

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

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RICHARD A. CHICHAKLI, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 ADAM SZUBIN, Director, Office of )  
 Foreign Assets Control, United States )  
 Department of the Treasury, in his )  
 official capacity et al., )  
 )  
 Defendants. )  
 )

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CIVIL ACTION NO. 3-06-CV-1546-N  
ECF CASE

**APPENDIX PART I**

Declaration of Adam J. Szubin ..... 1-13  
Blocking Notice ..... 14-28

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

RICHARD A. CHICHAKLI,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 3-06-CV-1546-N
	)	
ADAM SZUBIN, Director, Office of	)	ECF CASE
Foreign Assets Control, United States	)	
Department of the Treasury, in his	)	
official capacity <u>et al.</u> ,	)	
	)	
Defendants.	)	

DECLARATION OF ADAM J. SZUBIN

ADAM J. SZUBIN, pursuant to 28 U.S.C. § 1746, declares the following under penalty of perjury:

1. I am providing this declaration based on my personal knowledge and on information obtained in the course of my employment.

2. I am the Director of the U.S. Department of the Treasury’s (“Treasury”) Office of Foreign Assets Control (“OFAC”), and have been employed in this capacity since September 3, 2006. Prior to becoming the Director, I was Senior Advisor to Under Secretary Stuart Levey in Treasury’s Office of Terrorism and Financial Intelligence, a position I assumed in August 2004. Before joining Treasury, I was an attorney at the Department of Justice, serving as Counsel to the Deputy Attorney General from August 2003 to August 2004, and working in the Civil Division from September 2000 to August 2003.

OFAC’s Mission and Authority

3. The Department of the Treasury’s OFAC is the office principally responsible for administering U.S. economic sanctions programs. These programs are primarily directed against foreign states and nationals, including sponsors of global terrorism and foreign narcotics

traffickers, to implement U.S. foreign policy and national security goals. Pursuant to authority delegated by the President to the Secretary of the Treasury, OFAC acts under Presidential wartime and peacetime national emergency powers. OFAC also acts under authority granted by specific legislation to impose controls on transactions and to freeze, or “block,” certain foreign property and interests in property within the United States or in the possession or control of U.S. persons.

4. OFAC currently administers over 20 economic sanctions programs against foreign governments, entities and individuals. At present, OFAC administers sanctions programs relating to Iran, Iraq, Sudan, Liberia, Democratic Republic of the Congo, Cote d’Ivoire, Syria, Zimbabwe, Belarus, Burma, Cuba and the Western Balkans and continues to block certain previously frozen assets of Yugoslavia, and North Korea. In addition to implementing sanctions programs against terrorists pursuant to Executive Orders 12947 and 13224, OFAC also implements sanctions programs against narcotics kingpins of the “Cali Cartel” pursuant to Executive Order 12978 and administers the Foreign Narcotics Kingpin Sanctions Regulations issued pursuant to the Foreign Narcotics Kingpin Designation Act, 21 U.S.C. §§ 1901-1908, 8 U.S.C. § 1182.

5. As Director of OFAC, I am responsible for the implementation, administration, and enforcement of such economic sanctions programs. These responsibilities include enforcement of Presidential blocking orders to ensure the segregation and safeguarding of blocked property, as well as enforcement of restrictions on trade and financial transactions. The restrictions provided for in these programs affect both foreign and U.S. persons.

#### Presidential Blockings under IEEPA and UNPA

6. The International Emergency Economic Powers Act, 50 U.S.C. §§ 1701-1706 (“IEEPA”), grants to the President a broad spectrum of powers necessary to deal “with any unusual and extraordinary threat, which has its source in whole or substantial part outside the United States, to the national security, foreign policy, or economy of the United States, if the President declares a national emergency with respect to such threat.” 50 U.S.C. § 1701 (a). The President exercises these IEEPA powers through Executive Orders that impose economic

sanctions to address particular emergencies and delegate IEEPA powers for the programs' administration.

7. Section 5 of the United Nations Participation Act, 22 U.S.C. § 287c, grants the President the authority to apply certain measures that the United States has been called upon to apply by the United Nations Security Council. This authority includes the power to "investigate, regulate, or prohibit, in whole or in part, economic relations . . . involving property subject to the jurisdiction of the United States." 22 U.S.C. § 287c(a).

8. In addition to articulating in an Executive Order a particular threat, the President may also designate specific entities and individuals who pose or contribute to the threat and set forth standards for identifying more such entities and individuals. The President delegates the task of determining who meets these standards to an agency in the Executive Branch, usually the Department of the Treasury. Those who are determined to fit these standards are "designated" and subject to the Executive Order's economic sanctions.

9. A Presidential Executive Order that blocks property constitutes one of the most potent elements of an economic sanctions program. In practice, such Orders require holders of such property to freeze that property, including bank accounts, in their possession or control at the time of the Order, as well as property that later comes into the holders' possession. Blocking actions are not permanent and do not constitute a forfeiture or seizure of assets.

10. Blocking actions can serve a number of objectives. A blocking can deprive the sanctioned party of the benefit of his or her property, prevent the property from being used to further ends that threaten or conflict with United States interests, prevent the sanctioned party from receiving the economic benefits of transactions with United States persons or in the United States market, and limit the flow of hard currency or goods to or for the benefit of that sanctioned party. Blocked assets also may preserve them as a bargaining chip for use by the President in resolving the national emergency that gave rise to the blocking and, in many cases, settling U.S. financial claims against the sanctioned party. For example, the fact that Iranian assets were blocked was directly instrumental in the release of U.S. hostages in Iran in 1981 and the establishment of a funding mechanism to address U.S. claims against Iran.

11. Under sanctions programs where blocking is a component, blockings are designed to swiftly immobilize funds and other types of assets that OFAC has a reason to believe could be

used to finance activity posing a threat to U.S. interests. Thus, blockings and other sanctions set forth in a Presidential Executive Order have immediate effect. In the period between the President's issuance of an Executive Order and OFAC's promulgation of regulations related to the sanctions, as in the case of the present matter, OFAC implements the sanctions consistent with the Executive Order and the overall regulatory framework for administration of economic sanctions programs.

