U.S. DEPARTMENT OF THE TREASURY OFFICE OF FOREIGN ASSETS CONTROL

STATEMENT ON PROPOSED LIQUIDATION OF BANCO CONTINENTAL

On October 7, 2015, the Treasury Department's Office of Foreign Assets Control (OFAC) announced the designation of Banco Continental S.A., headquartered in San Pedro Sula, Honduras, as a Specially Designated Narcotics Trafficker pursuant to the Foreign Narcotics Kingpin Designation Act for playing a significant role in international narcotics trafficking. That same day, OFAC announced the designations of Jaime Rolando Rosenthal Oliva, along with his son, Yani Benjamin Rosenthal Hidalgo, and his nephew, Yankel Antonio Rosenthal Coello, for providing money laundering and other services that support the international narcotics trafficking activities of multiple Central American drug traffickers and their criminal organizations. Banco Continental S.A. served as an integral part of the Rosenthal money laundering operations and facilitated the laundering of narcotics proceeds for multiple Central American drug trafficking organizations.

On October 10, 2015, the Government of Honduras informed OFAC that it had initiated proceedings to liquidate Banco Continental S.A. We understand that Banco Continental S.A. is now under the control of the Government of Honduras and is being managed by a government-appointed liquidator.

In light of this action by the Government of Honduras, OFAC understands that non-U.S. persons — including Honduran and other financial institutions in the region — will need to engage in transactions to liquidate and wind down Banco Continental S.A. Such non-U.S. persons will not be designated or be the subject of an enforcement action for engaging in transactions related to the liquidation and wind-down of Banco Continental S.A., provided that they do not undertake such transactions with knowledge that such transactions involve or benefit, directly or indirectly, any individual or entity other than Banco Continental S.A. that is listed on OFAC's List of Specially Designated Nationals or Blocked Persons or that otherwise constitutes a person whose property and interests in property are blocked.

However, to the extent such a transaction to liquidate or wind down Banco Continental S.A. involves a U.S. person, including a U.S. financial institution, or is within the jurisdiction of the United States, that transaction would be prohibited unless authorized by OFAC. Applications for such OFAC authorization may be submitted via the OFAC Web site.

Dated: October 11, 2015