CUS
CYPRUS UNION OF SHIPOWNERS

US TREASURY REPORT

WEEK 47 OF 2026

1. OFAC UPDATES: Counter Terrorism Designations

On the 18th November 2026, OFAC SDN List has been updated with Counter Terrorism Designations of the following individuals and entities:

A. INDIVIDUALS

CHOUMAN, Afif Abdel Rida (Arabic: عفيف عبد الرضا شومان) (a.k.a. AL-FADL, Abu; a.k.a. SHUMAN, Afif Abd-Al-Rida), Zefta, Nabatieh, Lebanon; DOB 21 Apr 1983; POB Zefta, Nabatieh, Lebanon; 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 LR2501382 (Lebanon); alt. Passport LR0248911 (Lebanon) expires 15 Feb 2022; National ID No. 000013479394 (Lebanon); Identification Number 4285034 (Lebanon) (individual) [SDGT] (Linked To: HIZBALLAH).

KHECHEN, Hassan (Arabic: حسن خشن) (a.k.a. KHASHAN, Hassan; a.k.a. KHASHAN, Hassan Muhammad), Lebanon; DOB 19 Jul 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 LR3765421 (Lebanon) expires 29 Jul 2034; National ID No. 000050415869 (Lebanon) (individual) [SDGT] (Linked To: HIZBALLAH).

KHECHEN, Ibrahim (Arabic: ابراهيم خشن), Lebanon; DOB 10 Jun 1992; 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 1352745 (Lebanon) expires 25 Jul 2009; National ID No. 000040505200 (Lebanon) (individual) [SDGT] (Linked To: HIZBALLAH).

B. ENTITIES

GOLD GLOBAL COMPANY (a.k.a. GOLD GLOBAL COMPANY HASSAN MOHAMAD KHECHEN AND HIS PARTNERS), Jnah. Centro Mall, Office Bldg., Floor 3, Office 44, Sidon, Lebanon; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 19 Mar 2021; Organization Type: Wholesale of metals and metal ores; Commercial Registry Number 5009969 (Lebanon) [SDGT] (Linked To: KHECHEN, Hassan).

SANKARI GOLD KUYUMCULUK TICARET LIMITED SIRKETI (Latin: SANKARİ GOLD KUYUMCULUK TİCARET LİMİTED ŞİRKETİ) (a.k.a. SANKARI GOLD JEWELRY TRADE LIMITED COMPANY), Yenibosna Merkez Mah. Kuyumcukent No: 4m ic Kapi No: Z132 Bahcelievler, Istanbul, Turkey; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 05 Feb 2020; Organization Type: Wholesale of jewelry, watches, precious stones, and precious metals; Tax ID No. 7440967677 (Turkey); Chamber of Commerce Number 1223407 (Turkey); Registration Number 233645-5 (Turkey); Central Registration System Number 0744096767700001 (Turkey) [SDGT] (Linked To: KHECHEN, Hassan).

WA TA'AWANU ASSOCIATION (Arabic: جمعية وتعاونوا) (a.k.a. WA TAAWANOU), Zefta, Nabatieh, Lebanon; Website www.wataawano.org; 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 Nov 2019; alt. Organization Established Date 2021; Registration Number 387/2021 (Lebanon) issued 2021 [SDGT] (Linked To: HIZBALLAH).

OFAC designated the **Wa Ta'awanu Association** (Wa Ta'awanu), a Hizballah-affiliated charity that provides cover for Hizballah's activities under the guise of delivering humanitarian services. OFAC also designated members of a Lebanon- and Türkiye-based gold and cash smuggling network run by Hizballah and Iran's Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF).

OFAC's action exposes Hizballah's continued exploitation of civilian charitable organizations and its efforts to portray itself as a provider of humanitarian assistance. It also increases pressure on the group's illicit financing networks as Hizballah seeks to resist growing calls and international pressure to disarm. This action is being taken pursuant to the United States' counterterrorism authority, Executive Order (E.O.) 13224, as amended.

The U.S. Department of State designated Hizballah as a Specially Designated Global Terrorist pursuant to E.O. 13224 on October 31, 2001, for having committed, or posing a significant risk of committing, acts of terrorism that threaten the security of U.S. nationals or the national security, foreign policy, or economy of the United States. Previously, the U.S. Department of State had designated Hizballah as a Foreign Terrorist Organization (FTO) pursuant to section 219 of the Immigration and Nationality Act on October 8, 1997. OFAC also designated Hizballah pursuant to E.O. 13224, as amended, on August 20, 2026 for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, the IRGC-QF.

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

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.

Non-U.S. persons are also 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.