12. Generally, OFAC does not provide prior notice of an impending blocking action because notifying an entity or individual that its assets will be blocked would allow for the dissipation and/or destruction of funds and records before the blocking can occur, thereby placing in jeopardy national security and foreign policy interests underlying the blocking.

13. The property and property interests blocked by OFAC pursuant to an Executive Order may not be transferred, withdrawn, exported, paid, or otherwise dealt in by U.S. persons or in the United States without OFAC's prior authorization. OFAC interprets the term "interest" to include a property interest of any nature whatsoever, direct or indirect, present, future or contingent. *See, e.g.*, 31 C.F.R. 594.306 (Global Terrorism Sanctions Regulations); 31 C.F.R. 595.307 (Terrorism Sanctions Regulations); 31 C.F.R. 541.305 (Zimbabwe Sanctions Regulations). In addition, OFAC's regulations define "property" to include, *inter alia*, items such as bank deposits, savings accounts, contracts, book accounts, letters of credit, and other property, real, personal, or mixed, tangible or intangible, or interest or interests therein. *See, e.g.*, 31 C.F.R. 594.309; 31 C.F.R. 595.310; 31 C.F.R. 541.308.

14. Pursuant to IEEPA-based sanctions programs, OFAC asserts jurisdiction over U.S. persons wherever located in the world, including within the territory of the United States. These sanctions programs typically prohibit U.S. persons from dealing in or conducting transactions in blocked property.

15. A person's status as a U.S. person does not serve as a shield against blocking actions. To allow U.S. persons to hold and transfer blocked assets would undermine the intent and operation of the sanctions programs that OFAC is charged with administering and threaten the U.S. national interests that those programs are meant to protect. As just one example, sanctioned countries and persons could then transact their business through "untouchable", complicit U.S. persons and severely undercut the sanctions program.

16. In certain instances, OFAC may use its authority to license certain transactions that otherwise would be prohibited, when doing so would further U.S. policy. OFAC regularly promulgates in its sanctions regulations general licenses authorizing certain categories of otherwise prohibited activity, and it grants specific licenses on a case-by-case basis. 31 C.F.R. 501.801. In its blocking notices, OFAC explains that it will consider license requests for use of blocked funds to pay costs such as living expenses, attorneys' fees, and corporate operating costs. In addition, OFAC may license blocked parties to access their blocked documents under supervision. Because no two sanctions programs are exactly alike, and because applicants often find themselves in unique situations, OFAC considers such applications on a case-by-case basis in light of all facts presented.

17. As a matter of policy, OFAC provides a mechanism for designated persons to challenge their designations, the blocking of their property, and subsequent inclusion on the list of Specially Designated Nationals, which OFAC compiles and maintains. Such persons may submit arguments or evidence to challenge sufficiency of the basis for the blocking, or to assert mistaken identity. 31 C.F.R. 501.807. The information submitted is considered by OFAC. OFAC has, in the past, revoked blocking orders based upon new information provided by a designated party.

#### Executive Order 13348

18. On July 22, 2004, President Bush issued Executive Order 13348, "Blocking Property of Certain Persons and Prohibiting the Importation of Certain Goods from Liberia," 68 Fed. Reg. 44855 (July 27, 2004), to address the activities of former Liberian President Charles Taylor and the situation in Liberia. The President determined that Charles Taylor's and other persons' actions and policies, including the depletion of Liberian resources and secreting of Liberian funds and property, constituted an unusual and extraordinary threat to the foreign policy of the United States. President Bush declared a national emergency to deal with this threat. The national emergency and the sanctions set forth in the Order became effective on July 23, 2004.

19. E.O. 13348 followed a series of actions by the United Nations Security Council to address the crisis in Liberia. In Resolution 1521 of December 22, 2003 and Resolution 1532 of March 12, 2004, the Security Council decided, pursuant to Chapter VII of the United Nations

charter, to establish a sanctions program, including both travel restrictions and an asset freeze, related to Charles Taylor, his inner circle, and those supporting the actions and policies of his regime. On June 14, 2004, the Liberia Sanctions Committee of the Security Council issued an initial list of 23 individuals subject to the asset freeze. The United States thereby had an international law obligation to freeze any assets of those persons subject to United States jurisdiction.

20. E.O. 13348 blocks all property and interests in property within the United States, or within the possession or control of U.S. persons, in which there is an interest of any person listed in the Annex to the Order or subsequently determined to be subject to the Order. Blocking means, among other things, that there can be no transfer of, or dealing in, blocked property. The Annex to E.O. 13348 identified 28 individuals determined to be subject to the blocking provisions of the Order.

21. Section 8 of E.O. 13348 authorizes the Secretary of the Treasury, in consultation with the Secretary of State, to determine that circumstances no longer warrant the inclusion of an individual in the Annex. One individual included in the Annex, Abbas Fawaz, was removed from the list of Specially Designated Nationals on June 19, 2006, in response to his request for removal due to a change in circumstances. Mr. Fawaz was not subject to U.N. sanctions. Section 6 of E.O. 13348 authorizes the Secretary of the Treasury, in consultation with the Secretary of State, to take such actions and employ all powers granted to the President by IEEPA and the UNPA necessary to carry out the purposes of the Order, including determining that other individuals or entities meet the terms of the designation criteria set forth in the Order.

OFAC's Investigation and Comprehensive Blocking of Richard A. Chichakli

22. Among the 28 individuals identified by the President in the Annex to E.O. 13348 was Viktor Anatolijevitch Bout, described in the Annex as "Businessman, dealer and transporter of weapons and minerals." Mr. Bout, whose firms were tied to several major arms shipments to Liberia, had already been subjected to a UN travel ban imposed by UN Security Council Resolution 1343 (2001) on individuals involved in the conflict in Liberia and Sierra Leone, and was also included in the list of 23 individuals named by the United Nations on June 14, 2004, as subject to the asset freeze imposed by UNSCR 1532. He had also been cited by media sources

as the most prolific “sanctions buster” and weapons trafficker in areas where international arms embargoes have been imposed on one or both sides in regional conflicts. President Bush subsequently named Bout in the Annex to Executive Order 13413 of October 27, 2006, “Blocking Property of Certain Persons Contributing to the Conflict in the Democratic Republic of Congo,” 71 Fed. Reg. 64105 (Oct. 31, 2006), based on his arms-trafficking activities in the Democratic Republic of Congo.

