



Targeting Dynamic Illicit Financing Networks with Blocked Pending Investigation (BPI) Listings

By Michelle Kendler-Kretsch

The US Department of the Treasury's Office of Foreign Assets Control (OFAC) appears to have a renewed interest in a sanctions tool first used in 2001: blocking individuals and entities pending investigation. Used in two recent sets of listings, the tool offers the agility and speed necessary to quickly and efficiently dismantle financing networks and sanctions evasion tactics. Its strategic application warrants closer attention from financial institutions, who must be responsive to their compliance obligations. Non-government organizations (NGOs) may be aware of opportunities where they can advocate for OFAC to take greater advantage of this option, particularly in cases related to sanctions evasion and conflict financing. In parallel, NGOs can also play a vital role by sharing information that supports implementation and, where applicable, reinforces the credibility of these provisional designations.

On June 6, 2024, the US Department of the Treasury's Office of Foreign Assets Control (OFAC) quietly added seven companies in the United Arab Emirates (UAE) to its Specially Designated Nationals (SDN) list.¹ The UAE companies were listed—without an accompanying press release—under the Sudan program, due to “their potential involvement in activities violating US sanctions on Sudan.”^{2,3} This unusual move invoked a little-known sanctions tool from 2001, blocked pending investigation (BPI) listings.⁴ It represented the second such set of listings in a year.^{5,6} In September 2023, OFAC listed four companies pursuant to the Russian Harmful Foreign Activities program that were part of a corporate network in the Central African Republic (CAR) supporting the Wagner Group.^{7,8,9,10} Both of these sets of listings targeted fast-paced financing networks in dynamic environments, suggesting that the BPI listing can be a valuable tool to combat global illicit financing in jurisdictions where it's challenging and time consuming to conduct necessary investigations and validate information.

Corrupt and kleptocratic networks can be wide-ranging, fast-moving, and well-resourced, and all of this can hamper sanctions' effectiveness. Taking a network approach and sanctioning all elements of the network—including corporate networks, enablers, and financiers—can have a powerful impact, but it takes resources and time. By using BPI listings, for which investigations and formal evidentiary packages can be finalized after blocking, OFAC could theoretically list entities faster, with fewer up-front resources, and without incurring administrative delays, meaning that listed entities could be shut out of the financial sector more efficiently. BPI listings also signal OFAC's priorities to NGOs and civil society



groups, highlighting where sharing or publishing related information would be effective in supporting OFAC. The revival of the BPI listing could thus strengthen OFAC's ability to target conflict financing, sanctions evasion, and kleptocratic networks, especially if the agency can optimize the tool's use through effective implementation strategies based on past lessons learned and appropriate compliance by the private sector.

Background

Statute

In order to understand the public BPI listing's usages, benefits, and drawbacks, it's important to first look at the executive powers that govern it.¹¹ In October 2001, the USA PATRIOT Act amended Section 203 of the International Emergency Economic Powers Act (IEEPA), which grants the executive branch sanctioning authority.^{12, 13} The amendment empowered the executive branch to block transactions and assets "during the pendency of an investigation,"¹⁴ an ability that was designed for use in emergent cases.

In practice, blocked individuals and entities are included in OFAC's SDN list, and financial institutions are required to block their transactions to the same extent that they would an SDN.^{15, 16} Within a listing, OFAC distinguishes BPI listings by placing "BPI-" before the relevant executive order (EO), for instance [BPI-RUSSIA-EO14024].¹⁷ Blocked individuals and entities that are delisted are removed from the SDN list and their delisting is noted in OFAC's recent actions notifications.¹⁸

With regard to BPI listed individuals and entities, the PATRIOT Act does not specify a time limit for an investigation or for OFAC to determine whether to formally designate them as a standard SDN, according to analysis by the Brennan Center.¹⁹ In addition, neither IEEPA nor the PATRIOT Act requires OFAC to provide explanation to a designated party, including in cases where a subject is blocked pending investigation.^{20, 21} In some cases, it might be advantageous for OFAC to provide explanation to blocked entities at or following designation, even if there is no legal requirement to do so.

OFAC can authorize a particular transaction or type of transaction with SDNs through a license that allows parties to engage in normally prohibited transactions.²² Since transactions with BPI entities are also prohibited, applications for licenses are considered in BPI-related cases.²³

Overall, while awaiting formal designation or delisting, blocked entities effectively face the same restrictions as they would if they were formally designated.²⁴ This means that the BPI tool enables sanctioning authorities to apply immediate financial pressure to these entities—mirroring the impact of formal designation—while still finalizing an investigation.

Usage trends

The first identified BPI listing was in December 2001, two months after the amendment that made BPI listings possible.²⁵ Between 2001 and February 2006, OFAC publicly used the BPI authority nine times, and it was not used again until 2023. BPI has so far only been used by five sanctions programs: Counter Terrorism (December 2001, February 2004, February 2006), Libya (August 2002), Counter Narcotics Trafficking (August 2003, May 2003, June 2004, August 2005), Russian Harmful Foreign Activities (September 2023), and Sudan and Darfur (June 2024).²⁶ These listings were announced through OFAC's "Sanctions List Updates" pages and the Federal Register, as usual, although most were not accompanied by press releases in which OFAC explained their designation decisions.



Almost all BPI listings have been for entities, and the few individuals who have been blocked were listed under the Counter Narcotics Trafficking program.²⁷ The majority of BPI individuals and entities have later been officially listed as SDNs, but there are some exceptions. In March 2024, OFAC removed from the SDN list a Russia-linked company that had been blocked pending investigation.²⁸ Similarly, several BPI individuals and entities listed under the Counter Terrorism and Counter Narcotics Trafficking programs were also removed without formal designation, including two entities that had been on the list for seven and eight years, respectively.^{29, 30, 31, 32, 33}

BPI listed companies across multiple programs were revenue generating companies or were providing services to sanctioned entities.^{34, 35, 36, 37} For example, the UAE companies listed under the Sudan program were listed due to “their potential involvement in activities violating U.S. sanctions on Sudan,” according to press reporting, and OFAC has stated that one of the companies “has provided money and weapons to the RSF.”^{38, 39} What’s more, the majority of BPI companies have operated in a different jurisdiction than the program under which they were designated or the terrorist or drug trafficking organization that they were linked to. For instance, three of the four BPI entities listed under the Russia program are based in CAR,⁴⁰ while all of the BPI listed entities linked to Sudan are based in the UAE.⁴¹ Several early examples of BPI entities are US-based companies controlled by foreign persons with links to terrorist organizations in the Middle East.^{42, 43, 44} The cross-border nature of illicit financing and sanctions evasion tactics highlights the need for a global approach, and this pattern suggests that BPI listings can provide a valuable tool to target these networks.

Considerations for Use as a Sanctions Tool

Though implemented much like formal SDN listings, BPI listings have several differences that make them particularly appropriate under specific circumstances—for instance, in countering fast-moving, well-resourced sanctions evasion or conflict financing networks in challenging investigative environments. An effective sanctions strategy often requires a network-based approach that focuses on disrupting revenue generation, enablers, and circumvention methods.⁴⁵ Targeting these networks is also time sensitive: If a network approach is not taken quickly, the network can be utilized to render sanctions ineffective. BPI listings offer the potential to effectively and rapidly target these elements, strengthening sanctions effectiveness. There are also ways in which OFAC might implement the tool to increase the chances of improved sanctions policy outcomes.

Timing

BPI listings may provide a more rapid response option than formal designations, especially in instances of sanctions evasion or conflict financing, when quick action is essential. Building a full, formal designation package takes time, which may tip off a subject and give them space to redistribute their holdings and assets, but a BPI listing places an entity on the screening list while a complete package is still being finalized.^{46, 47} This speed is particularly relevant in cases when an entity is already publicly named, as in investigative reporting—the quicker turnaround for a BPI listing may shorten the time between naming and listing. In addition, since there is no notice period for BPI listings,^{48, 49} they can offer the useful element of surprise, which might otherwise wane while completing necessary investigative tasks of acquiring or verifying the appropriate documents and evidence for a formal, complete package. Another example highlighting the critical need for speed is when OFAC suspects that a potentially harmful transaction is imminent but has not yet gathered all the necessary evidence. In such cases, BPI could be used to halt the transaction, again leveraging the element of surprise.

Ultimately, BPI listings could improve OFAC’s ability to play whack-a-mole, enabling the agency to better keep up with sanctions evasion tactics in which newly established companies replace those already targeted by sanctions. OFAC



could theoretically list entities faster and with fewer up-front resources, meaning that listed entities could be shut out of the financial sector more efficiently, with blocked entities facing financial pressure while OFAC finalizes its investigations. This is particularly impactful in difficult to investigate environments where verifying evidence or finding additional information is time consuming and challenging.

Given that there is no statutory timeframe for these investigations, the indefinite nature of BPI listings could undermine the tool's effectiveness and even be argued to cause harm to individuals or entities. Since 2023, the time between a BPI listing and a formal designation or delisting has been less than a year (6-8 months), but prior to 2023, some cases took several years to be resolved.⁵⁰ OFAC should aim to balance its use of BPI to finalize investigations, without allowing investigations to continue that cannot be resolved within a reasonable timeframe.

Burden of proof

For a BPI listing, the “reasonable basis” legal standard still applies, and BPI listings undergo legal review.^{51, 52} Finalizing a formal designation package may require taking time to confirm or corroborate compelling evidence or receive official versions of documentary evidence, whereas a BPI listing allows OFAC to impose financial pressure while waiting to finalize details.

