

中華民國證券投資信託暨顧問商業同業公會 函

地址：10459 台北市中山區長春路145號3樓

承辦人：林采蓉

電話：(02)2581-7288#206

傳真：(02)2581-7388

電子信箱：Tsaijung.Lin@sitca.org.tw

(郵遞區號)

(地址)

受文者：

發文日期：中華民國108年1月25日

發文字號：中信顧字第1080050163號

速別：普通件

密等及解密條件或保密期限：

附件：如文

主旨：函轉金融監督管理委員會檢送有關美國財政部108年1月8日公告新增7名個人及23個實體於制裁名單（SDN list）一案，如發現疑似洗錢或資恐交易，請向法務部調查局申報，並注意該等交易風險，請查照。

說明：依金融監督管理委員會108年1月19日金管證券字第10803018081號函辦理。

正本：本公會各投信會員公司、本公會各投顧會員公司

副本：

理事長 張 錫

檔 號：

保存年限：

金融監督管理委員會 函

機關地址：新北市板橋區縣民大道二段7號
18樓

聯絡人：鄭先生

聯絡電話：(02) 27747266

傳 真：(02) 87734411

受文者：中華民國證券投資信託暨顧問商業同業公會

發文日期：中華民國108年1月19日

發文字號：金管證券字第10803018081號

速別：普通件

密等及解密條件或保密期限：

附件：如主旨(第一件 A45020000DORGUNIT108011903018081A2B301808.PDF)

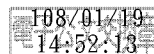
主旨：有關美國財政部108年1月8日公告新增7名個人及23個實體於制裁名單（SDN list）一案，請轉知所屬會員，如發現疑似洗錢或資恐交易，請向法務部調查局申報，並注意該等交易風險，請查照。

說明：

- 一、依據駐美國代表處經濟組108年1月8日經美字第1080000013號函副本辦理。
- 二、檢附駐美國代表處經濟組函文及美國財政部108年1月8日公告影本各一份。

正本：中華民國證券商業同業公會、中華民國期貨業商業同業公會、中華民國證券投資信託暨顧問商業同業公會、中華民國會計師公會全國聯合會（均含附件）

副本：臺灣證券交易所股份有限公司、財團法人中華民國證券櫃檯買賣中心、臺灣期貨交易所股份有限公司、臺灣集中保管結算所股份有限公司、金融監督管理委員會證券期貨局（證券發行組、投信投顧組、會計審計組、期貨管理組）



授權單位主管決行並鈐印

中華民國證券投資信託暨顧問商業同業公會

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檔 號：

保存年限：

駐美國代表處經濟組 函

地址：4301 Connecticut Ave., NW Suite 4
20, Washington D.C. 20008, USA

承辦人：侯文華

電話：1(202)6866400#107

傳真：1(202)3636294

Email：wphou@moea.gov.tw

受文者：金融監督管理委員會

發文日期：中華民國108年1月8日

發文字號：經美字第1080000013號

速別：最速件

密等及解密條件或保密期限：

附件：如文(1080000013_Attach1.pdf、1080000013_Attach2.doc)

主旨：陳報美國財政部公告新增7名個人及23個實體於制裁名單(SDN list)事，敬請查照。

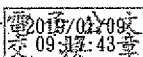
說明：

- 一、美財政部於本(2019)年1月8日發布新聞稿略以，該部外國資產管制局(OFAC)以受制裁人藉職務之便及委內瑞拉貨幣兌換機制漏洞，進行大規模的貪腐行為，自2008年竊取10億美元賄款為由，將委國國家財政辦公室(Venezuelan National Treasurer)前主任Claudia Patricia Diaz Guillen、Raul Antonio Gorrin Belisario及Alejandro Jose Andrade Cedeno等7人，並將渠等以貪汙所得進行投資之國內、外等23個實體納入制裁清單中，凍結渠等於美國境內之資產與交易。

- 二、檢附上述財政部新聞稿如附件，併請卓參。

正本：經濟部國際貿易局

副本：金融監督管理委員會





U.S. DEPARTMENT OF THE TREASURY

Resource Center

Venezuela-related Designations; Issuance of Venezuela-related General License; Publication of New FAQ

1/8/2019

Today, the Department of the Treasury's Office of Foreign Assets Control (OFAC) is issuing Venezuela-related General License 6. General License 6 authorizes U.S. persons to engage in specified transactions related to winding down or maintaining business with Globovision Tele C.A. and Globovision Tele CA, Corp. and their subsidiaries until January 8, 2020. OFAC is issuing a new FAQ about General License 6.

