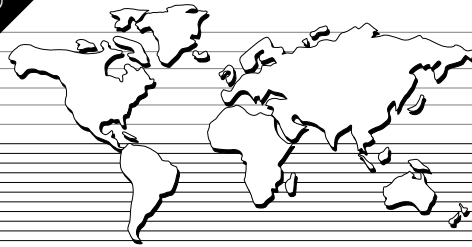




U.S. Department of the Treasury  
Office of Foreign Assets Control



# NARCOTICS

## What You Need To Know About U.S. Sanctions Against Drug Traffickers

### An overview of the Foreign Narcotics Kingpin Designation Act (21 U.S.C. §1901-1908, 8 U.S.C. §1182) and Executive Order 12978 of October 21, 1995

#### FOREIGN NARCOTICS KINGPIN DESIGNATION ACT

On December 3, 1999, the President signed into law the Foreign Narcotics Kingpin Designation Act (the "Kingpin Act"), 21 U.S.C. § 1901-1908, 8 U.S.C. § 1182. The related regulations are styled the "Foreign Narcotics Kingpin Sanctions Regulations" (31 C.F.R. Part 598).

The Kingpin Act blocks all property and interests in property, subject to U.S. jurisdiction, owned or controlled by significant foreign narcotics traffickers as identified by the President. In addition, the Kingpin Act blocks the property and interests in property, subject to U.S. jurisdiction, of foreign persons designated by the Secretary of Treasury, in consultation with the Attorney General, the Director of Central Intelligence, the Director of the Federal Bureau of Investigation, the Administrator of the Drug Enforcement Administration, the Secretary of Defense, and the Secretary of State, who are found to be: (1) materially assisting in, or providing financial or technological support for or to, or providing goods or services in support of, the international narcotics trafficking activities of a person designated pursuant to the Kingpin Act; (2) owned, controlled, or directed by, or acting for or on behalf of, a person designated pursuant to the Kingpin Act; or (3) playing a significant role in international narcotics trafficking.

Significant foreign narcotics traffickers and foreign persons designated by the Secretary of the Treasury are referred to collectively as Specially Designated Narcotics Traffickers. Foreign persons designated under the Kingpin Act are referred to as "[SDNTK]s" on OFAC's listing of "Specially Designated Nationals and Blocked Persons" to differentiate them from the Specially Designated Narcotics Traffickers named under Executive Order 12978 (see below).

U.S. persons are prohibited from engaging in any transaction or dealing in property or interests in property of [SDNTK]s and from engaging in any transaction that evades or avoids the prohibitions of the Kingpin Act. These prohibitions affect trade transactions as well as accounts, securities, and other assets.

Corporate criminal penalties for violations of the Foreign Narcotics Kingpin Designation Act range up to \$10,000,000; individual penalties range up to \$5,000,000 and 30 years in prison. Civil penalties of up to \$1,000,000 may also be imposed administratively.

On June 1, 2000, the President identified the following twelve foreign persons as significant foreign narcotics traffickers under the Kingpin Act:

- (1) AMEZCUA-CONTRERAS, Jose de Jesus
- (2) AMEZCUA-CONTRERAS, Luis Ignacio
- (3) ARELLANO-FELIX, Benjamin Alberto

- (4) ARELLANO-FELIX, Ramon Eduardo
- (5) CARO-QUINTERO, Rafael
- (6) CARRILLO-FUENTES, Vicente
- (7) CHANG Chi Fu
- (8) HEATH, Noel Timothy
- (9) MATTHEWS, Glenroy Vingrove
- (10) OGUNGBUYI, Abeni O.
- (11) OGUNGBUYI, Oluwole A.
- (12) WEI Hsueh Kang

On June 1, 2001, more names were added:

- (13) ALVAREZTOSTADO, Jose
- (14) AFGHAN, Sher
- (15) CARDENAS GUILLEN, Osiel
- (16) CARO QUINTERO, Miguel Angel
- (17) CHANG, Ping Yun
- (18) GILBOA, Joseph
- (19) GUZMANLOERA, Joaquin
- (20) HAMIEH, Jamiel
- (21) HIGUERA GUERRERO, Ismael
- (22) KHAN, Nasir Ali
- (23) MALHERBE DE LEON, Oscar
- (24) RAMON MAGANA, Alcides

On May 31, 2002, the President identified the following seven foreign persons as significant foreign narcotics traffickers under the Kingpin Act:

- (25) DA COSTA, Luis Fernando
- (26) GONZALEZ QUIRARTE, Eduardo
- (27) IBRAHIM, Haji
- (28) KNOWLES, Samuel
- (29) TUITO, Oded
- (30) VILLANUEVA MADRID, Mario Ernesto
- (31) ZAMBADA GARCIA, Ismael

Effective 12:01am Eastern Daylight Time on June 2, 2003, the President identified the following seven foreign persons as significant foreign narcotics traffickers under the Kingpin Act:

- (32) DIAS DEMENDONCA, Leonardo
- (33) ESPARRAGOZA MORENO, Juan Jose
- (34) PALMA SALAZAR, Hector Luis