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:

OFAC 18/11 - Operation Economic Outcast Targets Iran's Proxy Networks

OFAC 18/11 - U.S. Sanctions Hizballah Front Organization and Iran-Backed Financial Network

2. OFAC UPDATES: Issuance of Amended Russia-related General License and Frequently Asked Questions

On the 19th November 2026, OFAC issued the following Amended Russia-related General License:

- Russia-related General License 131L, "*Authorizing Certain Transactions for the Negotiation of and Entry Into Contingent Contracts for the Sale of Lukoil International GmbH and Related Maintenance Activities*".

GENERAL LICENSE 131L, replaces and supersedes General License No. 131K, dated October 21, 2026, and is effective as of November 19, 2026 and states that all transactions prohibited by Executive Order (E.O.) 14024 that are ordinarily incident and necessary to the negotiation of and entry into contracts with Public Joint-Stock Company Oil Company Lukoil or any of its affiliates for the sale, disposition, or transfer of Lukoil International GmbH ("LIG") or any entity in which LIG owns, directly or indirectly, individually or in the aggregate, a 50% or greater interest (collectively, "LIG Entities") are authorized through 12:01 a.m. eastern standard time, December 19, 2026, provided that the performance of any such contract is made expressly contingent upon the receipt of separate authorization from the Office of Foreign Assets Control ("contingent contracts").

For purposes of this general license, the term "contingent contracts" includes executory contracts, executory pro forma invoices, agreements in principle, executory offers capable of acceptance such as bids or proposals in response to public tenders, binding memoranda of understanding, or any other similar agreement.

Furthermore, except in cases that this general license does not authorize, all transactions prohibited by E.O. 14024 that are ordinarily incident and necessary to the maintenance or wind down of operations, contracts, or other agreements of LIG Entities are authorized through 12:01

a.m. eastern standard time, February 20, 2027. On this note, all blocked accounts of LIG Entities may be used, debited, or credited for the transactions authorized in E.O. 14024.

This general license does not authorize:

(1) The unblocking of any property blocked pursuant to any part of 31 CFR chapter V, except as in some cases described in the third paragraph;
(2) 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 blocked persons described in the first paragraph, unless separately authorized; or
(3) The transfer of funds to any person or account located in the Russian Federation.

For more information, please see Russia-related General License 131L.

Related Publications
OFAC 19/11 - Russia-related General License 131L

Moreover, OFAC has also issued two Amended Russian-related Frequently Asked Questions, FAQs 1224 and 1225.

- FAQ 1225 - What activities do Russia-related General License 128D and General License 131L authorize related to Lukoil International GmbH (LIG)?

OFAC has issued two General Licenses (GLs) relating specifically to Lukoil International GmbH (LIG) and its majority-owned subsidiaries ("LIG Entities"): GL 128D and GL 131L. The GLs are similar but have different expiration dates and terms as each serves a different purpose.

- To mitigate the effects of Lukoil's OFAC designation on retail consumers, OFAC issued on December 4, 2025 GL 128B to authorize maintenance, operation, and wind down activities for a narrow range of LIG entities, specifically Lukoil retail automobile service stations outside of the Russian Federation. OFAC subsequently issued GL 128C and GL 128D to extend the existing authorization until April 24, 2027.

- To enable Lukoil to divest its assets outside of Russia to non-blocked parties, OFAC issued on December 10, 2025 GL 131A to authorize, among other things, maintenance and wind down activities of all LIG Entities. OFAC subsequently issued GLs 131B, 131C, 131D, GL 131E, GL 131F, GL 131G, GL 131H, GL 131I, GL 131J, GL 131K, and GL 131L to extend the existing maintenance and wind down authorization until February 20, 2027. Please see Frequently Asked Question 1224 for additional information on authorizations regarding negotiations for the sale of LIG Entities.

Furthermore, GL 128D and GL 131L 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 128D and GL 131L. 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 128D and GL 131L 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.

We draw your attention to FAQ 1225.

Related Publications
OFAC 19/11 - FAQ 1225

- FAQ 1224 - What negotiations does Russia-related General License 131L authorize, and what transaction conditions will OFAC consider when evaluating requests for further authorization to effectuate a sale of Lukoil International GmbH (LIG) assets?

OFAC issued Russia-related General License (GL) 131L, which 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. This authorization for negotiations and entry into contingent contracts expires on December 19, 2026.

GL 131L 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 131L 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:

(1) completely sever LIG's ties with Lukoil;
(2) block any funds owed to Lukoil until sanctions are lifted by placing them in an account subject to U.S. jurisdiction;

(3) 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. OFAC may revoke GL 131L at any time, including if Lukoil and LIG do not appear to be engaging in good faith negotiations regarding the divestment of LIG or its assets.