In addition, OFAC has updated its SDN list.

The following individuals have been added to OFAC's SDN List:

DIAZ GUILLEN, Claudia Patricia (a.k.a. DIAZ, Claudia; a.k.a. DIAZ-GUILLEN, Claudia), Cap Cana, Dominican Republic; Spain; DOB 25 Nov 1973; citizen Venezuela; Gender Female; Cedula No. 11502896 (Venezuela); Passport 030415788 (Venezuela) expires 22 Nov 2014 (individual) [VENEZUELA-EO13850].

GONZALEZ DELLAN, Leonardo (a.k.a. GONZALEZ, Leonardo), London, United Kingdom; DOB 11 Sep 1966; citizen Venezuela; Gender Male; Cedula No. 8639102 (Venezuela); Passport 073785390 (Venezuela) expires 01 Jul 2018; alt. Passport 046041771 (Venezuela) expires 24 May 2016; alt. Passport 002272834 (Venezuela) expires 14 Aug 2012 (individual) [VENEZUELA-EO13850].

GORRIN BELISARIO, Raul (a.k.a. GORRIN BELISARIO, Raul Antonio; a.k.a. GORRIN BELISARIO, Raul Antonio De La Santisima Trinidad; a.k.a. GORRIN, Raul; a.k.a. GORRIN, Raul A; a.k.a. GORRIN, Raul Antonio; a.k.a. GORRIN-BELISARIO, Raul Antonio De La Santisima), 4100 Salzedo Street, Apt. 1010, Miami, FL 33146, United States; 4100 Salzedo St., Unit 804, Coral Gables, FL 33146, United States; 144 Isla Dorada Blvd., Coral Gables, FL 33143, United States; DOB 22 Nov 1968; citizen Venezuela; Gender Male; Cedula No. 8682996 (Venezuela); Passport 129603081 (Venezuela) expires 14 Oct 2020; alt. Passport 066936455 (Venezuela) expires 10 Jan 2018; alt. Passport 007931220 (Venezuela) expires 24 Jan 2013 (individual) [VENEZUELA-EO13850].

PERDOMO ROSALES, Gustavo Adolfo (a.k.a. PERDOMO ROSALES, Gustavo A; a.k.a. PERDOMO, Gustavo; a.k.a. PERDOMO, Gustavo A; a.k.a. PERDOMO, Gustavo Adolfo; a.k.a. PERDOMO-ROSALES, Gustavo), 4100 Salzedo St., Unit 804, Coral Gables, FL 33146, United States; 18555 Collins Avenue, Unit 4405, Sunny Isles, FL 33160, United States; DOB 05 Feb 1979; citizen Venezuela; Gender Male; Cedula No. 14585388 (Venezuela); Passport 083119116 (Venezuela) expires 28 Jan 2019; alt. Passport 023639834 (Venezuela) expires 13 Jun 2014 (individual) [VENEZUELA-EO13850].

PERDOMO ROSALES, Maria Alexandra (a.k.a. DE PERDOMO, Maria A; a.k.a. DE PERDOMO, Maria Alejandra; a.k.a. PERDOMO, Maria Alexandra; a.k.a. PERDOMO-ROSALES, Maria), 144 Isla Dorada Blvd., Coral Gables, FL 33146, United States; 4100 Salzedo Street, Apt 1010, Miami, FL 33146, United States; DOB 25 Mar 1972; citizen Venezuela; Gender Female; Cedula No. 10538067 (Venezuela); Passport 135278046 (Venezuela) expires 14 Oct 2020; alt. Passport 079280833 (Venezuela) expires 22 Oct 2018; alt. Passport 018516885 (Venezuela) expires 04 Dec 2013 (individual) [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul).