- (35) QUINTERO MERAZ, Jose Albino
- (36) REVOLUTIONARY ARMED FORCES OF COLOMBIA
- (37) UNITED SELF-DEFENSE FORCES OF COLOMBIA
- (38) UNITED WA STATE ARMY

On June 1, 2004, the President identified the following ten foreign persons as significant foreign narcotics traffickers under the Kingpin Act:

- (39) ARELLANO FELIX ORGANIZATION
- (40) ARELLANO FELIX, Eduardo Ramon
- (41) ARELLANO FELIX, Francisco Javier
- (42) CARRILLO FUENTES ORGANIZATION
- (43) VALENCIA CORNELIO, Armando
- (44) NEMBHARD, Norris
- (45) RAMCHARAN, Leebert
- (46) ZEVALLOS GONZALES, Fernando Melciades
- (47) MIRCHI, Iqbal
- (48) NOORZAI, Haji Bashir

On January 31, 2002, OFAC identified the following 26 foreign entities and foreign individuals as derivative designations of significant foreign narcotics traffickers named under the Kingpin Act:

**Entities:**

- (1) ACCESOS ELECTRONICOS, S.A. de C.V.
- (2) ADMINISTRADORA DE INMUEBLES VIDA, S.A. de C.V.
- (3) ADP, S.C.
- (4) COMPLEJO TURISTICO OASIS, S.A. de C.V.
- (5) DISTRIBUIDORA IMPERIAL DE BAJA CALIFORNIA, S.A. de C.V.
- (6) FARMACIA VIDA SUPREMA, S.A. de C.V.
- (7) FORPRES, S.C.
- (8) FREIGHT MOVERS INTERNATIONAL [Office in St Kitts & Nevis ONLY]
- (9) GEX EXPLORE, S. de R.L. de C.V.
- (10) OPERADORA VALPARK, S.A. de C.V.
- (11) VALPARK, S.A. de C.V.

**Individuals:**

- (12) AGUILAR AMAO, Miguel
- (13) AGUIRRE GALINDO, Manuel
- (14) ALBA CERDA, Salvador
- (15) ARELLANO FELIX, Enedina
- (16) FREGOSO AMEZQUITA, Maria Antonieta
- (17) GALINDOLEYVA, Esperanza
- (18) GIL GARCIA, Jose Alejandro
- (19) HERNANDEZ PULIDO, Maria Elda
- (20) MATTHEW, Karen
- (21) MIJARES TRANCOSO, Gilberto
- (22) MORENO MEDINA, Luis Ignacio
- (23) OROPEZA MEDRANO, Francisco Javier
- (24) OROZCO CARDENAS, Adrian
- (25) RAMIREZ AGUIRRE, Sergio Humberto
- (26) TOLEDO CARREJO, Luis Raul

**For additional identifying information and separate entries for each of the aliases of all of the foreign persons named under the Kingpin Act see OFAC's SDN list. The entries are styled "[SDNTK]."**

## EXECUTIVE ORDER 12978 OF OCTOBER 21, 1995

On October 21, 1995, President Clinton signed Executive Order 12978 entitled "Blocking Assets and Prohibiting Transactions with Significant Narcotics Traffickers" (the "Order"), which imposes sanctions with

respect to narcotics traffickers centered in Colombia. Executive Order 12978 has been implemented by the "Narcotics Trafficking Sanctions Regulations" at 31 CFR Part 536.

The Order blocks all property subject to U.S. jurisdiction in which there is any interest of four principal figures in the Cali drug cartel who are listed in the annex to the Order. Those four individuals are named as "Principal Individuals" below. In addition, the Order blocks the property and interests in property of foreign persons determined by the Secretary of the Treasury, in consultation with the Attorney General and the Secretary of State, (a) to play a significant role in international narcotics trafficking centered in Colombia, or (b) to materially assist in or provide financial or technological support for, or goods or services in support of, the narcotics trafficking activities of persons designated in or pursuant to the Order. In addition, the Order blocks all property and interests in property subject to U.S. jurisdiction of persons determined by the Secretary of the Treasury, in consultation with the Attorney General and the Secretary of State, to be owned or controlled by, or to act for or on behalf of, persons designated in or pursuant to the Order (collectively "Specially Designated Narcotics Traffickers"). Those designated are referred to as "[SDNT]s" on OFAC's listing of "Specially Designated Nationals and Blocked Persons" to differentiate them from the Specially Designated Narcotics Traffickers named under the Kingpin Act. Listed below are additional foreign entities and individuals designated by the Office of Foreign Assets Control as [SDNT]s pursuant to the Order.

The Order further prohibits any transaction or dealing by a United States person or within the United States in property or interests in property of [SDNT]s, and any transaction that evades or avoids, has the purpose of evading or avoiding, or attempts to violate, the prohibitions contained in the Order. This obviously impacts trade transactions (involving, for example, letters of credit) as well as accounts and other assets. Designations of persons blocked pursuant to the Order are effective upon the date of determination by the Director of the Office of Foreign Assets Control, acting under authority delegated by the Secretary of the Treasury. Public notice of blocking is effective upon the date of filing with the *Federal Register*, or upon prior actual notice.

