



## [IRAN] [NPWMD] [IFSR] Entries Changed on OFAC's SDN List on August 10, 2011

McNabb Associates, P.C. (OFAC SDN Removal Attorneys)

Submitted at 10:59 AM August 10, 2011

As of today, [OFAC](#) has changed [IRAN][NPWMD][IFSR] to the [Specially Designated Nationals List \(SDN List\)](#):

**The following [IRAN] [NPWMD] [IFSR] entries have been changed on OFAC's SDN list:**

BANK MELLI (a.k.a. BANK MELLI IRAN; a.k.a. NATIONAL BANK OF IRAN), PO Box 11365-171, Ferdowsi Avenue, Tehran, Iran; 43 Avenue Montaigne, Paris 75008, France; Room 704-6, Wheelock Hse, 20 Pedder St, Central, Hong Kong; Bank Melli Iran Bldg, 111 St 24, 929 Arasat, Baghdad, Iraq; PO Box 2643, Ruwi, Muscat 112, Oman; PO Box 2656, Liva Street, Abu Dhabi, United Arab Emirates; PO Box 248, Hamad Bin Abdulla St, Fujairah, United Arab Emirates; PO Box 1888, Clock Tower, Industrial Rd, Al Ain Club Bldg, Al Ain, Abu Dhabi, United Arab Emirates; PO Box 1894, Baniyas St, Deira, Dubai City, United Arab Emirates; PO Box 5270, Oman Street Al Nakheel, Ras Al-Khaimah, United Arab Emirates; PO Box 459, Al Borj St, Sharjah, United Arab Emirates; PO Box 3093, Ahmed Seddiqui Bldg, Khalid Bin El-Walid St, Bur-Dubai, Dubai City 3093, United Arab Emirates; PO Box 1894, Al Wasl Rd, Jumeirah, Dubai, United Arab Emirates; Postfach 112 129, Holzbruecke 2, D-20459, Hamburg, Germany; Nobel Ave. 14, Baku, Azerbaijan; Unit 1703-4, 17th Floor, Hong Kong Club Building, 3 A Chater Road Central, Hong Kong; all offices worldwide

[IRAN] [NPWMD] [IFSR] -to-BANK MELLI (a.k.a. BANK MELLI IRAN; a.k.a. NATIONAL BANK OF IRAN), PO Box 11365-171, Ferdowsi Avenue, Tehran, Iran; 43 Avenue Montaigne, Paris 75008, France; Room 704-6, Wheelock Hse, 20 Pedder St, Central, Hong Kong; Bank Melli Iran Bldg, 111 St 24, 929 Arasat, Baghdad, Iraq; PO Box 2643, Ruwi, Muscat 112, Oman; PO Box 2656, Liva Street, Abu Dhabi, United Arab Emirates; PO Box 248, Hamad Bin Abdulla St, Fujairah, United Arab Emirates; PO Box 1888, Clock Tower, Industrial Rd, Al Ain Club Bldg, Al Ain, Abu Dhabi, United Arab Emirates; PO Box 1894, Baniyas St, Deira, Dubai City, United Arab Emirates; PO Box 5270, Oman Street Al Nakheel, Ras Al-Khaimah, United Arab Emirates; PO Box 459, Al Borj St, Sharjah, United Arab Emirates; PO Box 3093, Ahmed Seddiqui Bldg, Khalid Bin El-Walid St, BurDubai, Dubai City 3093, United Arab Emirates; PO Box 1894, Al Wasl Rd, Jumeirah, Dubai, United Arab Emirates; Postfach 112 129, Holzbruecke 2, D-20459, Hamburg, Germany; Nobel Ave. 14, Baku, Azerbaijan; Unit 1703-4, 17th Floor, Hong Kong Club Building, 3 A Chater Road Central, Hong Kong; Esteghlal St., Opposite to Otbeh Ibn Ghazvan Hall , Basrah, Iraq; all offices worldwide [IRAN] [NPWMD] [IFSR] BANK MELLI IRAN (a.k.a. BANK MELLI; a.k.a. NATIONAL BANK OF IRAN), PO Box 11365-171, Ferdowsi Avenue, Tehran, Iran; 43 Avenue Montaigne, Paris 75008, France; Room 704-6,

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Douglas McNabb and other members of the U.S. law firm practice and write extensively on matters involving Federal Criminal Defense, INTERPOL Red Notice

Removal, International Extradition and OFAC SDN List Removal.

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## Weapons of Mass Destruction Proliferators [NPWMD] Entries Added on OFAC's SDN List on August 10, 2011

McNabb Associates, P.C. (OFAC SDN Attorneys)

Submitted at 11:05 AM August 10, 2011

As of today, [OFAC](#) has added Weapons of Mass Destruction Proliferators [NPWMD] to the [Specially Designated Nationals List \(SDN List\)](#):

**The following [NPWMD] entries have been added to OFAC's SDN list:**

COMMERCIAL BANK OF SYRIA, Damascus Branch, P.O. Box 2231, Moawiya St., Damascus, Syria; P.O. Box 933, Yousef Azmeh Square Damascus, Syria; Aleppo Branch, P.O. Box 2, Kastel Hajjarin St., Aleppo, Syria; SWIFT/BIC CMSY SY DA; all offices worldwide [NPWMD] SYRIAN LEBANESE COMMERCIAL BANK, Hamra, Makdessi Street, SLCB Building, P.O. Box 113-5127/11-8701, Beirut, Lebanon; Hamra Branch, Hamra St., Darwish and Fakhro

Building, P.O. Box 113-5127/11-8701, Beirut, Lebanon; Mar Elias Branch, Mar Elias Street, Fakhani Building, P.O. Box 145 796, Beirut, Lebanon; SWIFT/BIC SYLC LB BE [NPWMD]  
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**"Treasury Sanctions State-Owned Syrian Financial Institutions and Syria's Largest Mobile Phone Operator**

8/10/2011

WASHINGTON – The U.S. Department of the Treasury today announced the designation of the Commercial Bank of Syria, a Syrian state-owned financial institution, and its Lebanon-based subsidiary, Syrian Lebanese Commercial Bank, pursuant to Executive Order (E.O.) 13382, and Syriatel, the largest mobile phone operator in Syria, pursuant to E.O. 13572.