23. Following the issuance of E.O. 13348, OFAC focused significant investigative efforts on Mr. Bout’s network. This investigation developed extensive information on 30 businesses and 4 individuals who were found to meet the criteria for designation set forth in Section 1(a)(ii)(D) of the Executive Order; specifically, they were found to be entities and individuals “owned or controlled by, or acting or purporting to act for or on behalf of, directly or indirectly” Viktor Bout, a person whose property and interests in property were blocked pursuant to the Order. See Special Designation and Blocking Memorandum of April 22, 2005, attached at Appendix pages 22-28. Among these 34 individuals and entities were plaintiff Richard Chichakli and 10 companies owned or controlled by him, or acting for or on his behalf. Id. On April 22, 2005, the then-director of OFAC issued the Memorandum to block the funds, accounts and business records of Richard Chichakli and the 10 companies owned or controlled by him, along with 23 other individuals and entities related to the Bout network. The blocking took effect on April 26, 2005.

24. The Administrative Record upon which OFAC relied for plaintiff’s initial designation has previously been provided to Mr. Chichakli and is attached hereto as Appendix pages 78-819. That record consists of an Evidentiary Memorandum summarizing the evidence upon which OFAC relied in making its decision (App. 78-135), as well as the underlying Exhibits containing that evidence (App. 136-819). Because Mr. Chichakli was designated along with other individuals and entities, the complete administrative record contains evidence supporting all of the designations. When he sought administrative reconsideration of his designation (as described more fully below), Mr. Chichakli was provided with a redacted version of the Evidentiary Memorandum containing the complete Background section of the Memorandum and all of the information pertaining to him and to the companies designated because of their relation to him. Mr. Chichakli was also provided with copies of all of the



Exhibits cited in the redacted Evidentiary Memorandum. This same Administrative Record relating to Mr. Chichakli that is being filed with the Court herewith (except that it is my understanding that some additional information has been redacted from the Administrative Record being filed with the Court pursuant to the Court's Privacy Notice and Miscellaneous Order No. 61, as amended).

25. That record demonstrates that Mr. Chichakli has been an integral part of the Bout network for many years. For example, plaintiff's resumé describes his extensive management and coordination of activities for Air Cess, Air Pass, and Centrafrican Airlines, all prominent companies in the Bout network that were themselves designated by OFAC in the April 22 Memorandum. See App. 122-123 (Evidentiary Memorandum at 45-46). Mr. Chichakli has also established and registered in the United States several companies that have been essential components in the Bout network and its provision of weapons and other materials and services to numerous regimes, including that of Charles Taylor in Liberia. See App. 123 - 124 (Evidentiary Memorandum at 46-47). The record also establishes Mr. Chichakli's close working relationship with Viktor Bout, both before and after Mr. Bout's inclusion in the Annex to E.O. 13348, as well as Mr. Chichakli's special access to and knowledge of the workings of the Bout network. See App. 123 - 124 (Evidentiary Memorandum at 46-47).

26. Pursuant to the Blocking Memorandum directed at the Bout network, on April 26, 2005, OFAC issued Blocking Notices to Mr. Chichakli, as well as each of the companies identified as owned or controlled by him. See App. 14-28 (Blocking Notice issued to plaintiff). The Blocking Notice explained that, pursuant to E.O. 13348 and IEEPA, any transfer, withdrawal, export, payment or other dealing in blocked property or property interests was prohibited without OFAC's prior authorization. Id. The Notice also explained that OFAC would consider requests for licenses to ameliorate the effects of this blocking action and that such licenses may allow for, among other activities, the payment from blocked funds or accounts of rent, utility, tax and insurance payments. Id. The Notice also explained that, because funds and other assets can be transferred instantaneously, prior notice of OFAC's determination was not provided, consistent with Section 5 of the E.O. Id. In addition, the Notice provided instructions for requesting administrative reconsideration of the designation determination. Id.

27. On April 26, 2005, two OFAC officers arrived at Mr. Chichakli's residence in Richardson, Texas, along with a team of personnel from other agencies, including the Federal Bureau of Investigation, Internal Revenue Service, Immigration and Customs Enforcement, and the Dallas Police Department. The FBI agents executed a search and seizure warrant issued as part of a separate criminal matter, and seized a number of items and documents. One OFAC officer presented a copy of the Blocking Notice to Mr. Chichakli's wife, as Mr. Chichakli had agreed to leave the premises during the course of the search. Later in the day, OFAC officers personally served Mr. Chichakli with a Blocking Notice, which he signed. See App. 16 (Blocking Notice signed by plaintiff).

28. The OFAC officers then traveled to Mr. Chichakli's office, located at 811 South Central Expressway, Suite 210, Richardson, Texas, which was also being searched by a team of personnel from other agencies pursuant to a warrant. A search was also conducted at the residence of Mr. Chichakli's secretary in Plano, Texas.

29. From April 26 to 28, 2005, Mr. Chichakli requested a series of licenses from OFAC for a variety of purposes, including basic personal maintenance expenses, salaries, business telephone bills, airline tickets, and unemployment taxes. On April 26, OFAC issued license LB-8, authorizing plaintiff to remain in his personal residence and conduct transactions necessary for personal maintenance, and license LB-9, authorizing plaintiff to obtain legal services related to the designation and conduct other transactions related to such legal services. On April 29, OFAC amended both licenses to reflect subsequent information provided by Mr. Chichakli. On May 20, 2005, OFAC issued license LB-20 to Mr. Chichakli, Mr. Scott, and the Community Credit Union in Plano, TX, to authorize payment of counsel for the legal services authorized by OFAC in LB-9.

#### Request for Reconsideration

30. By letters dated April 27 and 28, 2005, Mr. Chichakli requested a copy of the administrative record underlying his designation and sought administrative reconsideration of the designation. See App. 29 - 31. A true and correct copy of all of the correspondence between OFAC and Mr. Chichakli and/or his counsel, Mr. Clay Scott, related to Mr. Chichakli's request for reconsideration is attached hereto as Appendix pages 29 - 77.

