

**US TREASURY REPORT**  
**WEEK 02 OF 2025**

**1. Russia-related and Russia-/Ukraine-related Designations; Venezuela-related Designations; Publication of Russia-related Determinations; Issuance of Russia-related General Licenses and Frequently Asked Questions**

On 10<sup>th</sup> January 2025, OFAC took sweeping action to fulfill the G7 commitment to reduce Russian revenues from energy, including blocking two major Russian oil producers. These actions also impose sanctions on an unprecedented number of oil-carrying vessels, many of which are part of the “shadow fleet,” opaque traders of Russian oil, Russia-based oilfield service providers, and Russian energy officials. These actions are underpinned by the issuance of a new determination that authorizes sanctions pursuant to Executive Order (E.O.) 14024 against persons operating or having operated in the energy sector of the Russian Federation economy. **These actions substantially increase the sanctions risks associated with the Russian oil trade.**

The United Kingdom (UK) is also taking action, joining Treasury in sanctioning two major Russian oil producers.

In particular, OFAC published a [Determination pursuant to Section 1\(a\)\(i\) of Executive Order 14024](#), "Energy Sector of the Russian Federation Economy" which imposes economic sanctions on any person determined that operate or have operated in such sectors of the Russian Federation economy. **This determination shall take effect on 10 January 2025.** OFAC designated two of Russia's most significant oil producers and exporters pursuant to E.O. 14024 for operating or having operated in the energy sector of the Russian Federation economy and pursuant to E.O. 13662 for operating in the energy sector of the Russian Federation economy.

**Public Joint Stock Company Gazprom Neft** (Gazprom Neft) is a Russia-based, vertically integrated oil company whose core activities include the exploration, production, and sale of oil.

**Surgutneftegas** is a Russia-based, vertically integrated oil company whose core activities include the exploration, production, and sale of oil.

The UK is also sanctioning Gazprom Neft and Surgutneftegas. Alongside Gazprom Neft and Surgutneftegas, OFAC is designating more than two dozen Gazprom Neft and Surgutneftegas subsidiaries. All entities owned 50% or more, directly or indirectly, by Gazprom Neft, Surgutneftegas, or their subsidiaries are also subject to blocking, even if not identified by OFAC.

Furthermore OFAC published a [Determination pursuant to Section 1\(a\)\(ii\) of Executive Order 14071](#), "Prohibition on Petroleum Services." As a result, the following activities are prohibited, except to the extent provided by law, or unless licensed or otherwise authorized by the OFAC:

The exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a United States person, wherever located, of petroleum services to any person located in the Russian Federation.

This determination excludes the following:

(1) any petroleum services related to isotopes derived from petroleum manufacturing that are used for medical, agricultural, or environmental purposes, such as Carbon-13;

(2) certain covered services related to the maritime transport of crude oil and petroleum products of Russian Federation origin, provided that such crude oil or petroleum products are purchased at or below the relevant determined price caps, as specified in: the Determination Pursuant to Sections 1(a)(ii), 1(b), and 5 of Executive Order 14071, Prohibitions on Certain Services as They Relate to the Maritime Transport of Crude Oil of Russian Federation Origin; the Determination Pursuant to Sections 1(a)(ii), 1(b), and 5 of Executive Order 14071, Prohibitions on Certain Services as They Relate to the Maritime Transport of Petroleum Products of Russian Federation Origin; the Determination Pursuant to Sections 1(a)(ii), 1(b), and 5 of Executive Order 14071, Price Cap on Crude Oil of Russian Federation Origin; and the Determination Pursuant to Sections 1(a)(ii), 1(b), and 5 of Executive Order 14071, Price Cap on Petroleum Products of Russian Federation Origin;

(3) any service in connection with the wind down or divestiture of an entity located in the Russian Federation that is not owned or controlled, directly or indirectly, by a Russian person.

**This determination shall take effect beginning at 12:01 a.m. eastern standard time on 27 February 2025.**

OFAC also has issued the following General Licenses:

A) [Russia-related General License 8L](#), "Authorizing the Wind Down of Transactions Related to Energy" which provides that all transactions prohibited by Executive Order (E.O.) 14024 involving one or more of the following entities that are ordinarily incident and necessary to the wind down of any transaction related to energy are authorized, through 12:01 a.m. eastern daylight time, 12 March 2025:

- (1) State Corporation Bank for Development and Foreign Economic Affairs Vnesheconombank;
- (2) Public Joint Stock Company Bank Financial Corporation Otkritie;
- (3) Sovcombank Open Joint Stock Company;
- (4) Public Joint Stock Company Sberbank of Russia;
- (5) VTB Bank Public Joint Stock Company;
- (6) Joint Stock Company Alfa-Bank;
- (7) Public Joint Stock Company Rosbank;
- (8) Bank Zenit Public Joint Stock Company;
- (9) Bank Saint-Petersburg Public Joint Stock Company;
- (10) National Clearing Center (NCC);
- (11) Any entity in which one or more of the above persons own, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest; or
- (12) the Central Bank of the Russian Federation.