As with any traditional designation file, evidence for a BPI listing can include a wide range of material, including open-source information, newspaper articles, and even hearsay.⁵³ Both the Sudan and Wagner cases involve BPI listed companies that were named in articles and reports published by the media and nongovernmental organizations prior to their listing.^{54, 55, 56, 57, 58} Given the negative media attention, these entities might have faced financial restrictions, but without swift OFAC action, they could have redistributed their network accordingly. Assuming that OFAC was not previously aware of these entities—or at a minimum not ready to designate based on their records at that time—the BPI listings enabled OFAC to take quick action following publication, and the agency could use the public reporting as part of its evidence for blocking. This also highlights the importance of NGOs and civil society continuing to investigate, report on, and provide evidence about bad actors and illicit conduct. Their work may provide helpful evidence to support a future BPI listing by OFAC or to aid OFAC in finalizing complete designation packages on already blocked entities.

Any differences in evidence requirements between BPI listings and formal designation do not appear to result in the overuse of the tool or in excessive blocks that never result in formal designations. When compared to standard designations, BPI listings have rarely been used; the current SDN list contains over 10,000 listed entities, and BPI has only been used 45 times since 2001 (see annex for full list).⁵⁹ Given this, there doesn't appear to be a pattern of overuse or out-of-control listing. In fact, 82% of BPI listings have eventually led to formal designations.⁶⁰ Nevertheless, both overuse and the potential risk of finding insufficient evidence for a formal designation should be monitored for.

Compliance

In terms of how banks and other financial institutions must respond to listings from a compliance standpoint, BPI listings are treated exactly like SDNs and are included on screening lists. However, because BPI listings often lack press releases, they may allow for a quieter listing with less potential for attention and blowback. This may be an important option to ensure private sector compliance while being sensitive to diplomatic pressures or reputational risks. In addition, while it is unclear what the interagency process is for BPI listings—an article in a law journal assesses that OFAC is in complete control of the ability to block assets pending investigation—the process could be less onerous and more independent



than for SDN listings, if true, improving OFAC's reaction time in responding to ongoing events that could impact sanctions effectiveness.⁶¹

Entities listed as BPI are under investigation for conduct that would qualify them for formal sanctions designations.⁶² The lack of a press release accompanying the listing, however, means that the public is typically unaware of the specific rationale for the listing or the risk profile of the blocked entity. This may hamper the effectiveness of sanctions, as financial institutions may be unaware of their obligations to treat BPI listings as they would typical SDN listings and may not respond according to the risks posed by a blocked entity. Further, this impacts the opportunity both for the threat of sanctions to change the behavior of not-yet-listed entities engaging in similar illicit activities and for the private sector to preemptively sever relationships that have similar risk profiles. Clear communication as to why an individual or entity has been listed as BPI could potentially influence both of these situations but should be balanced against the possible consequences of impacting ongoing investigations, making public the allegations from an investigation still being finalized, or tipping off possible future targets.

To improve private sector compliance and public awareness of the risk posed by listed entities, NGOs and civil society may be in a position to bridge a public messaging gap in cases where OFAC is unable to do so. After a designation, online search results for an SDN typically include the OFAC designation press release, along with media reporting on the designation. Compliance officers searching a BPI listed entity may face an information desert. Options to improve public information could include quick responses by knowledgeable civil society groups or OFAC communication alternatives to the press release. For example, in the case of the entities that were blocked under the Sudan program, press reporting of a Treasury spokesperson specified that they were listed due to "their potential involvement in activities violating U.S. sanctions on Sudan," providing some details in lieu of a formal press release.⁶³ Overall, this messaging serves as a deterrent to other actors engaging in similar behavior and as an alert to the private sector to thoroughly evaluate their relationships and improve sanctions effectiveness.

Delisting

Delisting is an important aspect of sanctions policy, as it incentivizes sanctioned entities to change their behavior.⁶⁴ There is a formal administrative procedure through which individuals and entities listed as SDNs can provide evidence as to why they should be delisted, including in cases where the basis for designation no longer applies; the company or individual has changed their behavior, control, or ownership; or the identifying information is incorrectly linked to an individual or entity.⁶⁵ BPI listings do not appear to have the same administrative reconsideration procedures, as they are not considered final agency actions under the Administrative Procedures Act and are therefore not required to be reviewed.⁶⁶ In the case of the main US branch of the Al Haramain Islamic Foundation, however, the foundation exchanged documents with OFAC between its BPI listing in February 2004 and its formal designation in September 2004,⁶⁷ demonstrating the ability for entities to communicate with OFAC even without a more formalized reconsideration procedure.

The ability to delist individuals and entities prior to designation also provides an avenue for OFAC to target individuals such as enablers and financiers, incentivize them to change their behavior, and delist them without long-lasting reputational damage from press releases or the attention raised by a formal designation. OFAC has blocked only a few individuals using the BPI authority, and none since 2023.⁶⁸ Yet, in the sphere of illicit financing and sanctions evasion networks, trusted enablers and their personal assets are vital and difficult to replace. Individuals may have to respond to listing pressure by changing their behavior and pushing for delisting, while blocked companies may instead just reorganize.



Constitutional issues

Several legal cases have raised constitutional concerns around BPI listings related to US-based individuals and entities.^{69, 70, 71, 72} They mostly relate to the constitutional right to due process for US persons and entities, and some concerns appear to be specific to the legal environment of investigating terrorism financing and links in the post-9/11 era.

Recent Case Studies

2023: Wagner-linked CAR companies

In September 2023, CAR-based companies Bois Rouge, First Industrial Company, and Logistique Économique Étrangère and Russia-based company Broker Expert LLC were first listed as BPI.⁷³ Six months later, Bois Rouge and Broker Expert LLC were formally designated.⁷⁴ By May 2024, Logistique Économique Étrangère was also sanctioned for receiving shipments from Broker Expert LLC.^{75, 76} All three companies had known ties to the paramilitary Wagner Group.^{77, 78}

The fourth company, First Industrial Company, was removed from the SDN list the same month that Bois Rouge and Broker Expert LLC were designated.⁷⁹ First Industrial Company may not have been listed as an SDN, but public reports indicate that it may have been part of the wider Wagner financing network. According to reporting by Jeune Afrique, First Industrial Company was managed by Dmitry Sytii, who was the director of the Russian House culture center in Bangui and is understood to be one of the leaders of Wagner in CAR.^{80, 81, 82, 83} The company markets Africa Ti L'Or, a Russian beer attempting to take market share from the France-based Castel.⁸⁴ Sytii is allegedly tied to two attempted firebombings of a Castel brewery, as well as to campaigns against the French company.^{85, 86}

This case demonstrates how BPI listings provide the flexibility to quickly add entities to the SDN list while formal evaluations and assessments are being completed, with options to either designate or delist. Financing networks are valuable assets for sanctions evasion by groups like the Wagner Group, and swiftly targeting these networks constrains how they can operate.

2024: RSF-linked UAE companies

In June 2024, OFAC listed as BPI seven UAE companies with ties to the Rapid Support Forces (RSF).^{87, 88, 89, 90} Several of the named companies had previously been featured in reporting by media and NGOs. Reporting indicated that the seven companies were listed as BPI due to “their potential involvement in activities violating U.S. sanctions on Sudan.”⁹¹ In January 2025, all seven companies were officially designated for being “linked to the RSF,” whose “ability to acquire military equipment and generate finances continue to fuel the conflict in Sudan.”⁹² The press release announcing their designations highlighted how these companies were an integral part of a network of already sanctioned individuals and entities related to the RSF, demonstrating a network approach.⁹³

One of the listed companies is Capital Tap Holdings, which has interests in mining in Sudan and in a consulting outfit, Capital Tap Management and Consultancies.^{94, 95} Public reporting prior to the formal designation revealed that the company put together “special bulletins” to UK politicians from the RSF,⁹⁶ a fact that was confirmed by the RSF.⁹⁷ The aim of the bulletins was reportedly to combat disinformation about the conflict, and the Foreign Affairs Select Committee chair “told i[News] that any organisation providing PR to the RSF was stoking the current conflict and hinted that sanctions could be necessary to deter international support for the warring groups.”⁹⁸ According to OFAC, Capital Tap Holdings



“provided money and weapons to the RSF.”⁹⁹ Another company, al Jil alQadem General Trading, was named by C4ADS prior to designation as being 49% owned by Abdelrahim Hamdan Dagalo, a family member of Mohamed Hamdan Dagalo, or “Hemedti,” the leader of the RSF.¹⁰⁰ In its press release, OFAC mentions Abdelrahim Hamdan Dagalo’s former minority stake in the company.¹⁰¹

Given the ongoing conflict in Sudan and the challenges with current mediation efforts, quick BPI listings such as these may have a more immediate impact on the conflict. The reference to sanctions violations indicates that OFAC may be using BPI for both deterrence and enforcement of existing sanctions. In addition, OFAC’s focus on UAE companies that are fueling the conflict indicates to NGOs and civil society some of OFAC’s sanctions priorities. NGOs and civil society should take the opportunity to work in parallel with OFAC, publishing new evidence on the blocked entities or sharing additional information on these types of networks.