TARASCIO-PEREZ, Mayela Antonina (a.k.a. DE PERDOMO, Mayela T; a.k.a. DE PERDOMO, Mayela Tarascio; a.k.a. TARASCIO DE PERDOMO, Mayela A; a.k.a. TARASCIO DE PERDOMO, Mayela Antonina; a.k.a. TARASCIO, Mayela; a.k.a. TARASCIO-PEREZ, Mayela), 4100 Salzedo St., Unit 804, Coral Gables, FL 33146, United States; DOB 20 Feb 1985; citizen Venezuela; Gender Female; Passport 083111668 (Venezuela) expires 28 Jan 2019; alt. Passport 023639818 (Venezuela) expires 13 Jun 2014; alt. Passport C1453352 (Venezuela) expires 02 Nov 2009 (individual) [VENEZUELA-EO13850] (Linked To: PERDOMO ROSALES, Gustavo Adolfo).

VELASQUEZ FIGUEROA, Adrian Jose (a.k.a. VELASQUEZ, Adrian), Cap Cana, Dominican Republic; Spain; DOB 02 Nov 1979; citizen Venezuela; Gender Male; Cedula No. 13813453 (Venezuela); Passport 024421568 (Venezuela) expires 25 Jun 2014 (individual) [VENEZUELA-EO13850].

The following entities have been added to OFAC's SDN List:

CONSTELLO INC., Saint Kitts and Nevis [VENEZUELA-EO13850] (Linked To: TARASCIO-PEREZ, Mayela Antonina; Linked To: PERDOMO ROSALES, Gustavo Adolfo).

CONSTELLO NO. 1 CORPORATION, 4100 Salzedo Street, Unit 804, Coral Gables, FL 33146, United States; DE, United States [VENEZUELA-EO13850] (Linked To: TARASCIO-PEREZ, Mayela Antonina; Linked To: PERDOMO ROSALES, Gustavo Adolfo).

CORPOMEDIOS GV INVERSIONES, C.A., Calle Alameda Quinta Globovision Pb, Libertador, Caracas, Venezuela [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul; Linked To: PERDOMO ROSALES, Gustavo Adolfo).

CORPOMEDIOS LLC, 4100 Salzedo Street, Unit 804, Coral Gables, FL 33146, United States [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul; Linked To: PERDOMO ROSALES, Gustavo Adolfo).

GLOBOVISION TELE C.A. (a.k.a. GLOBOVISION), Caracas, Venezuela [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul; Linked To: PERDOMO ROSALES, Gustavo Adolfo).

GLOBOVISION TELE CA, CORP., 4100 Salzedo Street, Unit 804, Coral Gables, FL 33146, United States [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul; Linked To: PERDOMO ROSALES, Gustavo Adolfo).

MAGUS HOLDING II, CORP., 4100 Salzedo St., Unit 804, Coral Gables, FL 33146, United States; 140 Paloma Drive, Coral Gables, FL 33143, United States [VENEZUELA-EO13850] (Linked To: PERDOMO ROSALES, Gustavo Adolfo).

MAGUS HOLDING LLC, 4100 Salzedo St., Unit 804, Coral Gables, FL 33146, United States [VENEZUELA-EO13850] (Linked To: PERDOMO ROSALES, Gustavo Adolfo).

MAGUS HOLDINGS USA, CORP., 4100 Salzedo St., Unit 804, Coral Gables, FL 33146, United States [VENEZUELA-EO13850] (Linked To: PERDOMO ROSALES, Gustavo Adolfo; Linked To: TARASCIO-PEREZ, Mayela Antonina).

PLANET 2 REACHING, INC., DE, United States; 7043 Fisher Dr., Unit 7043, Miami Beach, FL 33109-0064, United States [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul).

POSH 8 DYNAMIC, INC., 18555 Collins Avenue, Unit 4401, Sunny Isles, FL 33160, United States; DE, United States [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul).

POTRICO CORP., DE, United States [VENEZUELA-EO13850] (Linked To: PERDOMO ROSALES, Gustavo Adolfo).

RIM GROUP INVESTMENTS I CORP., 4100 Salzedo Street, Apt 1010, Miami, FL 33146, United States; 4100 Salzedo Street, Unit 608, Coral Gables, FL 33146, United States; 4100 Salzedo Street, Unit 807, Coral Gables, FL 33146, United States [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul; Linked To: PERDOMO ROSALES, Maria Alexandra).

RIM GROUP INVESTMENTS II CORP., 4100 Salzedo Street, Apt 1010, Miami, FL 33146, United States; 4100 Salzedo Street, Unit 813, Coral Gables, FL 33146, United States; 4100 Salzedo Street, Unit 913, Coral Gables, FL 33146, United States [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul; Linked To: PERDOMO ROSALES, Maria Alexandra).

