

	Source	The most important events of the period [15/09/2023 - 30/09/2023 ] Autor: Radu Ion, lector AS Financial Markets
1	$\bigcirc$	Emerging trends and risks
1	UK FCA	[21/September/2023] Final warning for cryptoasset firms marketing to UK consumers FCA is concerned that businesses supporting unregistered cryptoasset firms may be at risk of committing money laundering offences under Proceeds of Crime Act . Firms must carefully consider their arrangements with unregistered cryptoasset firms and ensure that they are not engaged in, supporting or facilitating money laundering. FCA is concerned that benefits obtained by unregistered cryptoasset businesses from illegal financial promotions could be criminal property, and that intermediaries are at risk of receiving and dealing with this criminal property through, for example: the fees generated by app stores, social media platforms, search engines and domain name registrars from hosting illegal financial promotions; investments made due to illegal financial promotions; and fees charged by payments firms or other intermediaries for services to unregistered cryptoasset businesses that generate income through illegal financial promotions. www.fca.org.uk/publication/correspondence/final-warning-cryptoasset-firms-marketing-consumers.pdf
1		[18/September/2023] Crypto crime displacement: what it is and what you can do about it Crypto crime displacement is a new trends in how criminals are using crypto for illicit activities. ELLIPTIC has shown in thsi new study that the trend in inter-chain crime is the result of the 'crime displacement' effect, where criminals switch to a new method to carry out their illicit activity. https://www.elliptic.co/blog/crypto-crime-displacement-what-it-is-and-what-you-can-do-about-it
2	¢	Warnings and reports, thematic analyzes of national and international authorities
	HONK KONG	[27/September/2023] AML/CFT Regtech: Case Studies and Insights Volume 2 Case Studies and Insights shars perspectives of Hong Kong banks that were in the process of incorporating Regtech in their AML/ CFT processes. The objective is to share with the industry practical insights and lessons learned on Regtech adoption, encourage broader adoption of Regtech solutions and ultimately uplift the collective AML/CFT effectiveness of HK ecosystem. The case studies shared cover four broad areas of Regtech implementation: 1/Real-time Fraud Monitoring; 2/Machine Learning for Transaction Monitoring Alerts Handling; 3/Natural Language Processing for News Monitoring; 4/Analytics with a 'Single View of the Customer https://www.hkma.gov.hk/media/eng/doc/key-functions/banking-stability/aml-cft/AMLCFT_Regtech- Case Studies and Insights Volume 2.pdf

	[19/September/2023] MAS Reports Robust Enforcement Outcomes and Enhances Disclosure of Statistics
SINGAPORE MAS	The Report covers enforcement actions taken during the period January 2022 to June 2023 for breaches of MAS' regulatory requirements. These include: 1/High-profile actions against four financial institutions in relation to their dealings with Wirecard-linked persons, as well as against Noble Group Limited and individuals relating to Three Arrows Capital. 2/ \$7.10 million in composition penalties for anti-ML related breaches and \$12.96 million in civil penalties for market abuse cases. 3/18 prohibition orders issued against unfit representatives. 4/39 criminal convictions of individuals involved in market misconduct and related offences; a result of joint investigations with the Singapore Police Force's Commercial Affairs Department. https://www.mas.gov.sg/-/media/mas/news-and-publications/monographs-and-information-papers/4th-enforcement-report.pdf
	[19/September/2023] FCA sets out initial findings on bank account access and closures
UK FCA	The FCA has published the findings of its initial data exercise on bank account access and closures. The information supplied by banks, building societies and payment companies suggests that no firm closed an account between July 2022 and June 2023 primarily because of a customer's political views. By far the most common reasons providers gave for closing, suspending or declining an account was because it was inactive/dormant or because there were concerns about financial crime. The FCA's report is the result of information gathered from firms at speed. https://www.fca.org.uk/news/press-releases/fca-sets-out-initial-findings-bank-account-access-and-closures
UNDOC	[16/September/2023] The Hawala System - Its operations and misuse Hawala payment system vulnerable to use by organized crime groups, including opiate traffickers and migrant smugglers. Hawala is a Money or Value Transfer Service (MVTS) that has been used for centuries, originat-ing in the Middle East and South Asia. It is over- whelmingly used for legitimate purposes, including personal and business financial transactions and for the sending of remittances by migrants and refugees to family members. https://www.unodc.org/documents/data-and-analysis/AOTP/Hawala_Digital.pdf
	[15/September/2023] Money Laundering Associated With Tax Crimes in the Asia Pacific
Asia-Pacific Group on Money Laundering	The aim of this paper is to inform the public of the nature and global scale of ML associated with tax evasion, the international standards that address it, and the opportunities available to improve the resilience of the international financial system to ML associated with tax crimes. This report analyses survey data collected from Asia-Pacific Group on Money Laundering (APG ) members* to provide an Asia-Pacific perspective on combating ML arising from tax crimes. *)AGP members: Australia, Bangladesh, Bhutan, Kingdom of Brunei Darussalam, Cambodia, Canada, China, People's Republic of, Cook Islands, Fiji, Hong Kong (China), India, Indonesia, Japan, Korea, Republic of Korea (South Korea), Lao People's Democratic Republic, Macao (China), Malaysia, Maldives, Marshall Islands, Republic of Mongolia, Myanmar, Nauru, Nepal, New Zealand, Niue, Pakistan, Palau, Papua New Guinea, Philippines, Samoa, Singapore, Solomon Islands, Sri Lanka, Chinese Taipei, Thailand, Timor-Leste, Tonga, United States of America, Vanuatu & Vietnam https://apgml.org/includes/handlers/get-document.ashx?d=1a9f1dd1-f85b-475b-ae83-29f05a485d22
	MAS UK FCA UNDOC