Framework for Effective Advocacy Around BPI

Sanctions evasion tactics have become more sophisticated, and staying ahead of them can be a difficult task for sanctioning authorities. OFAC has limited resources but is going after illicit networks with significant resources. As the agency battles multiple crises across the globe, BPI listings offer the ability to act quickly and with fewer up-front resources.

The BPI listing was designed for use in emergent cases, and under these conditions, there are additional circumstances in which it would be particularly effective. Overall, it should be used in cases where traditional sanctions designation routes would reasonably risk major consequences that could be mitigated by the use of BPI instead. These consequences might relate to reduced or negated sanctions effectiveness, as in cases of asset flight or changes in ownership; escalation in the emergency that underpins the sanctions program, such as the imminent threat of significantly escalated conflict or crimes against humanity; or irreversible actions, such as asset takeover or economic or environmental destruction.

In particular, advocating for the use of BPI might be effective when:

- Speed is of the essence, and a failure to act rapidly would result in accelerated escalation of conflict or improved means to commit gross human rights violations.
- There are fast-changing sanctions evasion networks, including enablers operating in real time to circumvent sanctions on behalf of designated entities, that would render sanctions completely ineffective. This would include, for example, the complete shift of assets to a third party.
- Actively involved enablers of sanctioned networks are personally incentivized to sever relations in exchange for delisting.
- Networks are actively financing conflict or providing weapons, materials, or other support that would increase the loss of civilian life.
- Actors are engaged in real time in sanctionable activity, such as undermining a democratic process or committing human rights violations, where there would be a realistic chance that blocking would decrease the sanctionable activity and that the lack of timely action would risk missing the window of opportunity for change.
- The entity or individual is named in the public sphere in connection with sanctionable activity, and the time to finalize a designation package would risk reduction of sanctions efficacy if assets are moved.
- There are suspected shadow designations—companies owned 50% or more by an already sanctioned



entity but not officially listed on the SDN list—that should be treated as sanctioned entities according to the 50% rule,¹⁰² but implementation has been poor, and BPI listings could lead to significant implementation improvements from the private sector.

Advocating for the use of BPI might be harmful or ineffective when:

- The investigation has been completed and the entity is already approved for formal designation.
- There is insufficient evidence linking an entity to activities that justify its designation.
- The timing or rapid use of BPI would not impact the likely response of the actor when compared to a formal designation.
- Humanitarian or wider political, economic, or military consequences of a listing are unknown or not thoroughly understood.
- Indications are that the pending investigations will not come to a swift conclusion.

Recommendations

Under the right circumstances, sanctioning authorities should consider the expedient use of BPI listings. As the agency renews its thinking on the use of BPI listings to target conflict financing and sanctions evasion networks, the private sector, NGOs, and civil society also have clear roles to play to ensuring this authority is properly implemented.

Financial institutions and other private sector actors

Ensure BPI listings are appropriately integrated into compliance programs and training. Front line compliance officers are key to identifying activity by blocked individuals and entities and stopping those transactions in accordance with their obligations. Sanctioning authorities' hopes of cutting blocked actors out of the financial system can only be realized if the private sector is aware of what BPI listings mean for them, are well trained, and respond appropriately. Compliance officers should familiarize themselves with the authority and format of BPI listings, and financial institutions should ensure that they are properly accounted for in screening processes, if not already.

NGOs and civil society

Leverage BPI listings as an opportunity to publish about blocked individuals and entities and related activities. Taking a BPI listing as a signal from OFAC, NGOs and civil society can tailor their public work to priorities that work in parallel to OFAC's investigation. These efforts can also improve compliance officers' understanding of the blocked individuals and entities and the risks they pose, increasing the searchability of a blocked actor. NGOs and civil society may also consider the themes or focus points of OFAC's efforts and publish about related activity, such as conflict financing, enablers, or weapons procurement.

Provide evidence to support sanctioning authorities' investigations. NGOs often have more detailed and specific evidence than is included in a publication, including underlying documentary evidence, identifying details, and testimonies, while civil society, working on the front lines, may also be able to provide a unique perspective. NGOs can play a role in providing evidence and information related to potential targets of a BPI listing. Additionally, NGOs and civil society should see public BPI listings as a signal from OFAC regarding their ongoing investigations. They should consider sharing information on blocked parties to support OFAC's pending investigations.



Advocate for the adoption of a BPI-style blocking tool by other sanctioning authorities. OFAC has often been at the forefront of creative sanctions tools, including its Global Magnitsky program targeting corrupt actors and human rights violators, which has been replicated by jurisdictions including the European Union and the United Kingdom. As the international community looks to collaboratively tackle illicit networks, NGOs and civil society should advocate for the adoption of a BPI-style tool by like-minded sanctioning authorities to more collectively tackle global illicit networks.

Sanctioning authorities

Encourage NGOs, civil society, and other stakeholders to share compelling evidence. The evidentiary materials used by sanctioning authorities to support a listing may include input from civil society and the media. Civil society groups often possess valuable evidence, such as documentation, identifying details, and testimonies. Any compelling evidence shared may be combined with other sources at a sanctioning authority's disposal to quickly respond and produce BPI listings.

Enhance communication on compliance obligations. Given the resurgence of the authority, the private sector may benefit from increased publicity about their obligations. Sanctioning authorities should proactively engage with the private sector to clarify compliance obligations. Financial institutions may benefit from enhanced communication strategies such as detailed updates on authority websites, regular press briefings, and targeted outreach events to address questions and improve understanding. Sanctions are only as effective as their implementation.

Ensure that listings are not left in limbo. BPI listings should only be included on the list for a limited period of time—perhaps six months—unless there are clear extenuating circumstances. Once this window has elapsed, sanctioning authorities should consider removing the BPI listed entity from the sanctions list, unless it is formally designated or is relisted as BPI. Relisting should only be considered when there is forward progress in the investigation and an increased likelihood of formal designation. This would prioritize the investigation into BPI listed entities and decrease the time they remain in limbo.

Align the delisting process for BPI listed entities with the administrative process for the delisting of standard designated entities. It is important for entities to have the opportunity to be removed from the sanctions list, especially in cases where the behavior has changed such that the entity would no longer qualify for listing. Such an opportunity improves the effectiveness of sanctions, adds legitimacy and accountability to the process, and lessens the potential for reckless listing. In addition, there have been instances when designated individuals stayed on sanctions lists far longer than was warranted and delisting took too long. Given that BPI listings are based on pending investigations, the process to reverse them should be swift to reward changed behavior and minimize any wrongfully incurred damage. This should be true whether or not the blocked party argues for delisting.



Annex: List of BPI Listed Entities

Name	Program	Location	BPI Listing	Designation	Delisting
Bois Rouge SARLU	BPI-RUSSIA-EO14024	CAR	2023-09-14 ¹⁰³	2024-03-08 ¹⁰⁴	
Limited Liability Company Broker Expert	BPI-RUSSIA-EO14024	Russia	2023-09-14 ¹⁰⁵	2024-03-08 ¹⁰⁶	
Logistique Économique Étrangère SARLU	BPI-RUSSIA-EO14024	CAR	2023-09-14 ¹⁰⁷	2024-05-30 ¹⁰⁸	
First Industrial Company SAU	BPI-RUSSIA-EO14024	CAR	2023-09-14 ¹⁰⁹		2024-03-13 ¹¹⁰
al Jil alQadem General Trading L.L.C.	BPI-SU-DAN-14098	UAE	2024-06-06 ¹¹¹	2025-01-07 ¹¹²	
Al Zumoroud And Al Yaqoot Gold And Jewellers Trading L.L.C.	BPI-SU-DAN-14098	UAE	2024-06-06 ¹¹³	2025-01-07 ¹¹⁴	
Capital Tap General Trading L.L.C.	BPI-SU-DAN-14098	UAE	2024-06-06 ¹¹⁵	2025-01-07 ¹¹⁶	
Capital Tap Holding L.L.C.	BPI-SU-DAN-14098	UAE	2024-06-06 ¹¹⁷	2025-01-07 ¹¹⁸	
Capital Tap Management And Consultancies L.L.C.	BPI-SU-DAN-14098	UAE	2024-06-06 ¹¹⁹	2025-01-07 ¹²⁰	
Creative Python L.L.C.	BPI-SU-DAN-14098	UAE	2024-06-06 ¹²¹	2025-01-07 ¹²²	
Horizon Advanced Solutions General Trading - Sole Proprietorship L.L.C.	BPI-SU-DAN-14098	UAE	2024-06-06 ¹²³	2025-01-07 ¹²⁴	
Benevolence International Foundation, Inc.	BPI-PA	US	2001-12-14 ¹²⁵	2002-11-19 ¹²⁶	
Global Relief Foundation, Inc.	BPI-PA	US	2001-12-14 ¹²⁷	2002-10-18 ¹²⁸	
Al-Haramain Foundation	BPI-PA	US	2004-02-18 ¹²⁹	2004-09-09 ¹³⁰	
Kindhearts For Charitable Humanitarian Development, Inc.	BPI-PA	US	2006-02-19 ¹³¹		2014-07-11 ¹³²
Zaratan Corporation	BPI-SDNT	BVI	2003-08-08 ¹³³	2003-10-17 ¹³⁴	2009-10-30 ¹³⁵
Ardila-Marmolejo, Ltd.	BPI-SDNT	Bahamas	2003-05-08 ¹³⁶	Before 2004-05-27 ¹³⁷	2009-10-30 ¹³⁸
Sepulveda-Iragorri, Inc.	BPI-SDNT	US	2003-05-08 ¹³⁹		2009-10-30 ¹⁴⁰