RIM GROUP INVESTMENTS III CORP., 4100 Salzedo Street, Apt 1010, Miami, FL 33146, United States; 144 Isla Dorada Blvd., Coral Gables, FL 33143, United States [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul; Linked To: PERDOMO ROSALES, Maria Alexandra).

RIM GROUP INVESTMENTS, CORP., 4100 Salzedo Street, Apt 1010, Coral Gables, FL 33146, United States [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul; Linked To: PERDOMO ROSALES, Maria Alexandra).

RIM GROUP PROPERTIES OF NEW YORK II CORP., 675 Third Avenue, 29th FL., New York, NY 10017, United States; 20 West 53rd Street, Unit 47A, New York, NY 10019, United States; 60 Riverside Boulevard, PH 3602, New York, NY 10069, United States [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul).

RIM GROUP PROPERTIES OF NEW YORK, CORP., 4100 Salzedo St., Unit 1010, Coral Gables, FL 33146, United States [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul).

SEGUROS LA VITALICIA C.A. (a.k.a. LA VITALICIA), Caracas, Venezuela; National ID No. J310205361 (Venezuela) [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul).

TINDAYA PROPERTIES HOLDING USA CORP., 675 Third Avenue, 29th Floor, New York, NY 10017, United States [VENEZUELA-EO13850] (Linked To: PERDOMO ROSALES, Gustavo Adolfo).

TINDAYA PROPERTIES OF NEW YORK CORP., 155 SW 25th Road, Miami, FL 33129, United States; 330 East 57th Street, Unit 12, New York, NY 10022, United States [VENEZUELA-EO13850] (Linked To: PERDOMO ROSALES, Gustavo Adolfo).

TINDAYA PROPERTIES OF NEW YORK II CORP., 675 Third Avenue, 29th Floor, New York, NY 10017, United States [VENEZUELA-EO13850] (Linked To: PERDOMO ROSALES, Gustavo Adolfo).

WINDHAM COMMERCIAL GROUP INC., Panama [VENEZUELA-EO13850] (Linked To: GORRIN BELISARIO, Raul; Linked To: PERDOMO ROSALES, Gustavo Adolfo).

The following aircraft has been added to OFAC's SDN List:

N133JA; Aircraft Model Mystere Falcon 50EX; Aircraft Manufacturer's Serial Number (MSN) 266; Aircraft Tail Number N133JA (aircraft) [VENEZUELA-EO13850] (Linked To: PERDOMO ROSALES, Gustavo Adolfo).

PRESS RELEASES

Treasury Targets Venezuela Currency Exchange Network Scheme Generating Billions of Dollars for Corrupt Regime Insiders

5254

January 8, 2019

Action continues to expose endemic corruption at the highest levels of the Venezuelan government as it prepares for Nicolas Maduro's illegitimate inauguration

Washington – Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctioned Venezuelan individuals and companies involved in a significant corruption scheme designed to take advantage of the Government of Venezuela's currency exchange practices, generating more than \$2.4 billion in corrupt proceeds. This designation, pursuant to Executive Order (E.O.) 13850, targets seven individuals, including former Venezuelan National Treasurer Claudia Patricia Diaz Guillen (Diaz) and Raul Antonio Gorrin Belisario (Gorrin), who bribed the Venezuelan Office of the National Treasury (ONT, or Oficina Nacional del Tesoro) in order to conduct illicit foreign exchange operations in Venezuela. In addition to Diaz and Gorrin, OFAC designated or blocked five other individuals and 23 entities, pursuant to E.O. 13850, for their roles in the bribery scheme, and identified one private aircraft as blocked property.

Venezuelan regime insiders have plundered billions of dollars from Venezuela while the Venezuelan people suffer. Treasury is targeting this currency exchange network which was another illicit scheme that the Venezuelan regime had long used to steal from its people," said Secretary of the Treasury Steven T. Mnuchin. "Our actions against this corrupt currency exchange network expose yet another deplorable practice that Venezuela regime insiders have used to benefit themselves at the expense of the Venezuelan people. The United States remains committed to holding accountable those responsible for Venezuela's tragic decline, and will continue to use diplomatic and economic tools to support the Venezuelan people's efforts to restore their democracy."

