

July 25, 2019  
Circular N° SBP-DPC-FACT-0073-2019

General Manager

Subject: List of Individuals and Entities  
added to the OFAC List.

Dear General Manager:

We refer to the press release issued today, July 25, 2019, by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) announcing the addition of the following persons and entities to the OFAC List:

- Alex Nain Saab Morán (Saab)
- Álvaro Enrique Pulido Vargas (Pulido) (previously known as German Enrique Rubio-Salas)
- Emmanuel Enrique Rubio Gonzalez (Rubio)
- Walter Jacob Gavidia Flores
- Yosser Daniel Gavidia Flores
- Yoswal Alexander Gavidia Flores
- José Gregorio Vielma Mora (Vielma Mora)
- Shadi Nain Saab Certain (Shadi)
- Isham Ali Saab Certain
- Mariana Andrea Staudinger Lemoine
- Asasi Food FZE
- Group Grand Limited
- Group Grand Limited, S.A. de C.V.
- Group Grand Limited General Trading
- Mulberry Proje Yatirim Anonim Sirketi (Mulberry)
- Seafire Foundation
- C I Fondo Global de Alimentos, LTDA
- Emmr & CIA. S.A.S.
- Global Structure, S.A.
- Multitex International Trading, S.A.
- Sun Properties LLC
- Clio Management Corp.
- Silver Bay Partners FZE (Silver)

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For further information on the details of the individuals and entities mentioned above (some of which are indicated as registered in Panama), please refer to OFAC's press release issued today, which may be accessed through:

<https://home.treasury.gov/news/press-releases/sm741>

In this regard, we encourage banks to make the relevant verifications and checks to verify whether any of the individuals and entities to which these persons are connected have contractual relationships with your bank.

In connection with the above, we request the General Manager provide the relevant instructions so that, any event, transaction or operation conducted in your bank on behalf of or in the name of any individual mentioned in the above list is analyzed and reported under the parameters and procedures established in Law 23 of 2015 and its regulations.

We would greatly appreciate your providing the pertinent instructions to your staff for compliance with this circular.

Best regards,

Ricardo G. Fernandez A.  
Superintendent of Banks

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