We draw your attention to FAQ 1224.

Related Publications
OFAC 19/11 - FAQ 1224

3. OFAC UPDATES: Counter Narcotics Designations

On the 19th November 2026, OFAC SDN List has been updated with Counter Narcotics Designations of the following individuals and entities:

A. INDIVIDUALS

COFFEN, Marco Francis (a.k.a. DE BERNARDO, Marco Sullivan), Italy; United Arab Emirates; DOB 06 Sep 1982; POB Australia; nationality Australia; citizen Australia; Gender Male; Passport G41266131 (Mexico) expires 18 Apr 2032; alt. Passport RV0122253 (Vanuatu) expires 04 Feb 2031 (individual) [ILLICIT-DRUGS-EO14059] (Linked To: COMANCHERO OUTLAW MOTORCYCLE GANG).

COMMISSO, Francesco (a.k.a. "U Scelto"), Ontario, Canada; Siderno, Calabria, Italy; DOB 03 Oct 1956; POB Siderno, Calabria, Italy; nationality Italy; Gender Male (individual) [ILLICIT-DRUGS-EO14059] (Linked To: 'NDRANGHETA).

COMMISSO, Rocco Remo, Ontario, Canada; DOB 29 Jun 1946; POB Siderno, Calabria, Italy; nationality Italy; Gender Male (individual) [ILLICIT-DRUGS-EO14059] (Linked To: 'NDRANGHETA).

DEMARIA, Vincenzo (a.k.a. DEMARIA, Jimmy), Ontario, Canada; DOB 16 Apr 1954; POB Siderno, Calabria, Italy; nationality Italy; Gender Male (individual) [ILLICIT-DRUGS-EO14059] (Linked To: 'NDRANGHETA).

FIGLIOMENI, Angelo (a.k.a. "Don Angelino"), Vaughan, Ontario, Canada; DOB 30 Sep 1962; POB Siderno, Calabria, Italy; nationality Italy; Gender Male (individual) [ILLICIT-DRUGS-EO14059] (Linked To: 'NDRANGHETA).

FIGLIOMENI, Cosimo (a.k.a. "Cosimino"; a.k.a. "Mino"), Ontario, Canada; DOB 06 Feb 1965; POB Siderno, Calabria, Italy; nationality Italy; Gender Male (individual) [ILLICIT-DRUGS-EO14059] (Linked To: 'NDRANGHETA).

MEEHAN, Allan John Norman (a.k.a. MEEHAN, Allan), Australia; DOB 19 Mar 1987; POB Auburn, New South Wales, Australia; nationality Australia; Gender Male; Passport PA7606808 (Australia) expires 29 Mar 2028 (individual) [ILLICIT-DRUGS-EO14059] (Linked To: COMANCHERO OUTLAW MOTORCYCLE GANG).

NAUFAHU, Pasilika (a.k.a. "Lika"), New Zealand; DOB 22 Jul 1987; POB New Zealand; nationality New Zealand; Gender Male; Passport LK010539 (New Zealand) (individual) [ILLICIT-DRUGS-EO14059] (Linked To: COMANCHERO OUTLAW MOTORCYCLE GANG).

NAUFAHU, Vetekina (a.k.a. "Kina"), New Zealand; DOB 05 Feb 1985; POB New Zealand; nationality New Zealand; Gender Male; Passport N5608183 (Australia) (individual) [ILLICIT-DRUGS-EO14059] (Linked To: COMANCHERO OUTLAW MOTORCYCLE GANG).

VARELA VILLAR, Alexandre (a.k.a. VARE, Alex; a.k.a. VARELA, Alex), Spain; DOB 19 Nov 1991; POB Pontevedra, Galicia, Spain; nationality Spain; Gender Male; Digital Currency Address - TRX TVwLtgUXyDhmcSoQ9x2z9QSua41f8mDFvU; National ID No. 36176177Y (Spain) (individual) [ILLICIT-DRUGS-EO14059] (Linked To: COMANCHERO OUTLAW MOTORCYCLE GANG).

VESCIO JR., Luigi, Ontario, Canada; DOB 14 Dec 1999; POB Canada; nationality Canada; Gender Male (individual) [ILLICIT-DRUGS-EO14059] (Linked To: VESCIO SR., Luigi).

VESCIO SR., Luigi (a.k.a. VESCIO, Lui; a.k.a. "The Undertaker"), Ontario, Canada; DOB 08 Jul 1971; POB Canada; nationality Canada; Gender Male (individual) [ILLICIT-DRUGS-EO14059] (Linked To: 'NDRANGHETA).

