

MEMO# 16922

December 24, 2003

OFAC UPDATE

[16922] December 24, 2003 TO: COMPLIANCE ADVISORY COMMITTEE No. 115-03 INTERNATIONAL COMMITTEE No. 85-03 INTERNATIONAL OPERATIONS ADVISORY COMMITTEE No. 53-03 MONEY LAUNDERING RULES WORKING GROUP No. 65-03 PRIMARY CONTACTS - MEMBER COMPLEX No. 118-03 TRANSFER AGENT ADVISORY COMMITTEE No. 115-03 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: ARMY OF MOHAMMED (a.k.a. JAISH-I-MOHAMMED; a.k.a. MOHAMMED'S ARMY; a.k.a. TEHRIK UL-FURQAAN), Pakistan [FTO] [SDGT] -to- ARMY OF MOHAMMED (a.k.a. JAISH-I-MOHAMMED; a.k.a. JAISHE E-MOHAMMED; a.k.a. KHUDAMUL ISLAM; a.k.a. KHUDDAM-UL-ISLAM; a.k.a. KUDDAM E ISLAMI; a.k.a. MOHAMMED'S ARMY; a.k.a. TEHRIK UL-FURQAAN), Pakistan [FTO] [SDGT] ARMY OF THE RIGHTEOUS (a.k.a. LASHKAR E-TAYYIBA; a.k.a. LASHKAR E-TOIBA; a.k.a. LASHKAR-I-TAIBA), Pakistan [FTO] [SDGT] -to- ARMY OF THE RIGHTEOUS (a.k.a. AL MANSOOREEN; a.k.a. AL MANSOORIAN; a.k.a. ARMY OF THE PURE; a.k.a. ARMY OF THE PURE AND RIGHTEOUS; a.k.a. LASHKAR E-TAYYIBA; a.k.a. LASHKAR E-TOIBA; a.k.a. LASHKAR-I-TAIBA), Pakistan [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 JAISH-I-MOHAMMED (a.k.a. ARMY OF MOHAMMED; a.k.a. MOHAMMED'S ARMY; a.k.a. TEHRIK UL-FURQAAN), Pakistan [FTO] [SDGT] -to- JAISH-I-MOHAMMED (a.k.a. ARMY OF MOHAMMED; a.k.a. JAISHE E-MOHAMMED; a.k.a. KHUDAMUL ISLAM; a.k.a. KHUDDAM-UL-ISLAM; a.k.a. KUDDAM E ISLAMI; a.k.a. MOHAMMED'S ARMY; a.k.a. TEHRIK UL-FURQAAN), Pakistan [FTO] [SDGT] LASHKAR E-TAYYIBA (a.k.a. ARMY OF THE RIGHTEOUS; a.k.a. LASHKAR E-TOIBA; a.k.a. LASHKAR-I-TAIBA), Pakistan [FTO] [SDGT] -to- LASHKAR E-TAYYIBA (a.k.a. AL MANSOOREEN; a.k.a. AL MANSOORIAN; a.k.a. ARMY OF THE PURE; a.k.a. ARMY OF THE PURE AND RIGHTEOUS; a.k.a. ARMY OF THE RIGHTEOUS; a.k.a. LASHKAR E-TOIBA; a.k.a. LASHKAR-I-TAIBA), Pakistan [FTO] [SDGT] LASHKAR E-TOIBA (a.k.a. LASHKAR E-TAYYIBA; a.k.a. ARMY OF THE RIGHTEOUS; a.k.a. LASHKAR-I-TAIBA), Pakistan [FTO] [SDGT] - to- LASHKAR E-TOIBA (a.k.a. AL MANSOOREEN; a.k.a. AL MANSOORIAN; a.k.a. ARMY OF THE PURE; a.k.a. ARMY OF THE PURE AND RIGHTEOUS; a.k.a. ARMY OF THE RIGHTEOUS; a.k.a. LASHKAR E-TAYYIBA; a.k.a. LASHKAR-I-TAIBA), Pakistan [FTO] [SDGT] LASHKAR-I-TAIBA (a.k.a. LASHKAR E-TAYYIBA; a.k.a. ARMY OF THE RIGHTEOUS; a.k.a. LASHKAR E-TOIBA), Pakistan [FTO] [SDGT] - to- LASHKAR-I-TAIBA (a.k.a. AL MANSOOREEN; a.k.a. AL MANSOORIAN; a.k.a. ARMY OF THE