		[15/September/2023] Qualified majority voting in common foreign and security policy - A cost of non-Europe report
2	EU	Common foreign and security policy (CFSP) has a particular status in the EU legal framework, part of which is the unanimity rule within the Council. This report analyses decision-making rules in CFSP from a 'cost of non-Europe' perspective. It identifies CFSP challenges and the extent to which they could be attributed to unanimity. This allows us to identify the current 'cost of unanimity'. The report also analyses possible alternatives to unanimity decision-making in CFSP, such as a switch to qualified majority voting (QMV), including their costs and benefits. The study develops several policy options, including options within the current legal framework, options requiring Treaty change, and options requiring a departure from the intergovernmentalism in CFSP.
3	$\square$	Terrorism and International Sanctions updates
		OFAC-Specially Designated Nationals and Blocked Persons (SDN) List https://www.treasury.gov/ofac/downloads/sdnlist.pdf
3	US	OFAC-Sectoral Sanctions Identifications (SSI) List https://www.treasury.gov/ofac/downloads/ssi/ssilist.pdf
		OFAC-List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List) https://www.treasury.gov/ofac/downloads/capta/captalist.pdf
3	EU	European Union Consolidated Financial Sanctions Lis https://webgate.ec.europa.eu/fsd/fsf/public/files/pdfFullSanctionsList/content?token=n002g3ky
		https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions?locale=en
		United Nations Security Council Consolidated List
3	UN	https://scsanctions.un.org/consolidated/
		[29/September/2023] COUNCIL IMPLEMENTING REGULATION (EU) 2023/2081 implementing Regulation (EU) 2023/1214 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine
3	EU	The restrictive measures referred to in Article 2f of Regulation (EU) No 833/2014, regarding the media and braodcast orprators shall apply as of 1 October 2023 in respect of all entities referred to in Annex IV to Regulation (EU) 2023/1214 -i.e. RT Balkan; Oriental Review ; Tsargrad ; New Eastern Outlook ; Katehon'
		https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R2081 3

		[28/September/2023] OFAC - Sudan Designations	
3	US	The SDN* list has been updated: 2 entities and 1 individual added for their role in undermining the peace, security, and stability of Sudan.	
		https://ofac.treasury.gov/recent-actions/20230928	
		[27/September/2023] OFAC - Iran-related Designations; Non-Proliferation Designations; Counter Terrorism Designation Update	
3	US	The SDN* list has been updated: 2 individual and 5 entities added and 1 entities changed, based in Iran, the People's Republic of China, Hong Kong, Türkiye, and the United Arab Emirates involved in the procurement of sensitive parts for Iran's one-way attack unmanned aerial vehicle program.	,
		https://ofac.treasury.gov/recent-actions/20230927	
		[26/September/2023] OFAC - Counter Narcotics Designations	
3	US	The SDN* list has been updated: 10 individuals added relatd to Sinaloa Cartel affiliates and fugitives.	
		https://ofac.treasury.gov/recent-actions/20230926	
		[25/September/2023] OFAC - Russia-related Designations Updates and Designation Removal; Burma-related Designation Removal; Iran-related Designation Update; Non-Proliferation Designation Update	
3	US	The SDN list has been updated: 1 individual and 3 entities deleted and 6 entities changed	
		https://ofac.treasury.gov/recent-actions/20230925	
		[19/September/2023] OFAC- Iran-related Designations and Designation Update; Non-Proliferation Designations and Designation Update; Counter Terrorism Designations Removals	
3	US	The SDN* list has been updated, 7 individuals and 4 entities based in Iran, the People's Republic of China (PRC), Russia, and Türkiye in connection with Iran's unmanned aerial vehicle (UAV) and military aircraft development were added to the list.	
		https://ofac.treasury.gov/recent-actions/20230919	
		https://ofac.treasury.gov/recent-actions/20230919 [18/September/2023] OFAC - Iran-related Designation and Designation update; Hostages and Wrongfully Detained U.S. Nationals Designations; Publication of Iran-related Frequently Asked Questions	
3	US	[18/September/2023] OFAC - Iran-related Designation and Designation update; Hostages and Wrongfully Detained U.S.	ty

		[15/September/2023] OFAC - Iran-related Designations and Designation Update; Counter Terrorism Designation and Designation Update; Non-Proliferation Designation Update; Syria Designation Update
3	US	OFAC desiganted 29 individuals and entities in connection with the Iranian regime's violent suppression of nationwide protests following the death of Mahsa "Zhina" Amini in custody of its 'Morality Police,' and the regime's continued efforts to detain dissenting voices and restrict access to a free and open internet. https://ofac.treasury.gov/recent-actions/20230915
3	EU	[15/September/2023] COUNCIL IMPLEMENTING DECISION (CFSP) 2023/1780 implementing Decision 2011/235/CFSP concerning restrictive measures directed against certain persons and entities in view of the situation in Iran COUNCIL IMPLEMENTING REGULATION (EU) 2023/1779 implementing Regulation (EU) No 359/2011 concerning restrictive measures directed against certain persons, entities and bodies in view of the situation in Iran 4 persons and 6 entities have been included in the list of natural and legal persons, entities and bodies subject to restrictive measures, retated to widespread and disproportionate use of force by the Iranian security forces against non-violent protestors
		https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023D1780 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R1779
		[15/September/2023] Case T-305/22 Rashnikov v Council - Viktor Rashnikov's application to annul his EU designation.
3	EU	The request of de-listng was rejected by EU General Court of Justice. <a href="https://curia.europa.eu/juris/document/document.jsf?text=&amp;docid=277344">https://curia.europa.eu/juris/document/document.jsf?text=&amp;docid=277344</a>
4	۵	EU ML/TF SupraNational Risk Assessment
4	EBA	EBA Opinion on money laundering and terrorist financing risks across the EU was published on [13/July/2023]         https://www.eba.europa.eu/sites/default/documents/files/document_library/Publications/Opinions/2023/1058335/EBA%20Op%202023%         2008%20Opinion%20on%20MLTF%20risks%20EBA%20REP%202023%2021.pdf
4	EU	The EU report of the risk of money laundering and terrorist financing affecting the internal market and relating to cross-border activities (EU SNRA) was issued on [27/October/2022]         https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022DC0554         https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022SC0344         5
5	<u>ل</u>	Information and assessments by national authorities on risks at national level