For the purposes of this general license, the term “related to energy” means the extraction, production, refinement, liquefaction, gasification, regasification, conversion, enrichment, fabrication, transport, or purchase of petroleum, including crude oil, lease condensates, unfinished oils, natural gas liquids, petroleum products, natural gas, or other products capable of producing energy, such as coal, wood, or agricultural products used to manufacture biofuels, or uranium in any form, as well as the development, production, generation, transmission, or exchange of power, through any means, including nuclear, thermal, and renewable energy sources.

This general license does not authorize:

- (1) Any transactions prohibited by Directive 1A under E.O. 14024, Prohibitions Related to Certain Sovereign Debt of the Russian Federation;
- (2) The opening or maintaining of a correspondent account or payable-through account for or on behalf of any entity subject to Directive 2 under E.O. 14024, Prohibitions Related to Correspondent or Payable-Through Accounts and Processing of Transactions Involving Certain Foreign Financial Institutions;
- (3) Any debit to an account on the books of a U.S. financial institution of the Central Bank of the Russian Federation; or
- (4) Any transactions otherwise prohibited by the Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587 (RuHSR), including transactions involving any person blocked pursuant to the RuHSR other than the blocked persons described in paragraph (a) of this general license, unless separately authorized.

Effective 10 January 2025, General License No. 8K, dated October 30, 2024, is replaced and superseded in its entirety by this General License No. 8L. Note to General License No. 8L. This authorization is valid until 12 March 2025. See RuHSR General License No. 115A for an authorization for transactions related to civil nuclear energy involving certain entities.

B) [Russia-related General License 115A](#), "Authorizing Certain Transactions Related to Existing Civil Nuclear Energy Projects which authorises certain Transactions Related to Civil Nuclear Energy.

In particular, all transactions prohibited by Executive Order (E.O.) 14024 involving one or more of the following entities that are related to civil nuclear energy are authorized through 12:01 a.m. eastern daylight time, 30 June 2025:

- (1) Gazpombank Joint Stock Company;
- (2) State Corporation Bank for Development and Foreign Economic Affairs Vnesheconombank;
- (3) Public Joint Stock Company Bank Financial Corporation Otkritie;
- (4) Sovcombank Open Joint Stock Company;

- (5) Public Joint Stock Company Sberbank of Russia;
- (6) VTB Bank Public Joint Stock Company;
- (7) Joint Stock Company Alfa-Bank;
- (8) Public Joint Stock Company Rosbank;
- (9) Bank Zenit Public Joint Stock Company;
- (10) Bank Saint-Petersburg Public Joint Stock Company;
- (11) National Clearing Center (NCC);
- (12) Any entity in which one or more of the above persons own, directly or indirectly, individually or in the aggregate, a 50% or greater interest; or
- (13) the Central Bank of the Russian Federation.

For the purposes of this general license, the term “related to civil nuclear energy” means transactions undertaken solely to maintain or support civil nuclear projects initiated before November 21, 2024.

This general license does not authorize:

- (1) Any transactions related to the Paks II nuclear power plant project (Paks II), including Paks II. Nuclear Power Plant Private Limited Company, or any successor project to the Paks II;
- (2) The opening or maintaining of a correspondent account or payable-through account for or on behalf of any entity subject to Directive 2 under E.O. 14024, Prohibitions Related to Correspondent or Payable-Through Accounts and Processing of Transactions Involving Certain Foreign Financial Institutions;

(3) Any debit to an account on the books of a U.S. financial institution of the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, or the Ministry of Finance; or

(4) Any transactions otherwise prohibited by the Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587 (RuHSR), including transactions involving any person blocked pursuant to the RuHSR other than the blocked persons described in paragraph (a) of this general license, unless separately authorized.

Effective 10 January 2025, General License No. 115, dated December 18, 2024, is replaced and superseded in its entirety by this General License No. 115A.

C) [Russia-related General License 117](#), "Authorizing the Wind Down of Transactions Involving Gazprom Neft, Surgutneftegas, and Certain Additional Entities Blocked on January 10, 2025" which authorises the Wind Down of Transactions Involving Gazprom Neft, Surgutneftegas, and Certain Additional Entities Blocked on 10 January 2025.

In particular, except as provided below, all transactions prohibited by Executive Order (E.O.) 14024 that are ordinarily incident and necessary to the wind down of any transaction involving one or more of the blocked entities listed in the Annex to this general license, or any entity in which those blocked entities own, directly or indirectly, individually or in the aggregate, a 50% or greater interest, are authorized through 12:01 a.m. eastern standard time, 27 February 2025, provided that any payment to a blocked person is made into a blocked account in accordance with the Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587 (RuHSR).

This general license does not authorize:

(1) Any transactions prohibited by Directive 2 under E.O. 14024, Prohibitions Related to Correspondent or Payable-Through Accounts and Processing of Transactions Involving Certain Foreign Financial Institutions;

(2) Any transactions prohibited by Directive 4 under E.O. 14024, Prohibitions Related to Transactions Involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, and the Ministry of Finance of the Russian Federation; or

(3) Any transactions otherwise prohibited by the RuHSR, including transactions involving any person blocked pursuant to the RuHSR other than the blocked entities described in paragraph (a) of this general license, unless separately authorized.

