

30 April 2024

US RESTRICTS EXPORT OF FIREARMS TO NON-GOVERNMENT ENTITIES IN HIGH-RISK COUNTRIES

On 30 April, the Global Sanctions blog reported that a new Rule due to take effect from 30 May involves a “presumption of denial” of the sale of firearms to commercial parties in 36 countries, with an increased scrutiny of transactions, a new export control classification numbers for firearms.

<https://globalsanctions.co.uk/2024/04/us-restricts-export-of-firearms-to-non-govt-entities-in-high-risk-countries/>

US: EXTENDED STATUTE OF LIMITATIONS FOR SANCTIONS SNEAKS INTO FOREIGN AID BILL

On 25 April, an article from Wilkie Farr & Gallagher LLP was concerned with the doubling the statute of limitations of the International Emergency Economic Powers Act (IEEPA) and the Trading With the Enemy Act (TWEA) from 5 years to 10 years. The extended statutes of limitations became effective immediately upon the signing of the bill into law on 24 April and will have far-reaching consequences for multinational companies and anyone else with exposure to US sanctions and certain export controls.

https://www.willkie.com/-/media/files/publications/2024/04/extended_statute_of_limitations_for_sanctions_and_export_controls_sneaks_into_foreign_aid_bill.pdf

CORPORATE DUE DILIGENCE: EU SUPPLY CHAIN DIRECTIVE (CS3D) ADOPTED

On 25 April, an article from Morgan Lewis & Bockius LLP said that, when approved by the EU Council of Ministers, and once the Directive is implemented into national law by the Member States, in-scope companies will be obligated to address the negative impacts of their operations on human rights and the environment.

<https://www.morganlewis.com/pubs/2024/04/corporate-due-diligence-eu-supply-chain-directive-adopted-against-all-odds>

OFAC REIMPOSES VENEZUELA OIL AND GAS SECTOR SANCTIONS BUT LEAVES DOOR OPEN FOR POSSIBLE SPECIFIC LICENSING

On 26 April, an article from Akin Gump reviewed the situation and the implications of the relevant General Licenses.

<https://www.mondaq.com/unitedstates/export-controls--trade--investment-sanctions/1457234/ofac-reimposes-venezuela-oil-and-gas-sector-sanctions-but-leaves-door-open-for-possible-specific-licensing>

UK: 3 UGANDAN NAMES ADDED TO CORRUPTION SANCTIONS LIST

On 30 April, a Notice from HM Treasury advised that 3 individuals from Uganda had been added to the global anti-corruption sanctions list. It sanctioned the speaker of the Ugandan parliament, Anita Among, and 2 high-profile Ugandan lawmakers, targeting corruption in the east African country for the first time with its sanctions regime. The Isle of Man followed suit.

https://assets.publishing.service.gov.uk/media/6630b43d3579e7a8f398a9ba/Notice_Global_Anti-Corruption_300424.pdf

<https://www.devdiscourse.com/article/law-order/2922784-britain-sanctions-three-ugandan-officials-under-anti-corruption-laws>

<https://www.gov.uk/government/news/uk-sanctions-corrupt-politicians-in-uganda-who-stole-from-vulnerable-communities>

<https://www.gov.im/news/2024/apr/30/financial-sanctions-global-anti-corruption/>

AN UPDATE ON VIOLENT NON-STATE ACTORS' USE OF ARMED UAV

The latest issue of Perspectives on Terrorism included this article which updates the findings presented in a 2020 article, and presents descriptive statistics on violent non-state actors' use of armed UAV. The UAV attacks are recorded across the globe, from Mexico and Ecuador, through the Middle East and North Africa, to Myanmar. However, 91.3% of the attacks occurred in the Middle East and North Africa.

<https://pt.icct.nl/article/still-aiming-harder-targets-update-violent-non-state-actors-use-armed-uavs>

US ISSUES RUSSIA SANCTIONS LICENCE FOR LOW-LEVEL MEDICAL DEVICES

On 30 April, the Global Sanctions blog reported that a new licence enables the delivery of humanitarian medical devices to the citizens of Russia, Belarus, and the occupied areas of Ukraine.

<https://globalsanctions.co.uk/2024/04/us-issues-russia-sanctions-licence-for-low-level-medical-devices/>

ASSESSING THE HOUTHJI WAR EFFORT SINCE OCTOBER 2023

An article from the April edition of CTC Sentinel says that the movement has demonstrated boldness — as the first Iranian axis member to fire ballistic missiles at Israel — and resilience in the face of US-

UK airstrikes. It says that the Houthis are likely to emerge from the war as a more confident, ambitious, and aggressive terrorist army, with a taste for provocative and eye-catching acts of defiance against Israel and the US.

