Treasury Continues Targeting Facilitators of Assad Regime

September 30, 2020

Washington – Today, as part of the U.S. government's continued effort to achieve a peaceful, political resolution of the Syrian conflict, the U.S. Department of the Treasury is taking action against key enablers of the Assad regime that are associated with the Fourth Division of the Syrian Arab Army, the Syrian General Intelligence Directorate, and the Central Bank of Syria. Specifically, Treasury's Office of Foreign Assets Control (OFAC) added three individuals and 13 entities to the Specially Designated Nationals and Blocked Persons List, pursuant to Syria sanctions authorities. Treasury is sanctioning a prominent, regime-connected Syrian businessman, who serves as an intermediary for the Fourth Division of the Syrian Arab Army, and his network of businesses that generate revenue for the regime and its supporters. Additionally, today's action includes the designations of two key Assad regime officials: the head of the Syrian General Intelligence Directorate and the Governor of the Central Bank of Syria.

"Those who continue to stand with the brutal regime of Bashar al-Assad further enable its corruption and human rights abuses," said Secretary Steven T. Mnuchin. "As we mark three years since the regime's slaughter of Syrian civilians in Armanaz, Syria, the United States will continue to employ all of its tools and authorities to target the finances of anyone who profits from or facilitates the Assad regime's abuse of the Syrian people."

Concurrent with the Treasury Department's designations, the State Department took action against three Syrian persons pursuant to Section 2 of Executive Order (E.O.) 13894, "Blocking Property and Suspending Entry of Certain Persons Contributing to the Situation in Syria."

KHODR TAHER BIN ALI AND HIS BUSINESS NETWORK

Khodr Taher Bin Ali (Taher) is a Syrian businessman who serves as a prominent local intermediary and contractor for the designated Fourth Division of the Syrian Arab Army (Fourth Division). The Fourth Division is an elite military unit, led by Maher al-Assad, the brother of Bashar al-Assad, that was founded to protect the regime from internal and external threats. On April 29, 2011, the President included Bashar al-Assad and Maher al-

Assad in the Annex to E.O. 13572, Blocking Property of Certain Persons With Respect to Human Rights Abuses in Syria." On January 12, 2017, OFAC identified the Syrian Arab Army as falling within the definition of the Government of Syria, as set forth in E.O. 13582 and the Syrian Sanctions Regulations. On June 17, 2020, the U.S. Department of State designated Bashar al-Assad, Maher al-Assad, and the Fourth Division pursuant to E.O. 13894.

In 2017, Taher established **Castle Security and Protection LLC**, a private security company that has become the informal executive arm of the Fourth Division's Security Bureau and is responsible for providing convoy protection at Fourth Division checkpoints. Taher was also chosen to direct the collection of fees at checkpoints and internal crossings between regime and opposition areas, as well as crossings with Lebanon. In addition to Castle Security and Protection LLC, Taher has reportedly established a number of other companies that are allegedly being used to obscure and launder money collected illicitly at regime crossings and through looting. These crossings into opposition areas have generated huge sums for regime officials, and in one example, most of the sums made reportedly went to Maher al-Assad.

Taher and his company, Castle Security and Protection LLC, were both designated today pursuant to E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods and services in support of, the Government of Syria. Castle Security and Protection LLC was additionally designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Taher.

In 2019, Taher founded **Emma Tel LLC**, a telecommunications provider that now has over 20 locations around Syria, where it sells mobile phone equipment and provides related services. Bashar al-Assad's wife, Asma al-Assad, allegedly ordered the establishment of Emma Tel LLC in order to create alternatives to the business empire of Rami Makhlouf, the cousin of Bashar al-Assad, and to break the dominance of the Makhlouf-owned Syriatel Mobile Telecom on the Syrian telecommunications market. Despite the reported linkages to Asma Al-Assad, Taher established Emma Tel LLC and owns 100 percent of its shares. Furthermore, Taher recently established **Ella Media Services LLC**, an advertisement company that was awarded a license to manage Syria's largest billboard advertising network.

Emma Tel LLC and Ella Media Services LLC were designated today pursuant to E.O. 13582 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Taher. Today, OFAC also issued a general license authorizing persons to wind

down transactions prohibited by the Syrian Sanctions Regulations involving Emma Tel LLC, or any entity in which Emma Tel LLC owns, directly or indirectly, a 50 percent or greater interest, for 90 days, as well as an FAQ which provides further guidance on the scope of the general license and the wind down of transactions involving Emma Tell LLC. On June 17, 2020, the U.S. Department of State designated Asma Al-Assad pursuant to E.O. 13894.

Taher is also involved in a joint venture with the **Syrian Transport and Tourism Company** named **Syrian Hotel Management LLC**. Taher owns two-thirds of the shares of the joint venture, while **Syrian Transport and Tourism Company** owns the remaining shares. The **Syrian Transport and Tourism Company** itself is owned 67 percent by the Syrian Ministry of Tourism.