D) [Russia-related General License 118](#), "Authorizing Certain Transactions Related to Debt or Equity of, or Derivative Contracts Involving, Gazprom Neft, Surgutneftegas, and Certain Additional Entities Blocked on 10 January 2025.

Authorizing Certain Transactions Related to Debt or Equity of, or Derivative Contracts Involving, Gazprom Neft, Surgutneftegas, and Certain Additional Entities Blocked on 10 January 2025  
Except as provided below, all transactions prohibited by Executive Order (E.O.) 14024 that are ordinarily incident and necessary to the divestment or transfer, or the facilitation of the divestment or transfer, of debt or equity issued or guaranteed by the following blocked entities ("Covered Debt or Equity") to a non-U.S. person are authorized through 12:01 a.m. eastern standard time, 27 February 2025:

- (1) Ingosstrakh Insurance Company;
- (2) Limited Liability Company Plant for the Production of Propeller Steering Columns Sapphire;
- (3) Open Joint Stock Company Volzhsky Abrasive;
- (4) Public Joint Stock Company Gazprom Neft;
- (5) Surgutneftegas; or
- (6) Any entity in which one or more of the above persons own, directly or indirectly, individually or in the aggregate, a 50% or greater interest.

Except as provided in this general license, all transactions prohibited by E.O. 14024 that are ordinarily incident and necessary to facilitating, clearing, and settling trades of Covered Debt or Equity that were placed prior to 4:00 p.m. eastern standard time, 10 January 2025 are authorized through 12:01 a.m. eastern standard time, 27 February 2025.

Except as provided in this general license, all transactions prohibited by E.O. 14024 that are ordinarily incident and necessary to the wind down of derivative contracts entered into prior to

4:00 p.m. eastern standard time, 10 January 2025 that (i) include a blocked person described in paragraph (a) of this general license as a counterparty or (ii) are linked to Covered Debt or Equity are authorized through 12:01 a.m. eastern standard time, 27 February 2025, provided that any payments to a blocked person are made into a blocked account in accordance with the Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587 (RuHSR).

Paragraph (a) of this general license does not authorize:

- (1) U.S. persons to sell, or to facilitate the sale of, Covered Debt or Equity to, directly or indirectly, any person whose property and interests in property are blocked; or
- (2) U.S. persons to purchase or invest in, or to facilitate the purchase of or investment in, directly or indirectly, Covered Debt or Equity, other than purchases of or investments in Covered Debt or Equity ordinarily incident and necessary to the divestment or transfer of Covered Debt or Equity as described in paragraph (a) of this general license.

This general license does not authorize:

- (1) Any transactions prohibited by Directive 2 under E.O. 14024, Prohibitions Related to Correspondent or Payable-Through Accounts and Processing of Transactions Involving Certain Foreign Financial Institutions;
- (2) Any transactions prohibited by Directive 4 under E.O. 14024, Prohibitions Related to Transactions Involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, and the Ministry of Finance of the Russian Federation; or
- (3) Any transactions otherwise prohibited by the RuHSR, including transactions involving any person blocked pursuant to the RuHSR other than the blocked persons described in paragraph (a) of this general license, unless separately authorized.

E) [Russia-related General License 119](#), "Authorizing Certain Transactions Involving Public Joint Stock Company Gazprom Neft Related to Diplomatic and Consular Mission Operations Outside of the Russian Federation which authorises Certain Transactions Involving Public Joint Stock Company Gazprom Neft Related to Diplomatic and Consular Mission Operations Outside of the Russian Federation (a) Except as provided in paragraph (b) of this general license, all transactions prohibited by Executive Order (E.O.) 14024 that are ordinarily incident and necessary to the official business of diplomatic or consular missions located outside of the Russian Federation and



involving Public Joint Stock Company Gazprom Neft (Gazprom Neft), or any entity in which Gazprom Neft owns, directly or indirectly, a 50% or greater interest, are authorized through 12:01 a.m. eastern standard time 27 February 2025.

This general license does not authorize: (1) Any transactions prohibited by Directive 2 under E.O. 14024, Prohibitions Related to Correspondent or Payable-Through Accounts and Processing of Transactions Involving Certain Foreign Financial Institutions; (2) Any transactions prohibited by Directive 4 under E.O. 14024, Prohibitions Related to Transactions Involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, and the Ministry of Finance of the Russian Federation; or (3) Any transactions otherwise prohibited by the RuHSR, including transactions involving any person blocked pursuant to the RuHSR other than the blocked entities described in paragraph (a) of this general license, unless separately authorized.

F) [Russia-related General License 120](#), "Authorizing Limited Safety and Environmental Transactions and the Unloading of Cargo Involving Certain Persons or Vessels Blocked on January 10, 2025 which authorizes through 12:01 a.m. eastern standard time, February 27, 2025, all transactions prohibited by Executive Order (E.O.) 14024 that are ordinarily incident and necessary to one or more of the following activities involving the blocked persons listed in the Annex to this general license, and any entity in which those blocked persons own, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest:

- (1) The safe docking and anchoring in port of any vessels in which any person listed in the Annex to this general license has a property interest (the "blocked vessels");
- (2) The preservation of the health or safety of the crew of any of the blocked vessels; or
- (3) Emergency repairs of any of the blocked vessels or environmental mitigation or protection activities relating to any of the blocked vessels.

