



# Treasury Sanctions Global Gold Smuggling Network

December 9, 2024

*On International Anti-Corruption Day, OFAC takes action in coordination with domestic and foreign partners*

WASHINGTON — Today, on International Anti-Corruption Day, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) is sanctioning 28 individuals and businesses involved in a global gold smuggling and money laundering network based in Zimbabwe, pursuant to Executive Order (E.O.) 13818, which targets perpetrators of serious human rights abuse and corruption around the world.


The global network led by **Kamlesh Pattni** (Pattni) has facilitated illicit activities by bribing officials, deploying trusted supporters to mask ownership, and weaving a global web of businesses to hide the illicit activities. This fraudulent scheme has robbed Zimbabwe's citizens of the benefit of those natural resources while enriching corrupt government officials and criminal actors.

"Across the globe, when corrupt actors like Pattni choose to exploit openings in governance structures to benefit themselves and their cronies, communities suffer and public trust is undermined," said Acting Under Secretary of the Treasury for Terrorism and Financial Intelligence Bradley T. Smith. "Corruption respects no borders and its consequences are felt worldwide. As we mark International Anti-Corruption Day, the United States reaffirms our commitment to use all available tools to hold these individuals to account for their schemes."

International Anti-Corruption Day has been observed annually on December 9 since the passage of the United Nations Convention against Corruption (UNCAC) in 2003 to raise public awareness of the importance of anti-corruption initiatives in preventing corruption from undermining democratic institutions, eroding governmental stability, and slowing economic development. There are currently 189 parties to the UNCAC.

Pattni's network illustrates the globalized nature of corruption and this action demonstrates a way to counter it: a whole-of-government approach and collaboration with allies and

partners.

Today's action was coordinated with the Federal Bureau of Investigations (FBI) and the United Kingdom (UK), reflecting the principles of [The United States Strategy on Countering Corruption](#) , released in December 2021, which has been pivotal to the fight against corruption. In coordination with Treasury's action, today, the UK designated Pattni, a UK citizen, and additional individuals.

The FBI collaborates with the Treasury Department and other domestic partners to hold accountable corrupt actors trying to take advantage of the stability of the U.S. financial market. Corrupt officials and their associates negatively affect their citizens by stealing natural resources and diverting funds for personal use that otherwise would provide infrastructure, enhance education, and improve their economies. These sanctions, on International Anti-Corruption Day, exemplify that we will not allow borders to impede justice and ensure we prevent these criminals from accessing their stolen wealth.

## **ACTION CAPS YEAR OF ANTI-CORRUPTION ACTIONS AND REFORMS**

Over the course of 2024, Treasury has taken a series of steps to prevent corrupt and criminal actors from laundering their illicit proceeds across the U.S. financial system. Over the past year, OFAC designated over 100 individuals and entities across more than a dozen countries for these activities, leveraging several Treasury tools and authorities—including E.O. 13818. This year's actions reinforce the Treasury's long-standing commitment to accountability for those who steal from the public or abuse their positions of power or public trust. Since 2021, Treasury has designated more than 500 individuals and entities for corruption and related activities.

Beyond sanctions, Treasury has advanced historic efforts this year to strengthen the United States' anti-money laundering/countering the financing of terrorism (AML/CFT) regime to safeguard the U.S. financial system from corruption and crime.

Treasury finalized two rules that aim to bring transparency and new safeguards to the residential real estate and investment adviser sectors—both of which have been misused by corrupt actors to hide ill-gotten gains in the United States. This year's actions represent among the most significant updates to the United States' AML/CFT regime in decades. These reforms aim to bolster the integrity of our financial system and root out corruption and crime, all while advancing fairness and transparency for law-abiding Americans and businesses.

## KAMLESH PATTNI'S COMPLEX WEB OF CORRUPTION

The designation of the Pattni's web of supporters and companies illustrates how illicit activity based in Zimbabwe spread across multiple countries, using a web of trusted supporters, and bribing government officials to concoct a complex corruption scheme.

