

9 March 2024

OFAC SANCTIONS COMPANIES AND INDIVIDUALS ADVANCING RUSSIAN MALIGN ACTIVITIES IN AFRICA

On 8 March, OFAC advised that it had sanctioned 2 companies - 1 in Russia and 1 in the Central African Republic (CAR) - for their efforts in advancing Russia's malign activities in CAR. The targets have played an important role enabling the Private Military Company 'Wagner' and, by extension, the activities of the Russian Federation. Those designated sought monetary gain from illicit natural resource extraction and provided material and financial support to the Wagner Group and other organisations associated with the enterprise of Yevgeniy Prigozhin, the former Wagner Group owner.

<https://home.treasury.gov/news/press-releases/jy2164>

<https://ofac.treasury.gov/recent-actions/20240308>

<https://stratnewsglobal.com/world-news/us-issues-sanctions-on-two-companies-over-links-to-wagner/>

SWITZERLAND DESIGNATES INDIVIDUALS & ENTITY ON MOLDOVA SANCTIONS LIST

On 8 March, the Global Sanctions blog reported that those designated are said to be responsible for actions aimed at destabilising, undermining or threatening the sovereignty and independence of Moldova. 5 existing listings were also amended.

<https://globalsanctions.co.uk/2024/03/switzerland-designates-individuals-entity-on-moldova-sanctions-list/>

OFAC PUBLISHES HUMANITARIAN GUIDANCE ON YEMEN SANCTIONS

On 8 March, the Global Sanctions blog reported the new guidance and FAQ.

<https://globalsanctions.co.uk/2024/03/ofac-publishes-humanitarian-guidance-re-yemen-sanctions/>

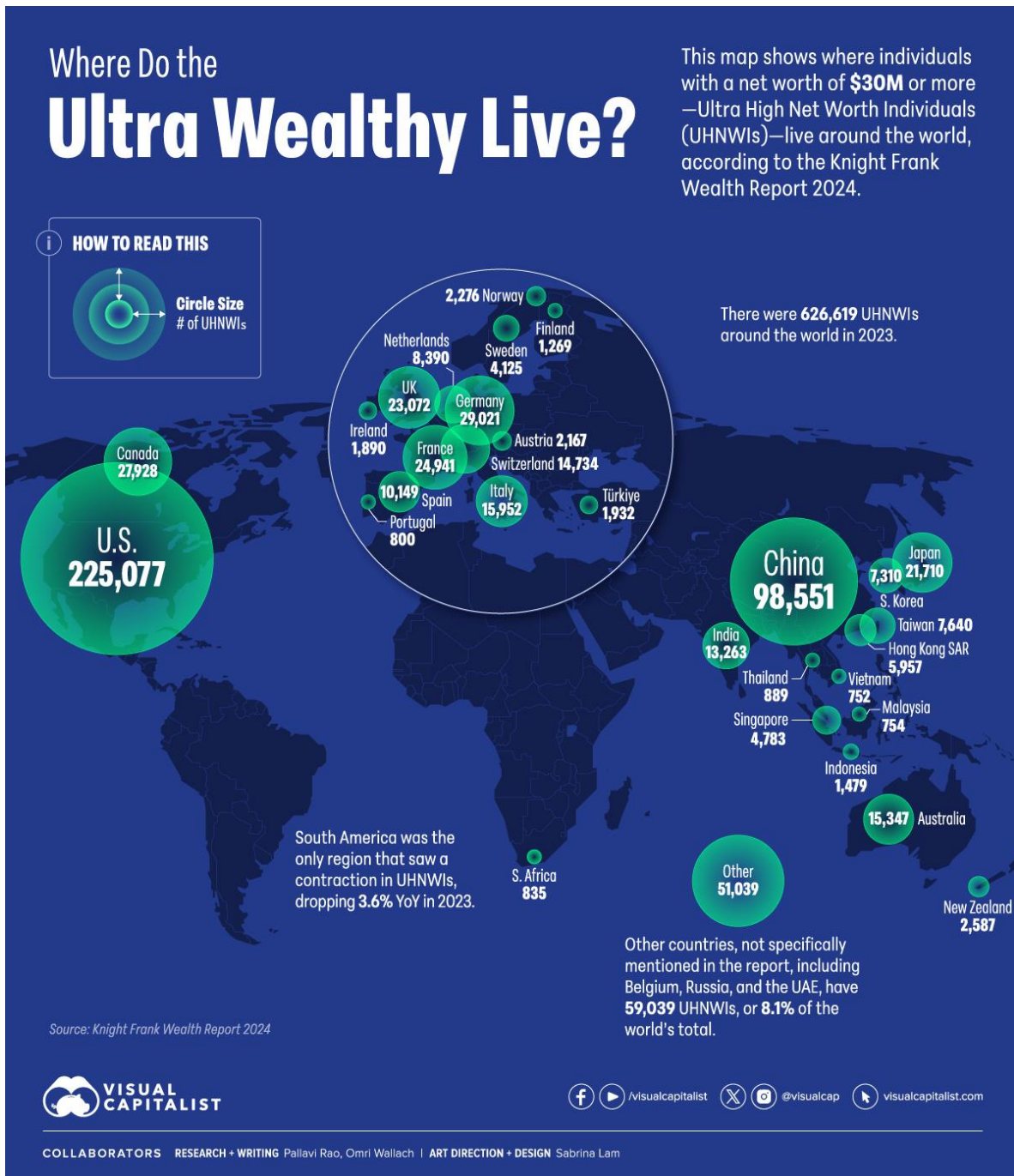
EXECUTIVE ORDER GRANTING AUTHORITIES TO REGULATE THE TRANSFER OF SENSITIVE US DATA TO COUNTRIES OF NATIONAL SECURITY CONCERN