This general license does not authorize:

- (1) The entry into any new commercial contracts involving the property or interests in property of any blocked persons, including the blocked persons described in paragraph (a) of this general license, except as authorized by paragraph (a);
- (2) Any transactions prohibited by Directive 2 under E.O. 14024, Prohibitions Related to Correspondent or Payable-Through Accounts and Processing of Transactions Involving Certain Foreign Financial Institutions;

- (3) Any transactions prohibited by Directive 4 under E.O. 14024, Prohibitions Related to Transactions Involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, and the Ministry of Finance of the Russian Federation; or
- (4) Any transactions otherwise prohibited by the RuHSR, including transactions involving the property or interests in property of any person blocked pursuant to the RuHSR, other than transactions involving the blocked persons described in paragraph (a) of this general license, unless separately authorized.

G) [Russia-related General License 121](#), "Authorizing Petroleum Services Related to Certain Projects;" and [Russia-/Ukraine-related General License 26](#), "Transactions Authorized Pursuant to the Russian Harmful Foreign Activities Sanctions Regulations."

Additionally, OFAC has **revoked** [Russia-related General License 93](#), "Authorizing Transactions Involving Certain Sovcomflot Vessels" through 12:01 a.m. eastern standard time eastern daylight time June 28, 2025, all transactions prohibited by the determination of January 10, 2025, made pursuant to section 1(a)(ii) of Executive Order 14071 ("Prohibition on Petroleum Services") that are related to the projects listed below:

- (1) Caspian Pipeline Consortium;
- (2) Tengizchevroil; or
- (3) Sakhalin-2.

H) [Russia-/Ukraine-related General License 26](#) "Transactions Authorized Pursuant to the Russian Harmful Foreign Activities Sanctions Regulations which authorizes all transactions prohibited by Executive Order (E.O.) 13662 involving one or more blocked persons listed in the Annex to this general license, or any entity in which those blocked persons own, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest, that are authorized or exempt under the Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587 (RuHSR), including transactions authorized by a general or specific license.

**Additionally, OFAC has revoked [Russia-related General License 93](#), "Authorizing Transactions Involving Certain Sovcomflot Vessels", as of 10 January 2025.**

OFAC furthermore has issued five new, Russia-related Frequently Asked Questions ([FAQs 1213 - 1217](#)), and amended 14 Russia-related Frequently Asked Questions ([FAQs 967, 976, 977, 978, 999, 1011, 1012, 1017, 1117, 1126, 1182, 1183, 1201, and 1203](#)).

Finally, OFAC has updated its SDN List, the Sectoral Sanctions Identifications List (SSI), and/or the non-SDN Menu-Based Sanctions List (NS-MBS List). [Please visit this page to access the latest version of the SDN list and the non-SDN Consolidated list.](#) Check this page periodically as it may also be updated if a new list-related format or product is offered.

**Related Articles:**

[\*Russia-related and Russia-/Ukraine-related Designations; Venezuela-related Designations; Publication of Russia-related Determinations; Issuance of Russia-related General Licenses and Frequently Asked Questions\*](#)

[\*Treasury Sanctions Venezuelan Officials Supporting Nicolas Maduro's Repression and Illegitimate Claim to Power | U.S. Department of the Treasury\*](#)

[\*Treasury Intensifies Sanctions Against Russia by Targeting Russia's Oil Production and Exports | U.S. Department of the Treasury\*](#)

**2. US Treasury: Issuance of Amended Executive Order Taking Additional Steps with Respect to the Situation in the Western Balkans**

On the 8<sup>th</sup> January 2025, the President of the United States [signed a new Executive Order \(E.O.\)](#), "Taking Additional Steps with Respect to the Situation in the Western Balkans."

In view of the events in Western Balkans, including attempts to challenge the sovereignty and territorial integrity of Western Balkans countries, the US President ordered the amendment of Executive Order 14033 by striking section 1 of the order and inserting in lieu the following provisions:

Section 1. (a) All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in: any person determined by the Secretary of the Treasury, in consultation with the Secretary of State:

- (i) to be responsible for or complicit in, or to have directly or indirectly engaged or attempted to engage in, actions or policies that threaten the peace, security, stability, or territorial integrity of any area or state in the Western Balkans;
- (ii) to be responsible for or complicit in, including by involvement in developing, or to have directly or indirectly engaged or attempted to engage in, actions or policies that undermine democratic processes or institutions in the Western Balkans;
- (iii) to be responsible for or complicit in, or to have directly or indirectly engaged or attempted to engage in, a violation of, or an act that has obstructed or threatened the implementation of, any regional security, peace, cooperation, or mutual recognition agreement or framework or

accountability mechanism, or to pose a significant risk of committing such an act, related to the Western Balkans, including the Prespa Agreement of 2018; the Ohrid Framework Agreement of 2001; United Nations Security Council Resolution 1244; the Dayton Accords; or the Conclusions of the Peace Implementation Conference Council held in London in December 1995, including the decisions or conclusions of the High Representative, the Peace Implementation Council, or its Steering Board; or the International Criminal Tribunal for the former Yugoslavia, or, with respect to the former Yugoslavia, the International Residual Mechanism for Criminal Tribunals;

