Treasury Sanctions Sinaloa Cartel Network of “Super Lab” Suppliers and Fentanyl Operators

February 22, 2023

WASHINGTON — Today, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) designated six Mexican nationals and Sinaloa Cartel members involved in the illicit methamphetamine and fentanyl trade as well as six Mexico-based entities pursuant to Executive Order (E.O.) 14059. Led by brothers Ludim Zamudio Lerma and Luis Alfonso Zamudio Lerma, this network is responsible for diverting illicit precursor chemicals directly into the hands of Sinaloa Cartel members and laboratory operators, further bolstering the Sinaloa Cartel’s role as the preeminent facilitator of illicit fentanyl and other deadly drugs being trafficked into the United States.

“The Zamudio Lerma brothers and their network enable the production of synthetic drugs that devastate American lives, while lining the pockets of Sinaloa Cartel leadership,” said OFAC Director Andrea Gacki. “Depriving this network of access and resources will hinder the Sinaloa Cartel’s ability to produce and traffic the illicit drugs it depends on.”

Based in Sinaloa, Mexico, the brothers, Ludim Zamudio Lerma and Luis Alfonso Zamudio Lerma, as well as Ludim Zamudio Lerma’s son, Ludim Zamudio Ibarra, supply illicit precursor chemicals to high-level Sinaloa Cartel members, including Luis Gerardo Flores Madrid, who works for Ovidio Guzman Lopez (the recently captured son of Joaquin “El Chapo” Guzman Loera), and lab operators, including Ernesto Machado Torres and Jose Santana Arredondo Beltran. The precursor chemicals are used in super labs — large-scale drug laboratories that produce 10 or more pounds of an illicit drug per production cycle — to produce illicit fentanyl and methamphetamine for the Sinaloa Cartel. OFAC designated each of the above individuals pursuant to E.O. 14059 for having engaged in, or attempted to engage in, activities or transactions that have materially contributed to, or pose a significant risk of materially contributing to, the international proliferation of illicit drugs or their means of production.

The Zamudio family owns numerous Mexico-based businesses, two of which — Aceros y Refacciones del Humaya, S.A. de C.V. and Farmacia Ludim — OFAC designated today pursuant to E.O. 14059 for having engaged in, or attempted to engage in, activities or
transactions that have materially contributed to, or pose a significant risk of materially contributing to, the international proliferation of illicit drugs or their means of production.

Additionally, OFAC designated a real estate business, *Inmobiliaria del Rio Humaya, S.A. de C.V.*, for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, Ludim Zamudio Lerma, while a second real estate business, *Operadora Zait, S.A. de C.V.*, was designated for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, Luis Alfonso Zamudio Lerma. OFAC also designated two import/export companies, *Operadora del Humaya, S.A. de C.V.* and *Operadora Parque Alamedas, S. de R.L. de C.V.*, for being owned, controlled, or directed by, or having acted for or on behalf of, directly or indirectly, Ludim Zamudio Lerma and Ludim Zamudio Ibarra.

This action was coordinated closely with the Government of Mexico and would not have been possible without the cooperation, support, and ongoing collaboration with the FBI Phoenix Field Office (Tucson Resident Agency), the FBI Legal Attaché San Salvador (Sub-Office Guatemala City), and the DEA Tucson District Office.

**SANCTIONS IMPLICATIONS**

As a result of today’s action, all property and interests in property of the designated individuals 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 transactions by U.S. persons or persons within or transiting the United States that involve any property or interests in property of designated or otherwise blocked persons. U.S. persons may face civil or criminal penalties for violations of E.O. 14059. In addition, persons that engage in certain transactions with the individuals and entities designated today may themselves be exposed to sanctions or subject to an enforcement action.

Today’s action is part of a whole-of-government effort to counter the global threat posed by the trafficking of illicit drugs into the United States that causes the deaths of tens of thousands of Americans annually, as well as countless non-fatal overdoses. OFAC, in coordination with its U.S. government partners and foreign counterparts, will continue to target and pursue accountability for foreign illicit drug actors.

U.S. sanctions need not be permanent; sanctions are intended to bring about a positive change of behavior. Consistent with the findings of *Treasury’s 2021 Sanctions Review*, the removal of sanctions is available for persons designated under counter narcotics authorities.
who demonstrate a change in behavior and no longer engage in activities linked to international illicit drug trafficking or other sanctionable activity.

For information concerning the process for seeking removal from any OFAC list, including the Specially Designated Nationals and Blocked Persons List, please refer to OFAC’s Frequently Asked Question 897. Additional information regarding sanctions programs administered by OFAC can be found here.

View more information on the individuals and entities designated today.

View the chart on the individuals and entities designated today.

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