

US TREASURY REPORT

WEEK 13 OF 2025

I. <u>US TREASURY: Counter Terrorism Designations and Designation Update; Russia-related Designation Removal; Reports for Licensing Activities Undertaken Pursuant to the Trade Sanctions Reform and Export Enhancement Act (TSRA)</u>

On the 2nd April 2025, OFAC released <u>Quarterly Reports of Licensing Activities</u> pursuant to Section 906(b) of the Trade Sanctions Reform and Export Enhancement Act of 2000 (TSRA), covering activities undertaken by OFAC under Section 906(a)(1) of the TSRA from <u>October through December 2024</u>. Under the procedures established in its TSRA-related regulations, OFAC processes license applications requesting authorization to export agricultural commodities, medicine, and medical devices to Iran under the specific licensing regime set forth in Section 906 of the TSRA.

Related Publications

<u>Trade Sanctions Reform and Export Enhancement Act of 2000 (TSRA) Reports to Congress |</u>
<u>Office of Foreign Assets Control</u>
1323297_Quarterly Report

Furthermore, the OFAC SDN List has been updated with the Counter Terrorism Designations of the following individuals, entities and vessel:

A. INDIVIDUALS

BELYAKOV, Yuri Vladimirovich (a.k.a. BELIAKOV, Yury (Cyrillic: БЕЛЯКОВ, Юрий)), Russia; DOB 24 Oct 1974; POB Vologodskaya Oblast, Russia; nationality Russia; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Tax ID No. 540697174841 (Russia) (individual) [SDGT] (Linked To: AL-JAMAL, Sa'id Ahmad Muhammad).

GHAIRAT, Hushang (Cyrillic: ГАЙРАТ, Ушанг), Russia; DOB 1984; nationality Afghanistan; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport SE046462 (Afghanistan) expires 01 Jan 2011 (individual) [SDGT] (Linked To: AL-JAMAL, Sa'id Ahmad Muhammad).



GHAIRAT, Sohrab (Cyrillic: ΓΑЙРАТ, Coxpa6), Moscow, Russia; DOB 06 Sep 1985; POB Kabul, Afghanistan; nationality Russia; alt. nationality Afghanistan; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport 752859643 (Russia) expires 24 Feb 2026 (individual) [SDGT] (Linked To: AL-JAMAL, Sa'id Ahmad Muhammad).

JAFARI, Hasan (a.k.a. JA'FARI, Hasan; a.k.a. KALESTAN, Hasan Jafari (Arabic: حسن جعفري)), Turkey; DOB 28 Nov 1991; nationality Iran; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport E65645407 (Iran); National ID No. 1630127760 (Iran) (individual) [SDGT] (Linked To: AL-JAMAL, Sa'id Ahmad Muhammad).

VIDANOV, Vyacheslav Vladimirovich (Cyrillic: ВИДАНОВ, Вячеслав Владимирович) (a.k.a. VIDANOV, Viacheslav), str. Kosmonavtov, d. 12/1, av. 34, Astrakhan, Russia; DOB 29 Sep 1987; POB Astrakhan, Russia; nationality Russia; Gender Male; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Passport 751615121 (Russia); National ID No. 1208209900 (Russia); Tax ID No. 301711405290 (Russia) (individual) [SDGT] (Linked To: AL-JAMAL, Sa'id Ahmad Muhammad).

B. ENTITIES

AM ASIA M6 LTD, 31st Floor, Tower Two, Times Square, 1, Matheson Street, Causeway Bay, Hong Kong, China; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 24 Jul 2019; Identification Number IMO 6187322; Company Number 2855903 (Hong Kong); Business Registration Number 70990857 (Hong Kong) [SDGT] (Linked To: AL-JAMAL, Sa'id Ahmad Muhammad).

LLC EDISON (a.k.a. LIMITED LIABILITY COMPANY EDISON (Cyrillic: ОБЩЕСТВО С ОГРАНИЧЕННОЙ ОТВЕТСТВЕННОСТЬЮ ЭДИСОН)), 125367, Vn. Ter. G. Municipal District Pokrovskoe-Streshnevo, Pr-d polesskiy, d. 16, Str. I, Pomeshch. 36/1/2, Moscow, Russia; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 04 Jun 2024; Tax ID No. 7733447427 (Russia); Registration Number 1247700410880 (Russia) [SDGT] (Linked To: GHAIRAT, Sohrab).