PURE; a.k.a. ARMY OF THE PURE AND RIGHTEOUS; a.k.a. ARMY OF THE RIGHTEOUS; a.k.a. LASHKAR E-TAYYIBA; a.k.a. LASHKAR E-TOIBA), Pakistan [FTO] [SDGT] MOHAMMED'S ARMY (a.k.a. ARMY OF MOHAMMED; a.k.a. JAISH-I- MOHAMMED; a.k.a. TEHRIK UL-FURQAAN), Pakistan [FTO] [SDGT] - to- MOHAMMED'S ARMY (a.k.a. ARMY OF MOHAMMED; a.k.a. JAISH-I-MOHAMMED; a.k.a. JAISHE E-MOHAMMED; a.k.a. KHUDAMUL ISLAM; a.k.a. KHUDDAM-UL-ISLAM; a.k.a. KUDDAM E ISLAMI; a.k.a. TEHRIK UL-FURQAAN), Pakistan [FTO] [SDGT] TEHRIK UL-FURQAAN (a.k.a. ARMY OF MOHAMMED; a.k.a. JAISH- I-MOHAMMED; a.k.a. MOHAMMED'S ARMY), Pakistan [FTO] [SDGT] - to- TEHRIK UL-FURQAAN (a.k.a. ARMY OF MOHAMMED; a.k.a. JAISH-I-MOHAMMED; a.k.a. JAISHE E-MOHAMMED; a.k.a. KHUDAMUL ISLAM; a.k.a. KHUDDAM-UL-ISLAM; a.k.a. KUDDAM E ISLAMI; a.k.a. MOHAMMED'S ARMY), Pakistan [FTO] [SDGT] These changes result in the following new entries: AL MANSOOREEN (a.k.a. AL MANSOORIAN; a.k.a. ARMY OF THE PURE; a.k.a. ARMY OF THE PURE AND RIGHTEOUS; a.k.a. ARMY OF 3 THE RIGHTEOUS; a.k.a. LASHKAR E-TAYYIBA; a.k.a. LASHKAR E- TOIBA; a.k.a. LASHKAR-I-TAIBA), Pakistan [FTO] [SDGT] AL MANSOORIAN (a.k.a. AL MANSOOREEN; a.k.a. ARMY OF THE PURE; a.k.a. ARMY OF THE PURE AND RIGHTEOUS; a.k.a. ARMY OF THE RIGHTEOUS; a.k.a. LASHKAR E-TAYYIBA; a.k.a. LASHKAR E- TOIBA; a.k.a. LASHKAR-I-TAIBA), Pakistan [FTO] [SDGT] ARMY OF THE PURE (a.k.a. AL MANSOOREEN; a.k.a. AL MANSOORIAN; a.k.a. ARMY OF THE PURE AND RIGHTEOUS; a.k.a. ARMY OF THE RIGHTEOUS; a.k.a. LASHKAR E-TAYYIBA; a.k.a. LASHKAR E-TOIBA; a.k.a. LASHKAR-I-TAIBA), Pakistan [FTO] [SDGT] ARMY OF THE PURE AND RIGHTEOUS (a.k.a. AL MANSOOREEN; a.k.a. AL MANSOORIAN; a.k.a. ARMY OF THE PURE; a.k.a. ARMY OF THE RIGHTEOUS; a.k.a. LASHKAR E-TAYYIBA; a.k.a. LASHKAR E- TOIBA; a.k.a. LASHKAR-I-TAIBA), Pakistan [FTO] [SDGT] JAISHE E-MOHAMMED (a.k.a. ARMY OF MOHAMMED; a.k.a. JAISH- I-MOHAMMED; a.k.a. KHUDAMUL ISLAM; a.k.a. KHUDDAM-UL- ISLAM; a.k.a. KUDDAM E ISLAMI; a.k.a. MOHAMMED'S ARMY; a.k.a. TEHRIK UL-FURQAAN), Pakistan [FTO] [SDGT] KHUDAMUL ISLAM (a.k.a. ARMY OF MOHAMMED; a.k.a. JAISH-I- MOHAMMED; a.k.a. JAISHE E-MOHAMMED; a.k.a. KHUDDAM-UL- ISLAM; a.k.a. KUDDAM E ISLAMI; a.k.a. MOHAMMED'S ARMY; a.k.a. TEHRIK UL-FURQAAN), Pakistan [FTO] [SDGT] KHUDDAM-UL-ISLAM (a.k.a. ARMY OF MOHAMMED; a.k.a. JAISH- I-MOHAMMED; a.k.a. JAISHE E-MOHAMMED; a.k.a. KHUDAMUL ISLAM; a.k.a. KUDDAM E ISLAMI; a.k.a. MOHAMMED'S ARMY; a.k.a. TEHRIK UL-FURQAAN), Pakistan [FTO] [SDGT] KUDDAM E ISLAMI (a.k.a. ARMY OF MOHAMMED; a.k.a. JAISH-I-MOHAMMED; a.k.a. JAISHE E-MOHAMMED; a.k.a. KHUDAMUL ISLAM; a.k.a. KHUDDAM-UL-ISLAM; a.k.a. MOHAMMED'S ARMY; a.k.a. TEHRIK UL-FURQAAN), Pakistan [FTO] [SDGT] All of OFAC's SDN material has been updated accordingly, as has OFAC's program brochure on Terrorism. In addition, the following foreign persons have been designated by the Secretary of State as being subject to the import ban of the Weapons of Mass Destruction Trade Control Regulations (Title 31 Part 539 of the U.S. Code of Federal Regulations): MIKROSAM, wherever located, including 7500 Prilep, Macedonia [December 24, 2003] 4 SAMAKOSKI, Blagoja; nationality Macedonian (individual) [December 24, 2003] OFAC's program brochure on Nonproliferation as well as OFAC's industry overviews for banks and for exporters & importers have been updated accordingly. Robert C. Grohowski Associate Counsel