THE INNER WORKINGS OF A CORRUPT SYSTEM

Today's designations target individuals who took advantage of a corrupt system within the Venezuelan ONT, stealing billions of dollars from the Venezuelan people since 2008, under the watch of two Venezuelan National Treasurers, Alejandro Jose Andrade Cedenio (Andrade) and Diaz. Andrade was sentenced by the United States District Court for the Southern District of Florida on November 27, 2018, to 10 years in prison for accepting over \$1 billion in bribes for his role in the below scheme.

The primary responsibility of the ONT is to manage the public finances of the Government of Venezuela using bolivars, the Venezuelan currency. The ONT maintains assets in UK bonds, U.S. dollars, and bolivars, the sum total of which equal the amount that the ONT has available to spend on Venezuelan government operations. When lacking sufficient bolivars for government projects, Andrade used a series of exchange houses, or casas de bolsa, to

exchange dollars for bolivars. As part of the scheme, exchange houses sold dollars for bolivars on parallel markets at a higher, black market exchange rate than the official government rate. These exchange houses kept the difference between the black market rate and the official government rate, resulting in massive profits for exchange houses providing bolivars to the ONT. Only exchange houses approved by the Government of Venezuela, specifically the ONT, had the ability to conduct bolivar-to-dollar exchanges with the Government of Venezuela. As the National Treasurer, Andrade and later Diaz had the authority to decide which exchange houses received government contracts.

THE NETWORK THAT RIGGED THE SYSTEM

The below former Government of Venezuela officials and individuals enriched themselves by capitalizing on favorable foreign exchange transactions through casas de bolsa, concealing their profits in European and U.S. bank accounts and investments. Both Andrade and Diaz, while occupying the role of National Treasurer, used their official positions to give Gorrin, a prominent Venezuelan businessman, access to the ONT's preferred exchange rates to maximize profits on currency transactions moving through the casas de bolsa, which Gorrin, amongst a select few others that were approved by the ONT, controlled. While Andrade was National Treasurer, he awarded the ONT exchange business to a limited number of individuals, including Gorrin and Leonardo Gonzalez Dellan (Gonzalez).

In return for their selection as the only currency exchange houses approved by the ONT, Gorrin and Gonzalez, another Venezuelan businessman, paid hundreds of millions of dollars in bribes to Andrade. Andrade facilitated the continuation of the bribery scheme by introducing Gorrin to Andrade's successor, Diaz, when he left the ONT. Gorrin compensated Andrade for introducing him to Diaz, and as a result, allowed the bribery scheme to continue, undeterred. From at least 2011 to 2013, Gorrin paid bribes to Diaz, wiring money to her and her husband, Adrian Jose Velasquez Figueroa (Velasquez), and purchasing assets on their behalf, to include a residence in Cap Cana, Dominican Republic, and an aircraft.

Gorrin and Gonzalez controlled the corrupt wealth that was generated on Andrade's behalf, holding the money in offshore bank accounts and reinvesting in properties, aircraft, and other luxury assets at the direction of Andrade.

Andrade's portion of the illicit profits were never sent directly to Andrade; instead these individuals would purchase assets for Andrade, at his direction, or on his behalf. Gorrin, Gonzalez, and Gorrin's brother-in-law and business partner, Gustavo Adolfo Perdomo Rosales (Perdomo), purchased assets and paid expenses for Andrade related to numerous aircraft and yachts, properties in the United States and abroad, multiple championship horses, and numerous high-end watches. The purchase of all of these goods and wiring of payments was hidden behind a sophisticated network of U.S. and foreign companies that hid the individuals' beneficial ownership. All individuals involved in the scheme spent their portions of the resulting profits on properties in the United States as well as through maintaining significant accounts in U.S. banks, and purchasing boats and planes that were registered in the United States. Gorrin later mimicked this structure in controlling Diaz's assets generated as a result of the currency exchange scheme.