Sepulveda-Iragorri, Ltd.	BPI-SDNT	Colombia	2003-05-08 ¹⁴¹	Before 2004-05-27 ¹⁴²	2009-10-30 ¹⁴³
Vidal Caggigas, Rolando	BPI-SDNT	US	2003-05-08 ¹⁴⁴		2006-12-22 ¹⁴⁵
Aero Continente (USA) Inc.	BPI-SDNTK	US	2004-06-01 ¹⁴⁶	2011-04-28 ¹⁴⁷	
Aero Continente S.A.	BPI-SDNTK	Peru	2004-06-01 ¹⁴⁸	2004-11-10 ¹⁴⁹	
Aviandina S.A.C.	BPI-SDNTK	Peru	2004-06-01 ¹⁵⁰	2009-02-10 ¹⁵¹	
Cargo Aircraft Leasing Corp.	BPI-SDNTK	US	2004-06-01 ¹⁵²	2011-04-28 ¹⁵³	
Desme Hurtado, Maximo Zadi	BPI-SDNTK	Peru	2004-06-01 ¹⁵⁴	2009-02-10 ¹⁵⁵	
IAC International Inc.	BPI-SDNTK	US	2004-06-01 ¹⁵⁶	2011-04-28 ¹⁵⁷	
International Pacific Trading, Inc.	BPI-SDNTK	US	2004-06-01 ¹⁵⁸	2011-04-28 ¹⁵⁹	
Mejia Magnani, John Yvan	BPI-SDNTK	Peru	2004-06-01 ¹⁶⁰	2009-02-10 ¹⁶¹	
Morales Andrade, Carlos Enrique	BPI-SDNTK	Peru	2004-06-01 ¹⁶²		2008-10-22 ¹⁶³
Sistema De Distribucion Mundial, S.A.C.	BPI-SDNTK	Peru	2004-06-01 ¹⁶⁴	2009-02-10 ¹⁶⁵	
Zevallos Gonzales, Lupe Maritza	BPI-SDNTK	Peru	2004-06-01 ¹⁶⁶	2009-02-10 ¹⁶⁷	
Zevallos Gonzales, Milagros Angelina	BPI-SDNTK	Peru	2004-06-01 ¹⁶⁸	2009-02-10 ¹⁶⁹	
Zevallos Gonzales, Winston Ricardo	BPI-SDNTK	Peru	2004-06-01 ¹⁷⁰	2009-02-10 ¹⁷¹	
Arreola Gomez, Guadalupe Armando	BPI-SDNTK	Mexico	2005-08-18 ¹⁷²	2006-07-12 ¹⁷³	
Arriola Luna, Oscar Ignacio	BPI-SDNTK	Mexico	2005-08-18 ¹⁷⁴	2006-07-12 ¹⁷⁵	2013-07-30 ¹⁷⁶
Arriola Luna, Paola	BPI-SDNTK	Mexico	2005-08-18 ¹⁷⁷	2006-07-12 ¹⁷⁸	
Carrasco Miranda, Willebaldo	BPI-SDNTK	Mexico	2005-08-18 ¹⁷⁹	2006-07-12 ¹⁸⁰	
Licon Munoz, Jorge Arturo	BPI-SDNTK	Mexico	2005-08-18 ¹⁸¹	2006-07-12 ¹⁸²	
Luna Rivera, Guadalupe Rocio	BPI-SDNTK	Mexico	2005-08-18 ¹⁸³		2008-10-22 ¹⁸⁴
Jimenez Bedoya, Maria Adriana	BPI-SDNT	Colombia		2002-10-25 ¹⁸⁵	2010-01-08 ¹⁸⁶
Mazuero Erazo, Hugo	BPI-SDNT	Colombia		Before 2004-05-27 ¹⁸⁷	2010-01-08 ¹⁸⁸
Mira Valencia, Adriana Patricia	BPI-SDNT	Colombia		2003-03-27 ¹⁸⁹	2010-01-08 ¹⁹⁰
Transporting, LLC	BPI-SDNT	US	2003-05-02 ¹⁹¹		2010-01-08 ¹⁹²
Platinum Commercial Bank Ltd.	BPI-LIBYA	Pakistan	2002-08-12 ¹⁹³		2002-08-13 ¹⁹⁴



Endnotes

- 1 US Department of the Treasury Office of Foreign Assets Control, "Counter Narcotics Designations; Sudan Designations; West Bank-Related Designation," June 6, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240606>
- 2 Sudan Tribune, "U.S. Treasury Blocks UAE Companies Pending Investigation for Potential Sudan Sanctions Violations," June 6, 2024, available at: <https://sudantribune.com/article286659/>
- 3 US Department of the Treasury Office of Foreign Assets Control, "Counter Narcotics Designations; Sudan Designations; West Bank-Related Designation," June 6, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240606>
- 4 United States of America, Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA Patriot Act) of 2001, Public Law 107 - 56, Sec. 106, available at: <https://www.congress.gov/107/plaws/publ56/PLAW-107publ56.pdf>
- 5 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations, Designations Updates, and Designations Removals; Issuance of Russia-Related General Licenses," September 14, 2023, available at: <https://ofac.treasury.gov/recent-actions/20230914>
- 6 US Department of the Treasury Office of Foreign Assets Control, "Counter Narcotics Designations; Sudan Designations; West Bank-Related Designation," June 6, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240606>
- 7 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations, Designations Updates, and Designations Removals; Issuance of Russia-Related General Licenses," September 14, 2023, available at: <https://ofac.treasury.gov/recent-actions/20230914>
- 8 Mathieu Olivier, "Café, cash et alcool : au cœur du système Wagner, de Douala à Bangui" (Coffee, Cash and Alcohol: At the Heart of the Wagner System, From Douala to Bangui), Jeune Afrique, August 11, 2022, available at: <https://www.jeuneafrique.com/1369001/politique/caf%C3%A9-cash-et-alcool-au-c%C5%93ur-du-syst%C3%A8me-wagner-de-douala-%C3%A0-bangui/>
- 9 US Department of the Treasury, "Treasury Sanctions Companies and Individuals Advancing Russian Malign Activities in Africa," Press Release, March 8, 2024, available at: <https://home.treasury.gov/news/press-releases/jy2164>
- 10 US Department of the Treasury, "Treasury Sanctions Wagner Group-Linked Companies in the Central African Republic," Press Release, May 30, 2024, available at: <https://home.treasury.gov/news/press-releases/jy2384>
- 11 Along with the public blocking of individuals and entities pending investigation discussed in this report, there is another type of BPI in which OFAC blocks specific properties or interests in property of an individual or entity who is not blocked in their entirety. This action is issued directly to the financial institution or other actor who is in possession or control of that specific property. See:

Word ECR, "OFAC Sheds Regulatory Light on Longstanding Tailored Sanctions Tools," October 2024, available at: <https://www.akingump.com/a/web/ruoNyRa5PpHpTCchUMcSXS/worlddecr-133-october-2024-pp34-36.pdf>
- 12 United States of America, Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA Patriot Act) of 2001, Public Law 107 - 56, Sec. 106, available at: <https://www.congress.gov/107/plaws/publ56/PLAW-107publ56.pdf>
- 13 United States of America, International Emergency Economic Powers Act of 1977, 50 USC § 1702, Sec. 203, available at: <https://www.congress.gov/95/statute/STATUTE-91/STATUTE-91-Pg1625.pdf>
- 14 United States of America, Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA Patriot Act) of 2001, Public Law 107 - 56, Sec. 106, available at: <https://www.congress.gov/107/plaws/publ56/PLAW-107publ56.pdf>
- 15 US Department of the Treasury Office of Foreign Assets Control, "Blocking and Rejecting Transactions," available at: <https://ofac.treasury.gov/faqs/topic/1601> (last accessed November 2024)
- 16 For an example of an announcement in the Federal Register, see:



- US Department of the Treasury Office of Foreign Assets Control, "Notice of OFAC Sanctions Actions," 88 FR 64520, September 19, 2023, available at: <https://www.federalregister.gov/documents/2023/09/19/2023-20235/notice-of-ofac-sanctions-actions>
- 17 US Department of the Treasury Office of Foreign Assets Control, "Russian Harmful Foreign Activities Sanctions Regulations," 31 CFR Part 587, March 1, 2022, available at: <https://www.federalregister.gov/documents/2022/03/01/2022-04281/russian-harmful-foreign-activities-sanctions-regulations>
 - 18 For an example of a delisting, see:
US Department of the Treasury Office of Foreign Assets Control, "Balkans-Related Designations; Russia-Related Removal," March 13, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240313>
 - 19 Andrew Boyle, "Checking the President's Sanctions Powers," Brennan Center for Justice, June 10, 2021, available at: <https://www.brennancenter.org/our-work/policy-solutions/checking-presidents-sanctions-powers>
 - 20 United States of America, Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA Patriot Act) of 2001, Public Law 107 - 56, Sec. 106, available at: <https://www.congress.gov/107/plaws/publ56/PLAW-107publ56.pdf>
 - 21 United States of America, International Emergency Economic Powers Act of 1977, 50 USC § 1702, Sec. 203, available at: <https://www.congress.gov/95/statute/STATUTE-91/STATUTE-91-Pg1625.pdf>
 - 22 Title 31 US Code of Federal Regulations (CFR) § 501.801, available at: <https://www.ecfr.gov/current/title-31/subtitle-B/chapter-V/part-501/subpart-E/section-501.801>
 - 23 The Sentry interviews with former OFAC officials, 2024.
 - 24 United States of America, Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA Patriot Act) of 2001, Public Law 107 - 56, Sec. 106, available at: <https://www.congress.gov/107/plaws/publ56/PLAW-107publ56.pdf>
 - 25 US Department of the Treasury Office of Foreign Assets Control, "BPI-PA Designations (Blocked Pending Investigation - Patriot Act)," December 14, 2001, available at: <https://ofac.treasury.gov/recent-actions/20011214a>
 - 26 A full list of BPI listed entities is available in the annex. Please note this may not be a comprehensive list, as historical listings and delistings can be difficult to identify without an accessible database of all past SDNs.
 - 27 A full list of BPI listed entities is available in the annex. Please note this may not be a comprehensive list, as historical listings and delistings can be difficult to identify without an accessible database of all past SDNs.
 - 28 US Department of the Treasury Office of Foreign Assets Control, "Balkans-Related Designations; Russia-Related Removal," March 13, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240313>
 - 29 A full list of BPI listed entities is available in the annex. Please note that this may not be a comprehensive list, as historical listings and delistings can be difficult to identify without an accessible database of all past SDNs.
 - 30 US Department of the Treasury Office of Foreign Assets Control, "SDNT Blocked Pending Investigation," May 2, 2003, available at: <https://ofac.treasury.gov/recent-actions/20030502>
 - 31 US Department of the Treasury Office of Foreign Assets Control, "Changes to List of Specially Designated Nationals and Blocked Persons Since January 1, 2010," available at: <https://www.treasury.gov/ofac/downloads/sdnew10.pdf>
 - 32 US Department of the Treasury Office of Foreign Assets Control, "BPI-PA (Blocked Pending Investigation) Designation," February 19, 2006, available at: <https://ofac.treasury.gov/recent-actions/20060219>
 - 33 US Department of the Treasury Office of Foreign Assets Control, "Counter Terrorism Designation Removal," July 11, 2014, available at: <https://ofac.treasury.gov/recent-actions/20140711>
 - 34 Sudan Tribune, "U.S. Treasury Blocks UAE Companies Pending Investigation for Potential Sudan Sanctions Violations," June 6, 2024, available at: <https://sudantribune.com/article286659/>



- 35 US Department of the Treasury, "Treasury Sanctions Companies and Individuals Advancing Russian Malign Activities in Africa," Press Release, March 8, 2024, available at: <https://home.treasury.gov/news/press-releases/jy2164>
- 36 US Department of the Treasury, "Treasury Sanctions Wagner Group-Linked Companies in the Central African Republic," Press Release, May 30, 2024, available at: <https://home.treasury.gov/news/press-releases/jy2384>
- 37 US Department of the Treasury, "Treasury Targets Financial Network of Fernando Zevallos Gonzales," Press Release, February 10, 2009, available at: <https://home.treasury.gov/news/press-releases/tg19>
- 38 Sudan Tribune, "U.S. Treasury Blocks UAE Companies Pending Investigation for Potential Sudan Sanctions Violations," June 6, 2024, available at: <https://sudantribune.com/article286659/>
- 39 US Department of the Treasury, "Treasury Sanctions Sudanese Paramilitary Leader, Weapons Supplier, and Related Companies," Press Release, January 7, 2025, available at: <https://home.treasury.gov/news/press-releases/jy2772>
- 40 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations, Designations Updates, and Designations Removals; Issuance of Russia-Related General Licenses," September 14, 2023, available at: <https://ofac.treasury.gov/recent-actions/20230914>
- 41 US Department of the Treasury Office of Foreign Assets Control, "Counter Narcotics Designations; Sudan Designations; West Bank-Related Designation," June 6, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240606>
- 42 US Department of the Treasury, "Treasury Designates Benevolence International Foundation and Related Entities as Financiers of Terrorism," Press Release, November 19, 2002, available at: <https://home.treasury.gov/news/press-releases/po3632>
- 43 US Department of the Treasury, "Treasure Designates Benevolence International Foundation and Related Entities as Financiers of Terrorism," Press Release, November 19, 2002, available at: <https://home.treasury.gov/news/press-releases/po3553>
- 44 US Department of the Treasury Office of Foreign Assets Control, "SDGT Designations," September 9, 2004, available at: <https://ofac.treasury.gov/recent-actions/20040909>
- 45 Hilary Mossberg, "Beyond Carrots, Better Sticks: Measuring and Improving the Effectiveness of Sanctions in Africa," The Sentry, October 2019, available at: <https://thesentry.org/reports/beyond-carrots-better-sticks/>
- 46 US Department of the Treasury Office of Foreign Assets Control, "Blocking and Rejecting Transactions," available at: <https://ofac.treasury.gov/faqs/topic/1601> (last accessed November 2024).
- 47 The Sentry interviews with former OFAC officials, 2024.
- 48 United States of America, Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA Patriot Act) of 2001, Public Law 107 - 56, Sec. 106, available at: <https://www.congress.gov/107/plaws/publ56/PLAW-107publ56.pdf>
- 49 United States of America, International Emergency Economic Powers Act of 1977, 50 USC § 1702, Sec. 203, available at: <https://www.congress.gov/95/statute/STATUTE-91/STATUTE-91-Pg1625.pdf>
- 50 A full list of BPI listed entities is available in the annex. Please note this may not be a comprehensive list, as historical listings and delistings can be difficult to identify without an accessible database of all past SDNs.
- 51 For BPI, OFAC has stated that it pursues an investigation based on a reasonable basis to suspect that the individual or entity meets the designation criteria. This standard, also used for other federal agency actions, differs from the legal standard for criminal cases—"beyond a reasonable doubt"—and for civil cases—"preponderance of the evidence." See:

Andrew Boyle, "Checking the President's Sanctions Powers," Brennan Center for Justice, June 10, 2021, available at: <https://www.brennancenter.org/our-work/policy-solutions/checking-presidents-sanctions-powers>

Ruth Maurice, "Legal Standards of Proof," NOLO, October 31, 2024, available at: <https://www.nolo.com/legal-encyclopedia/legal-standards-proof.html>
- 52 The Sentry interviews with former OFAC officials, 2024.



- 53 Andrew Boyle, "Checking the President's Sanctions Powers," Brennan Center for Justice, June 10, 2021, available at: <https://www.brennancenter.org/our-work/policy-solutions/checking-presidents-sanctions-powers>
- 54 The Sentry, "Architects of Terror: The Wagner Group's Blueprint for State Capture in the Central African Republic," June 2023, available at: <https://thesentry.org/wp-content/uploads/2023/06/ArchitectsTerror-TheSentry-June2023.pdf>
- 55 Julia Stanyard, Thierry Vircoulon, and Julian Radmeyer, "The Grey Zone: Russia's Military, Mercenary and Criminal Engagement in Africa," Global Initiative Against Transnational Organized Crime, February 2023, available at: <https://globalinitiative.net/wp-content/uploads/2023/02/Julia-Stanyard-T-Vircoulon-J-Rademeyer-The-grey-zone-Russias-military-mercenary-and-criminal-engagement-in-Africa-GI-TOC-February-2023-v3-1.pdf>
- 56 Mathieu Olivier, "Café, cash et alcool : au cœur du système Wagner, de Douala à Bangui" (Coffee, Cash and Alcohol: At the Heart of the Wagner System, From Douala to Bangui), Jeune Afrique, August 11, 2022, available at: <https://www.jeuneafrique.com/1369001/politique/caf%C3%A9-cash-et-alcool-au-c%C5%93ur-du-syst%C3%A8me-wagner-de-douala-a-bangui/>
- 57 Molly Blackall and Richard Holmes, "'Ethical' Private Equity Firm in Dubai Helped Notorious Sudan Militia to Lobby UK MPs," i, May 5, 2023, available at: <https://inews.co.uk/news/ethical-private-equity-firm-dubai-sudan-militia-lobby-uk-mps-2319805>
- 58 Catherine Cartier, Eva Kahan, and Isaac Zukin, "Breaking the Bank: How Military Control of the Economy Obstructs Democracy in Sudan," C4ADS, 2022, available at: <https://c4ads.org/wp-content/uploads/2022/07/BreakingtheBank-Report.pdf>
- 59 US Department of the Treasury Office of Foreign Assets Control, "Sanctions List Search," available at: <https://sanctionssearch.ofac.treas.gov/> (last accessed November 2024).
- 60 A full list of BPI listed entities is available in the annex. Please note this may not be a comprehensive list, as historical listings and delistings can be difficult to identify without an accessible database of all past SDNs.
- 61 Louisa C. Slocum, "OFAC, The Department of State, and the Terrorist Designation Process: A Comparative Analysis of Agency Discretion," Administrative Law Review, 2014, pp. 387-425, available at: <https://www.administrativelawreview.org/wp-content/uploads/2014/04/OPAC-The-Department-of-State-and-the-Terrorist-Designation-Process-A-Comparative-Analysis-of-Agency-Discretion.pdf>
- 62 United States of America, Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA Patriot Act) of 2001, Public Law 107 - 56, Sec. 106, available at: <https://www.congress.gov/107/plaws/publ56/PLAW-107publ56.pdf>
- 63 Sudan Tribune, "U.S. Treasury Blocks UAE Companies Pending Investigation for Potential Sudan Sanctions Violations," June 6, 2024, available at: <https://sudantribune.com/article286659/>
- 64 US Department of the Treasury Office of Foreign Assets Control, "Filing a Petition for Removal from an OFAC List," available at: <https://ofac.treasury.gov/specially-designated-nationals-list-sdn-list/filing-a-petition-for-removal-from-an-ofac-list> (last accessed November 2024).
- 65 US Department of the Treasury Office of Foreign Assets Control, "Filing a Petition for Removal from an OFAC List," available at: <https://ofac.treasury.gov/specially-designated-nationals-list-sdn-list/filing-a-petition-for-removal-from-an-ofac-list> (last accessed November 2024).
- 66 Andrew Boyle, "Checking the President's Sanctions Powers," Brennan Center for Justice, June 10, 2021, available at: <https://www.brennancenter.org/our-work/policy-solutions/checking-presidents-sanctions-powers>
- 67 Allison Lofgren, "Balancing Liberty and Security: A Proposal for Amplified Procedural Due Process Protections in the U.S. Sanctions Regime," William & Mary Bill of Rights Journal 31.2, 2022, pp. 235-266, available at: <https://scholarship.law.wm.edu/cgi/viewcontent.cgi?article=2027&context=wmborj>
- 68 A full list of BPI listed entities is available in the annex. Please note this may not be a comprehensive list, as historical listings and delistings can be difficult to identify without an accessible database of all past SDNs.
- 69 Global Relief Foundation Inc. v. O'Neill, 207 F.2d 779, N.D. Ill., 2002, available at: <https://casetext.com/case/global-relief-foundation-inc-v-oneill-2>