<https://ctc.westpoint.edu/assessing-the-houthi-war-effort-since-october-2023/>

WHICH REGIONS AND INDUSTRIES ARE PROFITING FROM RUSSIA'S WAR?

On 30 April, an article from the Carnegie Endowment for International Peace said that for some Russian regions, the country's invasion of Ukraine means they face shelling and dwindling export revenues due to sanctions. For others, it means an unprecedented influx of cash as they profit from the flywheel of war and growing domestic consumption.

<https://carnegieendowment.org/politika/92327>

LITHUANIAN COMPANIES EXPORTED DUAL-USE GOODS TO RUSSIA WORTH AT LEAST €130 MILLION USING SANCTIONS CIRCUMVENTION SCHEMES

On 30 April, Ukrinform reported that, between March 2022 and August 2023, Lithuanian companies shipped Western-made goods with potential military use under the guise of exports to Kazakhstan, Kyrgyzstan, Uzbekistan, Armenia, and other states close to the Kremlin.

<https://www.ukrinform.net/rubric-crime/3858409-lithuanian-companies-exported-eur-130-million-worth-of-military-goods-to-russia-media.html>

<https://www.occrp.org/en/daily/18687-lithuania-inspecting-company-suspected-of-viol>

IP: PRELIMINARY INJUNCTIONS - WHAT APPROACH TO LIABILITY IS TAKEN ACROSS THE GLOBE?

On 30 April, an article from Bird & Bird said that in disputes concerning the alleged infringement of intellectual property rights, a court may grant a preliminary injunction, for the benefit of the IP rights-holder, to restrain an alleged infringer from continuing the alleged infringing act while the case is pending or progressing to a trial.

<https://www.twobirds.com/en/insights/2024/global/preliminary-injunctions-what-approach-to-liability-is-taken-across-the-globe>

EU ADDS 6 NAMES ON DRC SANCTIONS LIST AND AMENDS 2 OTHERS

EU Regulation 2024/1271/EU added 6 individuals recently named by the relevant UN Sanctions Committee, with further information provided for 2 further individuals.

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202401271

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202401240

EncroChat: THE EU COURT OF JUSTICE CLARIFIES THE CONDITIONS FOR THE TRANSMISSION AND USE OF EVIDENCE IN CRIMINAL CASES WITH A CROSS-BORDER DIMENSION

On 30 April, a news release from CJEU e clarifies certain conditions for the transmission and use of evidence under the Directive regarding the European Investigation Order (EIO) in criminal matters. The French police were able, with the assistance of Dutch experts and the authorisation of a French court, to infiltrate the encrypted telecommunications service EncroChat - a service used worldwide on encrypted mobile phones for the purpose of illegal drug trafficking. The Regional Court of Berlin, before which criminal proceedings were brought, queries the lawfulness of the EIO, and submitted to the Court of Justice a series of questions for a preliminary ruling on the Directive regarding the European Investigation Order in criminal matters.

<https://curia.europa.eu/jcms/upload/docs/application/pdf/2024-04/cp240077en.pdf>

TURKISH BUSINESSMAN WAS BEHIND PURCHASE OF LUXURY LONDON RESIDENCE FOR AZERBAIJANI OFFICIAL'S SON

On 29 April, OCCRP reported that Turkish magnate Erdal Aksoy proudly describes himself as a fixer of major business deals between Turkey and Azerbaijan. It also says that his family is also behind a mystery shell company at the heart of a previous OCCRP investigation.

<https://www.occrp.org/en/investigations/turkish-businessman-was-behind-purchase-of-luxury-london-residence-for-azerbaijani-officials-son>

UPDATE ON THE GUERNSEY'S MONEYVAL ASSESSMENT

On 29 April, a news release advised that, on 26 April, the MoneyVal secretariat and evaluators concluded the 2-week phase of on-site technical assessment. Over the coming weeks the Bailiwick's agencies and bodies will be providing further information to MoneyVal in order to assist in the completion of the first draft of the review.

<https://www.gov.gg/article/200671/Update-on-the-Bailiwicks-MoneyVal-assessment>

POLICE CORRUPTION JEOPARDISES DRUG TRAFFICKING TRIAL IN SPAIN

On 29 April, Insight Crime reported that the alleged involvement of a high-ranking Spanish police officer in cocaine smuggling threatens to undermine a drug trafficking trial and underscores how corruption infiltrates all levels of the country's security forces.

<https://insightcrime.org/news/police-corruption-cocaine-trial-spain/>

HIGH-RANKING HELLS ANGELS MEMBER BUSTED IN DRUG TRAFFICKING OPERATION IN MARBELLA

On 29 April, a news release from Europol advised that a German-Spanish investigation, supported by Europol, targeted a criminal network involved in the trafficking of drugs and firearms. The leader of the network coordinated the criminal activities from Spain, where he had established his base.