Corporate criminal penalties for violations of the International Emergency Economic Powers Act range up to \$500,000; individual penalties range up to \$250,000 and 10 years in jail. Civil penalties of up to \$11,000 may also be imposed administratively.

The following are "Principal Individuals" under the Specially Designated Narcotics Traffickers program. Individual "a.k.a.s." where considered "strong," have been listed here as separate entries:

GOMEZ BUSTAMANTE, Luis Hernando, Km 7 Via Cartago-Obando, Hacienda El Vergel, Cartago, Colombia; Km 12 Via Santa Ana Molina, Hacienda Doima, Cartago, Colombia; c/o AGRICOLA DOIMA DEL NORTE DEL VALLE LTDA., Cartago, Valle, Colombia; c/o GANADERIA EL VERGEL LTDA., Cartago, Valle, Colombia; c/o GANADERIAS BILBAO LTDA., Cartago, Valle, Colombia; c/o INMOBILIARIA EL ESCORIAL LTDA., Cartago, Valle, Colombia; c/o INMOBILIARIA LINARES LTDA., Cartago, Valle, Colombia; c/o INMOBILIARIA PASADENALTD., Cartago, Valle, Colombia; c/o ORGANIZACION LUIS HERNANDO GOMEZ BUSTAMANTE Y CIA. S.C.S., Cartago, Valle, Colombia; c/o VISCAYA LTDA., Cartago, Valle, Colombia; DOB 14 Mar 1958; POB El Aguila, Valle, Colombia; Passport 16209410 (Colombia); Cedula No. 16209410 (Colombia) (individual)

HENAO MONTROYA, Arcangel de Jesus, Hacienda Coque, Cartago, Colombia; Carrera 4 No. 16-04 apt. 303, Cartago, Colombia; Carrera 8N No. 17A-12, Cartago, Colombia; Carrera 42 No. 5B-81, Cali, Colombia; c/o AGRICOLA GANADERA HENAO GONZALEZ Y CIA. S.C.S., Cartago, Colombia; c/o AGROPECUARIA MIRALINDO S.A., Cartago, Colombia; c/o ARIZONA S.A., Cartago, Colombia; c/o COMPANIA AGROINVERSORA HENAGRO LTDA., Cartago, Colombia; c/o DESARROLLOS COMERCIALES E INDUSTRIALES HENAO GONZALEZ Y CIA. S.C.S., Cartago, Colombia; c/o MAQUINARIA TECNICA Y TIERRAS LTDA., Cartago, Colombia; c/o ORGANIZACION EMPRESARIAL ADE HENAO E HIJOS Y CIA. S.C.S., Cartago, Colombia; DOB 7 Oct 1954; POB Cartago, Valle, Colombia; Passport 16215230 (Colombia); NIT # 16215230-1 (Colombia); Cedula No. 16215230 (Colombia) (individual)

HERNANDEZ ZEA, Luis Antonio (a.k.a. "EL CAPITAN"), Carrera 53 No. 35-35, Bogota, Colombia; c/o INTERCONTINENTAL DE AVIACION S.A., Bogota, Colombia; c/o AEROVIA ATLANTICO LTDA. AEROA TLANTICO LTDA., Baranquilla, Colombia; c/o ASOCIACION TURISTICA INTERNACIONAL S.C.S., Bogota, Colombia; c/o CIA CONSTRUCTORA Y COMERCIALIZADORA DEL SUR LTDA., Bogota, Colombia; c/o GREEN ISLAND S.A., Bogota, Colombia; c/o INTERCONTINENTAL DE FINANCIACION AEREA S.A., Bogota, Colombia; c/o INVERSIONES Y COMERCIALIZADORA INCOMLTDA., Cali, Colombia; c/o LARGO LEASING LTD., George Town, Cayman Islands; c/o TRANS PACIFIC WORLD LEASING LIMITED, Port Vila, Vanuatu; DOB 7 May 1960; POB Bogota, Colombia; Cedula No. 79252957 (Colombia); Passport P006320 (Colombia); alt. Passport PEO22166 (Colombia) (individual) [SDNT]

HERRERA BUITRAGO, Helmer (a.k.a. "Pacho"; a.k.a. "H7"), Cali, Colombia; DOB 24 Aug 1951; alt. DOB 5 Jul 1951; Passport J287011 (Colombia); Cedula No. 16247821 (Colombia) (individual)

MONTOYA SANCHEZ, Diego Leon, Diagonal 27 No. 27-104, Cali, Colombia; c/o INVERSIONES LA QUINTA Y CIA. LTDA., Cali, Colombia; c/o LADRILLERA LA CANDELARIA LTDA., Cali, Colombia; c/o MONTOYA LUNA E HIJOS Y CIA. S.C.S., Cali, Colombia; DOB 11 Jan 1958; POB Trujillo, Valle, Colombia; Passport 16348515 (Colombia); Cedula No. 16348515 (Colombia) (individual)