LLC KOLIBRI GROUP (Cyrillic: ООО КОЛИБРИ ГРУПП) (a.k.a. LIMITED LIABILITY COMPANY KOLIBRI GROUP), 123308, Vn. Ter. G. Municipal District, Khoroshevo-Mnevniki, Pr-kt Mashala Zhukova, d. 2, Pomeshch. 19/3, Moscow, Russia; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 29 Aug 2024; Tax ID No. 9734004492 (Russia); Registration Number 1247700583888 (Russia) [SDGT] (Linked To: GHAIRAT, Sohrab).



LLC SKY FRAME (Cyrillic: OOO СКАЙ ФРЕЙМ) (a.k.a. LIMITED LIABILITY COMPANY SKY FRAME), 129327, Vn. Ter. G. Municipal District, Babushkinskiy, UI Menzhinskogo, D. 3, Pomeshch. I, Kom. 25, Moscow, Russia; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Organization Established Date 20 Mar 2019; Tax ID No. 7716934251 (Russia); Registration Number 1197746202280 (Russia) [SDGT] (Linked To: GHAIRAT, Sohrab).

C. <u>VESSEL</u>

AM THESEUS (a.k.a. ZAFAR) (UBKZ6) Bulk Carrier Russia flag; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Vessel Registration Identification IMO 9720263; MMSI 273254900 (vessel) [SDGT] (Linked To: AM ASIA M6 LTD).

The above designations are subject to Secondary Sanctions Risk.

Pursuant to the counterterrorism authority, Executive Order (E.O.) 13224, as amended, OFAC took action against a network of Houthi financial facilitators and procurement operatives working in coordination with a senior Houthi financial official backed by Iran's Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF). This network has procured tens of millions of dollars' worth of commodities from Russia, including weapons and sensitive goods, as well as stolen Ukrainian grain, for onward shipment to Houthi-controlled Yemen. Additionally, OFAC has identified eight digital asset wallets used by the Houthis to transfer funds associated with their activities.

As a result of OFAC's action, all property and interests in property of the designated persons, or any entities that are owned, directly or indirectly, individually or in the aggregate, 50 percent or more by one or more blocked persons, that are in the United States or in the possession or control of U.S. persons is/are blocked and must be reported to OFAC. Unless authorized by a general or specific license issued by OFAC or exempt, U.S. sanctions 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.

<u>Violations of U.S. sanctions may result in the imposition of civil or criminal penalties on U.S. and foreign persons.</u>

OFAC may impose civil penalties for sanctions violations on a strict liability basis. In addition, financial institutions and other persons may risk exposure to sanctions for engaging in certain transactions or activities with designated or otherwise blocked persons.

<u>Furthermore</u>, engaging in certain transactions with the individuals designated entails risk of secondary sanctions pursuant to E.O. 13224, as amended. Pursuant to this authority,



OFAC can prohibit or impose strict conditions on opening or maintaining, in the United States, a correspondent account or a payable-through account of a foreign financial institution that knowingly conducts or facilitates any significant transaction on behalf of a Specially Designated Global Terrorist.

Exports, reexports, or transfers of items subject to U.S. export controls involving persons included on the SDN List pursuant to E.O. 13224, as amended, may be subject to additional restrictions administered by the Department of Commerce, Bureau of Industry and Security. See 15 C.F.R. section 744.8 for additional information.

Related Publication:

<u>Treasury Sanctions Houthi Network Procuring Weapons and Commodities from Russia | U.S. Department of the Treasury</u>

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

ROTENBERG, Karina Yurevna (Cyrillic: РОТЕНБЕРГ, Карина Юрьевна) (f.k.a. GAPCHUK FOX, Karina; a.k.a. ROTENBERG, Karina Iurevna; a.k.a. ROTENBERG, Karina Iurievna; a.k.a. ROTENBERG, Karina Iurievna; a.k.a. ROTENBERG, Karina Yurievna; a.k.a. ROTENBERG, Karina Yuryevna), Russia; France; DOB 24 Nov 1978; POB St. Petersburg, Russia; nationality Russia; Gender Female; Secondary sanctions risk: See Section 11 of Executive Order 14024. (individual) [RUSSIA-EO14024] (Linked To: ROTENBERG, Boris Romanovich).