- 70 Allison Lofgren, "Balancing Liberty and Security: A Proposal for Amplified Procedural Due Process Protections in the U.S. Sanctions Regime," William & Mary Bill of Rights Journal 31.2, 2022, pp. 235-266, available at: <https://scholarship.law.wm.edu/cgi/viewcontent.cgi?article=2027&context=wmborj>
- 71 KindHearts for Charitable Humanitarian Development v. Geithner, 647 F.2d 857, N.D. Ohio, 2009, available at: https://charityandsecurity.org/sites/default/files/KindHearts%20order%208.18.09_0.pdf
- 72 Charity & Security Network, "KindHearts Case Timeline," July 9, 2010, available at: <https://charityandsecurity.org/litigation/kindhearts-timeline/>
- 73 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations, Designations Updates, and Designations Removals; Issuance of Russia-Related General Licenses," September 14, 2023, available at: <https://ofac.treasury.gov/recent-actions/20230914>
- 74 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations Updates; OFAC to retire its FTP server (OFACFTP.treas.gov) on or about June 10, 2024," March 8, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240308>
- 75 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations," May 30, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240530>
- 76 US Department of the Treasury, "Treasury Sanctions Wagner Group-Linked Companies in the Central African Republic," Press Release, May 30, 2024, available at: <https://home.treasury.gov/news/press-releases/jy2384>
- 77 US Department of the Treasury, "Treasury Sanctions Companies and Individuals Advancing Russian Malign Activities in Africa," Press Release, March 8, 2024, available at: <https://home.treasury.gov/news/press-releases/jy2164>
- 78 US Department of the Treasury, "Treasury Sanctions Wagner Group-Linked Companies in the Central African Republic," Press Release, May 30, 2024, available at: <https://home.treasury.gov/news/press-releases/jy2384>
- 79 US Department of the Treasury Office of Foreign Assets Control, "Balkans-Related Designations; Russia-Related Removal," March 13, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240313>
- 80 Le Monde avec AFP, "En Centrafrique, la bière Castel au cœur de la guerre d'influence entre Paris et Moscou" (In the Central African Republic, Castel Beer Is at the Heart of the Influence War Between Paris and Moscow), Le Monde, March 16, 2023, available at: https://www.lemonde.fr/afrique/article/2023/03/16/en-centrafrique-la-biere-castel-au-c-ur-de-la-guerre-d-influence-entre-paris-et-moscou_6165706_3212.html
- 81 Mathieu Olivier, "Café, cash et alcool : au cœur du système Wagner, de Douala à Bangui" (Coffee, Cash and Alcohol: At the Heart of the Wagner System, From Douala to Bangui), Jeune Afrique, August 11, 2022, available at: <https://www.jeuneafrique.com/1369001/politique/caf%C3%A9-cash-et-alcool-au-c%C5%93ur-du-syst%C3%A8me-wagner-de-douala-%C3%A0-bangui/>
- 82 Julia Stanyard, Thierry Vircoulon, and Julian Radmeyer, "The Grey Zone: Russia's Military, Mercenary and Criminal Engagement in Africa," Global Initiative Against Transnational Organized Crime, February 2023, available at: <https://globalinitiative.net/wp-content/uploads/2023/02/Julia-Stanyard-T-Vircoulon-J-Rademeyer-The-grey-zone-Russias-military-mercenary-and-criminal-engagement-in-Africa-GI-TOC-February-2023-v3-1.pdf>
- 83 The Sentry, "Architects of Terror: The Wagner Group's Blueprint for State Capture in the Central African Republic," June 2023, available at: <https://thesentry.org/wp-content/uploads/2023/06/ArchitectsTerror-TheSentry-June2023.pdf>
- 84 Le Monde avec AFP, "En Centrafrique, la bière Castel au cœur de la guerre d'influence entre Paris et Moscou" (In the Central African Republic, Castel Beer Is at the Heart of the Influence War Between Paris and Moscow), Le Monde, March 16 2023, available at: https://www.lemonde.fr/afrique/article/2023/03/16/en-centrafrique-la-biere-castel-au-c-ur-de-la-guerre-d-influence-entre-paris-et-moscou_6165706_3212.html
- 85 James Pogue, "Wagner in Africa," Pulitzer Center, April 25, 2024, available at: <https://pulitzercenter.org/stories/wagner-africa>
- 86 Le Monde avec AFP, "En Centrafrique, la bière Castel au cœur de la guerre d'influence entre Paris et Moscou" (In the Central African Republic, Castel Beer Is at the Heart of the Influence War Between Paris and Moscow), Le Monde, March 16 2023, available at: https://www.lemonde.fr/afrique/article/2023/03/16/en-centrafrique-la-biere-castel-au-c-ur-de-la-guerre-d-influence-entre-paris-et-moscou_6165706_3212.html



- 87 US Department of the Treasury Office of Foreign Assets Control, "Counter Narcotics Designations; Sudan Designations; West Bank-Related Designation," June 6, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240606>
- 88 Capital Tap Holding, "Diversified Holding Company in UAE," available at: <https://web.archive.org/web/20230119190836/https://capitaltap.com/> (archived on January 19, 2023).
- 89 Molly Blackall and Richard Holmes, "'Ethical' Private Equity Firm in Dubai Helped Notorious Sudan Militia to Lobby UK MPs," i, May 5, 2023, available at: <https://inews.co.uk/news/ethical-private-equity-firm-dubai-sudan-militia-lobby-uk-mps-2319805>
- 90 Catherine Cartier, Eva Kahan, and Isaac Zukin, "Breaking the Bank: How Military Control of the Economy Obstructs Democracy in Sudan," C4ADS, 2022, available at: <https://c4ads.org/wp-content/uploads/2022/07/BreakingtheBank-Report.pdf>
- 91 Sudan Tribune, "U.S. Treasury Blocks UAE Companies Pending Investigation for Potential Sudan Sanctions Violations," June 6, 2024, available at: <https://sudantribune.com/article286659/>
- 92 US Department of the Treasury, "Treasury Sanctions Sudanese Paramilitary Leader, Weapons Supplier, and Related Companies," Press Release, January 7, 2025, available at: <https://home.treasury.gov/news/press-releases/jy2772>
- 93 US Department of the Treasury, "Treasury Sanctions Sudanese Paramilitary Leader, Weapons Supplier, and Related Companies," Press Release, January 7, 2025, available at: <https://home.treasury.gov/news/press-releases/jy2772>
- 94 Molly Blackall and Richard Holmes, "'Ethical' Private Equity Firm in Dubai Helped Notorious Sudan Militia to Lobby UK MPs," i, May 5, 2023, available at: <https://inews.co.uk/news/ethical-private-equity-firm-dubai-sudan-militia-lobby-uk-mps-2319805>
- 95 Capital Tap Holding, "Diversified Holding Company in UAE," available at: <https://web.archive.org/web/20230119190836/https://capitaltap.com/> (archived on January 19, 2023).
- 96 Molly Blackall and Richard Holmes, "'Ethical' Private Equity Firm in Dubai Helped Notorious Sudan Militia to Lobby UK MPs," i, May 5, 2023, available at: <https://inews.co.uk/news/ethical-private-equity-firm-dubai-sudan-militia-lobby-uk-mps-2319805>
- 97 Molly Blackall and Richard Holmes, "'Ethical' Private Equity Firm in Dubai Helped Notorious Sudan Militia to Lobby UK MPs," i, May 5, 2023, available at: <https://inews.co.uk/news/ethical-private-equity-firm-dubai-sudan-militia-lobby-uk-mps-2319805>
- 98 Molly Blackall and Richard Holmes, "'Ethical' Private Equity Firm in Dubai Helped Notorious Sudan Militia to Lobby UK MPs," i, May 5, 2023, available at: <https://inews.co.uk/news/ethical-private-equity-firm-dubai-sudan-militia-lobby-uk-mps-2319805>
- 99 US Department of the Treasury, "Treasury Sanctions Sudanese Paramilitary Leader, Weapons Supplier, and Related Companies," Press Release, January 7, 2025, available at: <https://home.treasury.gov/news/press-releases/jy2772>
- 100 Catherine Cartier, Eva Kahan, and Isaac Zukin, "Breaking the Bank: How Military Control of the Economy Obstructs Democracy in Sudan," C4ADS, 2022, available at: <https://c4ads.org/wp-content/uploads/2022/07/BreakingtheBank-Report.pdf>
- 101 US Department of the Treasury, "Treasury Sanctions Sudanese Paramilitary Leader, Weapons Supplier, and Related Companies," Press Release, January 7, 2025, available at: <https://home.treasury.gov/news/press-releases/jy2772>
- 102 US Department of the Treasury, "Revised Guidance on Entities Owned by Persons whose Property and Interests in Property are Blocked," August 13, 2014, available at: <https://ofac.treasury.gov/media/6186/download?inline>
- 103 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations, Designations Updates, and Designations Removals; Issuance of Russia-Related General Licenses," September 14, 2023, available at: <https://ofac.treasury.gov/recent-actions/20230914>
- 104 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations Updates; OFAC to Retire Its FTP Server (OFACFTP.treas.gov) on or About June 10, 2024," March 8, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240308>
- 105 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations, Designations Updates, and Designations Removals; Issuance of Russia-Related General Licenses," September 14, 2023, available at: <https://ofac.treasury.gov/recent-actions/20230914>
- 106 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations Updates; OFAC to Retire Its FTP Server (OFACFTP.treas.gov) on or About June 10, 2024," March 8, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240308>