NASSER DAVID, Julio Cesar (a.k.a. "Jaime Perez Pena"), Calle 74 No. 53-30, Barranquilla, Colombia; Carrera 38B No. 76-40, Barranquilla, Colombia; c/o AGRICOLA SONGO LTDA., Barranquilla, Colombia; c/o DESARROLLOS URBANOS "DESARROLLAR" LTDA., Barranquilla, Colombia; c/o EDIFICACIONES DEL CARIBE LTDA., Barranquilla, Colombia; c/o GRAN COMPANIA DE HOTELES LTDA., Barranquilla, Colombia; c/o HOTELES E INMUEBLES DE COLOMBIA LTDA., Barranquilla, Colombia; c/o INMOBILIARIA DEL CARIBE LTDA., Barranquilla, Colombia; c/o INMOBILIARIA HOTELERA DEL CARIBE LTDA., Barranquilla, Colombia; c/o INVERSIONES HOTELERAS DEL LITORAL LTDA., Barranquilla, Colombia; c/o INVERSIONES PRADO TRADE CENTER LTDA., Barranquilla, Colombia; c/o NEGOCIOS Y PROPIEDADES DEL CARIBE LTDA., Barranquilla, Colombia; c/o PROMOCIONES Y CONSTRUCCIONES DEL CARIBE LTDA., Barranquilla, Colombia; c/o PROMOCIONES Y CONSTRUCCIONES DEL CARIBE LTDA. Y CIA. S.C.A., Barranquilla, Colombia; c/o PROMOTORA HOTEL BARRANQUILLA LTDA., Barranquilla, Colombia; c/o SURAMERICANA DE HOTELES LTDA., Barranquilla, Colombia; DOB 1 Nov 1940; alt. DOB 1 Oct 1940; Passport H130865 (Colombia); Cedula No. 3710619 (Colombia) (individual)

PATINO FOMEQUE, Victor Hugo (a.k.a. PATINO FOMEQUE, Victor Julio), Avenida 4N No. 10N-100, Cali, Colombia; c/o INDUSTRIA DE PESCA SOBRE EL PACIFICO S.A., Buenaventura, Colombia; c/o TAURA S.A., Cali, Colombia; c/o GALAPAGOS S.A., Cali, Colombia; DOB 31 Jan 1959; Cedula No. 16473543 (Colombia) (individual)

PATINO FOMEQUE, Victor Julio (a.k.a. PATINO FOMEQUE, Victor Hugo), Avenida 4N No. 10N-100, Cali, Colombia; c/o INDUSTRIA DE PESCA SOBRE EL PACIFICO S.A., Buenaventura, Colombia; c/o TAURA S.A., Cali, Colombia; c/o GALAPAGOS S.A., Cali, Colombia; DOB 31 Jan 1959; Cedula No. 16473543 (Colombia) (individual)

PUERTA PARRA, Gabriel (a.k.a. "DOCTOR PUERTA"), Carrera 30 No. 90-82, Bogota, Colombia; c/o INTERCONTINENTAL DE AVIACION, S.A.; c/o COMERCIALIZADORA ANDINA BRASILEIRA S.A., Bogota, Colombia; c/o INDUSTRIAL MINERA Y PECUARIA S.A., Bogota, Colombia; c/o LA FRONTERA UNION GALVEZ Y CIA S EN C, Bogota, Colombia; DOB 1 Oct 1942; POB San Carlos, Antioquia, Colombia; Cedula No. 8238830 (Colombia); Passport P020046 (Colombia) (individual) [SDNT]

RAMIREZ ABADIA, Juan Carlos, Calle 6A No. 34-65, Cali, Colombia; DOB 16 Feb 1963; Passport AD127327 (Colombia); Cedula 16684736 (Colombia) (individual)

RODRIGUEZ OREJUELA, Gilberto Jose (a.k.a. "Lucas;" a.k.a. "The Chess Player"), Cali, Colombia; DOB 31 Jan 1939; Passports 6067015 (Colombia), T321642 (Colombia), 77588 (Argentina), 10545599 (Venezuela); Cedula No. 6067015; alt. Cedula No. 6068015 (Colombia) (individual) [SDNT]

RODRIGUEZ OREJUELA, Miguel Angel (a.k.a. "El Senor"; a.k.a. "Patricia"; a.k.a. "Patricio"; a.k.a. "Patty"; a.k.a. "Pat"; a.k.a. "Manuel"; a.k.a. "Manolo"; a.k.a. "Mike"; a.k.a. "Mauro"; a.k.a. "Doctor M.R.O."), Casa No. 19, Avenid Lago, Ciudad Jardin, Cali, Colombia; DOB 23 Nov 1943; alt. DOB 15 Aug 1943; Cedula No. 6095803 (Colombia) (individual)

SANTACRUZ LONDONO, Jose (a.k.a. "Chepe"; a.k.a. "Don Chepe"; a.k.a. "El Gordo Chepe"; a.k.a. "07"), Cali, Colombia; DOB 1 Oct 1943; Passport AB149814 (Colombia); Cedula No. 14432230 (Colombia) (individual)

