Arab Emirates); Economic Register Number (CBLS) 11436269 (United Arab Emirates) [RUSSIA-EO14024].

ETASIS ELEKTRONIK TARTI ALETLERI VE SISTEMLERI SANAYI VE TICARET ANONIM SIRKETI (a.k.a. ETASIS A.S.), 2001 Cadde No 36, 75, Yil Mahallesi, Odunpazari 26250, Turkey; Secondary sanctions risk: See Section 11 of Executive Order 14024.; Tax ID No. 7838098822 (Turkey); Registration Number 26355 (Turkey) [RUSSIA-EO14024].

ETASIS A.S. (a.k.a. ETASIS ELEKTRONIK TARTI ALETLERI VE SISTEMLERI SANAYI VE TICARET ANONIM SIRKETI), 2001 Cadde No 36, 75, Yil Mahallesi, Odunpazari 26250, Turkey; Secondary sanctions risk: See Section 11 of Executive Order 14024.; Tax ID No. 7838098822 (Turkey); Registration Number 26355 (Turkey) [RUSSIA-EO14024].

CPS PROSES KONTROL URUNLERI SANAYI VE TICARET ANONIM SIRKETI, Carsi Yapi Sitesi G Blok, No: 10G/5 Sanayi Mahallesi, Kocaeli, Turkey; Secondary sanctions risk: See Section 11 of Executive Order 14024.; Organization Established Date 22 Feb 2022; Tax ID No. 2150603096 (Turkey); Business Registration Number 32873 (Turkey) [RUSSIA-EO14024].

Finally, **the following deletion has been made to OFAC's FSE List:**

KAYAKIRAN, Evren, Turkey; DOB 08 Feb 1980; citizen Turkey; Gender Male; Passport U00242309 (Turkey) (individual) [FSE-IR].

#### **Related Publication**

[Iran-related Designations; International Criminal Court-related Designations; Russia-related Designations Removals; Foreign Sanctions Evaders Determination Removal; Issuance of Iran-related and International Criminal Court-related General Licenses | Office of Foreign Assets Control](#)

#### **4. OFAC SDN List Update: Counter Terrorism Designation Update**

On the 16<sup>th</sup> December 2025, **the OFAC SDN List has been updated with the following changes in relation to Counter Terrorism Designations:**

CLAN DEL GOLFO (a.k.a. BANDA CRIMINAL DE URABA; a.k.a. CLAN USUGA; a.k.a. GULF CLAN; a.k.a. LOS AUTODEFENSAS GAITANISTAS DE COLOMBIA; a.k.a. LOS URABENOS (Latin: LOS URABEÑOS)), Colombia [SDNTK] [ILLCIT-DRUGS-EO14059].

-to-

CLAN DEL GOLFO (a.k.a. BANDA CRIMINAL DE URABA; a.k.a. CLAN USUGA; a.k.a. GULF CLAN; a.k.a. LOS AUTODEFENSAS GAITANISTAS DE COLOMBIA; a.k.a. LOS URABENOS (Latin: LOS URABEÑOS)), Colombia; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Type: Transnational Terrorist Group; Target Type Criminal Organization [SDNTK] [FTO] [SDGT] [ILLCIT-DRUGS-EO14059].

#### **Related Publication**

[Counter Terrorism Designation Update | Office of Foreign Assets Control](#)

The Department of State designated Clan del Golfo as a Foreign Terrorist Organization (FTO) and a Specially Designated Global Terrorist (SDGT), resulting to the organization being subject to Secondary Sanctions Risk.

Clan del Golfo is a criminal organization with thousands of members. The group's primary source of income is cocaine trafficking and the organization is responsible for terrorist attacks against public officials, law enforcement and military personnel, and civilians in Colombia.

#### **Related Publication**

[Terrorist Designations of Clan del Golfo - United States Department of State](#)

## **5. US Treasury: Issuance of Belarus General License**

On the 15<sup>th</sup> December 2025, OFAC issued [Belarus General License 13](#), "Authorizing Transactions Involving Joint Stock Company Belarusian Potash Company, Agrorozkvit LLC, and Belaruskali OAO."

**GENERAL LICENSE 13** authorizes all transactions prohibited by the Belarus Sanctions Regulations, 31 CFR part 548 (BSR), involving the following entities:

- (1) Joint Stock Company Belarusian Potash Company;
- (2) Agrorozkvit LLC;
- (3) Belaruskali OAO; or
- (4) 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.

This general license does not authorize:

- (1) The unblocking of any property blocked pursuant to any part of 31 CFR chapter V; or
- (2) Any transactions otherwise prohibited by the BSR, including transactions involving the property or interests in property of any person blocked pursuant to the BSR other than the blocked persons described in paragraph (a) of this general license, unless separately authorized.

### **Related Publications**

[Issuance of Belarus General License | Office of Foreign Assets Control](#)

[Belarus General License 13](#)