The seven individuals designated today have been determined to be responsible for or complicit in, or have directly or indirectly engaged in, any transaction or series of transactions involving deceptive practices and corruption and the Government of Venezuela or projects or programs administered by the Government of Venezuela, or are immediate family members of such a person who held properties or owned or controlled companies on that person's behalf. These individuals are listed below:

- **Raul Gorrin Belisario** was indicted by the United States Attorney's Office for the Southern District of Florida in August 2018 for conspiring to violate the Foreign Corrupt Practices Act, and for conspiring to bribe Venezuelan officials and commit money laundering by hiding embezzled government funds, totaling more than \$1 billion, in

Florida and New York. Gorrin was also being investigated for misappropriating billions of dollars from Venezuela's state-owned oil company, Petroleos de Venezuela, S.A. (PDVSA).

Gorrin is also thought to have paid several officials to have access to Venezuelan politicians and government officials, and was believed to hold funds on behalf of these individuals in the same way he held funds for Andrade. These individuals include, but are not limited to, Elvis Eduardo Hidrobo Amoroso, who was designated by OFAC on November 9, 2017, and Maikel Jose Moreno Perez, a close friend of Gorrin, who was designated by OFAC on May 18, 2017 pursuant to Executive Order (E.O.) 13692. Gorrin also purchased gifts for Cilia Adela Flores de Maduro, the First Lady of Venezuela, who was designated by OFAC on September 25, 2018 pursuant to E.O. 13692.

- **Claudia Patricia Diaz Guillen** is the former head of the ONT, serving as the National Treasurer between 2011 and 2013. In her role as the National Treasurer, Diaz accepted bribes from Gorrin directly, as well as through her husband, Adrian Jose Velasquez Figueroa (Velasquez), in return for permitting Gorrin to be the one of the select casas de bolsa for the Government of Venezuela. Gorrin held and purchased assets for Diaz and Velasquez in the same way he did for Andrade, to include a property in Cap Cana, Dominican Republic, aircraft, and yachts, obfuscating ownership of these assets through another individual to hide the ultimate ownership by Diaz and Velasquez. She, along with Velasquez, is currently under house arrest in Spain.
- **Adrian Jose Velasquez Figueroa** received bribes from Gorrin on behalf of his wife, Diaz, as part of the scheme to ensure Gorrin's selection as one of the casas de bolsa for the Government of Venezuela. Gorrin held and purchased assets for Diaz and Velasquez in the same way he did for Andrade, to include a property in Cap Cana, Dominican Republic, aircraft, and yachts, obfuscating ownership of these assets through another individual to hide the ultimate ownership by Diaz and Velasquez. He, along with Diaz, is currently under house arrest in Spain.
- **Leonardo Gonzalez Dellan** was a front person, or testaferro, for Venezuelan senior Chavista military and political figures including Andrade, in his role as the National Treasurer and after, where he supported Andrade in money laundering involving the Venezuelan financial sector, to include Gonzalez' role in the corrupt scheme involving the ONT exchange business. Testaferros are those who advise, assist, and profit in investing the corruptly obtained wealth of these individuals. Gonzalez managed bank accounts associated with Andrade, and owned and controlled companies to manage Andrade's corrupt wealth and purchase properties and horses for Andrade.
- **Gustavo Adolfo Perdomo Rosales** is the brother-in-law and a business partner of Gorrin. As Gorrin's business partner, Perdomo — on Gorrin's instruction — made wire transfers and held property on behalf of Andrade. Additionally, Perdomo beneficially owns an aircraft that Andrade would use, N133JA.
- **Maria Alexandra Perdomo Rosales (Maria Alexandra)** is the wife of Gorrin, and owns or controls, along with Gorrin, several of the companies used to hold property in the United States.
- **Mayela Antonina Tarascio-Perez (Mayela Antonina)** is the wife of Perdomo, and owns or controls, along with Perdomo, a company used to hold property in the United States.

INVESTMENT OF THE CORRUPT WEALTH

From the beginning of the scheme in 2008 to present day, the billions of dollars' worth of corrupt proceeds generated through this scheme were invested in domestic and international property, aircraft, yachts, horses, and other luxury goods. In order to obfuscate the beneficial ownership of these assets, these individuals utilized a network of corporate entities and structures. The following companies were designated or blocked today for being owned or controlled by the aforementioned individuals, and one aircraft was identified as blocked property.

- **Globovision Tele C.A.** is a television station located in Caracas, Venezuela, and is owned or controlled by Gorrin and Perdomo.
- **Globovision Tele CA, Corp.** is registered in Miami, Florida, and is owned or controlled by Gorrin and Perdomo.