URDINOLA GRAJALES, Ivan (a.k.a. URDINOLA GRAJALES, Jairo Ivan), Calle 52 No. 28E-30, Cali, Colombia; Hacienda La Lorena, Zarzal, Valle del Cauca, Colombia; c/o AGROINVERSORA URDINOLA HENAO Y CIA. S.C.S., Cali, Colombia; c/o CONSTRUCTORA UNIVERSAL LTDA., Cali, Colombia; c/o EXPLOTACIONES AGRICOLAS Y GANADERAS LA LORENA S.C.S., Cali, Colombia; c/o INDUSTRIAS AGROPECUARIAS DEL VALLE LTDA., Cali, Colombia; c/o INVERSIONES EL EDEN S.C.S., Cali, Colombia; DOB 1 Dec 1960; Passport AD129003 (Colombia); Cedula No. 94190353 (Colombia) (individual)

URDINOLA GRAJALES, Jairo Ivan (a.k.a. URDINOLA GRAJALES, Ivan), Calle 52 No. 28E-30, Cali, Colombia; Hacienda La Lorena, Zarzal, Valle del Cauca, Colombia; c/o AGROINVERSORA URDINOLA HENAO Y CIA. S.C.S., Cali, Colombia; c/o CONSTRUCTORA UNIVERSAL LTDA., Cali, Colombia; c/o EXPLOTACIONES AGRICOLAS Y GANADERAS LA LORENA S.C.S., Cali, Colombia; c/o INDUSTRIAS AGROPECUARIAS DEL VALLE LTDA., Cali, Colombia; c/o INVERSIONES EL EDEN S.C.S., Cali, Colombia; DOB 1 Dec 1960; Passport AD129003 (Colombia); Cedula No. 94190353 (Colombia) (individual)

URDINOLA GRAJALES, Julio Fabio, Carrera 40 No. 5A-40, Cali, Colombia; c/o CONSTRUCTORA E INMOBILIARIA URVALLE CIA. LTDA., Cali, Colombia; Cedula No. 16801454 (Colombia) (individual)

VALENCIA TRUJILLO, Guillermo, Calle 93A No. 14-17 Ofc. 711, Bogota, Colombia; Calle 93N No. 14-20 Ofc. 601, Bogota, Colombia; Carrera 66 No. 7-31, Bogota, Colombia; Calle 67 Norte No. 8-85, Cali, Colombia; POB Cali, Valle, Colombia; Passport 14942909 (Colombia); Cedula No. 14942909 (Colombia) (individual)

VALENCIA TRUJILLO, Joaquin Mario, Carrera 122 No. 20-02, Cali, Colombia; Avenida 7 Norte No. 23N-81, Cali, Colombia; DOB 21 Aug 1957; POB Cali, Valle, Colombia; Driver License No. 76001000150900 (Colombia); Passports 16626888 (Colombia), AC030971 (Colombia); Cedula No. 16626888 (Colombia) (individual)

**For identifying information and separate entries for each of the aliases of all of the entities and other individuals named under this program, please see OFAC's SDN list. The entries are styled "[SDNT]."**

#### **A Bulletin from the Office of Foreign Assets Control - May 2, 2003**

All property and interests in property of TRANSPORTING, LLC, wherever located, have been blocked pending investigation pursuant to the Narcotics Trafficking Sanctions Regulations, 31 C.F.R. Part 536, and Section 203 of the International Emergency Economic Powers Act, as amended, 50 U.S.C. 1702. Although this entity is not now an SDNT, its name has been integrated into OFAC's SDN list with the descriptor "[BPI-SDNT]" to indicate that its property and interests in property are currently blocked:

TRANSPORTING, LLC, 6555 NW 36th Street, Suite 304, Virginia Gardens, Florida 33166-6975; 9443 Fontainebleau Boulevard, No. 114, Miami, Florida 33172; Business Registration Document # L00000012836 (Florida, U.S.A.); U.S. FEIN: 65-1048798 [BPI-SDNT]

#### **A Bulletin from the Office of Foreign Assets Control - May 8, 2003**

All property and interests in property of the following, wherever located, have been blocked pending investigation pursuant to the Narcotics Trafficking Sanctions Regulations, 31 C.F.R. Part 536, and Section 203 of the International Emergency Economic Powers Act, as amended, 50 U.S.C. 1702. Although they are not now SDNTs, their names have been integrated into OFAC's SDN list with the descriptor "[BPI-SDNT]" to indicate that their property and interests in property are currently blocked:

SEPULVEDA-IRAGORRI, INC., 4382 Fox Ridge Dr., Weston, Florida 33331, U.S.A.; Business Registration Document # P00000115667 (Florida, U.S.A.); U.S. FEIN: 65-1062397 [BPI-SDNT]

VIDAL CAGGIGAS, Rolando, 10720 NW 66th Street, No. 502, Miami, Florida 33178, U.S.A.; 9443 Fontainebleau Boulevard, No. 114, Miami, Florida 33172, U.S.A.; DOB 01 Aug 1961; Passport No. 16822748 (Colombia); Cedula No. 16822748 (Colombia) (individual) [BPI-SDNT]