VESCIO, Laura (a.k.a. VESCIO-SACCO, Laura), Ontario, Canada; DOB 30 Sep 1997; POB Canada; nationality Canada; Gender Female (individual) [ILLICIT-DRUGS-EO14059] (Linked To: VESCIO SR., Luigi).

VESCIO, Rose (a.k.a. VESCIO, Rosa Maria), Ontario, Canada; DOB 24 Jun 1970; nationality Canada; Gender Female (individual) [ILLICIT-DRUGS-EO14059] (Linked To: VESCIO SR., Luigi).

B. ENTITIES

COMANCHERO OUTLAW MOTORCYCLE GANG (a.k.a. COMANCHERO MOTORCYCLE CLUB; a.k.a. "COMANCHERO MC"), Australia; New Zealand; Spain; Bosnia and Herzegovina; Germany; Organization Established Date 15 Apr 1966; Target Type Criminal Organization [ILLICIT-DRUGS-EO14059].

FRATELLI VESCIO FUNERAL HOMES LTD., Woodbridge, Ontario, Canada; Organization Established Date 06 May 2002; Organization Type: Funeral and related activities; License FE1-729 (Canada); Business Number 852592732 (Canada); Registration Number 1519713 (Canada) [ILLICIT-DRUGS-EO14059] (Linked To: VESCIO SR., Luigi).

PHANTOM LIMOUSINE SERVICES INC., Woodbridge, Ontario, Canada; Organization Established Date 27 May 2024; Organization Type: Renting and leasing of motor vehicles; Registration ID 1000901864 (Canada); Business Number 771830627 (Canada) [ILLICIT-DRUGS-EO14059] (Linked To: VESCIO SR., Luigi).

VESCIO FUNERAL HOME MAPLE INC., Maple, Ontario, Canada; Organization Established Date 05 Dec 2018; Organization Type: Funeral and related activities; Registration ID 2669016 (Canada); License FE1-1444 (Canada); Business Number 722473089 (Canada) [ILLICIT-DRUGS-EO14059] (Linked To: VESCIO SR., Luigi).

VESCIO FUNERAL HOMES INC., Toronto, Ontario, Canada; Organization Established Date 21 Oct 2010; Organization Type: Funeral and related activities; Registration ID 2261014 (Canada); License FE1-1065 (Canada); Business Number 846519916 (Canada) [ILLICIT-DRUGS-EO14059] (Linked To: VESCIO SR., Luigi).

OFAC sanctioned two international drug trafficking organizations: the Australia-headquartered **Comanchero Outlaw Motorcycle Gang** (**Comancheros**) and the Italy-based **'Ndrangheta**, a mafia-type criminal syndicate. By providing essential logistical and operational support, the Comancheros and 'Ndrangheta help terrorist cartels expand their international reach and sustain global narcotrafficking networks.

The Comancheros and the 'Ndrangheta operate sophisticated transnational criminal networks that facilitate large-scale drug trafficking and money laundering. The 'Ndrangheta controls a significant share of the European cocaine trade, while the Comancheros have helped open access to some of the world's most lucrative illicit drug markets.

Treasury has coordinated closely with the Homeland Security Task Force (HSTF), taking nearly 40 actions against over 500 individuals and entities since the beginning of 2025. OFAC uses a network-based approach to simultaneously disrupt as many different facets of the cartels as possible, from their leadership and key organizational nodes to facilitators and enablers, such as corrupt officials, complicit family members, and ostensibly legitimate front persons.

OFAC conducted its investigation in parallel with the HSTF, with support from the Federal Bureau of Investigation, Drug Enforcement Administration, and Homeland Security Investigations. OFAC continues to work closely with the HSTF to disrupt the flow of illicit drugs and dismantle the networks, facilitators, and financial infrastructure that enable their production and distribution. The action was taken pursuant to Executive Order (E.O.) 14059, which targets the proliferation of illicit drugs and their means of production.

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

OFAC 19/11 - Treasury Sanctions Major Drug Trafficking Organizations Supporting Terrorist Cartels

CHART - 'Ndrangheta Operations in Canada - November 2026
CHART - Comanchero Outlaw Motorcycle Gang - November 2026

Moreover, the following changes have been made to OFAC's SDN List:

'NDRANGHETA ORGANIZATION, Italy [SDNTK].

-to-

'NDRANGHETA, Italy; Target Type Criminal Organization [SDNTK] [ILLICIT-DRUGS-EO14059].