		Austria National Risk Assessment was published on [12/May/2021]
5	Austria	EN: <u>https://www.bmf.gv.at/dam/jcr:19c18523-a864-4e9b-97ef-bc30b4d705ca/National%20Risk%20Assessment%202021.pdf</u>
		Moldova National Risk Assessment was published on [01/April/2022]
5	Moldova	RO : https://spcsb.gov.md/storage/posts/RAPORT_NRA.pdf
		France National Risk Assessment was published on [14/February/2023]
5	France	FR: <u>https://www.tresor.economie.gouv.fr/Articles/cf505823-7337-4178-abd2-e5bdecc0ce41/files/eec8335d-8bf8-4fea-b1ad-</u> 8075072408eb
		The main findings and conclusions of the Romania ML/TF National Risk Assessment (NRA) was published on [22/November/2022]
5	ROMANIA	RO: <u>http://www.onpcsb.ro/pdf/Rezumat%20NRA%20Public.pdf</u> EN:
		http://www.onpcsb.ro/pdf/Summary%20of%20the%20National%20Risk%20Assessment%20Report%20on%20Money%20Laundering%2 0and%20Terrorism%20Financing.pdf
		UK National risk assessment of money laundering and terrorist financing was published on [17/December/2020]
5	UK	EN: https://assets.publishing.service.gov.uk/media/5fdb34abe90e071be47feb2c/NRA_2020_v1.2_FOR_PUBLICATION.pdf
6	4	Specific guidelines, guides, instructions or warnings
		[26/September/2023] Joint Guidance On Countering Russia Evasion
6	E5	The governments of Australia, Canada, New Zealand, the United Kingdom, and the United States today issued joint guidance to industry and academia identifying high priority items critical to Russian weapons systems and urging specific actions to prevent diversion of these items to Russia through third countries.
6		https://www.bis.doc.gov/index.php/documents/enforcement/3336-2023-09-26-export-enforcement-five-guidance-for-industry-and- academia-priority-hs-codes/file
		https://www.bis.doc.gov/index.php/documents/about-bis/newsroom/press-releases/3337-final-2023-09-22-bis-press-release-quint-seal- ee-ocpa-clean-ajb-osb/file

		[18/September/2023] FinCEN Issues Compliance Guide to Help Small Businesses Report Beneficial Ownership Information
(	US FinCEN	The U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) published a Small Entity Compliance Guide to assist the small business community in complying with the beneficial ownership information (BOI) reporting rule. Starting in 2024, many entities created in or registered to do business in the United States will be required to report information about their beneficial owners—the individuals who ultimately own or control a company—to FinCEN. The Guide is intended to help businesses determine if they are required to report their beneficial ownership information to FinCEN. The Guide describes each of the BOI reporting rule's provisions in simple, easy-to-read language; answers key questions; and provides interactive checklists, infographics, and other tools to assist businesses in complying with the BOI reporting rule.
		[12/September/2023] European Commission updated numerous FAQs related to the Russia sanctions regime.
		The updates cover: 12 September 2023 : Imports, purchase and transfer of listed goods
(	6 EU	https://finance.ec.europa.eu/eu-and-world/sanctions-restrictive-measures/sanctions-adopted-following-russias-military-aggression- against-ukraine/frequently-asked-questions-sanctions-against-russia_en
		https://finance.ec.europa.eu/document/download/66e8fd7d-8057-4b9b-96c2-5e54bf573cd1_en?filename=faqs-sanctions-russia- consolidated_en.pdf
7		Warnings, fines and convictions for violating the KYC/AML/CTF/FiSa/Compliance legislation in financial market
		[29/September/2023] \$15 Million Civil Money Penalty Against Shinhan Bank
7	USFinCEN	The Financial Crimes Enforcement Network (FinCEN) assessed a \$15 million civil money penalty against Shinhan Bank America (SHBA) for willful violations of the Bank Secrecy Act (BSA) and its implementing regulations. SHBA admitted to willfully violating the BSA from April 2016 through March 2021, by failing to implement and maintain an effective AML program that was reasonably designed to guard against money laundering and failing to timely report several hundred transactions to FinCEN involving suspicious financial activity by its customers processed by, at, or through the bank. As a result, tens of millions of dollars in suspicious transactions were not reported to FinCEN in a timely manner, including transactions connected to tax evasion, public corruption, money laundering, and other financial crimes.
		https://www.fincen.gov/sites/default/files/enforcement_action/2023-09-29/SHBA_9-28_FINAL_508.pdf

			[25/September/2023] Deutsche Bank Subsidiary DWS to Pay \$25 Million for Anti-Money Laundering Violations and Misstatements Regarding ESG Investments
	7	USSEC	The Securities and Exchange Commission charged registered investment adviser DWS Investment Management Americas Inc. (DIMA or DWS), a subsidiary of Deutsche Bank AG, in two separate enforcement actions, one addressing its failure to develop a mutual fund Anti-Money Laundering (AML) program, and the other concerning misstatements regarding its Environmental, Social, and Governance (ESG) investment process. To settle the charges, DIMA agreed to pay a total of \$25 million in penalties. In the AML action, the SEC's order finds that DIMA caused mutual funds it advised to fail to develop and implement a reasonably designed AML program to comply with the Bank Secrecy Act and applicable Financial Crimes Enforcement Network regulations. The order also finds that DIMA caused such mutual funds' failure to adopt and implement policies and procedures reasonably designed to detect activities indicative of money laundering and to conduct AML training specific to the mutual funds' business.
┢			[21/September/2023] OFAC Settles with Emigrant Bank for \$31,867.90
	7	USOFAC	Emigrant Bank (Emigrant), a bank located in New York, has agreed to remit \$31,867.90 to settle its potential civil liability for 30 apparent violations of the Iran sanctions administered by the Office of Foreign Assets Control (OFAC). For approximately 26 years, Emigrant maintained a Certificate of Deposit (CD) account on behalf of two individuals ordinarily resident and located in Iran, for which it processed 30 transactions between June 2017 and March 2021 totaling \$91,051.13. Emigrant had actual knowledge of the Iranian address and apparent location of the accountholders during this period. The settlement amount reflects OFAC's determination that Emigrant's conduct was non-egregious and voluntarily self-disclosed.
┢			[21/September/2023] OFAC Settles with 3M Company for \$9,618,477
	7	USOFAC	3M Company ("3M"), a global manufacturing company based in St. Paul, Minnesota, has agreed to pay \$9,618,477 to settle its potential civil liability for 54 apparent violations of OFAC sanctions on Iran. This conduct occurred between 2016 and 2018 when a 3M subsidiary based in Switzerland, 3M (East) AG ("3M East"), knowingly sold reflective license plate sheeting via a German reseller to Bonyad Taavon Naja, an entity controlled by Iran's Law Enforcement Forces. The settlement amount reflects OFAC's determination that 3M's apparent violations were egregious and voluntarily self-disclosed.
			https://ofac.treasury.gov/media/932161/download?inline
			[20/September/2023] MrQ finned £690,947 for social responsibility and AML failures.
	7	UK Gambling	Lindar Media Limited which trades as Mr Q and runs MrQ.com has been fined £690,947 by the UK Gambling Commission for failing to implement adequate CDD and EDD KYC measures, customer and business risk assessment and customer transaction monitoring.
		Commission	https://www.gamblingcommission.gov.uk/public-register/public-statement/detail/lindar-media-limited-public-statement# 8