- (iv) to be responsible for or complicit in, or to have directly or indirectly engaged or attempted to engage in, serious human rights abuse in the Western Balkans;
  - (v) to be responsible for or complicit in, or to have directly or indirectly engaged or attempted to engage in, corruption related to the Western Balkans, including corruption by, on behalf of, or otherwise related to a government in the Western Balkans, or a current or former government official at any level of government in the Western Balkans, such as the misappropriation of public assets, expropriation of private assets for personal gain or political purposes, or bribery;
  - (vi) to be a leader, official, or member of an entity, including a government entity, that has engaged in, or attempted to engage in, any of the activities described in subsections (1)(a)(i)-(v) of this order, or whose property and interests in property are blocked pursuant to this order;
  - (vii) 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 this order;
  - (viii) to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to this order;
  - (ix) to own or control, directly or indirectly, any person whose property and interests in property are blocked pursuant to this order; or
  - (x) to be a spouse or adult child of any person whose property and interests in property are blocked pursuant to subsections (1)(a)(i)-(v) of this order.
- (b) The prohibitions in subsection (a) of this section apply except to the extent provided by statutes, or in regulations, orders, directives, or licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted before the date of this order.”

**Related Publications:**

[US Treasury./08.01.2025/Executive Order on Taking Additional Steps with Respect to the Situation in the Western Balkans](https://www.treasury.gov/08.01.2025/Executive-Order-on-Taking-Additional-Steps-with-Respect-to-the-Situation-in-the-Western-Balkans)

[US Treasury/recent actions/2025.01.08/Issuance of Amended Executive Order Taking Additional Steps with Respect to the Situation in the Western Balkans](#)

### **3. Global Magnitsky Designation; Sudan-related Designations; Issuance of Amended Russia-related General License**

On the 7<sup>th</sup> January 2025, OFAC issued [Russia-related General License 13L](#), "Authorizing Certain Administrative Transactions Prohibited by Directive 4 under Executive Order 14024."

**Russia-related General License 13L**, which replaces and supersedes General License No. 13K, authorizes through 12:01 a.m. eastern daylight time, April 9, 2025 U.S. persons, or entities owned or controlled, directly or indirectly, by a U.S. person, are authorized to pay taxes, fees, or import duties, and purchase or receive permits, licenses, registrations, certifications, or tax refunds to the extent such transactions are prohibited by Directive 4 under Executive Order 14024, Prohibitions Related to Transactions Involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, and the Ministry of Finance of the Russian Federation, provided such transactions are ordinarily incident and necessary to the day-to-day operations in the Russian Federation of such U.S. persons or entities.

This general license does not authorize:

- (1) Any debit to an account on the books of a U.S. financial institution of the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, or the Ministry of Finance of the Russian Federation; or
- (2) Any transactions otherwise prohibited by the Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587 (RuHSR), including transactions involving any person blocked pursuant to the RuHSR, unless separately authorized.

#### **Related Publication**

[US Treasury/07.01.2025/GENERAL LICENSE NO. 13L](#)

Furthermore, **the OFAC SDN List has updated with the Sudan-related Designations of the following individuals and entities:**

#### **A. INDIVIDUALS**

AHMMED, Abu Dharr Abdul Nabi Habiballa (Arabic: أبو ذر عبد النبي حبيب الله أحمد) (a.k.a. AHMMED, Abo Zer Abdelnabi Habiballa), United Arab Emirates; POB Sudan; nationality Sudan; Gender Male (individual) [SUDAN-EO14098] (Linked To: CAPITAL TAP HOLDING L.L.C.).

MOUSA, Mohammed Hamdan Daglo (a.k.a. DAGALO, Mohamed Hamdan; a.k.a. DAGALO, Mohammed Hamdan; a.k.a. HAMDAN, Mohamed; a.k.a. "HEMEDTI"; a.k.a. "HEMETI"),

Sudan; DOB 01 Jan 1974 to 31 Dec 1974; POB North Darfur, Sudan; nationality Sudan; Gender Male (individual) [SUDAN-EO14098].

## **B. ENTITIES**

AL JIL ALQADEM GENERAL TRADING L.L.C. (Arabic: (الجيل القادم للتجارة العامة ش.ذ.م.م), Dubai, United Arab Emirates; Organization Established Date 05 Oct 2016; Organization Type: Wholesale and retail trade; License 767427 (United Arab Emirates); Registration Number 10946303 (United Arab Emirates) [BPI-SUDAN-14098]. -to- AL JIL ALQADEM GENERAL TRADING L.L.C. (Arabic: (الجيل القادم للتجارة العامة ش.ذ.م.م), No. 76, Khalid Mohammed Abdullah Al Zahid Property, Deira, Hor al Anz, Dubai, United Arab Emirates; Organization Established Date 05 Oct 2016; Organization Type: Wholesale and retail trade; License 767427 (United Arab Emirates); Registration Number 10946303 (United Arab Emirates) [SUDAN-EO14098] (Linked To: AHMMED, Abu Dharr Abdul Nabi Habiballa).