ROTENBERG, Karina Yurievna (f.k.a. GAPCHUK FOX, Karina; a.k.a. ROTENBERG, Karina Iurevna; a.k.a. ROTENBERG, Karina Iurievna; a.k.a. ROTENBERG, Karina Iuryevna; a.k.a. ROTENBERG, Karina Yurevna (Cyrillic: POTEHBEPF, Карина Юрьевна); a.k.a. ROTENBERG, Karina Yuryevna), Russia; France; DOB 24 Nov 1978; POB St. Petersburg, Russia; nationality Russia; Gender Female; Secondary sanctions risk: See Section 11 of Executive Order 14024. (individual) [RUSSIA-EO14024] (Linked To: ROTENBERG, Boris Romanovich).

ROTENBERG, Karina Yuryevna (f.k.a. GAPCHUK FOX, Karina; a.k.a. ROTENBERG, Karina Iurevna; a.k.a. ROTENBERG, Karina Iurievna; a.k.a. ROTENBERG, Karina Iuryevna; a.k.a. ROTENBERG, Karina Yurevna (Cyrillic: РОТЕНБЕРГ, Карина Юрьевна); a.k.a. ROTENBERG, Karina Yurievna), Russia; France; DOB 24 Nov 1978; POB St. Petersburg, Russia; nationality Russia; Gender Female; Secondary sanctions risk: See Section 11 of Executive Order 14024. (individual) [RUSSIA-EO14024] (Linked To: ROTENBERG, Boris Romanovich).



ROTENBERG, Karina Iurevna (f.k.a. GAPCHUK FOX, Karina; a.k.a. ROTENBERG, Karina Iurievna; a.k.a. ROTENBERG, Karina Iuryevna; a.k.a. ROTENBERG, Karina Yurevna (Cyrillic: POTEHBEPF, Карина Юрьевна); a.k.a. ROTENBERG, Karina Yurievna; a.k.a. ROTENBERG, Karina Yuryevna), Russia; France; DOB 24 Nov 1978; POB St. Petersburg, Russia; nationality Russia; Gender Female; Secondary sanctions risk: See Section 11 of Executive Order 14024. (individual) [RUSSIA-EO14024] (Linked To: ROTENBERG, Boris Romanovich).

ROTENBERG, Karina Iurievna (f.k.a. GAPCHUK FOX, Karina; a.k.a. ROTENBERG, Karina Iurevna; a.k.a. ROTENBERG, Karina Iuryevna; a.k.a. ROTENBERG, Karina Yurevna (Cyrillic: POTEHБЕРГ, Карина Юрьевна); a.k.a. ROTENBERG, Karina Yurievna; a.k.a. ROTENBERG, Karina Yuryevna), Russia; France; DOB 24 Nov 1978; POB St. Petersburg, Russia; nationality Russia; Gender Female; Secondary sanctions risk: See Section 11 of Executive Order 14024. (individual) [RUSSIA-EO14024] (Linked To: ROTENBERG, Boris Romanovich).

ROTENBERG, Karina Iuryevna (f.k.a. GAPCHUK FOX, Karina; a.k.a. ROTENBERG, Karina Iurevna; a.k.a. ROTENBERG, Karina Iurievna; a.k.a. ROTENBERG, Karina Yurevna (Cyrillic: POTEHБЕРГ, Карина Юрьевна); a.k.a. ROTENBERG, Karina Yurievna; a.k.a. ROTENBERG, Karina Yuryevna), Russia; France; DOB 24 Nov 1978; POB St. Petersburg, Russia; nationality Russia; Gender Female; Secondary sanctions risk: See Section 11 of Executive Order 14024. (individual) [RUSSIA-EO14024] (Linked To: ROTENBERG, Boris Romanovich).

GAPCHUK FOX, Karina (a.k.a. ROTENBERG, Karina Iurevna; a.k.a. ROTENBERG, Karina Iurievna; a.k.a. ROTENBERG, Karina Iurievna; a.k.a. ROTENBERG, Karina Yurevna (Cyrillic: РОТЕНБЕРГ, Карина Юрьевна); a.k.a. ROTENBERG, Karina Yurievna; a.k.a. ROTENBERG, Karina Yuryevna), Russia; France; DOB 24 Nov 1978; POB St. Petersburg, Russia; nationality Russia; Gender Female; Secondary sanctions risk: See Section 11 of Executive Order 14024. (individual) [RUSSIA-EO14024] (Linked To: ROTENBERG, Boris Romanovich).