7	USFinCEN	[15/Septembrie/2023] \$15 Million Civil Money Penalty against Bancrédito International Bank and Trust Corporation for Violations of the Bank Secrecy Act The Financial Crimes Enforcement Network (FinCEN) assessed a \$15 million civil money penalty against Bancrédito International Bank and Trust Corporation (Bancrédito) for willful violations of the Bank Secrecy Act (BSA) and its implementing regulations. This is FinCEN's first enforcement action against a Puerto Rican International Banking Entity (IBE), and includes the first violation for failure to implement and maintain an Anti-Money Laundering (AML) program. Bancrédito was the oldest and among the largest IBEs in Puerto Rico. IBEs were identified as having an elevated risk of money laundering in the U.S. Department of the Treasury's 2022 National Money Laundering Risk Assessment. <u>https://www.fincen.gov/sites/default/files/shared/Bancredito Consent_FINAL_091523_508C.pdf</u>
8	¢	Law enforcement actions for money laundering and international sanctions crimes
8	EUROPOL	[21/September/2023] Criminal network composed of Albanian and Chinese nationals was involved in the production, trafficking and laundering of criminal assets The criminal group was led by Albanian nationals and was active in the production and trafficking of marijuana, but also organised large-scale money laundering activities for drug trafficking organisations. They used the so-called hawala system of underground banking, while working closely with Chinese nationals. Following the law enforcement actions :27 arrests throughout Spain in Alicante, Barcelona, Madrid, Malaga, Seville and Valencia; seizures of luxury watches and jewellery valued at more than EUR 400 000 and seizures of high-end cars, phones, encrypted mobile phones and EUR 615 000 in cash. The "hawaladars", of Albanian origin, operated as an illegal banking entity, carried out the transfers and concealed large sums of money from the sale of drugs. This served for the financing of new criminal operations. https://www.europol.europa.eu/media-press/newsroom/news/27-arrested-in-spain-for-laundering-over-eur-65-million-drug-profits
8	USDOJ	[21/September/2023] Former CFO of Russian Natural Gas Company Sentenced to More Than Seven Years in Prison for Tax Crimes Mark Anthony Gyetvay of Naples, Florida, was sentenced today to 86 months in prison for a scheme to hide millions of dollars of income in undisclosed Swiss bank accounts and submitting a false filing with the IRS. Gyetvay was also ordered to serve three years of supervised release and to pay a \$350,000 fine and approximately \$4,021,074 in restitution to the United States. https://www.justice.gov/opa/pr/former-cfo-russian-natural-gas-company-sentenced-more-seven-years-prison-tax-crimes

		[19/September/2023] SEC Charges New York Firm Concord Management and Owner with Acting as Unregistered Investment Advisers to Billionaire Former Russian Official
8	USSEC	The Securities and Exchange Commission announced charges against Concord Management LLC of Tarrytown, New York, and its owner and principal, Michael Matlin, for operating as unregistered investment advisers to their only client—a wealthy former Russian official widely regarded as having political connections to the Russian Federation.
		https://www.sec.gov/news/press-release/2023-186
		[19/September/2023] Romania: Lucian Blaga University of Sibiu probed over fraud involving Erasmus funds
8	ЕРРО	Employees of the university, who were responsible for coordinating the External Relations Services, drew up fictitious contracts with various citizens from East Asia to receive funding for two Erasmus+ Partner Countries projects. It is also understood that students, doctoral students and teaching staff from Asia continued to appear on the payroll of two Erasmus Mundus mobility projects, even though their contracts were coming to an end. It is believed that their signatures were forged to transfer the money to other people. In total, the estimated damage amounts to around $\leq 1$ million.
		https://www.eppo.europa.eu/en/news/romania-lucian-blaga-university-sibiu-probed-over-fraud-involving-erasmus-funds
		[18/September/2023] Russian International Money Launderer Arrested for Illicitly Procuring Large Quantities of U.S Manufactured Dual-Use Military Grade Microelectronics for Russian Elites
	US DOJ	Maxim Marchenko, 51, a Russian citizen who has resided in Hong Kong, was charged in connection with conspiring to defraud the United States and with smuggling, wire fraud, and money laundering offenses based on his alleged participation in a scheme to unlawfully procure U.Ssourced, dual-use microelectronics with military applications on behalf of end users in Russia. According to court documents, Maxim Marchenko operates several Hong Kong-based shell companies, including Alice Components Co. Ltd., Neway Technologies Limited and RG Solutions Limited .
		https://www.justice.gov/opa/pr/russian-international-money-launderer-arrested-illicitly-procuring-large-quantities-us
		[15/September/2023] Return Of Significant Collection Of Antiquities To Cambodia
8	US DOJ	Damian Williams, the United States Attorney for the Southern District of New York, announced the return of 33 Khmer antiquities to the Kingdom of Cambodia, pursuant to an agreement between the U.S. Attorney's Office for the Southern District of New York and the family of the late George Lindemann. The collection includes statues dating to the 10th and 12th centuries that were originally looted from religious and archeological sites in Cambodia. The antiquities were turned over to Cambodia on September 11, 2023, and a ceremony celebrating their repatriation will be held in Cambodia at a later date. The Lindemann family has voluntarily agreed to return the antiquities.
		https://www.justice.gov/usao-sdny/pr/us-attorney-announces-return-significant-collection-antiquities-cambodia 10
9	$\land$	Threats, alerts and typologies

