

MEMO# 17116

February 19, 2004

OFAC UPDATE

[17116] February 19, 2004 TO: COMPLIANCE ADVISORY COMMITTEE No. 21-04 INTERNATIONAL COMMITTEE No. 10-04 INTERNATIONAL OPERATIONS ADVISORY COMMITTEE No. 9-04 MONEY LAUNDERING RULES WORKING GROUP No. 6-04 PRIMARY CONTACTS - MEMBER COMPLEX No. 18-04 TRANSFER AGENT ADVISORY COMMITTEE No. 19-04 RE: OFAC UPDATE The Office of Foreign Assets Control (OFAC) has adding the names of three entities and a number of individuals to its list of narcotics kingpins (SDNTKs).¹ In addition, OFAC has changed the designation of one specially designated national (SDN). Please note these changes. The new SDNTKs, whose assets must be blocked immediately,² are: Entities FUNDACION PARA LA PAZ DE CORDOBA (a.k.a. FUNDACION POR LA PAS DE CORDOBA; a.k.a. FUNDAZCOR; a.k.a. FUNPAZCOR), Carrera 6 No. 29-12, Monteria, Cordoba, Colombia; NIT # 830054536-9 (Colombia) [SDNTK] LOS GNOMOS LTDA., Calle 5 No. 61-82, Apt. 412B, Cali, Valle, Colombia; NIT # 800165614-2 (Colombia) [SDNTK] 1 Significant foreign narcotics traffickers and foreign persons designated by the Secretary of the Treasury are referred to collectively as Specially Designated Narcotics Traffickers. Foreign persons designated under the Foreign Narcotics Kingpin Designation Act (21 U.S.C. 1901-1908, 8 U.S.C 1182) are referred to as "SDNTKs" on OFAC's listing of "Specially Designated Nationals and Blocked Persons" to differentiate them from the Specially Designated Narcotics Traffickers (SDNTs) named under Executive Order 12978, dated October 21, 1995. 2 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 SOCIEDAD DE COMERCIALIZACION INTERNACIONAL POSEIDON S.A. (a.k.a. C.I. POSEIDON S.A.; f.k.a. C.I. COMERCIALIZADORA INTERNACIONAL POSEIDON S.A.), Calle 79 Sur No. 48B-56, Sabaneta, Antioquia, Colombia; NIT # 800173090-7 (Colombia) [SDNTK] Other Individuals ALBAN BURBANO, Luis Alberto (a.k.a. ALBAN URBANO, Luis Alberto; a.k.a. CALARCA, Marco Leon; a.k.a. CALARCA, Marcos Leon); DOB 16 Aug 1957; POB Cali, Valle, Colombia; Cedula No. 16588328 (Colombia) (individual) [SDNTK] ARROYAVE RUIZ, Elkin Alberto (a.k.a. LOPEZ, Cesar), Carrera 9 No. 71D-10, Cali, Colombia; DOB 3 Sep 1968; POB Cauca, Antioquia, Colombia; Cedula No. 4652820 (Colombia) (individual) [SDNTK] ATENCIA PITALUA, Rafael Dario, c/o FUNDACION PARA LA PAZ DE CORDOBA, Monteria, Cordoba, Colombia; DOB 4 Feb 1963; Cedula No. 6889653 (Colombia) (individual) [SDNTK] BLANCO PUERTA, Edgar Fernando; DOB 19 Jun 1946; POB Medellin, Antioquia, Colombia; Cedula No. 13224238 (Colombia) (individual) [SDNTK] BOCOTA AGUABLANCA, Gustavo (a.k.a. BOGOTA, Gustavo; a.k.a. "Estevan;" a.k.a. "Tribisu"); DOB 28 Aug 1966; Cedula No. 9466199 (Colombia); alt. Cedula No. 9466833

