

**MEMO# 16033**

May 9, 2003

## OFAC UPDATE

URGENT/ACTION REQUESTED [16033] May 9, 2003 TO: COMPLIANCE ADVISORY COMMITTEE No. 36-03 INTERNATIONAL COMMITTEE No. 32-03 INTERNATIONAL OPERATIONS ADVISORY COMMITTEE No. 22-03 MONEY LAUNDERING RULES WORKING GROUP No. 31-03 PRIMARY CONTACTS - MEMBER COMPLEX No. 35-03 TRANSFER AGENT ADVISORY COMMITTEE No. 49-03 RE: OFAC UPDATE Treasury's Office of Foreign Assets Control (OFAC) issued two bulletins yesterday outlining several important OFAC-related items. First, OFAC has blocked the assets of three entities and an individual pursuant to the Narcotics Trafficking Sanctions Regulations and amended two entries for specially designated global terrorists (SDGTs).<sup>1</sup> Second, the President issued an Executive Order terminating a previously declared emergency with respect to the actions and policies of the National Union for the Total Independence of Angola (UNITA). Pursuant to this Executive Order, OFAC has removed a number of entries from the SDN list. Finally, OFAC has issued a series of general licenses amending the Iraqi Sanctions Regulations, 31 C.F.R. Part 575. Each of these actions is summarized below. In addition, all of OFAC's SDN material and its program brochures on Narcotics and Terrorism has been updated to reflect these changes. Additions and Changes to the SDN List OFAC has blocked all property and interests in property of the following, wherever located, pending investigation pursuant to the Narcotics Trafficking Sanctions Regulations, 31 C.F.R. Part 536, and Section 203 of the International Emergency Economic Powers Act, as amended, 50 U.S.C. 1702. Although they are not now SDNTs, their names have been integrated 1 OFAC regulations require US persons, including investment companies, to block all accounts and assets of persons or entities named by OFAC. For an overview of OFAC regulations and a description of the various measures that mutual fund organizations may wish to consider adopting to ensure compliance with those regulations, refer to the Institute's paper entitled "Foreign Assets Control Compliance for Mutual Funds." This paper is available on the Institute's members' website at <http://members.ici.org>. The members' website is password-protected; staff at Institute member firms may request access codes by filling out the enrollment form on the website. 2 into OFAC's SDN list with the descriptor "[BPI-SDNT]" to indicate that their property and interests in property are currently blocked: ARDILA-MARMOLEJO, LTD. (f.k.a. HUYO-GIRALDO, LTD.), Nassau, Bahamas; Business Registration No. 88,046 B (Bahamas) [BPI-SDNT] SEPULVEDA-IRAGORRI, INC., 4382 Fox Ridge Dr., Weston, Florida 33331, U.S.A.; Business Registration Document # P00000115667 (Florida, U.S.A.); U.S. FEIN: 65-1062397 [BPI-SDNT] SEPULVEDA-IRAGORRI, LTD., Calle 6 Oeste No. 4-200 apt. 202, Cali, Colombia; Nassau, Bahamas [BPI-SDNT] VIDAL CAGGIGAS, Rolando, 10720 NW 66th Street, No. 502, Miami, Florida 33178, U.S.A.; 9443 Fontainebleau Boulevard, No. 114, Miami, Florida 33172, U.S.A.; DOB 01 Aug 1961; Passport No. 16822748 (Colombia); Cedula No. 16822748 (Colombia) (individual) [BPI-SDNT] In addition, the following SDGT entries have been expanded: LAJNAT AL DAAWA AL ISLAMIYYA (a.k.a. ISLAMIC CALL COMMITTEE), Kuwait [SDGT] -to- LAJNAT AL DAAWA AL ISLAMIYYA (a.k.a. ISLAMIC CALL COMMITTEE; a.k.a. LAJNA ALDAWA ALISALMIAH; a.k.a.