9		Nothing relevant during this period
10	Â	Corruption Perception Indices and Country Reports
10		2022 <b>Corruption Perceptions Index</b> was issued on [31/January/2023] The 2022 Corruption Perceptions Index (CPI) was published by Transparency International. The global average remains unchanged for over a decade at just 43 out of 100. More than two-thirds of countries score below 50, while 26 countries have fallen to their lowest scores yet. 155 countries out of 180 have made no significant progress against corruption or have declined since 2012. Here is the score for some relevant countries from each risk class : Denmark 90(88in2021); Austria 75(74in2021); Lithuania 62(61in2021); Malta 51(54in2021); Romania 46(45in2021); Moldova 39(36in2021); Pakistan 27(28in2021); Somalia 12(13in2021). The average score of Western Europe&EU is 66, with max Denmark 90 and min Hungary 42. <u>https://images.transparencycdn.org/images/Report_CPI2022_English.pdf</u>
11	Ą	Mutual evaluation reports or lists of states or jurisdictions that have KYC/AML/CTF deficiencies
11	FATF	[27/September/2023] FATF consolidated countries assessment ratings This table provides an up-to-date overview of the FATF ratings that assessed countries obtained for effectiveness and technical compliance with the 40 reccomandations. https://www.fatf-gafi.org/content/fatf-gafi/en/publications/Mutualevaluations/Assessment-ratings.html
11	FATF	[27/September/2023] Luxembourg's measures to combat money laundering and terrorist financing The Grand-Duchy of Luxembourg ("Luxembourg") has a solid anti-money laundering and counter-terrorist financing (AML/CFT) framework and a good understanding of its money laundering and terrorist financing risks. Authorities make good use of financial intelligence and co- operate effectively with international counterparts. However, Luxembourg needs to focus more on money laundering investigations and prosecutions, asset recovery and supervision of non-profit organisations and some non-financial sectors, according to FATF's assessment of the country's measures to tackle money laundering and terrorist financing. Luxembourg should focus more on sectors that are exposed to significant money laundering risk such as real estate and professionals from the non-financial sector offering trust and company services. Given the country's risk profile, authorities should also improve the detection, investigation, and prosecution of more complex money laundering cases. https://www.fatf-gafi.org/content/dam/fatf-gafi/mer/Luxembourg%20MER%202023.pdf.coredownload.inline.pdf 11

		Romania MONEYVAL Mutual Evaluation Report [18/July/2023]
11	Moneyval	The report provides a comprehensive assessment of the country's level of compliance with standards set by the Financial Action Task Force (FATF). MONEYVAL notes that Romania has achieved moderate levels of effectiveness in all areas assessed except for international cooperation, where it has achieved a substantial level of effectiveness and has been commended by other countries for its constructive assistance. MONEYVAL's mutual evaluation of Romania highlights that the country demonstrates a fair understanding of ML risks and, to a lesser degree, of TF risks. Romania needs to immediately start implementing mitigating actions that target the highest risks to which the country is exposed.
		https://rm.coe.int/moneyval-2023-5-mer-romania/1680abfd1c
11	FATF	FATF black and gray lists as of [23/June/2023] FATF has reviewed and published : <ul> <li>the lists of jurisdictions subject to a Call for Action(BLACK), list remained unchanged : North Korea; Iran; Myanmar;</li> <li>list of jurisdictions under Increased Monitoring(GREY), the updates are:, no exit but 3 countries enter in the list : Cameroon, Croatia and Vietnam. The list contains 26 countries : 1/Albania [Feb.20] 2/Barbados [Feb.20] 3/Burkina Faso [Feb.21] 4/Cameroon [Jun.23] 5/Cayman Islands [Feb.21] 6/Congo D.R.[Oct.22] 7/Croatia [Jun.23] 8/Gibraltar [Jun.22] 9/Haiti [Jun.20] 10/Jamaica [Feb.20] 11/Jordan [Oct.21] 12/Mali [Oct.21] 13/Mozambique [Oct.22] 14/Nigeria [Feb.23] 15/Panama [Jun.19] 16/Philippines [Jun.21] 17/Senegal [Feb.20] 24/United Arab Emirates [Feb.22] 25/Vietnam [Jun.23] 26/Yemen [Feb.10] https://www.fatf-gafi.org/content/fatf-gafi/en/publications/Fatfgeneral/Increased-monitoring-june-2023.html</li></ul>
11	EU	EU list of non-cooperative jurisdictions for tax purposes has been issued on [14/February/2023] The EU list of non-cooperative jurisdictions for tax purposes has been updated. The black list contains the following countries: 1/American Samoa; 2/Anguilla; 3/Bahamas; 4/British Virgin Islands(new); 5/Costa Rica(new); 6/Fiji; 7/Guam; 8/Marshall Islands(new); 9/Palau; 10/Panama; 11/Russia(new); 12/Samoa; 13/Trinidad and Tobago; 14/Turks and Caicos Islands; 15/US Virgin Islands; 16/Vanuatu. For the grey list see Annex II https://data.consilium.europa.eu/doc/document/ST-6375-2023-INIT/en/pdf 12

		The EU high-risk third countries with strategic deficiencies list has been updated on [26/June/2023]
		The Commission Delegated Regulation (EU) 2016/1675 regarding high-risk third countries with strategic deficiencies has been updated by C.D.Reg. 2023/1219 as follows: exit : Cambodia & Morocco, new entries: Nigeria & South Africa
11	EU	The list contains 27 countries : 1/Afghanistan(2016) 2/South Africa (2023) 3/Barbados(2020) 4/Burkina Faso(2022) 5/Cayman I.(2022) 6/D.R.Congo(2023) 7/Filipine(2022) 8/Gibraltar(2023) 9/Haiti(2022) 10/Jordan(2022) 11/Jamaica(2020) 12/Mali(2022) 13/Myanmar(2020) 14/Mozambique(2023) 15/Nigeria(2023) 16/Panama(2020) 17/Senegal(2022) 18/Syria(2016) 19/South Sudan(2022) 20/Trinidad and Tobago(2018) 21/Tanzania (2023) 22/Uganda(2016) 23/Vanuatu(2016) 24/Yemen(2016) 25/United Arab Emirates(2023) 26/Iran(2016) 27/D.P.R.Korea(2016) The Commission Delegated Regulation (EU) 2016/1675 regarding high-risk third countries with strategic deficiencies has been updated by C.D.Reg. 2023/410 as follows: <b>exit</b> : Nicaragua, Pakistan & Zimbabwe, <b>new entries</b> : D.R.Congo, Gibraltar, Mozambique, Tanzania & United Arab Emirates.
		https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R1675
12	<u></u>	Relevant information from credible and reliable organizations
	Amnesty	[27/September/2023] India: Government weaponizing terrorism financing watchdog recommendations against civil society
12		Indian authorities are exploiting the recommendations of a global terrorism financing and money laundering watchdog to target civil society groups and activists and deliberately hinder their work, said Amnesty International.
12	Amnesty International	
12		society groups and activists and deliberately hinder their work, said Amnesty International. https://www.amnesty.org/en/latest/news/2023/09/india-government-weaponizing-terrorism-financing-watchdog-recommendations- against-civil-society/
12	International	society groups and activists and deliberately hinder their work, said Amnesty International. https://www.amnesty.org/en/latest/news/2023/09/india-government-weaponizing-terrorism-financing-watchdog-recommendations-