<https://www.europol.europa.eu/media-press/newsroom/news/high-ranking-hells-angels-member-busted-in-drug-trafficking-operation-in-marbella>

CHANGES POSSIBLE AS ENGLAND REVIEWS REGULATORY APPROACHES TOWARDS LITIGATION FUNDING

On 30 April, an Out-Law article said that a review of the litigation funding market in England and Wales and its regulation is underway, and its outcome could decide whether further regulation or safeguards are needed. The review will be conducted by the Civil Justice Council (CJC), and a working group has been formed to lead the review on the third-party litigation funding market in England and Wales and it is expected to publish an interim report this summer and a full report by Summer 2025, which could make recommendations for reform.

<https://www.pinsentmasons.com/out-law/news/england-reviews-regulatory-approaches-litigation-funding>

FUGITIVE BUSINESSMAN EXTRADITED TO MONTENEGRO FROM UK

On 30 April, Rferl reported that Dusko Knezevic, once a close ally of former Montenegrin President Milo Djukanovic, has been extradited to Montenegro from Britain to face corruption charges.

<https://www.rferl.org/a/montenegro-corruption-britain-knezevic-djukanovic/32927826.html>

DIRTY GOLD: ECUADORIAN EXPORT COMPANIES TARGETED BY AUTHORITIES

On 14 April, Ojo Publico published a report saying that Ecuador has shown severe inconsistencies between its official production of gold of known origin and its exports. The report reveals how organised crime takes control in several areas of this country. This comes after a legal procedure involving a former director of the Energy Regulation Agency exposed the complicity between illegal activities and local authorities

<https://ojo-publico.com/5071/dirty-gold-ecuadorian-export-companies-targeted-authorities>

CREATIVE CHEMISTRY: SUPPORTING THE FIGHT AGAINST DRUG MANUFACTURE IN SE ASIA AND THE PACIFIC

On 18 April, UNODC said that, in SE Asia and the Pacific, a growing amount of chemicals continue to find their way into the hands of organised crime groups, which are turning to creative chemistry and the use of so-called designer precursors. To address this, the UN Office on Drugs and Crime (UNODC) together with the International Narcotics Control Board (INCB) is strengthening the capacities of competent authorities in the region.

<https://www.unodc.org/roseap/en/2024/04/fight-against-drug-manufacture-southeast-asia/story.html>

A DECADE OF ILLEGAL GOLD MINING AND LAUNDERING IN SOUTH AMERICA

This report from Ojo Publico examined illegal gold mining in 7 countries between 2014 and 2023. It reveals that between 2014 and 2023, the Andean Amazonian countries exported more than 3,000 tons of high-purity gold of unknown origin.

<https://ojo-publico.com/especiales/latinoamerica/las-rutas-del-oro-sucio-amazonia/en/>

FBI NABS 7 US-BASED NIGERIANS FOR \$8 MILLION MONEY LAUNDERING CONSPIRACY

On 30 April, the Daily Post reported that the men are said to have acted as middlemen to receive \$8 million proceeds of romance scams from victims of internet fraudsters, known as *Yahoo Boys*.

<https://dailypost.ng/2024/04/30/fbi-nabs-7-us-based-nigerians-for-8m-money-laundering-conspiracy/>

<https://gazettengr.com/fbi-busts-seven-nigerian-pickers-in-u-s-for-laundering-8-million-scam-proceeds-to-yahoo-boys-in-lagos/>

UK: ISRAEL AND THE OCCUPIED PALESTINIAN TERRITORIES HUMANITARIAN ACTIVITY GENERAL LICENCE EXTENDED TO MAY 2025

On 30 April, HM Treasury advised that the General Licence had been amended and now expires on 14 May 2025.

https://assets.publishing.service.gov.uk/media/6630b8d93579e7a8f398a9be/Gaza_Humanitarian_General_Licence_Extension_30APR24.pdf

Total external debt (current USD)



Top 20 Countries in Debt to China

As of 2022

External debt refers to money a country owes to foreign lenders, in this case China. Source: World Bank



Where Data Tells the Story



https://www.visualcapitalist.com/ranked-the-top-20-countries-in-debt-to-china/#google_vignette

THE FACTORS INVOLVED IN ECUADOR'S SPIRALLING VIOLENCE

On 24 April, a Commentary from CSIS examined both the endogenous and exogenous factors at play in Ecuador's spiralling violence. It says that, more than any country in Latin America, Ecuador has been caught in the crosshairs of increasing violence related to changing patterns of transnational organised crime.

<https://www.csis.org/analysis/eye-storm-ecuadors-compounding-crises>

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