On 8 March, a post from the program on Corporate Compliance & Enforcement at the New York University School of Law was concerned with Executive Order 14117, "Preventing Access to Americans' Bulk Sensitive Personal Data and United States Government-Related Data by Countries of Concern", issued in February.

https://wp.nyu.edu/compliance_enforcement/2024/03/08/president-biden-issues-executive-order-granting-authorities-to-regulate-the-transfer-of-sensitive-u-s-data-to-countries-of-national-security-concern/

<https://www.alstonprivacy.com/article-executive-order-to-limit-sales-of-americans-sensitive-data-to-adversarial-foreign-governments/>

<https://www.alstonprivacy.com/white-house-executive-order-to-regulate-transactions-involving-sensitive-personal-data-of-americans/>



https://www.visualcapitalist.com/where-wealthiest-people-live-2024/#google_vignette

ONCE AGAIN, CONCERNS ARISE ABOUT CHINA-PAKISTAN WMD NEXUS

On 8 March, The Diplomat reported that Indian customs officials reportedly intercepted a Malta-flagged merchant ship carrying an Italian-made computer numerical control machine (CNC) en route from China to Pakistan. The ship was stopped because it was suspected to be carrying a “dual-use consignment” that could find its way into Pakistan’s nuclear and ballistic missile program. Since 1986, CNC machines have been controlled under the Wassenaar Arrangement, a global export control regimes designed to stop proliferation of dual-use items.

<https://thediplomat.com/2024/03/nuclear-proliferation-surfaces-again-as-india-intercepts-pakistan-bound-dual-use-items/>

CALIFORNIA MAN CHARGED WITH SMUGGLING GREENHOUSE GASES HINTS AT THE REVIVAL OF A DECADES-LONG BLACK MARKET

On 9 March, Business Insider reported on a blooming black market in greenhouse gases, involving HFC commonly used in refrigerators and air conditioners, but also potent greenhouse gases. Their import is strictly regulated. An indictment alleges that the man bought the chemicals in Mexico, hid them in his truck under a tarp as he drove back to the US, posted them online and sold them for profit. In 2021, the EPA, Department of Homeland Security, Department of Defense, Department of Justice, and other US Government agencies created an interdepartmental task force aimed at stopping the illegal importation of HFC.