		[26/September/2023] Global Organized Crime Index 2023
1:	Global Initiative	Providing a thorough, holistic view of organized crime dynamics, the Index evaluates all 193 UN member states in terms of the scope and scale of criminality, on the one hand, and their resilience, or ability to withstand and counteract organized crime activities, on the other. the Global Organized Crime Index is based on three key elements: -The scope, scale and impact of 15 criminal markets -The structure and influence of 5 criminal actor types -The existence and capacity of countries to be resilient to organized crime, measured across 12 resilience building blocks
		https://ocindex.net/report/2023/0-3-contents.html
		[25/September/2023] The evolution of targeted sanctions usage against organized crime
1:	Global Initiative	The use of targeted sanctions has emerged as part of this expanding international toolkit to address organized crime. Such sanctions can be defined as legal authorities that prohibit certain forms of otherwise licit activity, including financial access or travel, for a specific entity in order to hamper their pursuit of a specific goal. Despite this growing use, there has been limited tracing of why and how different international actors have converged in their use of targeted sanctions, how they have developed processes to issue and implement sanctions regimes and their impact and effectiveness. This report addresses the first two issues. The questions of impact and effectiveness will be addressed in a separate, forthcoming report. The report begins by briefly detailing what targeted sanctions are and how they link to the longer history of sanctions as a foreign policy tool. The second section looks at the evolution of the US's unilateral sanctions programmes and processes, which are rooted in a national security rationale.13 The third describes the evolution of the UN's approaches to sanctioning criminal actors, which derive from concerns about the nexus between conflict and crime and the complicated political process of designation. The fourth section sets out how the EU and the UK are shifting their use of sanctions to target organized criminal actors, primarily based on thematic concerns around human rights, corruption and peace and conflict, and the process challenges these new sanctions regimes face. The report ends with a brief conclusion and recommendations.
1:	2 OCCRP	[22/September/2023] Leak Unveils Russian Oligarch Abramovich's \$1 Billion Art Collection. Despite Sanctions, It Has Not Been Seized or Frozen.         Documents leaked from Cyprus show that, just before Russia invaded Ukraine and Abramovich was sanctioned last year, the billionaire passed the massive collection to his ex-wife. Experts say it's one of the most impressive private art collections in the world. Made up of over 300 pieces — including works by Picasso, Monet, and Degas — it was valued in 2018 at nearly \$1 billion.         https://www.occrp.org/en/investigations/leak-unveils-russian-oligarch-abramovichs-1-billion-art-collection-despite-sanctions-it-has-not-been-seized-or-frozen

		[18/Septembrie/2023] MEASURING THE SCOPE AND SCALE OF WASTE MANAGEMENT CRIMES
12	GLOBAL Initiative	Waste management is a huge economic sector and opportunities inev-itably arise at various stages for illegal activities enabled by the complexities of waste definitions and legislative loopholes. Waste-related crimes can also happen within the micro-environment of an urban area. <u>https://globalinitiative.net/wp-content/uploads/2023/04/Shirleen-Chin-Measuring-the-scope-and-scale-of-waste-management-crimes-GI-TOC-September-2023.pdf</u>
		[15/September/2023] IRS investigating sanctioned Russian oligarchs' use of South Dakota trusts
12	US IRS	U.S. authorities are investigating cases of Russian oligarchs evading sanctions by hiding assets in South Dakota trusts, an Internal Revenue Service agent told South Dakota Public Broadcasting.
	ING	https://www.icij.org/investigations/pandora-papers/irs-investigating-sanctioned-russian-oligarchs-use-of-south-dakota-trusts-agent-says/
		[15/September/2023] Global Wealth Report 2023
12	UBS	The Global Wealth Report covers estimates of the wealth holdings of 5.4 billion adults around the world and across the wealth spectrum.
		https://www.ubs.com/global/en/family-office-uhnw/reports/global-wealth-report-2023.html
		[15/September/2023] Moody's Analytics research reveals low public understanding of Politically Exposed Persons (PEPs)
12	Moody's Analytics	New research released today by Moody's Analytics has highlighted low awareness around the world about Politically Exposed Persons (PEPs) and the risks they can be connected to. The global survey polled more than 7,500 members of the general public across Europe, the US, and APAC. It found that only 45% of respondents know what a PEP is. wareness of connections to PEPs is also low. After being provided definitions of a PEP, fewer than 50% of respondents correctly answered that a person can be a PEP by association and nearly a third (33%) incorrectly believed having a public friendship would not qualify someone as a PEP by association.
		https://www.moodys.com/web/en/us/kyc/resources/insights/research-reveals-low-public-understanding-politically-exposed-persons- peps.html