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

ANSARALLAH (a.k.a. ANSAR ALLAH; a.k.a. ANSARULLAH; a.k.a. "HOUTHI GROUP"; a.k.a. "PARTISANS OF GOD"; a.k.a. "SUPPORTERS OF GOD"), Yemen; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886 [FTO] [SDGT].

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ANSARALLAH (a.k.a. ANSAR ALLAH; a.k.a. ANSARULLAH; a.k.a. "HOUTHI GROUP"; a.k.a. "PARTISANS OF GOD"; a.k.a. "SUPPORTERS OF GOD"), Yemen; Secondary sanctions risk: section 1(b) of Executive Order 13224, as amended by Executive Order 13886; Digital Currency Address - USDT TC4VsFHJdZ66BdwobZxkudVZBVmQZgCP65; alt. Digital Currency Address - USDT TQ5mpZPbQMSq2s1vSM3RJgiB1AsTsiTpFZ; alt. Digital Currency



Address - USDT TXEaKf4rT3rMoD3Vuqnuhwr6vLq6BL5t33; alt. Digital Currency Address - USDT TGUPpmW2bAnMCLe5ih2CFisfCHk4gTFDsx; alt. Digital Currency Address - USDT TDwN1Eq62bqvVhfGAjdRRJjE46jsi5KNMV; alt. Digital Currency Address - USDT TM6Kix9wH8cYQ4rLpFifsQ4ddH3rPX3f8p; alt. Digital Currency Address - USDT TDprk9jeYPVm6khkBp1u7fwuyJcEJFrPWD; alt. Digital Currency Address - USDT TVn4q7L4fKEPbygi7UHq1CKfZxtbeuMV5q [FTO] [SDGT].

Related Publication:

Counter Terrorism Designations and Designation Update; Russia-related Designation Removal; Reports for Licensing Activities Undertaken Pursuant to the Trade Sanctions Reform and Export Enhancement Act (TSRA) | Office of Foreign Assets Control

II. OFAC SDN List Update: Non-Proliferation Designations; Iran-related Designations

On the 1st April 2025, the OFAC SDN List has been updated with the Non-Proliferation and Iran-related Designations of the following Individuals and Entities:

A. INDIVIDUALS

AKBARI, Hossein (a.k.a. AKBARI, Hosein; a.k.a. AKBARI, Hosseyn; a.k.a. "DANIAL, Yousef"), Tehran, Iran; DOB 17 Jun 1961; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; National ID No. 0042740721 (Iran) (individual) [NPWMD] [IFSR] (Linked To: RAH ROSHD INTERNATIONAL TRADE EXCHANGES DEVELOPMENT).

YOUSEFNEJAD, Abbas (a.k.a. SHULAMI, Abbas Yusofnezhad; a.k.a. YOSEFNEJAD, Abbas; a.k.a. YOUSEF NEJAD, Abbas; a.k.a. YUSOFNEZHAD, Abbas; a.k.a. YUSUF NEZHAD, Abbas), Tehran, Iran; DOB 15 Jul 1986; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; National ID No. 2669933963 (Iran) (individual) [NPWMD] [IFSR] (Linked To: RAH ROSHD INTERNATIONAL TRADE EXCHANGES DEVELOPMENT).

B. ENTITIES

DIAMOND CASTLE ELECTRONICS TRADING LLC, Port Saeed, Deira, Dubai, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 19 Aug 2021; Commercial Registry Number 1597188 (United Arab Emirates); Chamber of Commerce Number 369833 (United Arab Emirates); Business Registration Number



974594 (United Arab Emirates); Economic Register Number (CBLS) 11717588 (United Arab Emirates) [NPWMD] [IFSR] (Linked To: RAH ROSHD INTERNATIONAL TRADE EXCHANGES DEVELOPMENT).

FUTURE TRENDS GOODS WHOLESALERS LLC, Bur Dubai, Dubai, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 28 Dec 2021; Business Registration Number 1017310 (United Arab Emirates); Economic Register Number (CBLS) 11798282 (United Arab Emirates) [NPWMD] [IFSR] (Linked To: RAH ROSHD INTERNATIONAL TRADE EXCHANGES DEVELOPMENT).

