

## **US TREASURY REPORT**

### **WEEK 46 OF 2024**

#### **1. OFAC: Treasury Targets Syrian Conglomerate Funding Qods Force and Houthis**

On 14 November 2024, OFAC sanctioned 26 companies, individuals, and vessels associated with the Al-Qatirji Company, a Syrian conglomerate responsible for generating hundreds of millions of dollars in revenue for Iran's Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) and the Houthis through the sale of Iranian oil to Syria and the People's Republic of China (PRC). Previously designated for its role in facilitating the sale of fuel between the Syrian regime and the Islamic State of Iraq and Syria (ISIS), the Al-Qatirji Company has morphed into one of the main channels through which the IRGC-QF generates revenue and funds its regional proxy groups. OFAC is expanding its targeting of Al-Qatirji's network and its fleet of vessels to inhibit the IRGC-QF from benefiting from this relationship.

This action is being taken pursuant to counterterrorism authority Executive Order (E.O.) 13224, as amended. OFAC designated the IRGC-QF pursuant to E.O. 13224 on October 25, 2007, for providing material support to multiple terrorist groups. The Al-Qatirji Company was designated pursuant to E.O. 13582 on September 6, 2018 for its ties to the Government of Syria. The U.S. Department of State designated Ansarallah, also known as the Houthis, as a Specially Designated Global Terrorist (SDGT) pursuant to E.O. 13224, as amended, effective February 16, 2024, for having committed or attempted to commit, posing a significant risk of committing, or having participated in training to commit acts of terrorism.

The Al-Qatirji Company exports millions of barrels of Iranian oil, worth hundreds of millions of dollars, to Syria and East Asia, including the PRC, to finance the IRGC-QF and Houthis. As of 2024, the Al-Qatirji Company has become one of the IRGC-QF's main financial channels, enabling the IRGC-QF to generate and access hundreds of millions of dollars in revenue this year alone, much of which is laundered through major cities such as Istanbul and Beirut. Some of the oil proceeds are ultimately sent to the Houthis, who receive millions of dollars per month from the Al-Qatirji Company. The Al-Qatirji Company is being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the IRGC-QF.

In this respect, [OFAC's SDN List](#) has been updated accordingly:

**The following individuals have been added to OFAC's SDN List:**

KATERJI, 'Abbas; DOB 01 Jan 2006; nationality Syria; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport 016021971 (Syria) expires 17 Oct 2024 (individual) [SDGT] (Linked To: AL-QATIRJI COMPANY).

QATIRJI, Muhammad Agha Ahmed Rashdi (Arabic: محمد آغا أحمد رشدي قاطرجي) (a.k.a. AL-QATIRJI, Muhammad Agha; a.k.a. QATIRJI, Muhammad Agha; a.k.a. QATIRJI, Muhammad Agha Ahmed), United Arab Emirates; DOB 01 Jan 1991; nationality Syria; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (individual) [SDGT] (Linked To: AL-QATIRJI COMPANY).

**The following entities have been added to OFAC's SDN List:**

AMITIS JAZIREH KISH SHIP MANAGEMENT CO LLC, Unit 44, 11th Floor, Mena Tower, Plot BO139, Sanaei Street, Kish 7941773197, Iran; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 2021; Identification Number IMO 6221126 [SDGT] (Linked To: AL-QATIRJI COMPANY).

BLUESPECTRUM SHIPPING S.A., 60th Floor, BICSA Financial Center, Avenida Balboa, Panama City, Panama; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 2023; Identification Number IMO 6459297; Folio Mercantil No. 155744579 (Panama) [SDGT] (Linked To: AL-QATIRJI COMPANY).

ELIAS SHIPPING & TRADING GROUP SA (a.k.a. ELIAS SHIPPING AND TRADING GROUP S.A.), 21st Floor, Global Plaza Building, Calle 50, Panama City, Panama; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 2023; Identification Number IMO 6422446; Folio Mercantil No. 155736668 (Panama) [SDGT] (Linked To: AL-QATIRJI COMPANY).

MOSHTAQ TEJARAT SANAT CO JSC (Arabic: شرکت مشتاق تجارت صنعت), 2nd Floor, South Unit, Felestin Street, 472, Tehran 1415714583, Iran; Unit 205, 2nd Floor, Yas Trading Office Complex, No. 0, Private Dead End, Doctor Ali Shariati Street, Gholhak, Central District, Tehran, Tehran 1941934336, Iran; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 22 Aug 2004; National ID No. 10102696911 (Iran); Identification Number IMO 6175130; alt. Identification Number 411478487166 (Iran); Registration Number 228557 (Iran) [SDGT] (Linked To: AL-QATIRJI COMPANY).