		[15/September/2023] Port in a Storm - Organized crime in Odesa since the Russian invasion
12	Global Initiative	Odesa is a city of immense importance to Ukraine. Its port is the gateway through which most of Ukraine's trade with the world is conducted, but it also holds a deeply symbolic place in the country's heart – the so-called 'Jewel of the Black Sea'. It has also long been one of the most criminalized cities in Ukraine, both in terms of illicit flows through its port (including drugs, weapons and contraband) and the high levels of corruption around the construction industry, law enforcement, the
		criminal justice system and the customs agency. https://globalinitiative.net/wp-content/uploads/2023/09/Port-in-a-storm-Organized-crime-in-Odesa-since-the-Russian-invasion-GI-TOC- September-2023.pdf
13	$\bigtriangleup$	Information from statistical organizations and academia & others
13		[15/September/2023] Illegal wild life trade:the critical role of the banking sector in combating money laundering This paper aims to illustrate the importance of the banking sector in combating money laundering relating to IWT. It also aims to demonstrate the need for a general recognition of illegal wildlife trade (IWT) as a predicate offence for money laundering. This study finds that the banking sector is well-placed to combat money laundering relating to the IWT and is, by virtue of its international nature and strong focus on compliance, able to be effective in preventing the use of the proceeds of IWT as well as in identifying broader trafficking networks. Moreover, the banking sector is well-equipped to develop appropriate platforms to facilitate the swift, easy and effective sharing of financial intelligence between banks at the local, regional and especially international level. https://www.emerald.com/insight/content/doi/10.1108/JMLC-06-2023-0105/full/pdf?title=illegal-wildlife-trade-the-critical-role-of-the- banking-sector-in-combating-money-laundering
14	$\bigtriangleup$	Relevant information on ML/FT risks from mass - media
14	Mass-media	[28/September/2023] Indonesia to sue UK agency for share of Airbus bribery case settlement Indonesia plans to sue the United Kingdom's anti-graft agency for a share of a 991 million euro (\$1.04 billion) bribery settlement paid by aircraft maker Airbus to the British government. Airbus, the world's largest aircraft manufacturer, agreed to the payout in 2020 as part of a record \$4 billion settlement with France, Britain and the U.S. following a 3-1/2 year criminal investigation into allegations of bribery and corruption. The investigation covered allegations of corrupt conduct by Airbus in five countries, including Indonesia. https://www.reuters.com/business/aerospace-defense/indonesia-sue-uk-agency-share-airbus-bribery-case-settlement-minister-2023-09- 27/
	12 13 13 14	12Initiative13

		[27/September/2023] UBS seeks to wipe out €1.8bn tax fine at top French court
14	Mass-media	Swiss bank UBS will seek to convince France's top court to overturn a reputation-damaging conviction and €1.8 billion (\$1.9 billion) penalty for helping wealthy French clients stash away undeclared funds in Swiss accounts. <a href="https://www.swissinfo.ch/eng/ubs-seeks-to-wipe-out1.8bn-tax-fine-at-top-french-court/48841750">https://www.swissinfo.ch/eng/ubs-seeks-to-wipe-out1.8bn-tax-fine-at-top-french-court/48841750</a>
		[27/September/2023] JP Morgan settles Epstein lawsuits with US Virgin Islands and Jes Staley
14	Mass-media	JP Morgan Chase has reached settlements with the US Virgin Islands and former executive Jes Staley to resolve lawsuits over its alleged dealings with convicted sex offender Jeffrey Epstein. It will pay \$75m to the territory, which alleged the bank facilitated Epstein's sex trafficking ring. JPMorgan did not admit any wrongdoing in the settlement.
		https://www.bbc.com/news/business-66925934
		[26/September/2023] UK suspects Wirecard's Jan Marsalek of spying for Russia
14	Mass-media	The public prosecutor's office in London accused former Wirecard chief operating officer Jan Marsalek of involvement in a spying network for Russia. Marsalek is named as part of a case against five Bulgarian nationals in the UK that was made public last week. The Austrian businessman is said to have been a contact person for the oldest of the five people arrested, who is accused of organizing and managing the cell's operations. The cell is accused of surveilling and reporting on people and places of interest to Russia within the UK.
		https://www.dw.com/en/uk-suspects-wirecards-jan-marsalek-of-spying-for-russia/a-66928487
		[25/September/2023] `Cash-flow' podcaster made off with millions in Ponzi scheme, SEC alleges
14	Mass-media	An Ohio podcast host ran an \$11 million Ponzi scheme that defrauded more than 50 investors with false claims of helping them become a "real estate investing badass," the U.S. Securities and Exchange Commission
		https://www.cnbc.com/2023/09/25/cash-flow-podcaster-made-off-with-millions-in-ponzi-scheme-sec.html
		[25/September/2023] Founder of Chinese gambling website linked to S'pore's \$2b money laundering case
14	Mass-media	A man who made millions offering illegal online gambling services to players in China is among a number of individuals who avoided arrest in Singapore during the Aug 15 anti-money laundering blitz. Wang Bingang formed his group in 2012 when he was only 23 years old. In two short years, the young man from Anxi, Fujian, started churning out millions by running the Hongli International gambling site from the Philippines and Cambodia.
		https://www.straitstimes.com/singapore/courts-crime/founder-of-chinese-gambling-website-linked-to-singapore-s-2b-money-laundering- case

Γ			[23/September/2023] HUNGARIAN AUTHORITIES CONFISCATE \$1 MILLION IN CRYPTO ASSETS AMID TAX EVASION
			CRACKDOWN
	14	Mass-media	Hungary's National Tax and Customs Administration (NAV) seized \$1 million in cryptocurrency assets from a criminal organization suspected of evading approximately \$8.29 million in taxes. The group, involved in the consumer electronics trade, allegedly imported tax-free goods from the EU and sold them through shell companies to avoid value-added tax (VAT).
			https://www.cryptopolitan.com/hungarian-authorities-confiscate-1-million-in-crypto-assets/
┢			[21/September/2023] Assets seized in Singapore's money laundering case swell to S\$2.4 billion
	14	Mass-media	The total value of assets seized in Singapore's biggest money laundering case has swelled to S\$2.4 billion (\$1.76 billion), police said on Wednesday. The assets now include cash amounting to more than S\$76 million, 68 gold bars, cryptocurrencies of more than S\$38 million, more than 110 properties and 62 vehicles worth more than S\$1.2 million. Police did not give details of the fresh seizures and how they were found.
			https://www.reuters.com/world/asia-pacific/assets-seized-singapores-money-laundering-case-swell-s24-bln-2023-09-21/
			[21/September/2023] Dark Banker And Owner Of FCA-Regulated Payment Institution Extradited Over Money-Laundering Charges.
	14	Mass-media	Caio Marchesani, owner of Trans-Fast Remittance through Optima FX Ltd, is believed to have managed large cash transactions for Sergio Roberto De Carvalho, a Brazilian previously identified by Interpol as a top global fugitive until his 2022 capture. De Carvalho, or "Major Carvalho," was on Interpol's radar for drug trafficking, money laundering, document fraud, and homicide, with strong links to organized crime. Prosecutors also accuse Marchesani of overseeing crypto accounts for Flor Bressers, known as the "finger cutter." Arrested at Heathrow Airport in May, Marchesani is being held without bail. He must be extradited to Belgium to face criminal charges, a London judge ruled early on 19 Sept 2023.
			https://fintelegram.com/dark-banker-and-owner-of-fca-regulated-payment-institution-extradited-over-money-laundering-charges/
			[19/September/2023] Corruption accusations continue to plague top Zelenskiy aides
	14	Mass-media	In his years as the chief executive of one of Ukraine's biggest construction firms, Oleh Maiboroda kept rolls of dollar bills in a safe behind his desk. The money, Maiboroda told Reuters, was intended to bribe public officials to approve building projects. The task of handing over the cash, he said, was entrusted to a lawyer named Oleh Tatarov, now a senior adviser to Ukraine's president Volodymyr Zelenskiy.
			https://www.reuters.com/world/europe/graft-accusations-dog-top-zelenskiy-aides-2023-09-19/