31. By letter dated April 29, 2005, OFAC responded to Mr. Chichakli's request and informed him that OFAC would provide him with a copy of the information upon which his designation was based, and that, in conducting a comprehensive reconsideration of the designation, OFAC would consider the information upon which the original designation was based, any additional material provided to OFAC by Mr. Chichakli, and any additional information available to the Government. See App. 32. In this regard, OFAC advised Mr. Chichakli that any material he wished to submit as part of the reconsideration process should be received by June 10, 2005.

32. By letter dated May 9, 2005, OFAC provided Mr. Chichakli with the Administrative Record upon which his designation was based, as described above. See App. 33. This Administrative Record consisted of a redacted Evidentiary Memorandum summarizing the evidence in the record pertaining to Mr. Chichakli, and 54 exhibits containing that evidence. Mr. Chichakli was invited to provide any additional information he wished OFAC to consider in its review. Mr. Chichakli was given until June 24, 2005, an additional two weeks from the initial deadline of June 10, to provide such information. Id.

33. Mr. Chichakli submitted a letter dated June 2, 2005 in support of his request for reconsideration. See App. 34-38. After reviewing Mr. Chichakli's June 2 submission, OFAC wrote to Mr. Chichakli's counsel, by a letter dated June 10, 2005, to inform him of Mr. Chichakli's submission, "not[ing] in particular that Mr. Chichakli's June [2], 2005 submission includes no exhibits or affidavits corroborating the assertions Mr. Chichakli makes therein." See App. 39. Mr. Chichakli's counsel, Mr. Scott, subsequently submitted a letter dated June 23, 2005, in support of Mr. Chichakli's request for reconsideration. See App. 40-49. The only evidence submitted by either Mr. Chichakli or his counsel consisted of four pages of academic transcripts appended to Mr. Scott's June 23 letter. See App. 46-49. Although that letter references additional attached materials, those materials were not included with the letter. Id.

34. On November 9, 2005, Mr. Scott faxed OFAC a copy of a letter he had sent John Cox of the Criminal Division of the United States Department of Justice, in which he suggests a meeting to discuss immunity for Mr. Chichakli and notes that "Richard [Chichakli] believes that he cannot only produce Viktor Bout for the conference, but also Sergei Bout." App. 57-58.

35. On December 1, 2005, the United Nations Security Council Sanctions Committee on Liberia added Mr. Chichakli and his companies to the Liberia asset freeze list, thereby imposing an obligation on all U.N. Member States to take steps to freeze Mr. Chichakli's assets.

36. By letter dated April 12, 2006, OFAC informed Mr. Chichakli that a preliminary decision had been reached to deny his request for reconsideration. See App. 62-68. In this letter, OFAC provided an explanation of the bases for the preliminary decision, as well as copies of the 60 unclassified Exhibits used to make the preliminary decision. Id. OFAC invited Mr. Chichakli to provide any additional information that he wished OFAC to consider in reaching a final decision. Id.

37. By letter dated May 3, 2006, Mr. Scott informed OFAC that "there is nothing else to be provided." See App. 72.

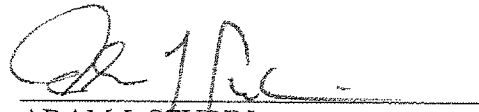
38. Following a final review process, I determined on behalf of OFAC that Mr. Chichakli's request for reconsideration should be denied. I issued a final determination letter to Mr. Scott informing him of this decision on September 26, 2006. See App. 77. The Administrative Record supporting this determination consisted of an Evidentiary Memorandum (hereinafter "Reconsideration Evidentiary Memorandum") summarizing the evidence supporting the decision, as well as 60 Exhibits containing that evidence (which had been provided to Mr. Chichakli in OFAC's April 12, 2006 letter referenced above). That Administrative Record on reconsideration is attached as Appendix pages 820-1196. In addition, I relied upon a classified memorandum and underlying exhibits, also classified, in reaching the determination to deny Mr. Chichakli's request for reconsideration. It is my understanding that the Department of Justice is making arrangements to provide that classified administrative record to the Court for its review on an ex parte, in camera basis pursuant to 50 U.S.C. § 1702(c).

39. The Administrative Record supporting my decision to deny Mr. Chichakli's request for reconsideration demonstrated that, contrary to Mr. Chichakli's unsupported assertions, he had in fact acted or purported to act for or on behalf of, directly or indirectly, Viktor Bout, both before and after Mr. Bout's inclusion in the Annex to E.O. 13348. The record included, among other things, evidence that Mr. Bout continued to control the UAE branch of Mr. Chichakli's firm, Air Bas Transportation Inc., and that this branch made payments to the U.S. office after Mr. Bout's designation; that Mr. Chichakli acted to facilitate the purchase of an

aircraft on behalf of another Bout-affiliated firm after Mr. Bout's designation; that Mr. Chichakli remained listed as a Director of a Bout-related firm after Mr. Bout's designation and still maintained a credit card for Mr. Bout after his designation; and that a copy of Mr. Chichakli's resume found in his office that was identical to the resume originally relied upon by OFAC (which Mr. Chichakli claimed was false) stated that Mr. Chichakli had served as Chief Financial Officer for several Bout-related companies. In addition, the record contained evidence of Mr. Chichakli's long-standing activity for or on behalf of Mr. Bout. See App. 820 - 838 (Reconsideration Evidentiary Memorandum); App. 839 -- 1196 (Administrative Record on Reconsideration).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8<sup>th</sup> day of December, 2006.

  
ADAM J. SZUBIN  
Director  
Office of Foreign Assets Control  
Department of the Treasury





DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

BLOCKING NOTICE

APR 22 2005

FAC No. LB-238092

Richard A. Chichakli  
811 S. Central Expressway Ste 210  
Richardson, TX 75080

Dear Mr. Chichakli:

You are hereby notified that you have been identified as a Specially Designated National ("SDN") effective April 26, 2005, at 8:00 a.m. EDT, pursuant to Executive Order 13348 issued July 23, 2004, Blocking of Property of Certain Persons and Prohibiting the Importation of Certain Goods from Liberia (the "Executive Order"), and the International Emergency Economic Powers Act, 50 U.S.C. §§ 1701-06 ("IEEPA"). The designation is the result of the Office of Foreign Assets Control's ("OFAC") inclusion of you on the list of persons presently subject to the sanctions imposed in the Executive Order. A copy of OFAC's determination is attached.

