

17 January 2023

### **RUSSIAN SANCTIONS AND THEIR IMPACT ON INTERNET SERVICE PROVIDERS, APP STORES AND SOCIAL MEDIA**

On 23 December, RPC published this brief article which looks at the impact of UK sanctions.

<https://www.rpc.co.uk/snapshots/technology-digital/winter-2022/russian-sanctions-and-their-impact-on-internet-service-providers-app-stores-social-media/>

### **BETCONSTRUCT'S B2C ARM VIVARO LIMITED - TRADING AS VBET - TO PAY A £337,631 SETTLEMENT TO THE UK GAMBLING COMMISSION, DUE TO AML AND PLAYER PROTECTION FAILINGS**

On 17 January, iGB reported that BetConstruct's B2C sports betting and igaming arm Vivaro Limited - trading as Vbet - will pay a £337,631 (\$412,000/ €381,000) regulatory settlement to the Gambling Commission, due to AML and player protection failings.

<https://igamingbusiness.com/legal-compliance/gc-hits-vbet-with-340k-regulatory-settlement>

### **US: FORMER EXECUTIVES OF FOX SUBSIDIARY FACE TRIAL IN FIFA BRIBERY CASE**

On 15 January, the Wall Street Journal reported that 2 former executives of a 21<sup>st</sup> Century Fox subsidiary are set to go on trial over allegations that they bribed a FIFA official to secure broadcasting rights to soccer matches. They are accused of working with others to make millions of dollars in illicit payments and kickbacks between 2000 and 2015 to South American soccer officials in exchange for the broadcasting rights to the region's most popular club tournament, the Copa Libertadores, and other matches.

<https://www.wsj.com/articles/former-executives-of-fox-subsiary-face-trial-in-fifa-bribery-case-11673725292>

### **CANADA LOOKS POISED TO PASS LAW ON FORCED LABOUR**

On 16 January, the Wall Street Journal reported that Canada could require that companies report on their efforts to stop goods made with forced labour from entering their supply chains. The legislation would compel many companies to report on steps taken to prevent or reduce the use of forced labour in their supply chains by detailing, among other things, parts of the supply chains

where forced labour might be occurring and the company's due-diligence procedures. The Bill could become law as soon as March.

<https://www.wsj.com/articles/canada-looks-poised-to-pass-law-on-forced-labor-11673649127>

#### **UK: HOME SECRETARY ORDERS EXTRADITION OF ARMS DEALER SANJAY BHANDARI TO INDIA**

On 17 January, the Business Standard reported that the Home Secretary has ordered the extradition of Sanjay Bhandari, an accused middleman and consultant in arms deals, to India to face charges of tax evasion and money laundering. Bhandari now has 14 days until the end of this month to appeal against the order in the High Court in London.

[https://www.business-standard.com/article/current-affairs/uk-home-secy-orders-extradition-of-arms-dealer-sanjay-bhandari-to-india-123011700782\\_1.html](https://www.business-standard.com/article/current-affairs/uk-home-secy-orders-extradition-of-arms-dealer-sanjay-bhandari-to-india-123011700782_1.html)

#### **NIGERIAN PIRATES SWITCH TARGETS FROM SHIPS TO SHORE**

On 17 January, the Guardian carried an article saying that while attacks on commercial vessels have dropped thanks to more security around the country's coast small fishing communities are facing brutal assault. Artisanal fishing communities say they are now being targeted.

<https://www.theguardian.com/global-development/2023/jan/17/nigeria-pirates-switch-targets-from-ships-to-shore>

#### **HOW THE IMPOVERISHED FRENCH OVERSEAS TERRITORY OF GUIANA BECAME A 'NARCO HUB' FOR EUROPE**

On 16 January, The local reported that more than a sixth of the cocaine consumed in France is smuggled inside the bodies of drug mules from its poverty-stricken South American territory of Guiana. Geography and poverty have made French Guiana "a narco region and one of the main hubs" of the cocaine trade.

<https://www.thelocal.fr/20230116/how-the-impooverished-french-overseas-territory-of-guiana-became-a-narco-hub-for-europe/>

#### **ISLE OF MAN: ADDITIONAL IRAN AND ISIL/AL-QAIDA SANCTIONS CHANGES, PLUS HAITI SANCTIONS GUIDANCE**

On 17 January, 3 news release from the Isle of Man advised that the existing entry for Mohammad Jafar MONTAZERI had been amended, that Abdul Rehman MAKKI had been added to the Al-

Qaida/ISIL sanctions lists, and that the Treasury's Customs and Excise Division had issued guidance on the Haiti sanctions regime applicable to the Isle of Man.