- 107 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations, Designations Updates, and Designations Removals; Issuance of Russia-Related General Licenses," September 14, 2023, available at: <https://ofac.treasury.gov/recent-actions/20230914>
- 108 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations," May 30, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240530>
- 109 US Department of the Treasury Office of Foreign Assets Control, "Russia-Related Designations, Designations Updates, and Designations Removals; Issuance of Russia-Related General Licenses," September 14, 2023, available at: <https://ofac.treasury.gov/recent-actions/20230914>
- 110 US Department of the Treasury Office of Foreign Assets Control, "Balkans-Related Designations; Russia-Related Removal," March 13, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240313>
- 111 US Department of the Treasury Office of Foreign Assets Control, "Counter Narcotics Designations; Sudan Designations; West Bank-Related Designation," June 6, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240606>
- 112 US Department of the Treasury Office of Foreign Assets Control, "Global Magnitsky Designation; Sudan-Related Designations; Issuance of Amended Russia-Related General License," January 7, 2025, available at: <https://ofac.treasury.gov/recent-actions/20250107>
- 113 US Department of the Treasury Office of Foreign Assets Control, "Counter Narcotics Designations; Sudan Designations; West Bank-Related Designation," June 6, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240606>
- 114 US Department of the Treasury Office of Foreign Assets Control, "Global Magnitsky Designation; Sudan-Related Designations; Issuance of Amended Russia-Related General License," January 7, 2025, available at: <https://ofac.treasury.gov/recent-actions/20250107>
- 115 US Department of the Treasury Office of Foreign Assets Control, "Counter Narcotics Designations; Sudan Designations; West Bank-Related Designation," June 6, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240606>
- 116 US Department of the Treasury Office of Foreign Assets Control, "Global Magnitsky Designation; Sudan-Related Designations; Issuance of Amended Russia-Related General License," January 7, 2025, available at: <https://ofac.treasury.gov/recent-actions/20250107>
- 117 US Department of the Treasury Office of Foreign Assets Control, "Counter Narcotics Designations; Sudan Designations; West Bank-Related Designation," June 6, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240606>
- 118 US Department of the Treasury Office of Foreign Assets Control, "Global Magnitsky Designation; Sudan-Related Designations; Issuance of Amended Russia-Related General License," January 7, 2025, available at: <https://ofac.treasury.gov/recent-actions/20250107>
- 119 US Department of the Treasury Office of Foreign Assets Control, "Counter Narcotics Designations; Sudan Designations; West Bank-Related Designation," June 6, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240606>
- 120 US Department of the Treasury Office of Foreign Assets Control, "Global Magnitsky Designation; Sudan-Related Designations; Issuance of Amended Russia-Related General License," January 7, 2025, available at: <https://ofac.treasury.gov/recent-actions/20250107>
- 121 US Department of the Treasury Office of Foreign Assets Control, "Counter Narcotics Designations; Sudan Designations; West Bank-Related Designation," June 6, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240606>
- 122 US Department of the Treasury Office of Foreign Assets Control, "Global Magnitsky Designation; Sudan-Related Designations; Issuance of Amended Russia-Related General License," January 7, 2025, available at: <https://ofac.treasury.gov/recent-actions/20250107>
- 123 US Department of the Treasury Office of Foreign Assets Control, "Counter Narcotics Designations; Sudan Designations; West Bank-Related Designation," June 6, 2024, available at: <https://ofac.treasury.gov/recent-actions/20240606>
- 124 US Department of the Treasury Office of Foreign Assets Control, "Global Magnitsky Designation; Sudan-Related Designations; Issuance of Amended Russia-Related General License," January 7, 2025, available at: <https://ofac.treasury.gov/recent-actions/20250107>
- 125 US Department of the Treasury Office of Foreign Assets Control, "BPI-PA Designations (Blocked Pending Investigation - Patriot Act)," December 14, 2001, available at: <https://ofac.treasury.gov/recent-actions/20011214a>
- 126 US Department of the Treasury, "Treasury Designates Benevolence International Foundation and Related Entities as Financiers of Terrorism," Press Release, November 19, 2002, available at: <https://home.treasury.gov/news/press-releases/po3632>



- 127 US Department of the Treasury Office of Foreign Assets Control, "BPI-PA Designations (Blocked Pending Investigation - Patriot Act)," December 14, 2001, available at: <https://ofac.treasury.gov/recent-actions/20011214a>
- 128 US Department of the Treasury, "Treasure Designates Benevolence International Foundation and Related Entities as Financiers of Terrorism," Press Release, November 19, 2002, available at: <https://home.treasury.gov/news/press-releases/po3553>
- 129 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations; SDGT Blocked Pending Investigation," February 18, 2004, available at: <https://ofac.treasury.gov/recent-actions/20040218>
- 130 US Department of the Treasury Office of Foreign Assets Control, "SDGT Designations," September 9, 2004, available at: <https://ofac.treasury.gov/recent-actions/20040909>
- 131 US Department of the Treasury Office of Foreign Assets Control, "BPI-PA (Blocked Pending Investigation) Designation," February 19, 2006, available at: <https://ofac.treasury.gov/recent-actions/20060219>
- 132 US Department of the Treasury Office of Foreign Assets Control, "Counter Terrorism Designation Removal," July 11, 2014, available at: <https://ofac.treasury.gov/recent-actions/20140711>
- 133 US Department of the Treasury Office of Foreign Assets Control, "SDNT Blocked Pending Investigation, SDGT Designations," August 8, 2003, available at: <https://ofac.treasury.gov/recent-actions/20030808>
- 134 US Department of the Treasury, "Treasury Designates Network of Cali Drug Cartel Front Companies," October 17, 2003, available at: <https://home.treasury.gov/news/press-releases/js915>
- 135 US Department of the Treasury Office of Foreign Assets Control, "Anti-Narcotics Designations Removals," October 30, 2009, available at: <https://ofac.treasury.gov/recent-actions/20091030>
- 136 US Department of the Treasury Office of Foreign Assets Control, "SDNT Blocked Pending Investigations; SDGT Updates; UNITA Designation Removals," May 8, 2003, available at: <https://ofac.treasury.gov/recent-actions/20030508pm>
- 137 US Department of the Treasury Office of Foreign Assets Control, "Narcotics: What You Need to Know About U.S. Sanctions Against Drug Traffickers," May 2004, available at: <https://www.hsdl.org/c/view?docid=446825>
- 138 US Department of the Treasury Office of Foreign Assets Control, "Anti-Narcotics Designations Removals," October 30, 2009, available at: <https://ofac.treasury.gov/recent-actions/20091030>
- 139 US Department of the Treasury Office of Foreign Assets Control, "SDNT Blocked Pending Investigations; SDGT Updates; UNITA Designation Removals," May 8, 2003, available at: <https://ofac.treasury.gov/recent-actions/20030508pm>
- 140 US Department of the Treasury Office of Foreign Assets Control, "Anti-Narcotics Designations Removals," October 30, 2009, available at: <https://ofac.treasury.gov/recent-actions/20091030>
- 141 US Department of the Treasury Office of Foreign Assets Control, "SDNT Blocked Pending Investigations; SDGT Updates; UNITA Designation Removals," May 8, 2003, available at: <https://ofac.treasury.gov/recent-actions/20030508pm>
- 142 US Department of the Treasury Office of Foreign Assets Control, "Narcotics: What You Need to Know About U.S. Sanctions Against Drug Traffickers," May 2004, available at: <https://www.hsdl.org/c/view?docid=446825>
- 143 US Department of the Treasury Office of Foreign Assets Control, "Anti-Narcotics Designations Removals," October 30, 2009, available at: <https://ofac.treasury.gov/recent-actions/20091030>
- 144 US Department of the Treasury Office of Foreign Assets Control, "SDNT Blocked Pending Investigations; SDGT Updates; UNITA Designation Removals," May 8, 2003, available at: <https://ofac.treasury.gov/recent-actions/20030508pm>
- 145 US Department of the Treasury Office of Foreign Assets Control, "Anti-Narcotics Designations Removals," December 22, 2006, available at: <https://ofac.treasury.gov/recent-actions/20061222>
- 146 Federal Deposit Insurance Corporation, "FIL-65-2004 Attachment," June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
- 147 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations; Kingpin Act Designation Updates;