Syrian Hotel Management LLC was designated today pursuant to E.O. 13582 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Taher. Syrian Transport and Tourism was also designated today under E.O. 13582 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, the Government of Syria. OFAC additionally identified the Syrian Ministry of Tourism as part of the Government of Syria.

Taher further owns or controls several other companies, including **Al Ali and Al Hamza LLC**, **Jasmine Contracting Company, Golden Star Trading LLC**, **Emma LLC**, **Ella Tourism Company, and Emma Tel Plus LLC**. These companies are involved in an array of activities, including contracting, the wholesale of metals and electronics, money transfer, and tourism activities. These companies were all designated today pursuant to E.O. 13582 for being owned or controlled by or having acted or purported to act for or on behalf of, directly or indirectly, Taher. Taher additionally owns a 50 percent stake in the **Syrian Company for Metals and Investments LLC**, which is being identified for being owned in the aggregate, directly or indirectly, 50 percent or more by Taher.

HUSAM MUHAMMAD LOUKA – HEAD OF THE SYRIAN GENERAL INTELLIGENCE DIRECTORATE

Today, OFAC also designated **Husam Muhammad Louka** (Louka), the current head of the Syrian General Intelligence Directorate (GID), one of Syria's four intelligence agencies. On April 29, 2011, the President included the GID in the Annex to E.O. 13572. On April 22, 2012, the President included the GID in the Annex to E.O. 13606, "Blocking the Property and

Suspending Entry Into the United States of Certain Persons With Respect to Grave Human Rights Abuses by the Governments of Iran and Syria via Information Technology."

Louka is a longtime leader within the Syrian regime's security apparatus. In 2010, Louka was appointed Assistant Head of the GID. Since the Syrian revolution broke out in March 2011, Louka has held several high-ranking positions in both the Syrian Political Security Directorate and the GID, including as Head of the Political Security Branches in Homs and Hama. While working in Homs, Louka reportedly committed a number of massacres and was responsible for the torture of detainees in his department. In 2015, Louka was accused in press reporting of participating in the so-called "Eid massacre" in the al-Waer neighborhood, where a children's playground was bombed and 19 people, including 14 children, were killed. Louka has been serving in his current position as Head of the GID since July 2019.

Louka is being designated pursuant to E.O. 13572 for being a senior official of the GID, an entity whose property and interests in property are blocked pursuant to E.O. 13572.

HAZEM YOUNES KARFOUL – GOVERNOR OF THE CENTRAL BANK OF SYRIA

Additionally, today OFAC designated the Governor of the Central Bank of Syria (CBoS), Hazem Younes Karfoul (Karfoul). The Syria Sanctions Regulations at 31 C.F.R. part 542 includes the Central Bank of Syria in the definition of Government of Syria.

In September 2018, Syrian President Bashar Al-Assad appointed Karfoul Governor of the CBoS. The CBoS, which is headquartered in Damascus, Syria, oversees the stability, integrity, and efficiency of the country's monetary policy and acts as the fiscal agent and depository of the government. Prior to his appointment as Governor, Karfoul held other posts at the bank. In 2010, he was assigned to the CBoS's Directorate of Economic Research and General Statistics, and later, in February 2011, he became head of the Department of Office Control and Assistant Director of the Directorate of the Government Commission. In November 2013, Karfoul worked with the Anti-Money Laundering and Terrorism Financing Authority and took the position of Secretary of Authority that same month. In 2014, Karfoul was assigned the position of First Deputy Governor of the CBoS.

As Governor of the CBoS, Karfoul met with the Governor of the Central Bank of Iran in Tehran in September 2019 to sign a memorandum of understanding for the development of strategic and long-term areas of economic cooperation. Also, in September 2019, Karfoul assembled some of Syria's wealthiest businessmen in Damascus to seek donations in an

effort to strengthen the country's struggling currency. It was reported in the press that Karfoul identified the properties and other assets of the businessmen during the meeting and had suggested to the participants that their fortunes could be seized if they did not give a significant contribution to the state's coffers.

Karfoul is being designated pursuant to E.O. 13573 for being a senior official of the Government of Syria and pursuant to E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, the Government of Syria, a person whose property and interests in property are blocked pursuant to E.O. 13582.

SANCTIONS IMPLICATIONS

All property and interests in property of these persons that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. OFAC's regulations generally prohibit all dealings by U.S. persons or within (or transiting) the United States that involve any property or interests in property of blocked or designated persons. In addition, non-U.S. persons that engage in certain transactions with the persons designated today may be exposed to designation. Pursuant to the general license issued today, U.S. persons are authorized to wind down transactions with Emma Tel LLC, and any entity in which Emma Tel LLC owns, directly or indirectly, a 50 percent or greater interest, until December 20, 2020.

View identifying information on the individuals and entities designated today.

For more information regarding the scope of any sanctions program's requirements please contact OFAC's Sanction Compliance and Evaluation Division at (800) 540-6322 or (202) 622-2490, or by email at OFAC_Feedback@treasury.gov.

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