LAJNA ALDAWA ALISLAMIA; a.k.a. LAJNA ALDAWA ALISLAMIYA; a.k.a. LAJNAT AL D'AWA AL ISLAMIAK; a.k.a. LAJNAT AL DAAWA AL ISLAMIYA; a.k.a. LAJNAT AL DAWA; a.k.a. LAJNAT AL DAWA AL ISLAMIA; a.k.a. LAJNAT ALDAWA AL ISLAMIAH; a.k.a. LAJNAT ALDAWA ALISLAMIA), Kuwait [SDGT] ISLAMIC CALL COMMITTEE (a.k.a. LAJNAT AL DAAWA AL ISLAMIYYA), Kuwait [SDGT] -to- ISLAMIC CALL COMMITTEE (a.k.a. LAJNA ALDAWA ALISALMIAH; a.k.a. LAJNA ALDAWA ALISLAMIA; a.k.a. LAJNA ALDAWA ALISLAMIYA; a.k.a. LAJNAT AL D'AWA AL ISLAMIAK; a.k.a. LAJNAT AL DAAWA AL ISLAMIYA; a.k.a. LAJNAT AL DAAWA AL ISLAMIYYA; a.k.a. LAJNAT AL DAWA; a.k.a. LAJNAT AL DAWA AL ISLAMIA; a.k.a. LAJNAT ALDAWA AL ISLAMIAH; a.k.a. LAJNAT ALDAWA ALISLAMIA), Kuwait [SDGT] President's UNITA Order Effective May 7, 2003, the President of the United States has terminated the national emergency declared with respect to the National Union for the Total Independence of Angola (UNITA) in Executive Order 12865 of September 26, 1993 and revoked that executive order, as well as Executive Order 13069 of December 12, 1997 and Executive Order 13098 of August 18, 1998. The text of the President's Executive Order is attached. Based on the President's Executive Order, the following entries have been removed from the SDN list: ARMED FORCES FOR THE LIBERATION OF ANGOLA (a.k.a. FALA; a.k.a. FORCAS ARMADAS PARA A LIBERACIO DE ANGOLA) [UNITA] 3 CAMALATA, Abilio (a.k.a. KAMALATA, Abilio Jose Augusto "Numa"), General of UNITA; DOB 31 Aug 1955; POB Cubal, Benguela Province, Angola (individual) [UNITA] CANDEIA, Anibal Jose Mateus "Kile" (a.k.a. KANDEYA, Amilcar Jose Mateus; a.k.a. KANDEYA, Anibal), UNITA Representative to the United Kingdom; DOB 21 Aug 1954; POB Dondi, Huambo Province, Angola; Passport No. PSAE/505893 (Ivory Coast) (individual) [UNITA] CENTER FOR DEMOCRACY IN ANGOLA [UNITA] CHILALA, Odeth Ludovina Baca Joaquim (a.k.a. LUDEVINA, Odeth), President of UNITA's League of Angolan Women (Secretary of Women's Organization for UNITA); DOB 05 Aug 1959; POB Bela Vista, Huambo Province, Angola (individual) [UNITA] DACHALA, Marcial Adriano, UNITA Information Secretary; DOB 11 Aug 1956; POB Bela Vista, Huambo Province, Angola (individual) [UNITA] DEMBO, Antonio Sebastiao, Vice-President of UNITA; DOB 25 Aug 1944; POB Nambuangongo, Luanda Province, Angola (individual) [UNITA] FALA (a.k.a. ARMED FORCES FOR THE LIBERATION OF ANGOLA; a.k.a. FORCAS ARMADAS PARA A LIBERACIO DE ANGOLA) [UNITA] FORCAS ARMADAS PARA A LIBERACIO DE ANGOLA (a.k.a. ARMED FORCES FOR THE LIBERATION OF ANGOLA; a.k.a. FALA) [UNITA] FREE ANGOLA INFORMATION SERVICE, INC. [UNITA] GATO, Paulo Lukamba (a.k.a. PAULO, Armindo Lukamba "Gato;" a.k.a. PAULO, Armindo Lucas "Gato"), UNITA Secretary-General; DOB 13 May 1954; POB Bailundo, Huambo Province, Angola (individual) [UNITA] KAMALATA, Abilio Jose Augusto "Numa" (a.k.a. CAMALATA, Abilio), General of UNITA; DOB 31 Aug 1955; POB Cubal, Benguela Province, Angola (individual) [UNITA] KANDEYA, Amilcar Jose Mateus (a.k.a. CANDEIA, Anibal Jose Mateus "Kile;" a.k.a. KANDEYA, Anibal), UNITA Representative to the United Kingdom; DOB 21 Aug 1954; POB Dondi, Huambo Province, Angola; Passport No. PSAE/505893 (Ivory Coast) (individual) [UNITA] KANDEYA, Anibal (a.k.a. CANDEIA, Anibal Jose Mateus "Kile;" a.k.a. KANDEYA, Amilcar Jose Mateus), UNITA Representative to the United Kingdom; DOB 21 Aug 1954; POB Dondi, Huambo Province, Angola; Passport No. PSAE/505893 (Ivory Coast) (individual) [UNITA] LUDEVINA, Odeth (a.k.a. CHILALA, Odeth Ludovina Baca Joaquim), President of UNITA's League of Angolan Women (Secretary of Women's Organization for UNITA); DOB 05 Aug 1959; POB Bela Vista, Huambo Province, Angola (individual) [UNITA] 4 MULATO, Ernesto Joaquim, UNITA Representative to Germany; DOB 12 Aug 1940; POB Bembe, Uige Province, Angola (individual) [UNITA] NATIONAL UNION FOR THE TOTAL INDEPENDENCE OF ANGOLA (a.k.a. UNIAO NACIONAL PARA A INDEPENDENCIA TOTAL DE ANGOLA; a.k.a. UNITA) [UNITA] PAULO, Armindo Lucas "Gato" (a.k.a. GATO, Paulo Lukamba; a.k.a. PAULO, Armindo Lukamba "Gato"), UNITA Secretary-General; DOB 13 May 1954; POB Bailundo, Huambo Province, Angola (individual) [UNITA] PAULO, Armindo Lukamba "Gato" (a.k.a. GATO, Paulo Lukamba; a.k.a. PAULO, Armindo

