

MEMO# 16959

January 12, 2004

OFAC UPDATE

[16959] January 12, 2004 TO: COMPLIANCE ADVISORY COMMITTEE No. 5-04 INTERNATIONAL COMMITTEE No. 4-04 INTERNATIONAL OPERATIONS ADVISORY COMMITTEE No. 2-04 MONEY LAUNDERING RULES WORKING GROUP No. 2-04 PRIMARY CONTACTS - MEMBER COMPLEX No. 2-04 TRANSFER AGENT ADVISORY COMMITTEE No. 4-04 RE: OFAC UPDATE Treasury's Office of Foreign Assets Control (OFAC) issued a bulletin today making a number of changes to its lists of foreign terrorist organizations (FTOs) and specially designated global terrorists (SDGTs).¹ The following "[FTO][SDGT]" entries have been changed on OFAC's SDN list: FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN (a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] -to- FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN (a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KONGRA-GEL; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN PEOPLE'S CONGRESS (KHK); a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PEOPLE'S CONGRESS OF KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] 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 HALU MESRU SAVUNMA KUVVETI (HSK) (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. KADEK; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] -to- HALU MESRU SAVUNMA KUVVETI (HSK) (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. KADEK; a.k.a. KONGRA-GEL; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN PEOPLE'S CONGRESS (KHK); a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PEOPLE'S CONGRESS OF KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] KADEK (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] -to- KADEK (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KONGRA-GEL; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN PEOPLE'S CONGRESS (KHK); a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN

KURDISTAN; a.k.a. PEOPLE'S CONGRESS OF KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] KURDISTAN FREEDOM AND DEMOCRACY CONGRESS (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] -to- KURDISTAN FREEDOM AND DEMOCRACY CONGRESS (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KONGRA-GEL; a.k.a. KURDISTAN PEOPLE'S CONGRESS (KHK); a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PEOPLE'S CONGRESS OF KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] KURDISTAN WORKERS' PARTY (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] -to- KURDISTAN WORKERS' PARTY (a.k.a. FREEDOM AND DEMOCRACY 3 CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KONGRA-GEL; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN PEOPLE'S CONGRESS (KHK); a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PEOPLE'S CONGRESS OF KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] PARTIYA KARKERAN KURDISTAN (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] -to- PARTIYA KARKERAN KURDISTAN (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KONGRA-GEL; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN PEOPLE'S CONGRESS (KHK); a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PEOPLE'S CONGRESS OF KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] PKK (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] -to- PKK (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KONGRA-GEL; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN PEOPLE'S CONGRESS (KHK); a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PEOPLE'S CONGRESS OF KURDISTAN; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] THE PEOPLE'S DEFENSE FORCE (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PKK) [FTO][SDGT] -to- THE PEOPLE'S DEFENSE FORCE (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KONGRA-GEL; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN PEOPLE'S CONGRESS (KHK); a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN 4 KURDISTAN; a.k.a. PEOPLE'S CONGRESS OF KURDISTAN; a.k.a. PKK) [FTO][SDGT] These changes result in the following new entries: KONGRA-GEL (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN PEOPLE'S CONGRESS (KHK); a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PEOPLE'S CONGRESS OF KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] KURDISTAN PEOPLE'S CONGRESS (KHK) (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU

SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KONGRA-GEL; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PEOPLE'S CONGRESS OF KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] PEOPLE'S CONGRESS OF KURDISTAN (a.k.a. FREEDOM AND DEMOCRACY CONGRESS OF KURDISTAN; a.k.a. HALU MESRU SAVUNMA KUVVETI (HSK); a.k.a. KADEK; a.k.a. KONGRA-GEL; a.k.a. KURDISTAN FREEDOM AND DEMOCRACY CONGRESS; a.k.a. KURDISTAN PEOPLE'S CONGRESS (KHK); a.k.a. KURDISTAN WORKERS' PARTY; a.k.a. PARTIYA KARKERAN KURDISTAN; a.k.a. PKK; a.k.a. THE PEOPLE'S DEFENSE FORCE) [FTO][SDGT] All of OFAC's SDN material has been updated accordingly, as has OFAC's program brochure on Terrorism. Robert C. Grohowski Associate Counsel

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