<https://www.businessinsider.com/greenhouse-gas-black-market-smuggling-hfc-arrests-crackdown-global-warming-2024-3>

RUSSIA’S AFRICA CORPS – MORE THAN OLD WINE IN A NEW BOTTLE

On 8 March, Defence Web reported that the Russian military company Wagner appears to have been renamed the Africa Corps by Moscow, and brought under the control of Russia’s Defence Ministry. It asks what does the government takeover of the company mean for security in Africa?

<https://www.defenceweb.co.za/security/national-security/russias-africa-corps-more-than-old-wine-in-a-new-bottle/>

STRATEGIC DE-RISKING BEYOND CHIPS

On 6 March, a report from ETH Zurich says that, as states seek to “de-risk” critical supply chains further, they face difficult challenges in identifying national security risks from emerging dual-use technologies and making trade-offs between economic and security considerations.



https://css.ethz.ch/en/publications/css-analyses-in-security-policy/details.html?id=/n/o/3/3/no_337_strategic_derisking_beyond_chipsn

FOLLOWING UK CRACKDOWN, SURGE IN ENGLISH LIMITED PARTNERSHIPS THAT ARE NOT SUBJECT TO NEW RULES

On 7 March, Private Eye reported that, in 2016, new laws required companies including LLP to publish their beneficial owners, or "persons of significant control" (PSC). This triggered a move to Scottish limited partnerships (SLP), which surged in popularity until the government extended the disclosure requirement to SLP a year later. This in turn triggered a move to English limited partnerships (LP), to which the disclosure obligations still didn't apply. The Government has rejected extending controls to LP.

<https://www.private-eye.co.uk/hp-sauce>

ALABAMA COURT DECLARING THE US CORPORATE TRANSPARENCY ACT UNCONSTITUTIONAL: UPDATE

On 8 March, Nelson Mullins reported that FinCEN had responded to the court's order by saying that it will "comply with the court's order for as long as it remains in effect" and will not enforce the CTA against the plaintiffs in the case.

<https://www.jdsupra.com/legalnews/update-fincen-issues-notice-regarding-8750851/>

UK GOVERNMENT FACING 2 SETS OF LEGAL ACTION AFTER SAUDI DEFENCE DEAL TRIAL

On 9 March, the Guardian reported that the UK Government is facing legal action on 2 fronts after a court case that heard allegations that Britain facilitated the payment of bribes to high-ranking Saudis for decades, but saw the defendants acquitted. A whistleblower alleges that it blocked his attempts to uncover the truth, and that he had to flee the country after being threatened with imprisonment. In addition, one of those acquitted may sue the Government after he successfully argued that he

had been unfairly prosecuted because the payments had been authorised by the British and Saudi Governments.

<https://www.theguardian.com/world/2024/mar/09/uk-government-facing-two-sets-of-legal-action-after-saudi-defence-deal-trial>

UK: NATIONAL LOTTERY OPERATOR HAD BORROWED MILLIONS FROM RUSSIAN-OWNED BANKS

On 9 March, the Guardian reported that the company behind the National Lottery was borrowing millions from Kremlin-owned banks when it won the UK's largest public-sector contract. VTB and Sberbank, were part of a syndicate that agreed to lend up to €640 million to Allwyn in 2020, 2 years before the pan-European gaming specialist was named the "preferred bidder" for the lottery contract.

<https://www.theguardian.com/uk-news/2024/mar/09/national-lottery-operator-had-borrowed-millions-from-kremlin-owned-banks>

LOCAL ISLAMIC STATE BRANCHES NOW CONTROL TERRITORY IN MALI, SOMALIA AND MOZAMBIQUE

On 1 March, the Washington Institute for Near East Policy reported that, nearly 5 years after losing territorial control in its core areas of Iraq and Syria, the Islamic State is once again racking up territorial gains around Africa.