This notice is also to inform you that, as an SDN, all of your property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of a U.S. person are blocked. This blocked property may not be transferred, withdrawn, exported, paid, or otherwise dealt in without prior authorization from OFAC. Also, any unauthorized transaction or dealing by a U.S. person, or within the United States, in your property or interests in property is prohibited.

Pursuant to the authorities granted in the Regulations, you are hereby advised to refrain from engaging in any further transactions involving property within the United States or within the possession or control of any U.S. person. Any contract or written agreement between you, or persons acting for or on behalf of you, and any U.S. person, as well as any payments due to you as a result of services provided under such contract or agreement, are blocked and may not be dealt in without specific authorization from OFAC. Any funds received as payments from U.S. persons must be placed in a blocked interest bearing account at a U.S. financial institution, and must be reported to OFAC,

APP-14

Attn: Compliance Programs Division, 1500 Pennsylvania Avenue, N.W. (Annex), Washington, DC 20220, within 10 business days from the date the funds are received, as required by § 501.603 of the Reporting, Procedures and Penalties Regulations, 31 C.F.R. part 501. This report must include the name and address of the financial institution, the account title, number and the amount of funds deposited.

**Willful violations of IEEPA and its regulations, and of licenses and orders issued thereunder, including this Blocking Notice, are punishable by criminal penalties ranging from up to 10 years in prison and/or fines up to \$500,000 for corporations and up to \$250,000 for individuals. Civil penalties of up to \$11,000 per count may be imposed by OFAC.**

OFAC has not issued a specific license authorizing you to engage in any transactions with respect to blocked property. Please be advised that OFAC has licensing authority to help ameliorate the effects of the blocking of property and interests in property. OFAC will consider requests for specific licenses to allow for, among other activities, the payment from blocked funds or accounts of outstanding financial obligations, such as rent, utility, tax and insurance payments. Additionally, OFAC will consider a request for authorization to liquidate, partially or totally, blocked property and interests in property and to deposit the net sale proceeds into an interest-bearing blocked account in your name at a U.S. financial institution in the United States.

Should you wish to seek a license to engage in transaction prohibited by this order, please refer to the licensing procedures set forth in §§ 501.801-802 of the Reporting, Procedures and Penalties Regulations, 31 C.F.R. part 501. A copy of that regulation is attached. Requests for specific licenses must be made in writing to U.S. Department of the Treasury, Office of Foreign Assets Control, Attn: Licensing Division, 1500 Pennsylvania Avenue, N.W. (Annex), Washington, DC 20220. In order to expedite OFAC's handling of any such license application, the license application and related correspondence may be sent via facsimile to (202) 622-1657, with original to follow by mail.

Because funds and other assets can be transferred instantaneously, prior notice to you of OFAC's



determination would have rendered the sanctions in the Executive Order ineffectual. Therefore, consistent with section 5 of the Executive Order, you were not provided prior notice of OFAC's determination.

You are hereby notified that you may seek administrative reconsideration of your designation. Procedures for such reconsideration are found in § 501.807 of the Reporting, Procedures and Penalties Regulations, 31 C.F.R. part 501. A copy of that regulation is attached. Requests for reconsideration must be made in writing to Director, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, N.W. (Annex), Washington, DC 20220. In order to expedite OFAC's handling of any such request for reconsideration, the request and related correspondence may be sent via facsimile to (202) 622-1657, with original to follow by mail.

If you have any questions concerning this notice, please contact Daryl L. Johnston at (202) 622-2430.

Sincerely,



Robert W. Werner  
Director  
Office of Foreign Assets Control

Attachments

Served by OFAC Enforcement Officer

*[Handwritten Signature]* on  
the 22 day of April, 2005.

*[Handwritten Signature]* Richard Kichicki  
(Signature of Recipient) (Printed Name and Title of Recipient)

Witnessed by: *[Handwritten Signature]*

§ 501.801 Licensing.

(a) *General licenses.* General licenses have been issued authorizing under appropriate terms and conditions certain types of transactions which are subject to the prohibitions contained in this chapter. All such licenses are set forth in subpart E of each part contained in this chapter. General licenses may also be issued authorizing under appropriate terms and conditions certain types of transactions which are subject to prohibitions contained in economic sanctions programs the implementation and administration of which have been delegated to the Director of the Office of Foreign Assets Control but which are not yet codified in this chapter. It is the policy of the Office of Foreign Assets Control not to grant applications for specific licenses authorizing transactions to which the provisions of an outstanding general license are applicable. Persons availing themselves of certain general licenses may be required to file reports and statements in accordance with the instructions specified in those licenses. Failure to file such reports or statements will nullify the authority of the general license.

(b) *Specific licenses—(1) General course of procedure.* Transactions subject to the prohibitions contained in this chapter, or to prohibitions the implementation and administration of which have been delegated to the Director of the Office of Foreign Assets Control, which are not authorized by general license may be effected only under specific licenses.

(2) *Applications for specific licenses.* Original signed applications for specific licenses to engage in any transactions prohibited by or pursuant to this chapter or sanctions programs that have been delegated to the Director of the Office of Foreign Assets Control for implementation and administration must be filed by mail or courier. Applications will not be accepted by fax or electronically, unless otherwise authorized. Applications may be submitted in letter form with the exception of license applications for the unblocking of funds transfers. Applications for the unblocking of funds transfers must be submitted using TD-F 90–22.54, “Application for the Release of Blocked Funds,” accompanied by two complete copies of the entire submission. The form, which requires information regarding the date of the blocking, the financial institutions involved in the transfer, and the beneficiary and amount of the transfer, may be obtained from the OFAC Internet Home Page: <http://www.treas.gov/ofac>, the OFAC fax-on-demand service: 202/622–0077, or the Compliance Programs Division, Office of Foreign Assets Control, Department of the Treasury, Washington, DC 20220. Any person having an interest in a transaction or proposed transaction may file an application for a license authorizing such transaction.