NATIVA MANAGEMENT LTD, Trust Company Complex Ajeltake Road, Majuro, Ajeltake Island MH 96960, Marshall Islands; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 2021; Identification Number IMO 6224770 [SDGT] (Linked To: AL-QATIRJI COMPANY).

PEARL SHIPPING & TRADING LTD (a.k.a. PEARL SHIPPING AND TRADING LTD), 1st Floor, Boubes Center, Moussaytbeh Street, Beirut, Lebanon; Registration Country Liberia; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 2017; Identification Number IMO 5988457 [SDGT] (Linked To: AL-QATIRJI COMPANY).

SALINA SHIP MANAGEMENT PVT LTD (a.k.a. SALINA SHIP MANAGEMENT PRIVATE LIMITED), Office 603, Shagun Reality Insignia 195, Sector 19, Ulwe, Navi Mumbai, Maharashtra 410206, India; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 17 Mar 2023; Identification Number IMO 6422208; Business Registration Number UMH2023PTC399204 (India) [SDGT] (Linked To: AL-QATIRJI COMPANY).

SOFTWATER NAVIGATION HOLDING LTD., Trust Company Complex, Ajeltake Road, Majuro, Ajeltake Island MH 96960, Marshall Islands; 1st Floor General Building, Adnan Hakim Street, Baabda-Bir Hassan, Ghobeiry, Mount Lebanon, Lebanon; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 23 May 2023; Identification Number IMO 6414066; Registration Number 120208 (Marshall Islands) [SDGT] (Linked To: AL-QATIRJI COMPANY).

VELINE SHIPTRADE INCORPORATED (a.k.a. VELINE SHIPTRADE INC), Suite 10, 3rd Floor, La Ciotat, Mont Fleuri, Mahe, Seychelles; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 2022; Identification Number IMO 6372426 [SDGT] (Linked To: AL-QATIRJI COMPANY).

**The following vessels have been added to OFAC's SDN List:**

BARON (a.k.a. DARAN; a.k.a. UPMAN) (8RCB2) Chemical/Products Tanker Guyana flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9080493; MMSI 667001798 (vessel) [SDGT] (Linked To: PEARL SHIPPING & TRADING LTD).

CELINE (3E2126) Crude Oil Tanker Panama flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9305609; MMSI 352001369 (vessel) [SDGT] (Linked To: SALINA SHIP MANAGEMENT PVT LTD).

CHLOE (a.k.a. SAM 121) (8RAX1) Crude Oil Tanker Guyana flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9173745; MMSI 750656000 (vessel) [SDGT] (Linked To: AL-QATIRJI COMPANY).

ELINE (8PAA5) Crude Oil Tanker Barbados flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9292486; MMSI 314856000 (vessel) [SDGT] (Linked To: SALINA SHIP MANAGEMENT PVT LTD).

JOEL (T8A4642) Crude Oil Tanker Palau flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9198094; MMSI 511101321 (vessel) [SDGT] (Linked To: BLUESPECTRUM SHIPPING S.A.).

LELIA (8PAB1) Crude Oil Tanker Barbados flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9258870; MMSI 314861000 (vessel) [SDGT] (Linked To: SALINA SHIP MANAGEMENT PVT LTD).

LOTUS (EPNF3) Crude Oil Tanker Iran flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9203784; MMSI 422300300 (vessel) [SDGT] (Linked To: AL-QATIRJI COMPANY).

RAMONA I (a.k.a. SHADI) (8RPE6) Crude Oil Tanker Guyana flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9233222; MMSI 750925000 (vessel) [SDGT] (Linked To: ELIAS SHIPPING & TRADING GROUP SA).

REX 1 (3EUU2) Crude Oil Tanker Panama flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9219056; MMSI 372979000 (vessel) [SDGT] (Linked To: SOFTWATER NAVIGATION HOLDING LTD.).

ROMINA (EPMH6) Crude Oil Tanker Iran flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9114608; MMSI 422278900 (vessel) [SDGT] (Linked To: AMITIS JAZIREH KISH SHIP MANAGEMENT CO LLC).

STAR 5 (EPPV7) Crude Oil Tanker Iran flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9150377; MMSI 422362100 (vessel) [SDGT] (Linked To: MOSHTAQ TEJARAT SANAT CO JSC).

**The following changes have been made to OFAC's SDN List:**

AL-QATIRJI COMPANY (a.k.a. AL-SHAM AND AL-DARWISH COMPANY; a.k.a. KHATIRJI GROUP), Mazzah, Damascus, Syria [SYRIA]. -to- AL-QATIRJI COMPANY (a.k.a. AL-SHAM AND AL-DARWISH COMPANY; a.k.a. KATERJI GROUP COMPANY; a.k.a. KATERJI GROUP LTD; a.k.a. KHATIRJI GROUP), Mazzah, Damascus, Syria; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Type: Activities of holding companies

[SDGT] [SYRIA] [IFSR] (Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS (IRGC)-QODS FORCE).