AL ZUMOROU AND AL YAQOOT GOLD AND JEWELLERS TRADING L.L.C. (Arabic: (الزمرد و اليقوت للتجارة الذهب و المجوهرات ش.ذ.م.م), (a.k.a. "AZ GOLD"), Dubai, United Arab Emirates; Organization Established Date 20 Feb 2020; Organization Type: Wholesale and retail trade; License 880169 (United Arab Emirates); Registration Number 1708681 (United Arab Emirates) [BPI-SUDAN-14098]. -to- AL ZUMOROU AND AL YAQOOT GOLD & JEWELLERS TRADING L.L.C. (Arabic: (الزمرد و اليقوت للتجارة الذهب و المجوهرات ش.ذ.م.م), (a.k.a. AL ZUMOROU AND AL YAQOOT GOLD AND JEWELLERS TRADING L.L.C.; a.k.a. "AZ GOLD"), Office M-10, M-11, M-12 - King of Ghaith Hamel bin Khadim al Ghaith al Qubaisi, Al Dagghaya, PO Box 90928, Dubai, United Arab Emirates; Organization Established Date 20 Feb 2020; Organization Type: Wholesale and retail trade; License 880169 (United Arab Emirates); Registration Number 1708681 (United Arab Emirates) [SUDAN-EO14098] (Linked To: AHMMED, Abu Dharr Abdul Nabi Habiballa).

CAPITAL TAP GENERAL TRADING L.L.C. (Arabic: (كابيتال تاب للتجارة العامة ش.ذ.م.م), (a.k.a. ELRAKIZA GENERAL TRADING L.L.C. (Arabic: (الركيزة للتجارة العامة ش.ذ.م.م), a.k.a. M I N S GENERAL TRADING L.L.C. (Arabic: (ام اي ان اس للتجارة العامة ش ذ م م), 406, Business Bay, Royal Class Business Centre, Dubai, United Arab Emirates; PO Box 416657, 44 & 43, Dubai Municipality, Dubai, United Arab Emirates; Organization Established Date 18 Feb 2019; Organization Type: Wholesale and retail trade; License 826794 (United Arab Emirates); Registration Number 11337684 (United Arab Emirates) [BPI-SUDAN-14098]. -to- CAPITAL TAP GENERAL TRADING L.L.C. (Arabic: (كابيتال تاب للتجارة العامة ش.ذ.م.م), (a.k.a. ELRAKIZA GENERAL TRADING L.L.C. (Arabic: (الركيزة للتجارة العامة ش.ذ.م.م), a.k.a. M I N S GENERAL TRADING L.L.C. (Arabic: (ام اي ان اس للتجارة العامة ش ذ م م), 406, Business Bay, Royal Class Business Centre, Dubai, United Arab Emirates; PO Box 416657, 44 & 43, Dubai Municipality,



Dubai, United Arab Emirates; Organization Established Date 18 Feb 2019; Organization Type: Wholesale and retail trade; License 826794 (United Arab Emirates); Registration Number 11337684 (United Arab Emirates) [SUDAN-EO14098] (Linked To: AHMMED, Abu Dharr Abdul Nabi Habiballa).

CAPITAL TAP HOLDING L.L.C. (Arabic: كابيتال تاب القابضة ذ.م.م.) (a.k.a. "CAPITAL TAP"; a.k.a. "CTH"), Office 2602, U-Bora Towers, Business Bay, Dubai, United Arab Emirates; P.O. Box, 54116, Dubai, United Arab Emirates; Website [www.capitaltap.com](http://www.capitaltap.com); Organization Established Date 12 Apr 2021; alt. Organization Established Date circa 2019; Organization Type: Financial and Insurance Activities; License 947727 (United Arab Emirates); Registration Number 11651015 (United Arab Emirates) [BPI-SUDAN-14098]. -to- CAPITAL TAP HOLDING L.L.C. (Arabic: كابيتال تاب القابضة ذ.م.م.) (a.k.a. "CAPITAL TAP"; a.k.a. "CTH"), Office 2602, U-Bora Towers, Business Bay, Dubai, United Arab Emirates; P.O. Box, 54116, Dubai, United Arab Emirates; Website [www.capitaltap.com](http://www.capitaltap.com); Organization Established Date 12 Apr 2021; alt. Organization Established Date circa 2019; Organization Type: Trusts, funds and similar financial entities; License 947727 (United Arab Emirates); Registration Number 11651015 (United Arab Emirates) [SUDAN-EO14098].