(3) *Information to be supplied.* The applicant must supply all information specified by relevant instructions and/or forms, and must fully disclose the names of all parties who are concerned with or interested in the proposed transaction. If the application is filed by an agent, the agent must disclose the name of his principal(s). Such documents as may be relevant shall be attached to each application as a part of such application, except that documents previously filed with the Office of Foreign Assets Control may, where appropriate, be incorporated by reference in such application. Applicants are required to supply their taxpayer identifying number pursuant to 31 U.S.C. 7701, which number may

be used for purposes of collecting and reporting on any delinquent amounts arising out of the applicant's relationship with the United States Government. Applicants may be required to furnish such further information as is deemed necessary to a proper determination by the Office of Foreign Assets Control. Any applicant or other party in interest desiring to present additional information may do so at any time before or after decision. Arrangements for oral presentation should be made with the Office of Foreign Assets Control.

(4) *Effect of denial.* The denial of a license does not preclude the reopening of an application or the filing of a further application. The applicant or any other party in interest may at any time request explanation of the reasons for a denial by correspondence or personal interview.

(5) *Reports under specific licenses.* As a condition for the issuance of any license, the licensee may be required to file reports with respect to the transaction covered by the license, in such form and at such times and places as may be prescribed in the license or otherwise.

(6) *Issuance of license.* Licenses will be issued by the Office of Foreign Assets Control acting on behalf of the Secretary of the Treasury or licenses may be issued by the Secretary of the Treasury acting directly or through any specifically designated person, agency, or instrumentality.

(7) *Address.* License applications, reports, and inquiries should be addressed to the appropriate division or individual within the Office of Foreign Assets Control, or to its Director, at the following address: Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, NW.—Annex, Washington, DC 20220.

(c) *Registration of nongovernmental organizations—(1) Purpose of registration.* For those parts of this chapter specifically authorizing the registration of nongovernmental organizations (“NGOs”), registration numbers may be issued on a case-by-case basis to NGOs involved in humanitarian or religious activities in countries or geographic areas subject to economic sanctions pursuant to this chapter V. A registration number authorizes certain transactions by or on behalf of the registered NGO otherwise prohibited by the specific part with respect to which the registration number is issued, including the exportation of goods, services, and funds to the country or geographic area subject to such part for the purpose of relieving human suffering. The transactions authorized for registered NGOs either will be specified by the statement of licensing policy in the part under which the registration number is issued or by the Office of Foreign Assets Control letter issuing the registration number.

(2) *Application information to be supplied.* Applications for registration numbers should be submitted to the Compliance Programs Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, NW.; Annex, Washington, DC 20220, or by facsimile to (202) 622–2426, and must include:

- (i) The organization's name in English, in the language of origin, and any acronym or other names used to identify the organization;
  - (ii) Address and phone number of the organization's headquarters location;
  - (iii) Full name in English, in the language of origin, and any acronym or other names used, as well as nationality, citizenship, current country of residence, place and date of birth for key staff at the organization's headquarters, such as the chairman and board members, president, director, etc.;
  - (iv) Identification of field offices or partner offices elsewhere, including addresses, phone numbers, and organizational names used, as well as the identification of the senior officer(s) at these locations, including the person's name, position, nationality, citizenship, and date of birth (names of individuals and organizations shall be provided in English, in the language of origin, and shall include any acronym or other names used to identify the individuals or organizations);
  - (v) Identification of subcontracting organizations, if any, to the extent known or contemplated at the time of the application;
  - (vi) Existing sources of income, such as official grants, private endowments, commercial activities;
  - (vii) Financial institutions that hold deposits on behalf of or extend lines of credit to the organization (names of individuals and organizations shall be provided in English, in the language of origin, and shall include any acronym or other names used to identify the individuals or organizations);
  - (viii) Independent accounting firms, if employed in the production of the organization's financial statements (names of individuals and organizations shall be provided in English, in the language of origin, and shall include any acronym or other names used to identify the individuals or organizations);
  - (ix) A detailed description of the organization's humanitarian or religious activities and projects in countries or geographic areas subject to economic sanctions pursuant to this chapter V;
  - (x) Most recent official registry documents, annual reports, and annual filings with the pertinent government, as applicable; and
  - (xi) Names and addresses of organizations to which the applicant currently provides or proposes to provide funding, services or material support, to the extent known at the time of the vetting, as applicable.
- (3) *Use of registration number.* Registered NGOs conducting transactions authorized by their registrations to support their humanitarian or religious activities pursuant to any part

of this chapter should reference the registration number on all payments and funds transfers and on all related documentation, including all purchasing, shipping, and financing documents.

(4) *Limitations.* Registered NGOs are not authorized to make remittances from blocked accounts. Registration numbers are not transferable and may be revoked or modified at any time at the discretion of the Director, Office of Foreign Assets Control. Registration numbers do not excuse compliance with any law or regulation administered by the Office of Foreign Assets Control or any other agency (including reporting requirements) applicable to the transaction(s) herein authorized, nor does it release the Registrant or third parties from civil or criminal liability for violation of any law or regulation.

(5) *Prior numbers.* Registration numbers already issued remain in effect.

**§ 501.807 Procedures governing removal of names from appendices A, B, and C to this chapter.**

A person may seek administrative reconsideration of his, her or its designation or that of a vessel as blocked, or assert that the circumstances resulting in the designation no longer apply, and thus seek to have the designation rescinded pursuant to the following administrative procedures:

(a) A person blocked under the provisions of any part of this chapter, including a specially designated national, specially designated terrorist, or specially designated narcotics trafficker (collectively, "a blocked person"), or a person owning a majority interest in a blocked vessel may submit arguments or evidence that the person believes establishes that insufficient basis exists for the designation. The blocked person also may propose remedial steps on the person's part, such as corporate reorganization, resignation of persons from positions in a blocked entity, or similar steps, which the person believes would negate the basis for designation. A person owning a majority interest in a blocked vessel may propose the sale of the vessel, with the proceeds to be placed into a blocked interest-bearing account after deducting the costs incurred while the vessel was blocked and the costs of the sale. This submission must be made in writing and addressed to the Director, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, NW.—Annex, Washington, DC 20220.

(b) The information submitted by the blocked person seeking unblocking or by a person seeking the unblocking of a vessel will be reviewed by the Office of Foreign Assets Control, which may request clarifying, corroborating, or other additional information.

(c) A blocked person seeking unblocking or a person seeking the unblocking of a vessel may request a meeting with the Office of Foreign Assets Control; however, such meetings are not required, and the office may, at its discretion, decline to conduct such meetings prior to completing a review pursuant to this section.