BIN AHMED RUSHDI AL-QATIRJI, Hussam (Arabic: حسام بن أحمد رشدي قاطرجي) (a.k.a. AL-QATIRJI, Hossam (Arabic: حسام القاطرجي); a.k.a. AL-QATIRJI, Hussam; a.k.a. KATARJI, Hussam; a.k.a. KATERJI, Hussam; a.k.a. KHATARJI, Hussam; a.k.a. KHATIRJI, Hussam; a.k.a. QATARJI, Hossam; a.k.a. QATERJI, Hussam; a.k.a. QATIRJI BIN AHMED RUSHDI, Hussam (Arabic: حسام قاطرجي بن احمد رشدي)), Syria; DOB 11 Jan 1982; POB Raqqa, Syria; nationality Syria; Gender Male (individual) [SYRIA]. - **to-** BIN AHMED RUSHDI AL-QATIRJI, Hussam (Arabic: حسام بن أحمد رشدي قاطرجي) (a.k.a. AL-QATIRJI, Hossam (Arabic: حسام القاطرجي); a.k.a. AL-QATIRJI, Hussam; a.k.a. KATARJI, Hussam; a.k.a. KATERJI, Hussam; a.k.a. KHATARJI, Hussam; a.k.a. KHATIRJI, Hussam; a.k.a. QATARJI, Hossam; a.k.a. QATERJI, Hussam; a.k.a. QATIRJI BIN AHMED RUSHDI, Hussam (Arabic: حسام قاطرجي بن احمد رشدي)), Syria; DOB 11 Jan 1982; POB Raqqa, Syria; nationality Syria; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 (individual) [SDGT] [SYRIA] (Linked To: AL-QATIRJI COMPANY).

DOMANI (f.k.a. GERD KNUTSEN) Shuttle Tanker Cameroon flag; Vessel Registration Identification IMO 9041057 (vessel) [VENEZUELA-EO13850] (Linked To: FIDES SHIP MANAGEMENT LLC). - **to-** LIA (a.k.a. DOMANI; a.k.a. GERD KNUTSEN; a.k.a. SERENITY) Crude Oil Tanker Guyana flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9041057 (vessel) [SDGT] [VENEZUELA-EO13850] (Linked To: FIDES SHIP MANAGEMENT LLC; Linked To: NATIVA MANAGEMENT LTD).

FREEDOM (f.k.a. MAGUS) Crude Oil Tanker Cameroon flag; Vessel Registration Identification IMO 9018464 (vessel) [VENEZUELA-EO13850] (Linked To: FIDES SHIP MANAGEMENT LLC). - **to-** MIA (a.k.a. FREEDOM; a.k.a. MAGUS) (8RCY1) Crude Oil Tanker Guyana flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9018464 (vessel) [SDGT] [VENEZUELA-EO13850] (Linked To: FIDES SHIP MANAGEMENT LLC; Linked To: VELINE SHIPTRADE INCORPORATED).

As a result of this action, all property and interests in property of these individuals and entities named above, and of any entities that are owned, directly or indirectly, 50% or more by them, individually, or with other blocked persons, that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. OFAC's regulations generally prohibit all dealings by U.S. persons or within the United States (including transactions transiting the United States) that involve any property or interests in property of designated or blocked persons. U.S. persons must comply with OFAC regulations, including all U.S. citizens and permanent resident aliens regardless of where they are located, all persons within the United States, and all U.S.-incorporated entities and their foreign branches. Non-U.S. persons are also subject to certain OFAC prohibitions. For example, non-U.S. persons are 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. Violations of OFAC regulations may result in civil or criminal penalties. OFAC may impose civil penalties for sanctions violations based on strict liability, meaning that a person subject to U.S. jurisdiction may be held civilly liable even if such person did not know or have reason to know that it was engaging in a transaction that was prohibited under sanctions laws and regulations administered by OFAC.

Furthermore, engaging in certain transactions with the individuals designated today **entails risk of secondary sanctions pursuant to E.O. 13224, as amended**. Pursuant to this authority, OFAC can prohibit or impose strict conditions on the opening or maintaining in the United States of a correspondent account or a payable-through account of any foreign financial institution that knowingly conducted or facilitated any significant transaction on behalf of a Specially Designated Global Terrorist.