Furthermore, OFAC issued the following Illicit Drugs-related General License:

- Illicit Drugs General License 1, "Authorizing the Wind Down of Transactions Involving Certain Persons Blocked on November 19, 2026."

All transactions prohibited by the Illicit Drug Trade Sanctions Regulations (IDTSR), 31 CFR part 599, that are ordinarily incident and necessary to the wind down of any transaction involving one or more of the following blocked persons are authorized through 12:01 a.m. eastern standard time, December 18, 2026, provided that any payment to a blocked person is made into a blocked interest-bearing account located in the United States, in accordance with the IDTSR:

(1) Fratelli Vescio Funeral Homes Ltd.;
(2) Phantom Limousine Services Inc.;
(3) Vescio Funeral Homes Inc.;
(4) Vescio Funeral Home (Maple) Inc.; or
(5) Any entity in which one or more of the above persons own, directly or indirectly, individually or in the aggregate, a 50% or greater interest.

This general license does not authorize any transactions otherwise prohibited by the IDTSR, including transactions involving any person blocked pursuant to the IDTSR other than the blocked persons described above, unless separately authorized.

Related Publications
OFAC 19/11 - Illicit Drugs General License 1

4. OFAC Updates: Cyber-related Designations

On the 19th November 2026, OFAC SDN List **has been updated with Cyber-related Designations of the following individuals and entities:**

A. INDIVIDUALS

ONE, Saw A (a.k.a. "ONE, Saw Eh"; a.k.a. "WAH, Saw Ew"), Kyain Chaung Village, Payathonzu Township, Karen State, Burma; DOB 1979 to 1980; nationality Burma; Gender Male (individual) [CYBER4] (Linked To: DEMOCRATIC KAREN BENEVOLENT ARMY).

WAH, Saw Shwe (a.k.a. WAH, Maung Shwe; a.k.a. "WA, Saw Shwe"; a.k.a. "WAH, Swe"), Kayin State, Burma; DOB 25 Oct 1971; POB Hpa-An, Kayin State, Burma; nationality Burma; Gender Male (individual) [CYBER4] (Linked To: DEMOCRATIC KAREN BENEVOLENT ARMY).

ZHAO, Hui, Tokyo, Japan; DOB 25 Apr 1991; POB Harbin, Heilongjiang, China; nationality Cambodia; alt. nationality China; Gender Male; Passport N01749414 (Cambodia) issued 17 Sep 2019 expires 17 Sep 2029; National ID No. 23210119910425461X (China) (individual) [CYBER4].

B. ENTITIES

BEI FANG BO LIN CONSTRUCTION DECORATION CO., LTD., 55B, Street 369, Sk. Prek Pra, Kh. Chbar Ampov District, Phnom Penh, Cambodia; Organization Established Date 20 Jul 2018; Organization Type: Construction of buildings; Tax ID No. K005-901804544 (Cambodia); Business Registration Number 00035002 (Cambodia) [CYBER4] (Linked To: ZHAO, Hui).

ZHZ INVESTMENT CONSULTING CO., LTD., Tuek L'ak Muoy, Tuol Kuok, Phnom Penh, Cambodia; Organization Established Date 18 Jan 2018; Organization Type: Management consultancy activities; Tax ID No. K005-901803243 (Cambodia); Business Registration Number 00030982 (Cambodia) [CYBER4] (Linked To: ZHAO, Hui).

OFAC sanctioned three individuals involved in operating and facilitating cyber scam centers in Southeast Asia, as well as two affiliated companies. The individuals designated, include operators of scam compounds that target Americans through virtual currency investment fraud and affiliates of armed groups that provide protection and support to scam-center networks in Southeast Asia.

These actions are being taken in furtherance of Executive Order (E.O.) 14390 of March 6, 2026, "Combating Cybercrime, Fraud, and Predatory Schemes Against American Citizens," which orders the U.S. Government to unleash every available tool to stop foreign-backed criminal networks that exploit vulnerable Americans through cybercrime, cyber-enabled fraud, and extortion. This action further reflects OFAC's coordination with the Federal Bureau of Investigation's New York Field Office, Department of Justice's Scam Center Strike Force, and the Drug Enforcement Administration, and the Homeland Security Task Force and National Coordination Center. OFAC took these actions pursuant to E.O. 13694, as amended by E.O. 13757, E.O. 14144, and E.O. 14306 ("E.O. 13694, as further amended").

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

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.

Non-U.S. persons are also 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.

Related Publication:
OFAC 19/11 - Treasury Targets Cyber Scam Operators and Armed Group Facilitators in Southeast Asia