“By exposing Syria’s largest commercial bank as an agent for designated Syrian and North Korean proliferators, and by targeting Syria’s largest mobile phone operator for being controlled by one of the regime’s most corrupt insiders, we are taking aim at the financial infrastructure that is helping provide support to Assad and his regime’s illicit activities,” said Under Secretary for Terrorism and Financial Intelligence David S. Cohen.

E.O. 13382 is an authority that targets proliferators of weapons of mass destruction (WMD) and their supporters, and E.O. 13572 targets Syrian officials and others responsible for human rights abuses in Syria. As a result of today’s actions, U.S. persons are generally prohibited from engaging in commercial or financial transactions with the Commercial Bank of Syria, Syrian Lebanese Commercial Bank and Syriatel, and any assets of these entities under U.S. jurisdiction are frozen.

**Commercial Bank of Syria and Syrian Lebanese Commercial Bank**

The Commercial Bank of Syria, a Syrian state-owned financial institution based in Damascus with approximately 50 branches, was designated today for providing financial services to Syria’s Scientific Studies and Research Center (SSRC) and North Korea’s Tanchon Commercial Bank (Tanchon). SSRC and Tanchon were listed in the Annex to E.O. 13382 in June 2005 for their support for WMD proliferation by Syria and North Korea, respectively. The Syrian Lebanese Commercial Bank was designated today for being owned or controlled by the Commercial Bank of Syria.

SSRC controls Syria’s missile production facilities and oversees Syria’s facilities to develop unconventional weapons and their delivery systems. The Commercial Bank of Syria has continued to provide financial services to the SSRC and associated companies following the SSRC’s designation, including the maintenance of bank accounts and financing for purchases that permit the SSRC and associated companies to advance Syria’s WMD programs. For example, in 2010, SSRC arranged financing through the Commercial Bank of Syria for missile-related purchases.

The Commercial Bank of Syria also holds an account for Tanchon, the primary financial agent for the Korea Mining Development Corporation (KOMID), North Korea’s premier arms dealer and main exporter of goods and equipment related to ballistic missiles and conventional weapons. KOMID was also listed in the Annex to E.O. 13382.

The Commercial Bank of Syria has also engaged in dealings with several Iranian banks designated by Treasury under E.O. 13382, including the Export Development

Bank of Iran, Bank Saderat and Bank Melli.

The Commercial Bank of Syria was identified by Treasury as a financial institution of primary money laundering concern under Section 311 of the USA PATRIOT ACT in May 2004, and issued its Final Rule in March 2006. The Commercial Bank of Syria remains in control of much of the Syrian banking market and controls most public sector contracts. In light of today’s designation, Treasury’s Financial Crimes Enforcement Network (FinCEN) has issued an advisory to alert U.S. financial institutions of the Commercial Bank of Syria’s continued involvement in illicit financial activities.

**Syriatel**

Syriatel, the largest mobile phone operator in Syria, was designated today for being owned or controlled by Rami Makhluaf, a powerful Syrian businessman and regime insider designated under E.O. 13460 in February 2008 for improperly benefitting from and aiding the public corruption of Syrian regime officials.

Treasury identified Syriatel as property blocked pursuant to E.O. 13460 in July 2008 because of Makhluaf’s majority ownership interest in the company. Despite attempts to obscure his controlling interest in Syriatel, Makhluaf has continued to own and run the telecommunications company.

Syriatel was also designated today for being owned and controlled by Al Mashreq Investment Fund – a firm designated by Treasury pursuant to E.O. 13572 in May 2011 for being owned and controlled by Makhluaf. Al Mashreq Investment Fund is Syriatel’s largest shareholder.

**Identifying Information:**

**Entity: Commercial Bank of Syria (and all offices worldwide)**

Location: P.O. Box 933, Yousef Azmeh Square, Damascus, Syria

Alt. Location: Aleppo Branch,  
P.O. Box 2, Kastel Hajjarin St.,  
Aleppo, Syria

Alt Location: Damascus Branch,  
P.O. Box 2231, Moawiya St.,  
Damascus, Syria

SWIFT/BIC: CMSY SY DA

**Entity: Syrian Lebanese**

**Commercial Bank**

Location: Hamra, Makdessi  
Street, SLCB Building, P.O. Box  
113-5127/11-8701, Beirut,  
Lebanon

Alt. Location: Hamra Branch,  
Hamra Street, Darwish and Fakhro  
Building, P.O. Box 113-5127/11-  
8701, Beirut, Lebanon

Alt. Location: Mar Elias Branch,  
Mar Elias Street, Fakhani Building,  
P.O. Box 145 796, Beirut, Lebanon

SWIFT/BIC: SYLC LB BE

**Entity: Syriatel**

AKA: Syriatel Mobile Telecom

Address: Doctors Syndicate  
Building, Al Jalaa Street, Abu  
Roumaneh Area, P.O. Box 2900,  
Damascus, Syria"

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practice and write extensively on  
matters involving Federal Criminal  
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Removal, International Extradition  
and OFAC SDN List Removal.

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