**A Bulletin from the Office of Foreign Assets Control - June 1, 2004**

All property and interests in property that are owned or controlled by the following and that are in, or come within, the United States or that are in, or come within, the possession or control of any U.S. person, including a foreign branch, have been blocked pending further investigation pursuant to the Foreign Narcotics Kingpin Sanctions Regulations, 31 C.F.R. Part 598, and the Foreign Narcotics Kingpin Designation Act, Pub.L. 106-120, title 8, 113 Stat. 1606, 1626-1636 (codified at 21 U.S.C. 1901-1908, 8 U.S.C. 1182(a)(2)(C)). Although they are not now SDNTKs, their names have been integrated into OFAC's SDN list with the descriptor "[BPI-SDNTK]" to indicate that their property and interests in property are currently blocked:

AERO CONTINENT S.A. (a.k.a. AERO CONTINENTE S.A.), Jr. Francisco Bolognesi 125, Piso 16, Miraflores, Lima 18, Peru; Av. Grau 602 D, Barranco, Lima, Peru; Plaza Camacho TDA 3-C, Camacho, Lima, Peru; Av. Antunez de Mayolo 889, Los Olivos, Lima, Peru; Av. Pardo 605, Miraflores I-Pardo, Lima, Peru; Av. Camino Real 441, San Isidro, Lima, Peru; Av. Arequipa 326, Santa Beatriz, Lima, Peru; Av. Benavides 4581, Surco I, Lima, Peru; Av. Saenz Pena 184, Callao, Lima, Peru; Jr. Rufino Torrico 981, Lima, Peru; Av. Enrique Llosa 395-A, Magdalena, Lima, Peru; Av. Larco 123-2 Do Piso, Miraflores II-Larco, Lima, Peru; Av. Peru 3464, San Martin de Porres, Lima, Peru; C.C. San Miguel Shopping Center, TDA. 50 - Av. La Mar 2291, San Miguel, Lima, Peru; Av. La Encalada 1587, (C.C. El Polo Block A Oficina 213), Surco II-C.C. El Polo, Lima, Peru; Av. Jose Pardo 601, Miraflores, Lima, Peru; Av. Benavides 4581, Surco I, Lima, Peru; Av. Peru 3421, San Martin, Lima, Peru; Av. Grau 624, Barranco, Lima, Peru; Av. La Marina 2095, San Miguel, Lima, Peru; Sta Catalina 105 A-8, Arequipa, Peru; Jr. 9 de Diciembre 160, Ayacucho, Peru; Jr. 2 de Mayo 381, Cajamarca, Peru; Calle San Jose 867-879, Chiclayo, Peru; Portal de Carnes 254, Cusco, Peru; Jr. Prospero 232, Iquitos, Peru; Calle San Roman 175, Juliaca, Peru; Jr. Libertad 945-951, Piura, Peru; Leon Velarde 584, Puerto Maldonado, Peru; Jr. 7 de Junio 861, Pucallpa, Peru; Alonso de Alvarado 726, Rioja, Peru; Calle Apurimac 265, Tacna, Peru; Jr. Moyobamba 101, Tarapoto, Peru; Jr. Pizarro 470, Trujillo, Peru; Av. Tumbes 217, Tumbes, Peru; Jr. Libertad 139, Yurimaguas, Peru; 8940 N.W. 24 Terrace, Miami, FL 33172; Thames 2406 (CP 1425) C.F., Buenos Aires, Argentina; Calle 90 No. 11A-41 Piso 5, Edif. Nipon Center-Bogota, Bogota, Colombia; Av. Amazonas No. 22-11B Y Veintimilla-Quito, Quito, Ecuador; Av. 11 De Septiembre No. 2155, Torre B Oficina 1204, Santiago, Chile; Boyaca 1012 Y P. Icaza, Guayaquil, Ecuador; Av. 27 De Febrero No. 102, Edif Miguel Mejia Urr. El Vergel, Santo Domingo, Dominican Republic; Av. San Felipe, Torre Center Coinasa, Piso 2 Oficina 22-A La Castellana, Caracas, Venezuela; Dreieich, Germany; Cordoba, Argentina; Victoria, Australia; Ontario, Canada; Madrid, Spain; Paris, France; Heemstede, Holland; Kfar Saba, Israel; Milan, Italy; Tokyo, Japan; Mexico City, Mexico; Auckland, New Zealand; Lisbon, Portugal; London, United Kingdom; Taipei, Taiwan; RUC # 20108363101 (Peru); NIT # 8300720300 (Colombia); Business Registration Document # F01000003035 (Florida, U.S.A.); US FEIN: 55-2197267 [BPI-SDNTK]

AERO CONTINENTE (USA) INC. (a.k.a. AERO CONTINENTE, INC.), 2858 NW 79 Avenue, Miami, Florida 33122; Business Registration Document # P94000013372 (Florida, U.S.A.); US FEIN: 65-0467983 [BPI-SDNTK]