(Colombia) (individual) [SDNTK] BRICENO SUAREZ, German (a.k.a. "Granobles;" a.k.a. SUAREZ ROJAS, Noe); DOB 15 Dec 1953; Cedula No. 347943 (Colombia) (individual) [SDNTK] BRICENO SUAREZ, Jorge (a.k.a. BRICENO SUAREZ, Jorge Enrique; a.k.a. "Mono Jojoy;" a.k.a. "Oscar Riano;" a.k.a. SUAREZ, Luis; a.k.a. SUAREZ ROJAS, Victor Julio); DOB Jan 1953; alt. DOB 1 Feb 1949; alt. DOB 2 Jan 1951; alt. DOB 5 Feb 1953; POB Santa Marta, Magdalena, Colombia; alt. POB Cabrera, Cundinamarca, Colombia; Cedula No. 12536519 (Colombia); alt. Cedula No. 19208210 (Colombia); alt. Cedula No. 17708695 (Colombia); may also be using Cedula No. 70753211 (Colombia) (individual) [SDNTK] BUITRAGO PARADA, Hector German (a.k.a. "Martin Llanos"); DOB 21 Jan 1968; POB Monterrey, Casanare, Colombia; Cedula No. 79436816 (Colombia) (individual) [SDNTK] CABRERA, Jose Benito (a.k.a. CABRERA CUEVAS, Jose Benito; a.k.a. "El Mono Fabian;" a.k.a. "Fabian Ramirez"); DOB 6 Jul 1963; alt. DOB 5 Jul 3 1965; POB El Paujil, Caqueta, Colombia; Cedula No. 96329309 (Colombia) (individual) [SDNTK] CARACAS VIVEROS, Oscar (a.k.a. "El Negro Oscar"); DOB 15 Nov 1967; POB Colombia; Cedula No. 96351739 (Colombia) (individual) [SDNTK] CASTANO GIL, Carlos; DOB 15 May 1965; POB Amalfi, Antioquia, Colombia; Cedula No. 70564150 (Colombia) (individual) [SDNTK] CASTANO GIL, Hector; DOB 24 Mar 1959; POB Amalfi, Antioquia, Colombia; Cedula No. 3371328 (Colombia) (individual) [SDNTK] CASTANO GIL, Jose Vicente; DOB 2 Jul 1957; Cedula No. 3370637 (Colombia) (individual) [SDNTK] CASTELLANOS GARZON, Henry (a.k.a. "Comandante Romana;" a.k.a. "Edison Romana;" a.k.a. "Romana"); DOB 20 Mar 1965; POB San Martin, Meta, Colombia; Cedula No. 17353695 (Colombia) (individual) [SDNTK] CIFUENTES GALINDO, Luis Eduardo (a.k.a. "El Aguila"); DOB 16 Mar 1960; Cedula No. 3254362 (Colombia) (individual) [SDNTK] DEVIA SILVA, Luis Edgar (a.k.a. "Raul Reyes"); DOB 30 Sep 1948; POB La Plata, Huila, Colombia; Cedula No. 14871281 (Colombia) (individual) [SDNTK] DUQUE GAVIRIA, Ivan Roberto (a.k.a. "Ernesto Baez"); DOB 9 May 1955; POB Aguadas, Caldas, Colombia; Cedula No. 10241940 (Colombia) (individual) [SDNTK] GIRALDO SERNA, Hernan; DOB 16 Oct 1948; Cedula No. 12531356 (Colombia) (individual) [SDNTK] GOMEZ ALVAREZ, Sor Teresa, c/o FUNDACION PARA LA PAZ DE CORDOBA, Monteria, Cordoba, Colombia; DOB 27 Jun 1956; POB Amalfi, Antioquia, Colombia; Passport 21446537 (Colombia); Cedula No. 21446537 (Colombia) (individual) [SDNTK] ISAZA ARANGO, Ramon Maria; DOB 30 Sep 1940; POB Sonson, Antioquia, Colombia; Cedula No. 5812993 (Colombia) (individual) [SDNTK] LONDONO ECHEVERRY, Rodrigo (a.k.a. "Timochenko;" a.k.a. "Timoleon Jimenez"); DOB 22 Jan 1959; alt. DOB 1 Jan 1949; POB Calarca, Quindio, Colombia; Cedula No. 79149126 (Colombia) (individual) [SDNTK] 4 MANCUSO GOMEZ, Salvatore (a.k.a. LOZADA, Santander), Calle 64 No. 8A-56, Monteria, Cordoba, Colombia; DOB 17 Aug 1964; POB Monteria, Cordoba, Colombia; Cedula No. 6892624 (Colombia) (individual) [SDNTK] MARIN ARANGO, Luciano (a.k.a. "Ivan Marques;" a.k.a. "Ivan Marquez"); DOB 16 Jun 1955; POB Florencia, Caqueta, Colombia; Cedula No. 19304877 (Colombia) (individual) [SDNTK] MARIN, Pedro Antonio (a.k.a. "Manuel Marulanda;" a.k.a. "Manuel Marulanda Velez;" a.k.a. MARIN MARIN, Pedro Antonio; a.k.a. "Tirofijo"); DOB 13 May 1930; POB Genova, Quindio, Colombia; Cedula No. 4870142 (Colombia) (individual) [SDNTK] MATA MATA, Noel (a.k.a. "Efrain Guzman;" a.k.a. "El Chucho;" a.k.a. MATTA MATTA, Noel); DOB 31 Jan 1935; alt. DOB 30 Jan 1935; POB Chaparral, Tolima, Colombia; Cedula No. 4870352 (Colombia) (individual) [SDNTK] MOLINA CARACAS, Tomas (a.k.a. "Arturo Guevara;" a.k.a. CASTILLO CORTES, Miguel Angel; a.k.a. "El Patron;" a.k.a. "Jorge Medina;" a.k.a. MEDINA CARACAS, Tomas; a.k.a. "Negro Acacio"); DOB 15 Mar 1965; POB Lopez De Micay, Cauca, Colombia (individual) [SDNTK] MURILLO BEJARANO, Diego Fernando (a.k.a. "Adolfo Paz;" a.k.a. "Don Berna"); DOB 23 Feb 1961; Cedula No. 16357144 (Colombia) (individual) [SDNTK] PEREZ ALZATE, Guillermo (a.k.a. "Pablo Sevillano"), Diagonal 50 No. 49-14 of. 601, Medellin, Colombia; Calle 26A No. 70-35 Medellin, Colombia; Calle 30 No. 9-51, Monteria, Cordoba, Colombia; Calle 24 No. 1-52, B. Cta de Oro, Colombia; Calle 37 No. 2-40, Almacen Dulcino, Tumaco, Narino, Colombia;

Passport AF891052 (Colombia); Cedula No. 71646827 (Colombia) (individual) [SDNTK] PINEDA PALMERA, Juvenal Ovidio (a.k.a. PALMERA PINEDA, Juvenal Ovidio Ricardo; a.k.a. "Simon Trinidad"); DOB 30 Jul 1950; POB Bogota, Cundinamarca, Colombia; Passports T757205 (Colombia), AC204175 (Colombia), AH182002 (Colombia); Cedula No. 12715418 (Colombia); alt. Cedula No. 12751418 (Colombia); alt. Cedula No. 12715416 (Colombia) (individual) [SDNTK] ROMERO VARELA, Carlos Ali (a.k.a. MARTINEZ, Richard), c/o LOS GNOMOS LTDA., Cali, Colombia; c/o SOCIEDAD DE COMERCIALIZACION INTERNACIONAL POSEIDON S.A., Sabaneta, Antioquia, Colombia; DOB 19 Mar 1959; alt. DOB 19 Feb 1959; Passport B0088212 (Venezuela); Cedula No. 13447909 (Colombia) (individual) [SDNTK] 5 SAENZ VARGAS, Guillermo Leon (a.k.a. "Alfonso Cano"); DOB 22 Jul 1948; POB Bogota, Cundinamarca, Colombia; Cedula No. 17122751 (Colombia) (individual) [SDNTK] SANCHEZ VARILLA, Luis Manuel; DOB 1 Feb 1964; Cedula No. 8174649 (Colombia) (individual) [SDNTK] SIERRA RAMIREZ, Juan Carlos; DOB 15 Apr 1966; Cedula No. 71680143 (Colombia) (individual) [SDNTK] TONCEL REDONDO, Milton De Jesus (a.k.a. "El Negro;" a.k.a. "Joaquin Gomez;" a.k.a. "Oro Churco;" a.k.a. "Usurriaga"); DOB 18 Mar 1947; alt. DOB Feb 1949; POB Barrancas, La Guajira, Colombia; alt. POB Ubita, Boyaca, Colombia; Cedula No. 15237742 (Colombia); may also be using Cedula No. 70753211 (Colombia) (individual) [SDNTK] TORRES VICTORIA, Jorge (a.k.a. "Pablo Catatumbo"); DOB 19 Mar 1953; POB Cali, Valle, Colombia; Cedula No. 14990220 (Colombia) (individual) [SDNTK] VARGAS PERDOMO, Eugenio (a.k.a. "Carlos Bolas;" a.k.a. DORNELES DE MENEZES, Francisco); DOB 19 Nov 1969; POB Puerto Lopez, Meta, Colombia; Cedula No. 17344616 (Colombia) (individual) [SDNTK] VARGAS RUEDA, Nelson (a.k.a. "Alfredo;" a.k.a. "Hugo"); DOB 27 Apr 1970; Cedula No. 77130763 (Colombia) (individual) [SDNTK] In addition, the bulletin notes that all financial assets and real property of the following entity are blocked pending investigation pursuant to Section 106 of the USA PATRIOT Act of 2001, Pub.L. No. 107-56 (October 26, 2001). Although it is not now an "[SDGT]," its name and "a.k.a."s have been integrated into OFAC's SDN list with the descriptor "[BPI-PA]" to indicate that its financial assets and real property are currently blocked. AL-HARAMAIN FOUNDATION (a.k.a. AL-HARAMAIN : United States Branch; a.k.a. AL HARAMAIN FOUNDATION, INC.; a.k.a. AL- HARAMAIN HUMANITARIAN FOUNDATION; a.k.a. AL- HARAMAIN ISLAMIC FOUNDATION; a.k.a. AL-HARAMAYN; a.k.a. AL-HARAMAYN FOUNDATION; a.k.a. AL-HARAMAYN HUMANITARIAN FOUNDATION; a.k.a. AL-HARAMAYN ISLAMIC FOUNDATION; a.k.a. AL-HARAMEIN; a.k.a. AL-HARAMEIN FOUNDATION; a.k.a. AL-HARAMEIN HUMANITARIAN FOUNDATION; a.k.a. AL-HARAMEIN ISLAMIC FOUNDATION; a.k.a. ALHARAMAIN; a.k.a. ALHARAMAIN FOUNDATION; a.k.a. ALHARAMAIN HUMANITARIAN FOUNDATION; a.k.a. ALHARAMAIN ISLAMIC FOUNDATION; a.k.a. ALHARAMAYN; a.k.a. ALHARAMAYN FOUNDATION; a.k.a. ALHARAMAYN HUMANITARIAN FOUNDATION; a.k.a. ALHARAMAYN ISLAMIC FOUNDATION; a.k.a. ALHARAMEIN; a.k.a. ALHARAMEIN 6 FOUNDATION; a.k.a. ALHARAMEIN HUMANITARIAN FOUNDATION; a.k.a. ALHARAMEIN ISLAMIC FOUNDATION; a.k.a. MU'ASSASAT AL-HARAMAIN AL-KHAYRIYYA; a.k.a. MU'ASSASAT AL-HARAMAYN AL-KHAYRIYYA; a.k.a. MU'ASSASAT AL-HARAMEIN AL-KHAYRIYYA; a.k.a. VAZIR; a.k.a. VEZIR), 1257 Siskiyou Boulevard, Ashland, OR 97520, U.S.A.; 3800 Highway 99 S., Ashland, OR 975208718, U.S.A.; 2151 E. Division Street, Springfield, MO 65803, U.S.A. [BPI-PA] All of OFAC's SDN material, including its brochures on Narcotics and Terrorism, has been updated accordingly. Robert C. Grohowski Associate Counsel