<https://www.gov.im/news/2023/jan/17/financial-sanctions-iran-human-rights/>

<https://www.gov.im/news/2023/jan/17/financial-sanctions-isil-daesh-and-al-qaida/>

<https://www.gov.im/news/2023/jan/17/haiti-sanctions-guidance/>

#### **OFAC VENEZUELA SANCTIONS GENERAL LICENSE AND FAQ**

On 17 January, OFAC issued General License 5J Authorizing Certain Transactions Related to the Petróleos de Venezuela, S.A. 2020 8.5 Percent Bond on or After April 20, 2023; and amended FAQ 595.

[https://home.treasury.gov/system/files/126/venezuela\\_gl5j.pdf](https://home.treasury.gov/system/files/126/venezuela_gl5j.pdf)

<https://home.treasury.gov/policy-issues/financial-sanctions/faqs/595>

#### **US EXPORT CONTROLS OF CERTAIN ADVANCED COMPUTING AND SEMICONDUCTOR MANUFACTURING ITEMS EXTENDED TO MACAU**

On 17 January, KPMG reported that BIS of the Commerce Department had an updated Final Rule that concerns the Export Administration Regulations (EAR) implementing necessary controls on advanced computing integrated circuits, computer commodities that contain such integrated circuits, and certain semiconductor manufacturing items, by adding the same controls implemented with respect to China, to Macau. Comments on the Final Rule are invited by 31 January.

<https://home.kpmg/us/en/home/insights/2023/01/tnf-us-export-controls-advanced-computing-semiconductor-manufacturing-items-macau.html>

#### **OFAC ISSUES 3 RUSSIA SANCTIONS GENERAL LICENSES AND AMENDS 4 FAQ**

On 17 January, OFAC advised of new General Licenses 54A (Authorizing Certain Transactions Involving VEON Ltd. or VEON Holdings B.V. Prohibited by Executive Order 14071); 28B (Authorizing the Wind Down and Rejection of Certain Transactions Involving Public Joint Stock Company Transkapitalbank and Afghanistan); and 6C (Transactions Related to Agricultural Commodities, Medicine, Medical Devices, Replacement Parts and Components, or Software Updates, the Coronavirus Disease 2019 (COVID-19) Pandemic, or Clinical Trials); and 4 associated FAQ have been amended.

<https://home.treasury.gov/policy-issues/financial-sanctions/recent-actions/20230117>

#### **UK ADDS ABDUL REHMAN MAKKI TO ISIL/AL-QIADA SANCTIONS LISTS**

On 17 January, a Notice from HM Treasury advised that Abdul Rehman MAKKI had been added to the Consolidated List.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1129590/Notice\\_ISIL\\_Da\\_esh\\_and\\_Al-Qaida\\_170123.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1129590/Notice_ISIL_Da_esh_and_Al-Qaida_170123.pdf)

#### **NEXO SUES CAYMAN ISLANDS MONETARY AUTHORITY FOR BLOCKING ITS VASP LICENCE**

On 17 January, ZyCrypto reported that Nexo – facing an investigation over alleged money laundering and tax offences in Bulgaria, and having exited the US over “unclear regulations” - Nexo is suing Cayman Islands’ financial regulator for denying its registration as a virtual asset service provider in the territory. CIMA declined Nexo’s VASP application dated 20 December.

<https://zycrypto.com/embattled-nexo-sues-cayman-islands-monetary-authority-for-blocking-its-vasp-license/>

#### **ORAL ARGUMENT PREVIEW: UNITED STATES v TURKIYE HALK BANKASI SA**

On 17 January, Lawfare published another post about this hearing before the US Supreme Court and involving the Foreign Sovereign Immunities Act (FSIA). It examines the likely arguments.

<https://www.lawfareblog.com/oral-argument-preview-united-states-v-turkiye-halk-bankasi-sa-halkbank>

#### **FRAUD IS THE BIGGEST THREAT TO CARGO LOSSES**

On 17 January, an article from Global Trade Magazine says that criminal fraud in its many and various manifestations within the global supply chain is seen by international freight transport insurer TT Club as a primary and growing threat. It has many manifestations; from payment fraud that involves existing mandates and impersonation of executives to procurement fraud featuring false invoicing.

<https://www.globaltrademag.com/fraud-is-the-biggest-threat-to-cargo-losses/>