AERO CONTINENTE, INC. (a.k.a. AERO CONTINENTE (USA) INC.), 2858 NW 79 Avenue, Miami, Florida 33122; Business Registration Document # P94000013372 (Florida, U.S.A.); US FEIN: 65-0467983 [BPI-SDNTK]

AERO CONTINENTE S.A. (a.k.a. AERO CONTINENT S.A.), Jr. Francisco Bolognesi 125, Piso 16, Miraflores, Lima 18, Peru; Av. Grau 602 D, Barranco, Lima, Peru; Plaza Camacho TDA 3-C, Camacho, Lima, Peru; Av. Antunez de Mayolo 889, Los Olivos, Lima, Peru; Av. Pardo 605, Miraflores I-Pardo, Lima, Peru; Av. Camino Real 441, San Isidro, Lima, Peru; Av. Arequipa 326, Santa Beatriz, Lima, Peru; Av. Benavides 4581, Surco I, Lima, Peru; Av. Saenz Pena 184, Callao, Lima, Peru; Jr. Rufino Torrico 981, Lima, Peru; Av. Enrique Llosa 395-A, Magdalena, Lima, Peru; Av. Larco 123-2 Do Piso, Miraflores II-Larco, Lima, Peru; Av. Peru 3464, San Martin de Porres, Lima, Peru; C.C. San Miguel Shopping Center, TDA. 50 - Av. La Mar 2291, San Miguel, Lima, Peru; Av. La Encalada 1587, (C.C. El Polo Block A Oficina 213), Surco II-C.C. El Polo, Lima, Peru; Av. Jose Pardo 601, Miraflores, Lima, Peru; Av. Benavides 4581, Surco I, Lima, Peru; Av. Peru 3421, San Martin, Lima, Peru; Av. Grau 624, Barranco, Lima, Peru; Av. La Marina 2095, San Miguel, Lima, Peru; Sta Catalina 105 A-8, Arequipa, Peru; Jr. 9 de Diciembre 160, Ayacucho, Peru; Jr. 2 de Mayo 381, Cajamarca, Peru; Calle San Jose 867-879, Chiclayo, Peru; Portal de Carnes 254, Cusco, Peru; Jr. Prospero 232, Iquitos, Peru; Calle San Roman 175, Juliaca, Peru; Jr. Libertad 945-951, Piura, Peru; Leon Velarde 584, Puerto Maldonado, Peru; Jr. 7 de Junio 861, Pucallpa, Peru; Alonso de Alvarado 726, Rioja, Peru; Calle Apurimac 265, Tacna, Peru; Jr. Moyobamba 101, Tarapoto, Peru; Jr. Pizarro 470, Trujillo, Peru; Av. Tumbes 217, Tumbes, Peru; Jr. Libertad 139, Yurimaguas, Peru; 8940 N.W. 24 Terrace, Miami, FL 33172; Thames 2406 (CP 1425) C.F., Buenos Aires, Argentina; Calle 90 No. 11A-41 Piso 5, Edif. Nipon Center-Bogota, Bogota, Colombia; Av. Amazonas No. 22-11B Y Veintimilla-Quito, Quito, Ecuador; Av. 11 De Septiembre No. 2155, Torre B Oficina 1204, Santiago, Chile; Boyaca 1012 Y P. Icaza, Guayaquil, Ecuador; Av. 27 De Febrero No. 102, Edif Miguel Mejia Urr. El Vergel, Santo Domingo, Dominican Republic; Av. San Felipe, Torre Center Coinasa, Piso 2 Oficina 22-A La Castellana, Caracas, Venezuela; Dreieich, Germany; Cordoba, Argentina; Victoria, Australia; Ontario, Canada; Madrid, Spain; Paris, France; Heemstede, Holland; Kfar Saba, Israel; Milan, Italy; Tokyo, Japan; Mexico City, Mexico; Auckland, New Zealand; Lisbon, Portugal; London, United Kingdom; Taipei, Taiwan; RUC # 20108363101 (Peru); NIT # 8300720300 (Colombia); Business Registration Document # F01000003035 (Florida, U.S.A.); US FEIN: 55-2197267 [BPI-SDNTK]

AVIANDINA S.A.C., Lima, Peru; RUC # 20423916541 (Peru) [BPI-SDNTK]

CARGO AIRCRAFT LEASING CORP., 2310 NW 55TH Court, Suite 120, Ft. Lauderdale, Florida 33309; Business Registration Document # 93000004034 (Florida, U.S.A.); US FEIN: 65-0389435 [BPI-SDNTK]

DESME HURTADO, Maximo Zadi (a.k.a. DESME, Zadi), c/o AVIANDINA S.A.C.; c/o SISTEMA DE DISTRIBUCION MUNDIAL S.A.C.; DOB 21 Aug 1958; LE 06367724 (Peru) (individual) [BPI-SDNTK]

DESME, Zadi (a.k.a. DESME HURTADO, Maximo Zadi), c/o AVIANDINA S.A.C.; c/o SISTEMA DE DISTRIBUCION MUNDIAL S.A.C.; DOB 21 Aug 1958; LE 06367724 (Peru) (individual) [BPI-SDNTK]