- **Seguros La Vitalicia** is located in Caracas, Venezuela, and is owned or controlled by Gorrin.
- **Corpomedios GV Inversiones, C.A.** is located in Caracas, Venezuela, and is owned or controlled by Gorrin and Perdomo.
- **Corpomedios LLC** is registered in Miami, Florida, and is owned or controlled by Gorrin and Perdomo.
- **RIM Group Investments, Corp.** is registered in Miami, Florida, and is owned or controlled by Gorrin, and his wife, Maria Alexandra.
- **RIM Group Investments I Corp.** is registered in Miami, Florida, and is owned or controlled by Gorrin, and his wife, Maria Alexandra.
- **RIM Group Investments II Corp.** is registered in Miami, Florida, and is owned or controlled by Gorrin, and his wife, Maria Alexandra.
- **RIM Group Investments III Corp.** is registered in Miami, Florida, and is owned or controlled by Gorrin, and his wife, Maria Alexandra.
- **RIM Group Properties of New York, Corp.** is registered in New York, New York, and is owned or controlled by Gorrin.
- **RIM Group Properties of New York II Corp.** is registered in New York, New York, and is owned or controlled by Gorrin.
- **Magus Holdings USA, Corp.** is registered in Miami, Florida, and is owned or controlled by Perdomo, and his wife, Mayela Antonina.
- **Magus Holding LLC** is registered in Miami, Florida, and is owned or controlled by Perdomo.
- **Magus Holding II LLC** is registered in Miami, Florida, and is owned or controlled by Perdomo.
- **Tindaya Properties Holding USA Corp.** is registered in New York, New York, and is owned or controlled by Perdomo.
- **Tindaya Properties of New York, Corp.** is registered in New York, New York, and is owned or controlled by Perdomo.
- **Tindaya Properties of New York II Corp.** is registered in New York, New York, and is owned or controlled by Perdomo.
- **Posh 8 Dynamic Inc.** is registered in Delaware, and is owned or controlled by Gorrin.
- **Constello No. 1 Corporation** is registered in Delaware, and is owned or controlled by Perdomo, and his wife, Mayela Antonina.
- **Constello Inc.** is registered in St. Kitts and Nevis, and is owned or controlled by Perdomo, and his wife, Mayela Antonina.
- **Windham Commercial Group Inc.** is registered in Delaware, and is owned or controlled by Gorrin and Perdomo.
- **Planet 2 Reaching Inc.** is registered in Delaware, and is owned or controlled by Gorrin.
- **Potrico Corp.** is registered in Delaware, and is owned or controlled by Perdomo.
- **N133JA** is a Dassault Mystere Falcon 50EX private aircraft that is beneficially owned by Perdomo.

As a result of this action, all property and interests in property of those designated today subject to or transiting U.S. jurisdiction are blocked, and U.S. persons are generally prohibited from engaging in transactions with them. Concurrent with this action, OFAC is issuing a general license that authorizes certain transactions and activities with two entities owned or controlled by Gorrin and Perdomo, **Globovision Tele C.A.** and **Globovision Tele CA, Corp.**, for a one-year period. This general license is intended to allow the Venezuelan-based Globovision news network to

continue operating by authorizing specific activities that would otherwise be prohibited. The path for the United States to provide permanent sanctions relief to these entities is through divestment and relinquishment of control by any Specially Designated Nationals, including Gorriin and Perdomo.

U.S. sanctions need not be permanent; sanctions are intended to change behavior. The United States has made it clear that we will consider lifting sanctions for persons designated under E.O. 13692 or E.O. 13850 who take concrete and meaningful actions to restore democratic order, refuse to take part in human rights abuses, speak out against abuses committed by the government, and combat corruption in Venezuela.

For additional information about the methods that Venezuelan senior political figures, their associates, and front persons use to move and hide corrupt proceeds, including how they try to exploit the U.S. financial system and real estate market, please refer to FinCEN's advisories FIN-2017-A006, "Advisory on Widespread Public Corruption in Venezuela," and FIN-2017-A003, "Advisory to Financial Institutions and Real Estate Firms and Professionals."

Chart relating to the January 8, 2019 announcement.

General License relating to the January 8, 2019 announcement.

Information about Andrade's sentencing on November 27, 2018.

Information about Gorriin's indictment on November 20, 2018.

Identifying information on the individuals designated today.

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