INFRACOM COMMUNICATION NETWORKS FZE, No. 724, Jebel Ali Free Zone, Dubai, United Arab Emirates; P.O. Box 262995, Dubai, United Arab Emirates; Office 434, JAFZA 14, Dubai, United Arab Emirates; Website www.infracommunication.com; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 08 Nov 2009; Commercial Registry Number 133319 (United Arab Emirates); Chamber of Commerce Number 184048 (United Arab Emirates); Business Registration Number 119400 (United Arab Emirates) [NPWMD] [IFSR] (Linked To: RAH ROSHD INTERNATIONAL TRADE EXCHANGES DEVELOPMENT).

PHENOMENA INTERNATIONAL GENERAL TRADING LLC, Office 402, Ntali Haddad, Bur Dubai, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 12 Mar 2015; Chamber of Commerce Number 1159296 (United Arab Emirates); Business Registration Number 729197 (United Arab Emirates) [NPWMD] [IFSR] (Linked To: INFRACOM COMMUNICATION NETWORKS FZE).

RAH ROSHD INTERNATIONAL TRADE EXCHANGES DEVELOPMENT (a.k.a. RAH ROSHD COMPANY; a.k.a. RAH ROSHD ENGINEERING CO; a.k.a. RAH ROSHD INTERNATIONAL TRADE DEVELOPMENT COMPANY; a.k.a. TOSE'E MOBADLAT BAZARGANI BEYN OLMELALI RAH ROSHD; a.k.a. "RAH ROSHD"), Unit 7, No. 21, Firouzeh Alley, Sohrevardi St., Tehran, Iran; Karaj Special Road, Tehran, Iran; Kilometer 19 of the Special Road, in front of Golzar St., Corner of 74 St., No. 222, Tehran, Iran; Website www.rahroshd.net; alt. Website www.rahroshd.ir; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 07 Nov 1992; National ID No. 10101375839 (Iran); Registration Number 93476 (Iran) [NPWMD] [IFSR] (Linked To: QODS AVIATION INDUSTRIES).

ZIBO SHENBO MACHINELECTRONICS CO LTD (a.k.a. ZIBO SHENBO ELECTROMECHANICAL CO LTD), No. 76, Beishan Road, Boshan District, Zibo, Shandong Province 255200, China; Additional Sanctions Information - Subject to Secondary Sanctions; Organization Established Date 28 Jun 2002; Registration Number 370304228015542 (China); Unified Social Credit Code (USCC) 91370304740243518M (China) [NPWMD] [IFSR] (Linked To: RAH ROSHD INTERNATIONAL TRADE EXCHANGES DEVELOPMENT).



The above Designations are subject to Secondary Sanctions.

Related Publication

Non-Proliferation Designations; Iran-related Designations | Office of Foreign Assets Control

OFAC, in coordination with the U.S. Department of Justice, designated a network of six entities and two individuals based in Iran, the United Arab Emirates (UAE), and the People's Republic of China (PRC) responsible for the procurement of unmanned aerial vehicle (UAV) components on behalf of Iran-based Qods Aviation Industries (QAI)—a leading manufacturer for Iran's UAV program, pursuant to Executive Order (E.O.) 13382, which targets proliferators of weapons of mass destruction (WMD) and their means of delivery.

As a result of OFAC's action, all property and interests in property of the designated persons, or any entities that are owned, directly or indirectly, individually or in the aggregate, 50 percent or more by one or more blocked persons, that are in the United States or in the possession or control of U.S. persons is/are blocked and must be reported to OFAC. Unless authorized by a general or specific license issued by OFAC or exempt, U.S. sanctions 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.

<u>Violations of U.S. sanctions may result in the imposition of civil or criminal penalties on U.S.</u> and foreign persons.

OFAC may impose civil penalties for sanctions violations on a strict liability basis.

Exports, reexports, or transfers of items subject to U.S. export controls involving persons included on the SDN List pursuant to E.O. 13382 may be subject to additional restrictions administered by the Department of Commerce, Bureau of Industry and Security. See 15 C.F.R. section 744.8 for additional information.

Related Publication:

<u>The Departments of Treasury and Justice Take Action Against Iranian Weapons Procurement Network | U.S. Department of the Treasury</u>