*Related Article:*

[\*Treasury Targets Syrian Conglomerate Funding Qods Force and Houthis | U.S. Department of the Treasury\*](#)

## **2. OFAC SDN List Update: Sudan Designation; Publication of Amended Burma Sanctions Regulations**

On the 12<sup>th</sup> November 2024, **the OFAC SDN List has been updated with the Sudan Designation of the following individual:**

BARAKALLAH, Abdel Rahman Joma'a (a.k.a. BARAK ALLAH, Abdelrahman Gomaa; a.k.a. BARAK ALLAH, Abdul-Rahman Juma; a.k.a. BARAKALLAH AHMAD, Abdelrahman Juma'a (Arabic: عبدالرحمن جمعة براك الله احمد); a.k.a. BARKALLA, Abdelrahman Ahmed Guma; a.k.a. BARKTALLAH, Abdel-Rahman Juma (Arabic: عبدالرحمن جمعة براك الله); a.k.a. TARBALAKALA, Abdel-Rahman Yumma), Sudan; DOB 01 Jan 1969; POB Bahr Elarab, East Darfur, Sudan; nationality Sudan; Gender Male; Passport P07834700 (Sudan); National ID No. 21052659309 (Sudan) (individual) [SUDAN-EO14098].

The above individual is being sanctioned pursuant to Executive Order 14098 for being a foreign person who is or has been a leader, official, senior executive officer, or member of the board of directors of the RSF, an entity that has, or whose members have, engaged in actions or policies that threaten the peace, security, or stability of Sudan relating to the tenure of such leader, official, senior executive officer, or member of the board of directors.

As a result of OFAC's action, all property and interests in property of the designated person that are in the United States or in the possession or control of U.S. persons, or any entities that are owned, directly or indirectly, individually or in the aggregate, 50 percent or more by the blocked person, are blocked and must be reported to OFAC.. Unless authorized by a general or specific license issued by OFAC, or exempt, OFAC's regulations generally prohibit all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons.



In addition, financial institutions and other persons that engage in certain transactions or activities with the sanctioned individual may expose themselves to sanctions or be subject to an enforcement action. The prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any designated person, or the receipt of any contribution or provision of funds, goods, or services from any such person.

**Related Publication:**

[US Treasury/press release/12.11.2024/Treasury Sanctions Sudanese Commander Involved in Human Rights Abuses in West Darfur](#)

Furthermore, OFAC is amending the [Burma Sanctions Regulations, 31 CFR part 525, to further implement E.O. 14014 and reissuing them in their entirety](#) as a more comprehensive set of regulations that includes additional interpretive guidance and definitions, general licenses, and other regulatory provisions that will provide further guidance to the public.

The Regulations block, with certain exceptions, all property and interests in property that are in the United States, that come within the United States, or that are or come within the possession or control of any U.S. person of any person determined:

- (i) to operate in the defense sector of the Burmese economy or any other sector of the Burmese economy
- (ii) to be responsible for or complicit in, or to have directly or indirectly engaged or attempted to engage in, any of the following:
  - (A) actions or policies that undermine democratic processes or institutions in Burma;
  - (B) actions or policies that threaten the peace, security, or stability of Burma;
  - (C) actions or policies that prohibit, limit, or penalize the exercise of freedom of expression or assembly by people in Burma, or that limit access to print, online, or broadcast media in Burma; or
  - (D) the arbitrary detention or torture of any person in Burma or other serious human rights abuse in Burma;
- (iii) to be or have been a leader or official of:
  - (A) the military or security forces of Burma, or any successor entity to any of the foregoing;
  - (B) the Government of Burma on or after February 2, 2021;
  - (C) an entity that has, or whose members have, engaged in any activity described in section (1)(a)(ii) of E.O. 14014 relating to the leader's or official's tenure; or

(D) an entity whose property and interests in property are blocked pursuant to E.O. 14014 as a result of activities related to the leader's or official's tenure;

(iv) to be a political subdivision, agency, or instrumentality of the Government of Burma;

(v) to be a spouse or adult child of any person whose property and interests in property are blocked pursuant to E.O. 14014;

(vi) to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of any person whose property and interests in property are blocked pursuant to E.O. 14014; or

(vii) to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, the military or security forces of Burma or any person whose property and interests in property are blocked pursuant to E.O. 14014.

Furthermore, the Regulations prohibit the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to E.O. 14014, and the receipt of any contribution or provision of funds, goods, or services from any such person, as well as any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in E.O. 14014, as well as any conspiracy formed to violate such prohibitions.

**Related Publications:**

[US Treasury/12/11/2024/Burma Sanctions Regulations](#)

[US Treasury/2024.11.12/Sudan Designation; Publication of Amended Burma Sanctions Regulations](#)