CAPITAL TAP MANAGEMENT AND CONSULTANCIES L.L.C. (Arabic: كابيتال تاب للاستشارات الدارية ش.ذ.م.م.) (a.k.a. CAPITAL TAP MANAGEMENT CONSULTANCIES; a.k.a. "CAPITAL TAP"), Office 903, U-Bora Towers Abraj Street, Business Bay, Dubai, United Arab Emirates; Website [www.capitaltap.com](http://www.capitaltap.com); Organization Established Date 28 Nov 2019; Organization Type: Professional, scientific, and technical activities; License 865796 (United Arab Emirates); Registration Number 11475487 (United Arab Emirates) [BPI-SUDAN-14098]. -to- CAPITAL TAP MANAGEMENT AND CONSULTANCIES L.L.C. (Arabic: كابيتال تاب للاستشارات الدارية ش.ذ.م.م.) (a.k.a. CAPITAL TAP MANAGEMENT CONSULTANCIES; a.k.a. "CAPITAL TAP"), Office 903, U-Bora Towers Abraj Street, Business Bay, Dubai, United Arab Emirates; Website [www.capitaltap.com](http://www.capitaltap.com); Organization Established Date 28 Nov 2019; Organization Type: Professional, scientific, and technical activities; License 865796 (United Arab Emirates); Registration Number 11475487 (United Arab Emirates) [SUDAN-EO14098] (Linked To: CAPITAL TAP HOLDING L.L.C.).

CREATIVE PYTHON L.L.C. (Arabic: كريپتف بايثون ش.ذ.م.م.) (a.k.a. CREATIVE PYTHON), Burlington Tower, 2806, Business Bay, Dubai, United Arab Emirates; Website [www.creative-python.com](http://www.creative-python.com); Organization Established Date 29 Feb 2020; Organization Type: Professional, scientific, and technical activities; License 882080 (United Arab Emirates); Registration Number 11504889 (United Arab Emirates) [BPI-SUDAN-14098]. -to- CREATIVE PYTHON L.L.C. (Arabic: كريپتف بايثون ش.ذ.م.م.) (a.k.a. CREATIVE PYTHON), Burlington Tower, 2806, Business Bay, Dubai, United Arab Emirates; Website [www.creative-python.com](http://www.creative-python.com); Organization Established

Date 29 Feb 2020; Organization Type: Professional, scientific, and technical activities; License 882080 (United Arab Emirates); Registration Number 11504889 (United Arab Emirates) [SUDAN-EO14098] (Linked To: AHMMED, Abu Dharr Abdul Nabi Habiballa).

HORIZON ADVANCED SOLUTIONS GENERAL TRADING - SOLE PROPRIETORSHIP L.L.C. (Arabic: هوريزون ادفانسيد سوليوشنز للتجارة العامة - شركة الشخص الواحد ذ م م (a.k.a. HORIZON ADVANCED SOLUTIONS GENERAL TRADING), Abu Dhabi, United Arab Emirates; Organization Established Date 23 Feb 2020; Organization Type: Wholesale and retail trade; License CN-2994419 (United Arab Emirates); Registration Number 11502966 (United Arab Emirates) [BPI-SUDAN-14098]. -to- HORIZON ADVANCED SOLUTIONS GENERAL TRADING - SOLE PROPRIETORSHIP L.L.C. (Arabic: هوريزون ادفانسيد سوليوشنز للتجارة العامة - شركة الشخص الواحد ذ م م (a.k.a. HORIZON ADVANCED SOLUTIONS GENERAL TRADING), Abu Dhabi, United Arab Emirates; Organization Established Date 23 Feb 2020; Organization Type: Wholesale and retail trade; License CN-2994419 (United Arab Emirates); Registration Number 11502966 (United Arab Emirates) [SUDAN-EO14098] (Linked To: CAPITAL TAP HOLDING L.L.C.).

OFAC sanctioned the leader of Sudan's Rapid Support Forces (RSF), under Executive Order (E.O.) 14098, "Imposing Sanctions on Certain Persons Destabilizing Sudan and Undermining the Goal of a Democratic Transition", for engaging for nearly two years in a brutal armed conflict with the Sudanese Armed Forces for control of Sudan, killing tens of thousands, displacing 12 million Sudanese, and triggering widespread starvation.

Furthermore, OFAC is sanctioned seven companies and one individual linked to the RSF.

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 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 entities and individuals 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/07.01.2025/Treasury Sanctions Sudanese Paramilitary Leader, Weapons Supplier, and Related Companies](#)

Additionally, , **the OFAC SDN List has updated with the Global Magnitsky Designation of the following individual:**

ROGAN, Antal, Hungary; DOB 29 Jan 1972; POB Kormend, Hungary; nationality Hungary; Gender Male; National ID No. 018826IA (Hungary) (individual) [GLOMAG]

OFAC sanctioned a senior Hungarian government official, for his involvement in corruption in Hungary. He is being designated pursuant to Executive Order (E.O.) 13818, which builds upon and implements the Global Magnitsky Human Rights Accountability Act and targets perpetrators of serious human rights abuse and corruption around the world.

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

In addition, financial institutions and other persons that engage in certain transactions or activities with the 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 Publications**

[US Treasury/press release/07.01.2025/Treasury Sanctions Corrupt Hungarian Official](#)

[US Treasury/2025.01.07/Global Magnitsky Designation; Sudan-related Designations; Issuance of Amended Russia-related General License](#)

#### **4. Issuance of New Syria General License and Frequently Asked Questions**

On the 6<sup>th</sup> January 2025, OFAC issued [Syria General License 24](#), "Authorizing Transactions with Governing Institutions in Syria and Certain Transactions Related to Energy and Personal Remittances."