IAC INTERNATIONAL INC. (a.k.a. IAC INTERNATIONAL INC.; a.k.a. INTERNATIONAL AIRLINE CONSULTING), 8940 NW 24 TERRACE, Miami, Florida 33122; Business Registration Document # P9800004558 (Florida, U.S.A.); US FEIN: 65-0842701 [BPI-SDNTK]

IAC INTERNATIONAL INC. (a.k.a. IAC INTERNATIONAL INC.; a.k.a. INTERNATIONAL AIRLINE CONSULTING), 8940 NW 24 TERRACE, Miami, Florida 33122; Business Registration Document # P9800004558 (Florida, U.S.A.); US FEIN: 65-0842701 [BPI-SDNTK]

INTERNATIONAL AIRLINE CONSULTING (a.k.a. IAC INTERNATIONAL INC.; a.k.a. IAC INTERNATIONAL INC.), 8940 NW 24 TERRACE, Miami, Florida 33122; Business Registration Document # P9800004558 (Florida, U.S.A.); US FEIN: 65-0842701 [BPI-SDNTK]

INTERNATIONAL PACIFIC TRADING, INC., 2858 NW 79 Avenue, Miami, Florida 33122; Business Registration Document # V16155 (Florida, U.S.A.); US FEIN: 65-0315268 [BPI-SDNTK]

MEJIA MAGNANI, Jhon (a.k.a. MEJIA MAGNANI, John Yvan; a.k.a. MEJIA MAGNANI, John Ivan), c/o AERO CONTINENTE S.A., Lima, Peru; c/o SISTEMA DE DISTRIBUCION MUNDIAL S.A.C.; DOB 20 Apr 1966; LE 07541863 (Peru) (individual) [BPI-SDNTK]

MEJIA MAGNANI, John Ivan (a.k.a. MEJIA MAGNANI, Jhon; a.k.a. MEJIA MAGNANI, John Yvan), c/o AERO CONTINENTE S.A., Lima, Peru; c/o SISTEMA DE DISTRIBUCION MUNDIAL S.A.C.; DOB 20 Apr 1966; LE 07541863 (Peru) (individual) [BPI-SDNTK]

MEJIA MAGNANI, John Yvan (a.k.a. MEJIA MAGNANI, Jhon; a.k.a. MEJIA MAGNANI, John Ivan), c/o AERO CONTINENTE S.A., Lima, Peru; c/o SISTEMA DE DISTRIBUCION MUNDIAL S.A.C.; DOB 20 Apr 1966; LE 07541863 (Peru) (individual) [BPI-SDNTK]

MORALES ANDRADE, Carlos Enrique, c/o AERO CONTINENTE S.A., Lima, Peru; DOB 30 Aug 1954; LE 08779161 (Peru) (individual) [BPI-SDNTK]

SISTEMA DE DISTRIBUCION MUNDIAL, S.A.C. (a.k.a. WORLD DISTRIBUTION SYSTEM), Avenida Jose Pardo No. 601, Piso 11, Miraflores, Lima 18, Peru; RUC #20458382779 (Peru) [BPI-SDNTK]

WORLD DISTRIBUTION SYSTEM (a.k.a. SISTEMA DE DISTRIBUCION MUNDIAL, S.A.C.), Avenida Jose Pardo No. 601, Piso 11, Miraflores, Lima 18, Peru; RUC #20458382779 (Peru) [BPI-SDNTK]

ZEVALLOS GONZALES, Lupe Maritza, c/o AERO CONTINENTE S.A., Lima, Peru; DOB 17 Sept 1961; LE 07607833 (Peru) (individual) [BPI-SDNTK]

ZEVALLOS GONZALES, Milagros Angelina, c/o AERO CONTINENTE S.A., Lima, Peru; c/o SISTEMA DE DISTRIBUCION MUNDIAL S.A.C., Lima, Peru; DOB 12 Aug 1968; LE 07617157 (Peru) (individual) [BPI-SDNTK]

ZEVALLOS GONZALES, Ricardo (a.k.a. ZEVALLOS GONZALES, Winston Ricardo), c/o AERO CONTINENTE S.A., Lima, Peru; DOB 11 May 1959; SSN 592-29-5509; LE 07942932 (Peru) (individual) [BPI-SDNTK]

ZEVALLOS GONZALES, Winston Ricardo (a.k.a. ZEVALLOS GONZALES, Ricardo), c/o AERO CONTINENTE S.A., Lima, Peru; DOB 11 May 1959; SSN 592-29-5509; LE 07942932 (Peru) (individual) [BPI-SDNTK]

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This document is explanatory only and does not have the force of law. Executive Order 12978, and its implementing Narcotics Trafficking Sanctions Regulations (31 CFR Part 536), contain the legally binding provisions governing sanctions against narcotics traffickers centered in Colombia. The Foreign Narcotics Kingpin Designation Act contains the legally binding provisions governing the sanctions against significant foreign narcotics traffickers and their organizations. This document does not supplement or modify Executive Order 12978, 31 CFR Part 536, or the Foreign Narcotics Kingpin Designation Act.

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Washington, D.C. 20220  
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