<https://www.washingtoninstitute.org/policy-analysis/islamic-state-march-africa>

HONG KONG REVEALS NEW SECURITY LAW WITH HARSHER PENALTIES

On 8 March, RFA reported that the law steps up an ongoing crackdown on political opposition and public dissent, targets 'foreign forces'. It includes sentences of up to 10 years' imprisonment for "illegally disclosing state secrets".

<https://www.rfa.org/english/news/china/law-03082024110703.html>

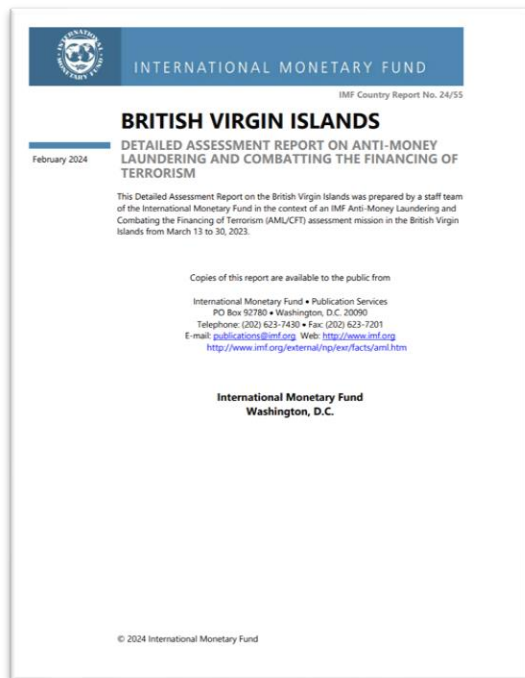
EU TRANSFER OF PROCEEDINGS LAW TO HELP FIGHT CROSS-BORDER CRIME

On 8 March, EU Business reported that the EU presidency and European Parliament had reached political agreement on a proposed EU law related to the transfer of proceedings in criminal matters. A new set of measures would enable the transfer of criminal proceedings to the Member State best-placed to prosecute.

<https://www.eubusiness.com/news-eu/transfer-of-proceedings-law-crime.63cd>

BVI: DETAILED IMF ASSESSMENT REPORT ON AML/CFT

On 27 February, the IMF released a Country Report which summarises the AML/CFT measures in place in the BVI at the time of the onsite visit in March 2023. It analyses the level of compliance with the FATF 40 Recommendations and the level of effectiveness of the AML/CFT system and provides recommendations on how the system could be strengthened.



<https://www.imf.org/-/media/Files/Publications/CR/2024/English/1VGBEA2024001.ashx>

