



Cayman Monetary Regulatory Authority International

At the forefront of financial regulation, the Cayman Monetary Regulatory Authority International (CMRAI) is dedicated to upholding the highest standards of financial oversight and compliance. Our mission is to safeguard the stability and integrity of the global financial system by ensuring that financial services operate within a framework of transparency, accountability, and excellence.

As a trusted partner to financial institutions worldwide, CMRAI provides rigorous supervision, innovative solutions, and strategic guidance to foster a secure and thriving financial environment. With decades of experience and a commitment to global standards, we stand as a pillar of trust and security in an ever-evolving financial landscape.

With a legacy of excellence in financial oversight, the Cayman Monetary Regulatory Authority International (CMRAI) is a beacon of trust in the international financial community. Our role extends beyond regulation; we are innovators, collaborators, and protectors of the global financial ecosystem. By fostering compliance, promoting best practices, and embracing technological advancements, CMRAI ensures that financial services remain resilient and adaptable in a dynamic global market.

Our comprehensive approach to regulation encompasses a deep understanding of financial risks and a proactive stance on emerging challenges. We are committed to empowering financial institutions with the tools and guidance necessary to navigate complex regulatory landscapes, thereby contributing to global economic stability and growth.

Cayman KY1 1001, Cayman Islands 4 August 2020 NOTICE RE: Financial Sanctions

1. The Cayman Monetary Regulatory Authority International (CMRAI) hereby notifies you that it has received a new Notice from the Office of Financial Sanctions Implementation, HM Treasury (OFSI), which is attached as an Annex to this Notice. 2. What you must do: A. In the case of an addition or amendment of a person to the Consolidated List and asset freeze: i. Check whether you maintain any accounts or hold any funds or economic resources for the persons set out in the OFSI Notice; ii. Freeze any such accounts and other funds or economic resources. iii. Refrain from dealing with the funds or assets or making them available (directly or indirectly) to such persons unless licensed by the Governor. iv. Report any findings to the Financial Reporting Authority (FRA) at together with any additional information that would facilitate compliance with the relevant legislative requirements. v. Provide any information concerning the frozen assets of designated persons to the FRA at and submitting a compliance reporting form. Information reported to FRA may be passed to other regulatory authorities or law enforcement. B. In the case of the removal of a person from the Consolidated List and unfreezing of assets i. Check whether you have frozen assets of any person or entity removed from the Consolidated List and verify that the person is no longer subject to an asset freeze. ii. Remove the person from your institution s list of persons or entities subject to financial sanction. iii. Un-freeze the assets of the person and where necessary re-activate all relevant accounts. SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands iv. Send advice to the person that the assets are no longer subject to an asset freeze. v. Advise the FRA at of the actions taken. 3. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence. Further Information. 4. For general information on financial sanctions please see FRAs Industry Guidance on targeted financial sanctions.

21%20FRA%20Financial%20Sanctions%20Guidance%20(Final).pdf. 5. Enquiries regarding this sanctions notice should be addressed to The Sanctions Coordinator Financial Reporting Authority P.O. Box 1054 Grand Cayman KY1-1102 Cayman Islands REGIME:

Venezuela INDIVIDUAL 1. Names (Last): Reverol Torres (1): Nestor (2): Luis (3): n/a (4): n/a (5): n/a Title: n/a Position: (1) Minister for Interior, Justice and Peace since 2016 (2) Vice-President of Public Works and Services and Executive Secretary of the Electrical General Staff since April 2019 A.K.A: n/a Date of Birth: 28/10/1964 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Former Commander General of the Bolivarian National Guard. Responsible for the torture of political prisoners and repression of political demonstrations. Listed On: 22/01/2018 Last Updated: 04/08/2020 Group ID: 13580 2. Names (Last): Gonzalez Lopez (1): Gustavo (2): Enrique (3): n/a (4): n/a (5): n/a Title: n/a Position: Head of the Bolivarian National Intelligence Service (SEBIN), reappointed on 30 April 2019 A.K.A: n/a Date of Birth: 02/11/1960 Place of Birth: n/a SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Formerly Security and Intelligence Adviser for the President s office from 8 January 2019 to 30 April 2019. Head of SEBIN until October 2018. Responsible for arbitrary detention, inhuman and degrading treatment, torture, and the repression of civil society. Listed On: 22/01/2018 Last Updated: 04/08/2020 Group ID: 13581 3. Names (Last): Lucena Ramirez (1): Tibisay (2): n/a (3): n/a (4): n/a (5): n/a Title: n/a Position: President of the National Electoral Council (Consejo Nacional Electoral (CNE)) A.K.A: n/a Date of Birth: 26/04/1959 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other