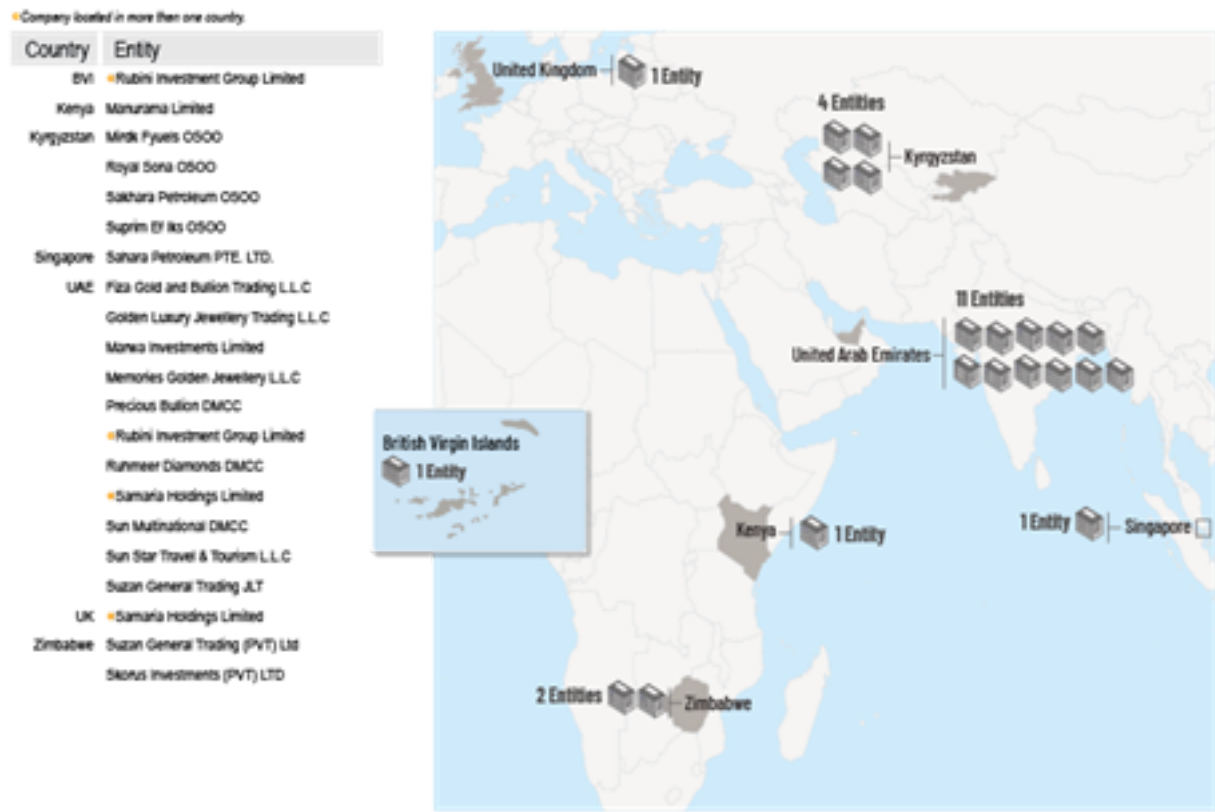
**Kamlesh Mansukhlal Damji Pattni** (Pattni) first came to global attention as a result of the infamous Goldenberg scandal in Kenya in the 1990s, wherein he was accused of manipulating Kenyan export incentives and corrupting senior Kenyan government officials. Although Pattni denied any wrongdoing, he fled Kenya and soon shifted his attention to Zimbabwe.

In Zimbabwe, Pattni befriended then-President Robert Mugabe and reestablished a scheme similar to the one he ran in Kenya. Pattni, as featured in public reporting and elsewhere, has enlisted a range of couriers and supporters to engage in export incentive fraud and bribery to enable his illicit profiting from the exportation of gold and diamonds from Zimbabwe.

Pattni and members of his network engaged in a scheme wherein they would generate cash via the sale of Zimbabwean natural resources in foreign jurisdictions. When Pattni and his network would return to Zimbabwe with the cash from the sale of the natural resources, they would overreport the amount of cash being brought back into the country, receive compensation on the overreported cash, and bribe government officials in Zimbabwe to receive protection for their illicit activity. Pattni then hid the profits behind a global network of companies often controlled by members of the network, including frontmen, facilitators, couriers, and other supporters.

## GLOBAL NATURE OF CRIMINAL NETWORK

Pattni's network has spread across multiple countries, reflecting the global nature of corruption. More recently, Pattni and several of his supporters have looked to establish new operations in other resource-rich countries, further compounding the threat his illicit network poses to the U.S. and global financial systems.



WIDESPRED USE OF SUPPORTERS TO MASK INTERESTS

Pattni is a prolific user of frontmen, facilitators, couriers, and other supporters to hide his interest in businesses. These supporters are individuals he trusts to not steal from him, including close friends and family members. As featured in public reporting and as pictured below, Pattni controls a complex web of companies designed to enable his illicit activity while obscuring his interests in these same companies.

Primary among the network of companies Pattni oversees is **Sun Multinational DMCC** (Sun Multinational), an ostensibly legitimate company ultimately wholly owned by **Marwa Investments Limited**, which in turn is owned by one of Pattni's long-time supporters and brother-in-law, **Mukesh Manuskhlal Vaya** (Mukesh). Pattni, who has been identified as Sun Multinational's "Group Chairman" by its CEO, **Swetang Sinha** (Sinha), has put forward numerous Sun Multinational subsidiaries as potential avenues for the laundering of funds. Sinha has been identified as a main supporter for Pattni, as well as having been involved in corruption involving Zimbabwean President Emmerson Mnangagwa, who was sanctioned pursuant to

E.O. 13818 for corruption and serious human rights abuse on [March 4, 2024](#).