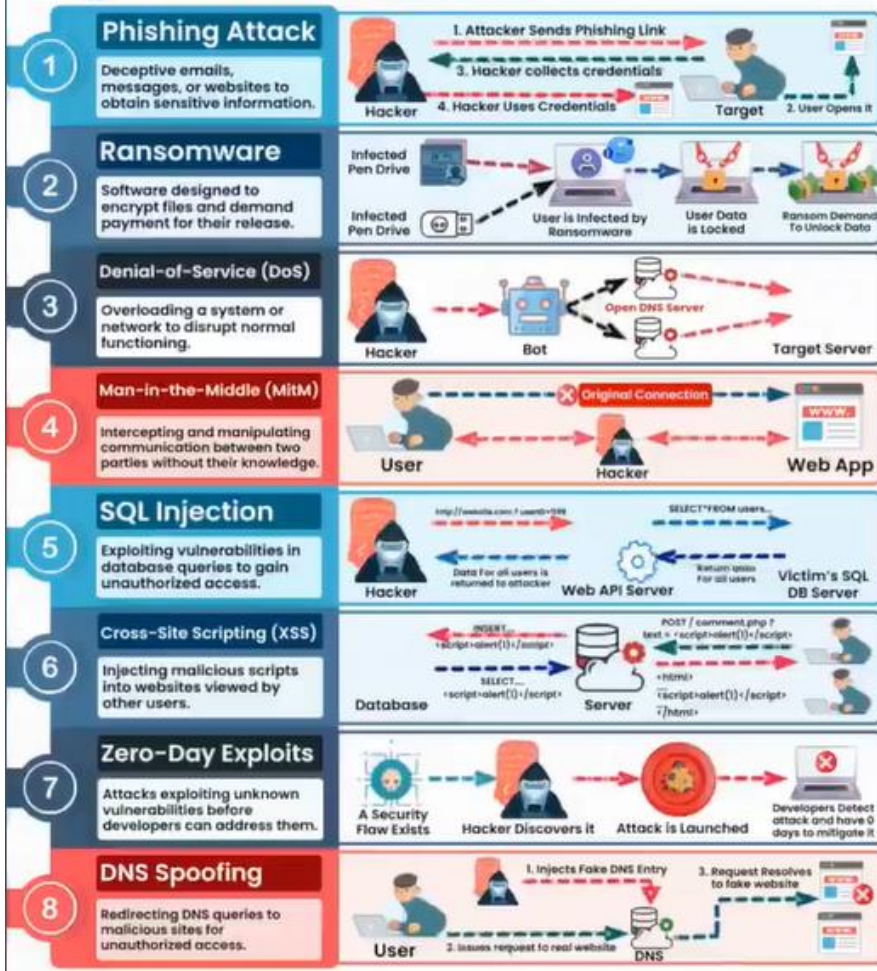
A TRIAL IN FRANCE RAISES HARD QUESTIONS ABOUT THE FINANCING OF TERRORISM

On 8 March, an article in Lawfare says that the case is an unusual one, with the defendants comprising 3 family members desperate to help their loved ones, 2 independent journalists moved to action by some blend of compassion and excessive proximity to their work, and a lawyer who stepped beyond his commitment to the legal defence of French foreign fighters in an effort to exfiltrate a jihadist and his family from Islamic State in Syria. It is said that the case raises crucial questions about the intersection of anti-terrorism laws and humanitarian efforts, illustrating the complexities involved in legislating the support extended to family members entangled with terrorist groups. Its outcome could heighten legal risks for any individuals who have attempted to aid foreign fighters or their families, irrespective of the aims behind that assistance.

<https://www.lawfaremedia.org/article/a-trial-in-france-raises-hard-questions-about-the-financing-of-terrorism>



Top 8 Types of Cyber Attacks



<https://www.linkedin.com/feed/update/urn:li:activity:7172283851807903744>

BRAZIL: THE FAKE NEWS AND CORRUPTION BEHIND THE CRIMINAL INVESTIGATION OF TRANSPARENCY INTERNATIONAL

On 6 March, a post on the Global Anticorruption Blog reminded one that Transparency International and its Brazilian chapter are now the subject of a criminal investigation in Brazil. This is said to be part of Supreme Court Justice Dias Toffoli's crusade to reverse the convictions handed down in *Lava Jato* ("Car Wash"), the landmark Brazilian corruption case.

<https://globalanticorruptionblog.com/2024/03/06/the-fake-news-and-corruption-behind-the-criminal-investigation-of-transparency-international/>

INDIA: ENFORCEMENT DIRECTORATE SEIZES RED SANDERS SMUGGLER BADSHAH MALIK'S ASSETS

On 9 March, India Today reported that the Enforcement Directorate had seized properties worth over \$8.5 million belonging to Malik and his associates, in connection with a money laundering case. A complaint stated that they used to smuggle red sanders in the guise of consignments of fabric glue, radiators etc. Malik was arrested after 7,800 tonnes of red sanders was found in a container at a port near Mumbai. The export of red sanders is banned in India.

<https://www.indiatoday.in/india/story/red-sandalwood-smuggling-badshah-majid-malik-ed-attaches-properties-2512703-2024-03-09>

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<https://www.buymeacoffee.com/KoIvM842y>