Information Gender: female. Failed to ensure that the CNE remained an impartial and independent institution in accordance with the Venezuelan Constitution. Facilitated the establishment of the Constituent Assembly and re-election of Nicolas Maduro in May 2018 through presidential elections that were neither free nor fair. Listed On: 22/01/2018 Last Updated: 04/08/2020 Group ID: 13582 4. Names (Last): Benavides Torres (1): Antonio (2): Jose (3): n/a (4): n/a (5): n/a Title: n/a Position: n/a A.K.A: n/a Date of Birth: 13/06/1961 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Formerly Chief of the Capital District (Distrito Capital) Government until January 2018. General Commander of the Bolivarian National Guard until 21 June 2017. Responsible for the Bolivarian National Guard taking the lead in the policing of civilian demonstrations and publicly advocating that military courts should have jurisdiction over civilians. Listed On: 22/01/2018 Last Updated: 04/08/2020 Group ID: 13583 5. Names (Last): Moreno Perez (1): Maikel (2): Jose (3): n/a (4): n/a (5): n/a Title: n/a Position: President of the Supreme Court of Justice of Venezuela (Tribunal Supremo de Justicia) A.K.A: n/a SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands Date of Birth: 12/12/1965 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Former Vice President of the Supreme Court of Justice of Venezuela. Responsible for actions and statements that have usurped the authority of the National Assembly. Listed On: 22/01/2018 Last Updated: 04/08/2020 Group ID: 13584 6. Names (Last): Saab Halabi (1): Tarek (2): William (3): n/a (4): n/a (5): n/a Title: n/a Position: Venezuelan Attorney General appointed by the Constituent Assembly A.K.A: n/a Date of Birth: 10/09/1963 Place of Birth: El Tigre, Anzoategui state Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Previously Ombudsman and President of the Republican Moral Council. Publicly supported actions against opponents of the government of Venezuela and the withdrawal of competences from the National Assembly. Listed On: 22/01/2018 Last Updated: 04/08/2020 Group ID: 13585 7. Names (Last): Cabello Rondon (1): Diosdado (2): n/a (3): n/a (4): n/a (5): n/a Title: n/a Position: (1) President of the Constituent Assembly (2) First Vice President of the United Socialist Party of Venezuela (PSUV) A.K.A: n/a Date of Birth: 15/04/1963 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Has used the media to publicly attack and threaten political opposition, other media and civil society. Listed On: 22/01/2018 Last Updated: 04/08/2020 Group ID: 13586 8. Names (Last): El-Aissami Maddah (1): Tareck (2): Zaidan (3): n/a (4): n/a (5): n/a Title: n/a Position: (1) Vice President of Economy (2) Minister for National Industry and Production A.K.A: n/a Date of Birth: 12/11/1974 Place of Birth: n/a Nationality: n/a SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands Passport Details: n/a Address: n/a Other Information Gender: male. Former Vice President of Venezuela with oversight of the Bolivarian National Intelligence Service (SEBIN). Responsible for arbitrary detention, politically motivated investigations, inhumane and degrading treatment, torture, and the prohibition of public demonstrations. Heading President Maduro's anti-coup command which has targeted civil society and the democratic opposition. Listed On: 26/06/2018 Last Updated: 04/08/2020 Group ID: 13679 9. Names (Last): Rivero Marcano (1): Sergio (2): Jose (3): n/a (4): n/a (5): n/a Title: n/a Position: Inspector General of the Bolivarian National Armed Forces A.K.A: n/a Date of Birth: 08/11/1964 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. General Commander of the Bolivarian National Guard until 16 January 2018. Responsible for the excessive use of force, arbitrary detention and abuse of civil society and opposition members. Listed On:

26/06/2018 Last Updated: 04/08/2020 Group ID: 13680 10. Names (Last): Suarez Chourio (1): Jesus (2): Rafael (3): n/a (4): n/a (5): n/a Title: n/a Position: (1) Commander in Chief of the Venezuelan Bolivarian National Army (2) Chief of the General Staff to the Commander-in-Chief A.K.A: n/a Date of Birth: 19/07/1962 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Former General Commander of the Venezuelan Bolivarian National Army. Former Commander of Venezuela's Comprehensive Defence Region of the Central Zone (REDI Central). Responsible for the use of excessive force and the mistreatment of detainees. Targeted the democratic opposition and supported the use of military courts to try civilian protestors. Listed On: 26/06/2018 Last Updated: 04/08/2020 Group ID: 13683 11. Names (Last): Hernandez Dala (1): Ivan (2): n/a (3): n/a (4): n/a (5): n/a Title: n/a Position: (1) Head of the Directorate-General of Military Counter-Intelligence (DGCIM) since January 2014 (2) Head of the Presidential Guard since September 2015 A.K.A: n/a SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands Date of Birth: 18/05/1966 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Responsible for the excessive use of force and the ill- treatment of detainees. Listed On: 26/06/2018 Last Updated: 04/08/2020 Group ID: 13685 12. Names (Last): Rodriguez Gomez (1): Delcy (2): Eloina (3): n/a (4): n/a (5): n/a Title: n/a Position: Vice President of the Bolivarian Republic of Venezuela A.K.A: n/a Date of Birth: 18/05/1969 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: female. Former President of the illegitimate Constituent Assembly and former member of the Presidential Commission for the illegitimate National Constituent Assembly. Usurped the powers of the National Assembly and used them to target the opposition and prevent them taking part in the political process. Listed On: 26/06/2018 Last Updated: 04/08/2020 Group ID: 13687 13. Names (Last): Jaua Milano (1): Elias (2): Jose (3): n/a (4): n/a (5): n/a Title: n/a Position: n/a A.K.A: n/a Date of Birth: 16/12/1969 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Former Minister of Popular Power for Education. Former President of the Presidential Commission for the illegitimate National Constituent Assembly. Led the establishment of the illegitimate Constituent Assembly. Listed On: 26/06/2018 Last Updated: 04/08/2020 Group ID: 13688 14. Names (Last): Oblitas Ruzza (1): Sandra (2): n/a (3): n/a (4): n/a (5): n/a Title: n/a Position: (1) Vice President of National Electoral Council (CNE) (2) President of the Commission of the Electoral and Civilian Register A.K.A: n/a Date of Birth: 07/06/1969 Place of Birth: n/a SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: female. Facilitated the establishment of the illegitimate Constituent Assembly and manipulation of the electoral process. Listed On: 26/06/2018 Last Updated: 04/08/2020 Group ID: 13690 15. Names (Last): Bernal Rosales (1): Freddy (2): Alirio (3): n/a (4): n/a (5): n/a Title: n/a Position: (1) Head of the National Control Centre of the Committee for Local Supply and Production (CLAP) (2) Protector of Tachira State (3) Commissioner General of the Bolivarian National Intelligence Service (SEBIN). A.K.A: n/a Date of Birth: 16/06/1962 Place of Birth: San Cristobal, Tachira state Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Can call upon Special Forces (FAES). Able to influence appointments of judges and prosecutors. Responsible for undermining democracy through manipulation of CLAP programme distributions amongst voters. Responsible for SEBIN s activities such as arbitrary detention. Listed On: 26/06/2018 Last Updated: 04/08/2020 Group ID: 13691 16. Names (Last): Harrington Padron (1): Katherine (2): Nayarith (3): n/a

(4): n/a (5): n/a Title: n/a Position: n/a A.K.A: n/a Date of Birth: 05/12/1971 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: female. Deputy Prosecutor General (also translated as Deputy Attorney General) from July 2017 until October 2018. Appointed Deputy Prosecutor General by the Supreme Court in violation of the Constitution, rather than by the National Assembly. Initiated politically motivated prosecutions and failed to investigate allegations of human rights violations by the Maduro regime. Listed On: 26/06/2018 Last Updated: 04/08/2020 Group ID: 13694

17. Names (Last): Hernandez Hernandez (1): Socorro (2): Elizabeth (3): n/a (4): n/a (5): n/a Title: n/a Position: n/a SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands A.K.A: n/a Date of Birth: 11/03/1952 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: female. Member (Rector) of the National Electoral Council (CNE) and member of the National Electoral Board (JNE). Facilitated the establishment of the illegitimate Constituent Assembly and the manipulation of the electoral process. Listed On: 26/06/2018 Last Updated: 04/08/2020 Group ID: 13695

18. Names (Last): Moreno Reyes (1): Xavier (2): Antonio (3): n/a (4): n/a (5): n/a Title: n/a Position: Secretary-General of the National Electoral Council (CNE) A.K.A: n/a Date of Birth: n/a Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Facilitated the establishment of the illegitimate Constituent Assembly and manipulation of the electoral process. Listed On: 26/06/2018 Last Updated: 04/08/2020 Group ID: 13696

19. Names (Last): Blanco Hurtado (1): Nestor (2): Neptali (3): n/a (4): n/a (5): n/a Title: n/a Position: Major in the Bolivarian National Guard (GNB) A.K.A: n/a Date of Birth: 26/09/1982 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Has operated alongside officials in the Directorate- General of Military Counter-Intelligence (Direccion General de Contrainteligencia Militar (DGCIM)) since at least December 2017. Responsible for torture, the use of excessive force and the mistreatment of detainees in DGCIM facilities. Listed On: 27/09/2019 Last Updated: 04/08/2020 Group ID: 13791