(d) After the Office of Foreign Assets Control has conducted a review of the request for reconsideration, it will provide a written decision to the blocked person or person seeking the unblocking of a vessel.



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

FAC No. LB-236405

OFFICE OF FOREIGN ASSETS CONTROL

SPECIAL DESIGNATION AND BLOCKING MEMORANDUM

The Office of Foreign Assets Control, pursuant to Executive Order 13348 of July 22, 2004 ("Blocking Property of Certain Persons and Prohibiting the Importation of Certain Goods from Liberia")(the "Order"), 50 U.S.C. 1701 et seq.) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 et seq.) (NEA), section 5 of the United Nations Participation Act, as amended (22 U.S.C. 287c) (UNPA), and section 301 of title 3, United States Code, and in view of United Nations Security Council Resolutions 1521 of December 22, 2003, and 1532 of March 12, 2004, determines, in consultation with the Secretary of State, that there is reason to believe that the thirty entities and four individuals identified below and in the attached evidentiary memorandum, FAC No. LB-236405, (a) are owned or controlled by, or acting or purporting to act for or on behalf of, directly or indirectly, a person whose property and interests in property are blocked pursuant to this order, namely Viktor Bout; and/or (b) have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, the unlawful depletion of Liberian resources, the removal of Liberian resources from that country, and the secreting of Liberian funds and property by any person whose property and interests in property are blocked pursuant to the Order, or (c) are owned or controlled by, or act for or on behalf of, persons designated in or pursuant to the Order, and therefore are designated as Specially Designated Names ("SDNs").

ENTITIES:

1. ABIDJAN FREIGHT

Abidjan, Ivory Coast.

[SDN]

2. AIR CESS

(a.k.a. AIR CESS EQUATORIAL GUINEA)

(a.k.a. AIR CESS HOLDINGS LTD.)

(a.k.a. AIR CESS LIBERIA)

(a.k.a. AIR CESS RWANDA)

(a.k.a. AIR CESS SWAZILAND (PTY.) LTD.)

(a.k.a. AIR CESS INC. 360-C)

(a.k.a. AIR PAS)

(a.k.a. AIR PASS)

(a.k.a. CESSAVIA)

(a.k.a. CHESS AIR GROUP)

(a.k.a. PIETERSBURG AVIATION SERVICES & SYSTEMS)

Malabo, Equatorial Guinea

P. O. Box 7837, Sharjah, U.A.E.

P. O. Box 3962, Sharjah, U.A.E.

Islamabad, Pakistan

Entebbe, Uganda

[SDN]

**3. AIR ZORY LTD.**

(a.k.a. AIR ZORI)

(a.k.a. AIR ZORI LTD.)

54 G.M. Dimitrov Blvd., BG-1125, Sofia, Bulgaria

6 Zenas Kanther Str., 1065 Nicosia, Cyprus

[SDN]

**4. AIRBAS TRANSPORTATION FZE**

(a.k.a. AIR BAS)

(a.k.a. AIR BASS)

(a.k.a. AIRBAS TRANSPORTATION, INC.)

(a.k.a. AVIABAS)

P. O. Box 8299, Sharjah, UAE.

811 S. Central Expwy, Ste 210, Richardson, TX 75080 USA

[SDN]

**5. ATC LTD.**

Gibraltar, U.K.

[SDN]

**6. BUKAVU AVIATION TRANSPORT**

Democratic Republic of Congo.

[SDN]

**7. BUSINESS AIR SERVICES**

Democratic Republic of Congo.

[SDN]

**8. CENTRAFRICAN AIRLINES**

(a.k.a. CENTRAFRICAIN AIRLINES)

(a.k.a. CENTRAL AFRICAN AIRWAYS)

(a.k.a. CENTRAL AFRICAN AIR)

(a.k.a. CENTRAL AFRICAN AIR LINES)

P. O. Box 2760, Bangui, Central African Republic

c/o Transavia Travel Agency, P. O. Box 3962, Sharjah, UAE

P. O. Box 2190, Ajman, UAE

Kigali, Rwanda

Ras-al-Khaimah, UAE.



[SDN]

**9. CENTRAL AFRICA DEVELOPMENT FUND**

811 S. Central Expressway, Suite 210, Richardson, Texas,  
75081, USA.

P. O. Box 850431, Richardson, Texas 75085

Federal Employer Identification Number: [REDACTED] 4986

[SDN]

**10. CET AVIATION ENTERPRISE (FZE)**

P. O. Box 932 – C20, Ajman, UAE  
Equatorial Guinea.

[SDN]

**11. CHICHAKLI & ASSOCIATES, PLLC**

(a.k.a. CHICHAKLI HICKMAN-RIGGS & RIGGS, PLLC)

(a.k.a. CHICHAKLI HICKMANRIGGS & RIGGS)

811 S. Central Expressway, Suite 210, Richardson, Texas,  
75080, USA.

[SDN]

**12. CONTINUE PROFESSIONAL EDUCATION, INC.**

(a.k.a. GULF MOTOR SALES, INC)

811 S. Central Expressway, Suite 210, Richardson, Texas,  
75080, USA.

Federal Employer Identification Number: [REDACTED] 68-09

[SDN]

**13. DAYTONA POOLS, INC.**

225 Syracuse Place, Richardson, Texas 75081, USA.

[SDN]

**14. DHH ENTERPRISES, INC.**

811 S. Central Expressway, Suite 210, Richardson, Texas,  
75080, USA.

[SDN]

**15. GAMBIA NEW MILLENIUM AIR COMPANY**

(a.k.a. GAMBIA NEW MILLENIUM AIR)

(a.k.a. GAMBIA MILLENIUM AIRLINES)

State House, Banjul, Gambia.

[SDN]

**16. IB OF AMERICA HOLDINGS INC.**

811 S. Central Expressway, Suite 210, Richardson, Texas,  
75080, USA.

[SDN]

**17. IRBIS AIR COMPANY**

UL Furmanova 65, office 317, Almaty, Khazakhstan 48004

[SDN]

**18. MOLDTRANSVIA SRL**

Aeroport MD-2026, Chisinau, Moldova.