**Rahul Sood** (Sood), Sun Multinational's "Managing Director," has also been key to Pattni's network, acting as a manager and in other roles for numerous companies in the network. **Mishaal Hitesh Pattni** (Mishaal), Pattni's nephew, has also been identified as a key figure in Pattni's extended network of companies, often facilitating Pattni's activities and being featured as a manager or employee within the network of companies.

Furthermore, included in the Sun Multinational group of companies are **Fiza Gold and Bullion Trading L.L.C.**, which features Sood as its Manager; **Golden Luxury Jewellery Trading L.L.C.**, which features Mishaal as its Managing Director; **Memories Golden Jewellery L.L.C.**, which features Sood as its Manager; **Ruhmeer Diamonds DMCC**, which features Sood as a Manager; and **Sun Star Travel & Tourism L.L.C.** Although not part of the Sun Multinational group of companies, Sood also owns Singapore-based **Sahara Petroleum PTE. LTD.** and manages the United Arab Emirates-based **Precious Bullion DMCC**, where Mukesh is also an authorized signatory.

Pattni has relied on a global network of individuals and companies to enable his illicit activities. British Virgin Island-based **Rubini Investment Group Limited** at one time controlled Pattni's investments in real estate. Pattni also controls UAE-based **Samaria Holdings Limited**, UAE-based **Suzan General Trading JLT**, and Kenya-based **Manurama Limited**. Pattni has long controlled the trading firm **Suzan General Trading (PVT) LTD**, located in Zimbabwe.

**Sanjay Keshavji Vaya** (Sanjay) is considered Pattni's "right hand man" as relates to his Zimbabwe-based activities, and his son **Raj Vaya Sanjay** (Raj) has been identified as supporting Pattni by providing him gold and acting as a director on the Pattni-controlled **Skorus Investments (PVT) LTD**. Another director of Skorus Investments Limited is **David Paul Crosby** (Crosby), who also provides gold for Pattni and acted as a courier in the network. Crosby controls several companies based in Kyrgyzstan, including **Sakhara Petroleum OSOO**, **Mirdk Fyuels OSOO**, **Royal Sona OSOO**, and **Suprim Ef Iks OSOO**. Finally, **Dmytro Abakumov** (Abakumov) has been a courier for Pattni and was at one time his personal trader.

For more information on the bases of designations, please see [Annex 1](#) below.

## SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of these targets that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. In addition, any entities that are owned, directly or indirectly, 50 percent or more by one or more blocked persons are also blocked. OFAC's regulations generally prohibit all dealings by U.S. persons or within the United States (including transactions transiting the United States) that involve any property or interests in property of blocked or designated persons.

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. Furthermore, unless an exception applies, any foreign financial institution that knowingly facilitates a significant transaction for any of the individuals or entities designated today could be subject to U.S. sanctions.

The power and integrity of OFAC sanctions derive not only from its ability to designate and add persons to the SDN List, but also from its willingness to remove persons from the SDN List consistent with the law. The ultimate goal of sanctions is not to punish, but to bring about a positive change in behavior. For information concerning the process for seeking removal from an OFAC list, including the SDN List, please refer to [OFAC's Frequently Asked Question 897 here](#). For detailed information on the process to submit a request for removal from an OFAC sanctions list, [please click here](#).

[Click here for identifying information on the individuals and entities designated today.](#)

## ANNEX 1: FULL LIST OF TODAY'S DESIGNATIONS

Pattni is being designated [pursuant to E.O. 13818 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of](#) corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery.

Mukesh, Sinha, Sood, Mishaal, Sanjay, Raj, Crosby, and Abakumov are being designated pursuant to E.O. 13818 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of Pattni.

Sun Multinational, Marwa Investments Limited, Fiza Gold and Bullion Trading L.L.C, Golden Luxury Jewellery Trading L.L.C, Ruhmeer Diamonds DMCC, Precious Bullion DMCC, Star Travel & Tourism L.L.C, Rubini Investment Group Limited, Samaria Holdings Limited, Suzan General Trading JLT, Manurama Limited, Suzan General Trading (PVT) LTD, and Skorus Investments (PVT) LTD are being designated pursuant to E.O. 13818 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Pattni.

Memories Golden Jewellery L.L.C is being designated pursuant to E.O. 13818 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Sun Multinational.

Sahara Petroleum PTE. LTD. is being designated pursuant to E.O. 13818 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Sood.

Sakhara Petroleum OSOO, Mirdk Fyuels OSOO, Royal Sona OSOO, and Suprim Ef lks OSOO are being designated pursuant to E.O. 13818 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Crosby.

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