			[18/September/2023] Son of former Central Bank President charged with fraud in the US	
	14	Mass-media	The US prosecutor in Florida has charged 37-year-old Evan Daniel Tromp with wire fraud between 2017 and 2022. Evan, a Curaçao native, is the son of the former president of the Central Bank of Curaçao and Sint Maarten and was a 'ghost employee' at Ennia Investments and Holding from 2010 to 2017. He is also the director of Quanta Capital B.V. and has other involvements with various businesses. Evan is accused of operating a Ponzi scheme through his various companies: Quanta Capital B.V., Operational and Financ Advisory, LLC, and Quanta Nominee, LLC. He promised investors high returns by investing their money in cryptocurrency mining and trading with virtually no risk.	ial
			https://www.curacaochronicle.com/post/local/son-of-former-central-bank-president-charged-with-fraud-in-the-us/	
			[18/September/2023] Halliburton equipment imported to Russia despite sanctions	
,	14	Mass-media	The American gas multinational sold its Russian office to local management in September last year amid pressure on Western compan to cease operations in the country following the invasion of Ukraine. The sale of its business in Russia and impairments on its assets in Ukraine saw Halliburton take \$366m of impairments in the first half of 2022. However, despite completing the sale of its Russian arm of September 8, customs records seen by The Guardian indicate shipments of Halliburton equipment to Russia continued. There is no suggestion that any of the companies breached US or other global sanctions. Halliburton subsidiaries exported approximately £4.6 mil worth of equipment according to the records, largely shipped from the US and Singapore.	n Sn
			https://www.energyvoice.com/oilandgas/europe/pipelines-europe/534532/halliburton-equipment-imported-to-russia-despite-sanctions	<u>5/</u>
			[18/September/2023] Prominent German banker on trial in giant tax fraud scheme	
	14	Mass-media	A top German banker went on trial accused of playing a role in a multibillion-euro German tax fraud scheme that has ensnared scores domestic and global banks and hundreds of individuals. In the scheme, known as "cum-ex" or dividend stripping, banks and investors would swiftly trade shares of companies around their dividend payout day, blurring stock ownership and allowing multiple parties to falsely reclaim tax rebates on dividends. The loophole that allowed the trading to thrive between 2005 and 2012 is now closed, but a lengthy investigation has taken on vast dimensions as courts and officials try to hold wrongdoers to account and claw back an estimate 10 billion euros (\$10.66 billion) lost from government coffers. The trial that began in Bonn involves Christian Olearius, the 81-year-old former CEO and chair of the Hamburg-based bank M.M. Warburg and the most senior banker yet to stand trial. He has denied any wrongdoing but made no statement in court on Monday.	ed
			https://www.reuters.com/business/finance/prominent-german-banker-trial-giant-tax-fraud-scheme-2023-09-18/	
	14	Massmodia	[17/September/2023] Dutch Defense Ministry employee arrested for selling airplane parts to Russia A 48-year-old employee of the Ministry of Defense from Arnhem has been arrested on suspicion of circumventing sanctions against Russia. He is suspected of sending aircraft parts to Russia through an intermediary. This has been prohibited since sanctions were imposed on Russia following Russia's invasion of Ukraine last February. The man was arrested on Aug. 30, the financial crimes	
	14	Mass-media	inspectorate, FIOD, reported in a press release.	

Γ			[16/September/2023] UK drops sanctions evasion probe into Russian billionaire Fridman
-	14	Mass-media	The UK National Crime Agency (NCA) has closed an investigation into alleged sanctions evasion by Russian oligarch Mikhail Fridman. "The NCA can confirm that it will take no further action against Mikhail Fridman based on the warrant executed at Athlone House in December 2022". "Inquiries are ongoing in relation to associated suspects who fall under the wider investigation." https://news.yahoo.com/uk-drops-sanctions-evasion-probe-192700595.html
			[15/September/2023] The dark secrets of Switzerland's largest gold refinery
-	14	Mass-media	On December 3, 2020, the Central Office for Precious Metals Control conducted an on-site inspection at the Valcambi plant in canton Ticino. There it discovered gold of suspect provenance, which had come directly from a refinery in Dubai called MTM (MTM-O Gold Refinery) belonging to the Kaloti group. These names may be unfamiliar to the public at large, but in the world of precious metals, Kaloti and its MTM plant are synonymous with dirty gold. The company has been embroiled in allegations of drug money laundering and the marketing of gold from conflict zones in Sudan.
			https://www.swissinfo.ch/eng/the-dark-secrets-of-switzerland-s-largest-gold-refinery/48802284
-	15	Ą	Legislative changes
			[15/September/2023] DRAFT: COMMISSION DELEGATED REGULATION (EU) amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items
1	15	EU	European Commission published a draft version of the 2024 list of controlled dual-use items. The EU Council and Parliament and have two months to propose amendments before it enters into force.
			https://ec.europa.eu/transparency/documents-register/detail?ref=C(2023)6125⟨=en
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be blocked and reported to OFAC. In addition, any entities that are owned, directly or indirectly, 50 percent or more by one or more blocked persons are also blocked. 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 otherwise blocked persons.

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