Lucas "Gato"), UNITA Secretary-General; DOB 13 May 1954; POB Bailundo, Huambo Province, Angola (individual) [UNITA] SAKALA, Alcides (a.k.a. SIMOES, Alcides Sakala; a.k.a. TCHACALA, Alcides), UNITA Foreign Affairs Secretary; DOB 23 Dec 1953; POB Bailundo, Huambo Province, Angola (individual) [UNITA] SAPALALO, Altino Bango "Bock," General of UNITA; DOB 05 Nov 1954; POB Andulo, Bie Province, Angola (individual) [UNITA] SAVIMBI, Jonas Malheiro, President and Founder of UNITA; DOB 03 Aug 1934; POB Munhango, Bie Province, Angola (individual) [UNITA] SIMOES, Alcides Sakala (a.k.a. SAKALA, Alcides; a.k.a. TCHACALA, Alcides), UNITA Foreign Affairs Secretary; DOB 23 Dec 1953; POB Bailundo, Huambo Province, Angola (individual) [UNITA] TCHACALA, Alcides (a.k.a. SAKALA, Alcides; a.k.a. SIMOES, Alcides Sakala), UNITA Foreign Affairs Secretary; DOB 23 Dec 1953; POB Bailundo, Huambo Province, Angola (individual) [UNITA] UNIAO NACIONAL PARA A INDEPENDENCIA TOTAL DE ANGOLA (a.k.a. NATIONAL UNION FOR THE TOTAL INDEPENDENCE OF ANGOLA; a.k.a. UNITA) [UNITA] UNITA (a.k.a. NATIONAL UNION FOR THE TOTAL INDEPENDENCE OF ANGOLA; a.k.a. UNIAO NACIONAL PARA A INDEPENDENCIA TOTAL DE ANGOLA) [UNITA] General Licenses Issues Pursuant to the Iraqi Sanctions Regulations OFAC has issued four general licenses that amend the Iraqi Sanctions Regulations. Each of these is summarized below. The full text of the general licenses are attached. The first general license permits U.S. persons to transfer funds of up to \$500 per month to any person in Iraq for non-commercial humanitarian purposes, and permits U.S. financial institutions to engage in all transactions ordinarily incident to the transfer of such funds, including the opening of new correspondent accounts for funds transfers with Iraqi financial institutions. However, this license does not authorize transfers from blocked accounts. The second license permits U.S. government agencies and their contractors or grantees to engage in certain otherwise prohibited transactions that are within the scope of their official duties or the relevant U.S. government contracts or grants. The third license permits otherwise prohibited transactions that are necessary to provide privately financed humanitarian support, or to plan or prepare for the provision of humanitarian support, to the Iraqi people in Iraq. Transactions authorized by this license include, but are not limited to, the exportation to Iraq of goods and services necessary for the provision of humanitarian support, the financing of such humanitarian support, travel-related transactions necessary to provide humanitarian support, and related funds transfers by U.S. financial institutions. The fourth license authorizes certain exports and reexports of goods to Iraq. Robert C. Grohowski Associate Counsel Attachment (in .pdf format)