[SDN]

**19. NORDIC LTD.**

(a.k.a. NORDIK LIMITED EOOD)

9 Frederick J. Curie Street, Sofia, Bulgaria 1113.

[SDN]

**20. ODESSA AIR**

(f.k.a. OKAPI AIR)

Entebbe, Uganda.

[SDN]

**21. ORIENT STAR CORPORATION**

(d.b.a. ORIENT STAR AVIATION)

811 S. Central Expressway, Suite 210, Richardson, Texas,  
75080, USA.

[SDN]

**22. RICHARD A. CHICHAKLI, P.C.**

811 S. Central Expressway, Suite 210, Richardson, Texas  
75080, USA

P. O. Box 850432, Richardson, Texas 75085, USA.

[SDN]

**23. ROCKMAN LTD.**

(a.k.a. ROKMAN EOOD)

9 Frederick J. Curie Street, Sofia, Bulgaria 1113.

[SDN]

**24. SAN AIR GENERAL TRADING FZE**

(a.k.a. SAN AIR GENERAL TRADING, LLC)

P. O. Box 932-20C, Ajman, UAE

P. O. Box 2190, Ajman, UAE

811 S. Central Expwy. Ste 210, Richardson, Texas 75080, USA.

[SDN]

**25. SANTA CRUZ IMPERIAL AIRLINES**

P. O. Box 60315, Dubai, UAE  
Sharjah, UAE.  
[SDN]

**26. SOUTHBOUND LTD.**

P. O. Box 398, Suite 52 and 553 Monrovia House, 26 Main  
Street, Gibraltar.  
[SDN]

**27. TRANS AVIATION GLOBAL GROUP INC.**

811 S. Central Expressway, Suite 210, Richardson, Texas,  
75080, USA.  
[SDN]

**28. TRANSAVIA NETWORK**

(a.k.a. NV TRANS AVIATION NETWORK GROUP)  
(a.k.a. TAN GROUP)  
(a.k.a. TRANS AVIATION)  
(a.k.a. TRANSAVIA TRAVEL AGENCY)  
(a.k.a. TRANSAVIA TRAVEL CARGO)  
1304 Boorj Building, Bank Street, Sharjah, UAE  
P. O. Box 3962, Sharjah, UAE  
P. O. Box 2190, Ajman, UAE  
Ostende Airport, Belgium.  
[SDN]

**29. VIAL COMPANY**

Delaware, USA.  
[SDN]

**30. WESTBOUND LTD**

P.O. Box 399, 26 Main Street, Gibraltar.  
[SDN]

INDIVIDUALS

**1. BOUT, SERGEI ANATOLYIEVICH**

(a.k.a. SERGEY)  
(a.k.a. SERGO)  
(a.k.a. SERGI)  
(a.k.a. SERGUEI)  
(a.k.a. BUT)  
(a.k.a. BUTT)  
(a.k.a. SERGEY NIKOLAYEVICH BUT)

c/o AIR CESS, Islamabad, Pakistan  
c/o AIR CESS, P. O. Box 7837, Sharjah, UAE  
c/o AIR ZORY, 54 G. M. Dimitrov Blvd., BG-1125, Sofia, Bulgaria  
Moscow, Russia  
DOB: [REDACTED] 1961; POB: Tajikistan  
Citizenship: Russian/Ukrainian  
Identification number(s): [REDACTED] 6704 (Russian), [REDACTED] 9314  
(Ukrainian)  
(individual)[SDN]

**2. CHICHAKLI, RICHARD AMMAR**

(a.k.a. CHICHAKLI, AMMAR M.)  
225 Syracuse Place, Richardson, Texas, 75081, USA  
811 South Central Expressway, Suite 210, Richardson, Texas,  
75080, USA.  
DOB: [REDACTED] 1959; POB: Syria  
Citizenship: US  
SSN: [REDACTED] 5342 or [REDACTED] 1065  
(individual) [SDN]

**3. DENISSENKO, SERGUEI**

(a.k.a. SERGEI DENISSENKO)  
(a.k.a. DENISENKO)  
c/o SAN AIR GENERAL TRADING FZE, P. O. Box 932-20C, Ajman, UAE &  
P. O. Box 2190, Ajman, UAE  
c/o SAN AIR GENERAL TRADING LLC, 811 South Central Expressway, Suite 210,  
Richardson, Texas, USA  
DOB: 1961  
Passport: [REDACTED] 4635 (Russian).  
(individual)[SDN]

**4. NAYDO, VALERIY**

(a.k.a. NAIDO, VALERII)  
c/o CET AVIATION, P. O. Box 932 - 20C, Ajman, UAE  
Equatorial Guinea  
DOB: [REDACTED] 1957  
PPN: [REDACTED] 1295, [REDACTED] 4178  
Citizenship: Ukrainian  
(individual) [SDN]

Accordingly, except to the extent otherwise provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control, (1) all real, personal, and any other property and interest in property of an entity or individual named above that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of U.S. persons, including their overseas branches, are blocked and may not be

transferred, paid, exported, withdrawn or otherwise dealt in, and (2) any transaction or dealing by a U.S. person or within the United States in property or interests in property of an entity or individual named above is prohibited.

Additionally, except to the extent otherwise provided by law or unless licensed or otherwise authorized by the Office of Foreign Assets Control, the following are prohibited: (1) any transaction for the purpose of, or which has the effect of, evading or avoiding, or which facilitates the evasion or avoidance of, any of the prohibitions contained in the Order or the Regulations; (2) any attempt to violate the prohibitions of the Order or the Regulations; and (3) any conspiracy formed for the purpose of engaging in a transaction prohibited by the Order or the Regulations.

Because of the ability to transfer funds or assets instantaneously, prior notice of their designation to any entity or individual named above would render ineffectual the blocking and other measures authorized by the Order. Therefore, I find that no prior notice should be afforded any entity or individual named above because to do so would provide an opportunity to evade the measures authorized by the Order and, consequently, render those measures ineffectual towards addressing the national emergency declared in the Order.

Issued by direction and on behalf of the Secretary of the Treasury to become effective at 8:00 a.m. EDT, April 26, 2005.

April 22, 2005  
Date

Robert W. Werner  
Robert W. Werner  
Director  
Office of Foreign Assets Control