20. Names (Last): Blanco Marrero (1): Rafael (2): Ramon (3): n/a (4): n/a (5): n/a Title: n/a Position: (1) Deputy Director of the Directorate-General of Military Counter-Intelligence (Direccion General de Contrainteligencia Militar (DGCIM)) since at least December 2018 (2) Division General of the Venezuelan Bolivarian National Army since 5 July 2019 A.K.A: n/a SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands Date of Birth: 28/02/1968 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Responsible for torture, the use of excessive force and the mistreatment of detainees in DGCIM facilities. Linked to the death of Captain Acosta. Listed On: 27/09/2019 Last Updated: 04/08/2020 Group ID: 13792

21. Names (Last): Calderon Chirinos (1): Carlos (2): Alberto (3): n/a (4): n/a (5): n/a Title: n/a Position: Senior office holder (referred to as Commissioner, Director and Director General) in the Bolivarian National Intelligence Service (SEBIN). A.K.A: n/a Date of Birth: n/a Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Participated in and was responsible for acts of torture and the cruel, inhuman and degrading treatment of detainees in El Helicoide, a SEBIN prison. Listed On: 27/09/2019 Last Updated: 04/08/2020 Group ID: 13793

22. Names (Last): Escalona Marrero (1): Alexis (2): Enrique (3): n/a (4): n/a (5): n/a Title: n/a Position: Chief in Charge of the National Office Against Organized Crime and Terrorist Financing (ONDOFT) A.K.A: n/a Date of Birth: 12/10/1962 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. National Commander of the National Anti-Extortion and Kidnapping Command (Comando Nacional Antiextorsion y Secuestro (CONAS) between

2014 and 2017. Responsible for torture, excessive use of force, the mistreatment of detainees, and repression of civil society. Listed On: 27/09/2019 Last Updated: 04/08/2020 Group ID: 13794 23. Names (Last): Franco Quintero (1): Rafael (2): Antonio (3): n/a (4): n/a (5): n/a Title: n/a Position: Agent in the Bolivarian National Intelligence Service (SEBIN) A.K.A: n/a Date of Birth: 14/10/1973 SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Head of Investigations at the Directorate-General of Military Counter-Intelligence (Dirección General de Contrainteligencia Militar (DGCIM)) between at least 2017 and December 2018. Responsible for torture, excessive use of force and the ill treatment of detainees in DGCIM facilities. Responsible for the repression of civil society and democratic opposition. Linked to the death of Captain Acosta. Listed On: 27/09/2019 Last Updated: 04/08/2020 Group ID: 13795 24. Names (Last): Granko Arteaga (1): Alexander (2): Enrique (3): n/a (4): n/a (5): n/a Title: n/a Position: Head (Director) of the Special Affairs Division (DAE) of the Directorate-General of Military Counter-Intelligence (Dirección General de Contrainteligencia Militar (DGCIM)) A.K.A: n/a Date of Birth: 25/03/1981 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Committed serious human rights violations, including torture, excessive use of force causing death and injury and the ill-treatment of detainees in DGCIM facilities. Directly involved in the repression of civil society. Linked to the death of Captain Acosta. Listed On: 27/09/2019 Last Updated: 04/08/2020 Group ID: 13796 25. Names (Last): Guerrero Mijares (1): Hannover (2): Esteban (3): n/a (4): n/a (5): n/a Title: n/a Position: n/a A.K.A: n/a Date of Birth: 14/01/1971 Place of Birth: n/a Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Head of Investigations at the Directorate-General of Military Counter-Intelligence (Dirección General de Contrainteligencia Militar (DGCIM)) from at least April 2019 to August 2019. As Head of Investigations he supervised the DGCIM facility in Boleita. Committed serious human rights violations, particularly in Boleita, including torture, excessive use of force and the ill-treatment of detainees. Linked to the death of Captain Acosta. Listed On: 27/09/2019 Last Updated: 04/08/2020 Group ID: 13797 SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands 26. Names (Last): Ornelas Ferreira (1): Jose (2): Adelino (3): n/a (4): n/a (5): n/a Title: n/a Position: Secretary-General of the National Defence Council since 26 July 2019 A.K.A: (1) Ornellas Ferreira Jose Adelino, (2) Ornella Ferreira Jose Adelino Date of Birth: 14/12/1964 Place of Birth: Caracas, Distrito Capital Nationality: n/a Passport Details: n/a Address: n/a Other Information Gender: male. Former commander of the National Capital Integral Strategic Defence Region (REDI Capital). Former Chief of Staff and former Second-in-Command of the Operational and Strategic Command of the Bolivarian National Armed Forces of Venezuela (CEOFANB). Has supported and facilitated actions and policies of the Government of Venezuela. Responsible for obstructing the provision of humanitarian aid and the use of excessive force by officials. Listed On: 30/06/2020 Last Updated: 04/08/2020 Group ID: 13841