**SYRIA GENERAL LICENSE NO. 24** authorizes through 12:01 a.m. eastern daylight time, July 7, 2025, the following transactions that are prohibited by the Syrian Sanctions Regulations, 31 CFR part 542 (SySR), the Global Terrorism Sanctions Regulations, 31 CFR part 594 (GTSR), or the Foreign Terrorist Organizations Sanctions Regulations, 31 CFR part 597 (FTOSR):

- (1) transactions with governing institutions in Syria following December 8, 2024;
- (2) transactions in support of the sale, supply, storage, or donation of energy, including petroleum, petroleum products, natural gas, and electricity, to or within Syria; and
- (3) transactions that are ordinarily incident and necessary to processing the transfer of noncommercial, personal remittances to Syria, including through the Central Bank of Syria.

It should be noted that, this general license does not authorize:

- (1) The unblocking of any property blocked pursuant to any part of 31 CFR chapter V;
- (2) Any transactions involving military or intelligence entities, or any persons acting for or on behalf of such entities;
- (3) Transactions prohibited by 31 CFR § 542.208 (importation into the United States of petroleum or petroleum products of Syrian origin);
- (4) Any transactions for or on behalf of the Government of the Russian Federation or the Government of Iran or related to the transfer or provision of Iranian-origin or Russian-origin goods, technology, software, funds, financing, or services;
- (5) Financial transfers to any person blocked pursuant to the GTSR, FTOSR, or SySR other than for the purpose of effecting (i) the payment to governing institutions in Syria of taxes, fees, or import duties, (ii) the payment of salaries or wages of Syrian governing institution employees who are not identified on the Office of Foreign Assets Control's List of Specially Designated Nationals and Blocked Persons, or (iii) the purchase or receipt of permits, licenses, public utility services, or other public services in Syria; or
- (6) Transactions prohibited by 31 CFR § 542.206 (new investment in Syria), except contributions of funds for salaries or wages of employees of governing institutions in Syria consistent with subparagraph (b)(5).

It is also noted that nothing in this general license relieves any person from compliance with any other Federal laws or requirements of other Federal agencies, including the International Traffic in Arms Regulations (ITAR) administered by the Department of State and the Export Administration Regulations (EAR) administered by the Department of Commerce.

#### **Related Publication**

[US Treasury/06.01.2025/SYRIA GENERAL LICENSE NO 24](#)

Additionally, OFAC also issued eight new Syria Frequently Asked Questions ([FAQs 1205 - 1212](#)), and one amended Syria Frequently Asked Question ([FAQ 227](#)).

**FAQ 1206** explains what Syrian entities are included in the scope of "governing institutions" for the purposes of Syria General License (GL) 24 ("Authorizing Transactions with Governing Institutions in Syria and Certain Transactions Related to Energy and Personal Remittances").

Syrian governing institutions include departments, agencies, and government-run public service providers (including public hospitals, schools, and utilities) at the federal, regional, or local level in Syria following December 8, 2024, including entities involved with Hay'at Tahrir al Sham (HTS) across all geographic areas of Syria.

GL 24 does not authorize transactions involving military or intelligence entities, or any persons acting on behalf of such entities.

[FAQ 1206](#)

**FAQ 1207** explains what types of transactions are included in the authorization related to Syrian governing institutions in Syria General License (GL) 24 ("Authorizing Transactions with Governing Institutions in Syria and Certain Transactions Related to Energy and Personal Remittances"), as per the provisions of the above GL.

[US Treasury/ FAQ 1207/](#)

**FAQ 1208** states that Syria General License (GL) 24 ("Authorizing Transactions with Governing Institutions in Syria and Certain Transactions Related to Energy and Personal Remittances") authorizes activities and transactions with a governing institution in Syria run by or led by a designated person.

[US Treasury/FAQ 1208](#)

**FAQ 1210** clarifies that Syria General License (GL) 24 ("Authorizing Transactions with Governing Institutions in Syria and Certain Transactions Related to Energy and Personal Remittances") does not remove the restrictions placed on Syria under the State Sponsor of Terrorism (SST) designation and that SST restrictions on Syria remain in place.

[US Treasury/FAQ 1210](#)

**FAQ 1211** confirms that foreign governments or companies can donate or provide subsidized fuel to Syria without facing exposure to U.S. sanctions, since Syria General License (GL) 24 authorizes transactions in support of the sale, supply, storage, or donation of energy, including petroleum, petroleum products, natural gas, and electricity, to or within Syria. This may include, for example, the donation of gasoline to Syrian refineries, and power plants.

However, authorizations for this activity under the general license do not relieve persons from compliance with any other laws or requirements of other federal agencies or international organizations. For example, the export or reexport of petroleum, petroleum products, natural gas,

and other commodities to Syria may require additional authorization from the Department of Commerce if such items are U.S.-origin or otherwise subject to the Export Administration Regulations (EAR).

[US Treasury/ FAQ 1211](#)

**FAQ 1212** states that international organizations and nongovernmental organizations are authorized to conduct transitional justice activities in Syria.

[US Treasury/ FAQ 1212](#)

**Related Publication**

[US Treasury/2025.01.06/Issuance of Syria General License and Frequently Asked Questions](#)