

OFAC Adds Venezuela Media Company and Others to US Sanctions List

OFAC added several parties to the SDN List and simultaneously issued a General License, authorizing certain wind-down activities until January 8, 2020.

Today, the Treasury Department's Office of Foreign Assets Control (OFAC) added certain parties, including **Globovision Tele C.A.**, a television station located in Caracas, Venezuela, and **Globovision Tele CA, Corp.**, a company registered in Miami, Florida, to the Specially Designated Nationals and Blocked Persons List (SDN List). OFAC added these parties pursuant to the existing US sanctions program relating to Venezuela.

As a general matter, "US Persons" — a term that includes all US citizens and lawful permanent residents (wherever located or employed), all entities incorporated under the laws of the United States (including foreign branches), and all persons physically located in the United States (regardless of nationality) — are prohibited from engaging in transactions or dealings with or involving a person on the SDN List, unless authorized by OFAC. Further, US persons are required to "block" and report to OFAC any property or interests in property of a person on the SDN List that comes into the US person's possession or control.

OFAC also added to the SDN List **Raul Antonio Gorrin Belisario** and **Gustavo Adolfo Perdomo Rosales**, who [OFAC identified](#) as persons that own or control Globovision Tele C.A. and Globovision Tele CA, Corp. The full list of persons and entities that OFAC designated is [available here](#).

Simultaneous with these designations, OFAC issued [General License No. 6](#) authorizing — until January 8, 2020 — all transactions and activities "ordinarily incident and necessary to the maintenance or wind down of operations, contracts, or other agreements ... that were in effect prior to January 8, 2019," involving Globovision Tele C.A., Globovision Tele CA, Corp., or their subsidiaries.

OFAC issued a [Frequently Asked Question](#) clarifying that this authorization generally permits:

- All transactions and activities ordinarily incident to performing under a contract or agreement in effect prior to January 8, 2019, provided that the level of performance is consistent with the terms of the general license and consistent with past practices that existed between the party and the blocked entity prior to January 8, 2019

- Transactions and activities ordinarily incident to obtaining goods or services from or providing goods or services to a blocked entity listed in General License No. 6 in a manner consistent with the terms of the general license and consistent with past practices that existed between the party and the blocked entity prior to January 8, 2019, even if no contract or agreement exists between the parties
- The entering into of contingent contracts for transactions and activities consistent with the above, if any performance after the expiration of the general license is contingent on such performance either not being prohibited or being authorized by OFAC

OFAC also clarified that [General License No. 6](#) does “not authorize entering into contracts, paying invoices, or receiving services involving the blocked entities where there was no preexisting relationship between a person and a blocked entity or where the contemplated activity exceeds past practices that existed between the party and the blocked entity prior to January 8, 2019 as demonstrated by transaction history.”

If you have questions about this *Client Alert* or could use assistance managing compliance obligations related to US economic and trade sanctions, please contact one of the authors listed below or the Latham lawyer with whom you normally consult:

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