- Anti-Narcotics Designation Removals; Sudan Designation Removals,” April 28, 2011, available at: <https://ofac.treasury.gov/recent-actions/20110428>
- 148 Federal Deposit Insurance Corporation, “FIL-65-2004 Attachment,” June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
 - 149 US Department of the Treasury, “Treasury Designates Peruvian Airline,” Press Release, November 10, 2004, available at: <https://home.treasury.gov/news/press-releases/js2095>
 - 150 Federal Deposit Insurance Corporation, “FIL-65-2004 Attachment,” June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
 - 151 US Department of the Treasury Office of Foreign Asset Control, “Kingpin Act Designations / Anti-Narcotics Designation Removal,” February 10, 2009, available at: <https://ofac.treasury.gov/recent-actions/20090210>
 - 152 Federal Deposit Insurance Corporation, “FIL-65-2004 Attachment,” June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
 - 153 US Department of the Treasury Office of Foreign Assets Control, “Kingpin Act Designations; Kingpin Act Designation Updates; Anti-Narcotics Designation Removals; Sudan Designation Removals,” April 28, 2011, available at: <https://ofac.treasury.gov/recent-actions/20110428>
 - 154 Federal Deposit Insurance Corporation, “FIL-65-2004 Attachment,” June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
 - 155 US Department of the Treasury Office of Foreign Asset Control, “Kingpin Act Designations / Anti-Narcotics Designation Removal,” February 10, 2009, available at: <https://ofac.treasury.gov/recent-actions/20090210>
 - 156 Federal Deposit Insurance Corporation, “FIL-65-2004 Attachment,” June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
 - 157 US Department of the Treasury Office of Foreign Assets Control, “Kingpin Act Designations; Kingpin Act Designation Updates; Anti-Narcotics Designation Removals; Sudan Designation Removals,” April 28, 2011, available at: <https://ofac.treasury.gov/recent-actions/20110428>
 - 158 Federal Deposit Insurance Corporation, “FIL-65-2004 Attachment,” June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
 - 159 US Department of the Treasury Office of Foreign Assets Control, “Kingpin Act Designations; Kingpin Act Designation Updates; Anti-Narcotics Designation Removals; Sudan Designation Removals,” April 28, 2011, available at: <https://ofac.treasury.gov/recent-actions/20110428>
 - 160 Federal Deposit Insurance Corporation, “FIL-65-2004 Attachment,” June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
 - 161 US Department of the Treasury Office of Foreign Asset Control, “Kingpin Act Designations / Anti-Narcotics Designation Removal,” February 10, 2009, available at: <https://ofac.treasury.gov/recent-actions/20090210>
 - 162 Federal Deposit Insurance Corporation, “FIL-65-2004 Attachment,” June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
 - 163 US Department of the Treasury Office of Foreign Assets Control, “Unblocking of Blocked Persons Pursuant to the Foreign Narcotics Kingpin Designation Act,” US Federal Register, October 28, 2008, available at: <https://www.federalregister.gov/documents/2008/10/28/E8-25595/unblocking-of-blocked-persons-pursuant-to-the-foreign-narcotics-kingpin-designation-act>
 - 164 Federal Deposit Insurance Corporation, “FIL-65-2004 Attachment,” June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
 - 165 US Department of the Treasury Office of Foreign Asset Control, “Kingpin Act Designations / Anti-Narcotics Designation Removal,” February 10, 2009, available at: <https://ofac.treasury.gov/recent-actions/20090210>



- 166 Federal Deposit Insurance Corporation, "FIL-65-2004 Attachment," June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
- 167 US Department of the Treasury Office of Foreign Asset Control, "Kingpin Act Designations / Anti-Narcotics Designation Removal," February 10, 2009, available at: <https://ofac.treasury.gov/recent-actions/20090210>
- 168 Federal Deposit Insurance Corporation, "FIL-65-2004 Attachment," June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
- 169 US Department of the Treasury Office of Foreign Asset Control, "Kingpin Act Designations / Anti-Narcotics Designation Removal," February 10, 2009, available at: <https://ofac.treasury.gov/recent-actions/20090210>
- 170 Federal Deposit Insurance Corporation, "FIL-65-2004 Attachment," June 1, 2004, available at: <https://www.fdic.gov/news/inactive-financial-institution-letters/2004/fil6504a.html>
- 171 US Department of the Treasury Office of Foreign Asset Control, "Kingpin Act Designations / Anti-Narcotics Designation Removal," February 10, 2009, available at: <https://ofac.treasury.gov/recent-actions/20090210>
- 172 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations and Designations Updates," August 18, 2005, available at: <https://ofac.treasury.gov/recent-actions/041>
- 173 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations & Updates," July 12, 2006, available at: <https://ofac.treasury.gov/recent-actions/20060712>
- 174 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations and Designations Updates," August 18, 2005, available at: <https://ofac.treasury.gov/recent-actions/20050818>
- 175 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations & Updates," July 12, 2006, available at: <https://ofac.treasury.gov/recent-actions/20060712>
- 176 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations; Counter Narcotics Removals; Cuba Removals," July 30, 2013, available at: <https://ofac.treasury.gov/recent-actions/20130730>
- 177 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations and Designations Updates," August 18, 2005, available at: <https://ofac.treasury.gov/recent-actions/20050818>
- 178 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations & Updates," July 12, 2006, available at: <https://ofac.treasury.gov/recent-actions/20060712>
- 179 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations and Designations Updates," August 18, 2005, available at: <https://ofac.treasury.gov/recent-actions/20050818>
- 180 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations & Updates," July 12, 2006, available at: <https://ofac.treasury.gov/recent-actions/20060712>
- 181 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations and Designations Updates," August 18, 2005, available at: <https://ofac.treasury.gov/recent-actions/20050818>
- 182 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations & Updates," July 12, 2006, available at: <https://ofac.treasury.gov/recent-actions/20060712>
- 183 US Department of the Treasury Office of Foreign Assets Control, "Kingpin Act Designations and Designations Updates," August 18, 2005, available at: <https://ofac.treasury.gov/recent-actions/20050818>
- 184 US Department of the Treasury Office of Foreign Assets Control, "Unblocking of Blocked Persons Pursuant to the Foreign Narcotics Kingpin Designation Act," US Federal Register, October 28, 2008, available at: <https://www.federalregister.gov/documents/2008/10/28/E8-25595/unblocking-of-blocked-persons-pursuant-to-the-foreign-narcotics-kingpin-designation-act>
- 185 US Department of the Treasury Office of Foreign Assets Control, "SDNT Designations," October 25, 2002, available at: <https://ofac.treasury.gov/recent-actions/20021025>



- 186 US Department of the Treasury Office of Foreign Assets Control, "Changes to List of Specially Designated Nationals and Blocked Persons Since January 1, 2010," available at: <https://www.treasury.gov/ofac/downloads/sdnew10.pdf>
- 187 US Department of the Treasury Office of Foreign Assets Control, "Narcotics: What You Need to Know About U.S. Sanctions Against Drug Traffickers," May 2004, available at: <https://www.hsdl.org/c/view?docid=446825>
- 188 US Department of the Treasury Office of Foreign Assets Control, "Changes to List of Specially Designated Nationals and Blocked Persons Since January 1, 2010," available at: <https://www.treasury.gov/ofac/downloads/sdnew10.pdf>
- 189 US Department of the Treasury Office of Foreign Assets Control, "SDNT Designations," March, 27, 2003, available at: <https://ofac.treasury.gov/recent-actions/20030327>
- 190 US Department of the Treasury Office of Foreign Assets Control, "Changes to List of Specially Designated Nationals and Blocked Persons Since January 1, 2010," available at: <https://www.treasury.gov/ofac/downloads/sdnew10.pdf>
- 191 US Department of the Treasury Office of Foreign Assets Control, "SDNT Blocked Pending Investigation," May 2, 2003, available at: <https://ofac.treasury.gov/recent-actions/20030502>
- 192 US Department of the Treasury Office of Foreign Assets Control, "Changes to List of Specially Designated Nationals and Blocked Persons Since January 1, 2010," available at: <https://www.treasury.gov/ofac/downloads/sdnew10.pdf>
- 193 US Department of the Treasury Office of Foreign Assets Control, "SDNT Blocked Pending Investigation," May 2, 2003, available at: <https://ofac.treasury.gov/recent-actions/20020812>
- 194 US Department of the Treasury Office of Foreign Asset Control, "Blocked Pending Investigation Libya Designation," August 13, 2002, available at: <https://ofac.treasury.gov/recent-actions/20020813>

