



International Cartels Designated as Foreign Terrorist Organizations and Specially Designated Global Terrorists

March 18, 2025

The Office of Foreign Assets Control (OFAC) is issuing this alert to raise awareness of recent terrorist designations of international cartels and the resulting sanctions and criminal liability risks for U.S. and foreign financial institutions and others with exposure to these cartels.

On January 20, 2025, President Trump issued <u>Executive Order (E.O.) 14157</u>, "Designating Cartels and Other Organizations as Foreign Terrorist Organizations and Specially Designated Global Terrorists." Subsequently, on February 20, 2025, the U.S. Department of State designated the following eight organizations* as Foreign Terrorist Organizations (FTOs) and Specially Designated Global Terrorists (SDGTs):

Tren de Aragua	Cártel del Noreste (formerly Los Zetas)
Mara Salvatrucha (MS-13)	La Nueva Familia Michoacana
Cártel de Sinaloa	Cártel de Golfo (Gulf Cartel)
Cártel de Jalisco Nueva Generación	Cárteles Unidos

*For more identifying information about these entities and applicable sanctions authorities, see the complete entries on OFAC's <u>Specially Designated Nationals and Blocked Persons List</u>.

OFAC has implemented the U.S. Department of State designations, including by adding new or updating existing entries on OFAC's <u>Specially Designated Nationals and Blocked Persons List</u>. With the exception of the newly designated Cárteles Unidos, these entities were already designated under other OFAC authorities.

All property and interests in property of the designated entities that are in the United States or that are in the possession or control of a U.S. person are blocked. U.S. persons are generally prohibited from engaging in transactions with the designated entities unless authorized. Non-U.S. persons are also prohibited from engaging in conduct that evades U.S. sanctions, as well as causing or conspiring to cause U.S. persons to wittingly or unwittingly violate U.S. sanctions.

Counterterrorism designations provide the U.S. government critical tools to combat cartels and curtail their support for terrorist activities. Persons that engage in certain transactions with the FTO and SDGT designated

cartels may themselves be exposed to sanctions and to civil or criminal penalties, including for knowingly providing "material support or resources" to a foreign terrorist organization, which is prohibited under 18 U.S.C. §2339B. Additionally, foreign financial institutions that knowingly facilitate a significant transaction or provide significant financial services for any of the designated organizations could be subject to U.S. correspondent or payable-through account sanctions, pursuant to E.O. 13224, as amended.

Companies and other organizations with operations in, or exposure to, high-risk jurisdictions, particularly those in which the designated cartels are active, should assess their existing sanctions compliance programs to ensure controls are sufficient to minimize sanctions exposure for interacting with such designated terrorist organizations.

Additional Information

For information about OFAC-administered sanctions programs, including counternarcotics trafficking sanctions and counterterrorism sanctions, visit our <u>Sanctions Programs and Country Information</u> page.

For advice on building a tailored, risk-based compliance program, see <u>A Framework for OFAC Compliance</u> <u>Commitments</u>.



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OFAC's Counter Narcotics Trafficking Sanctions

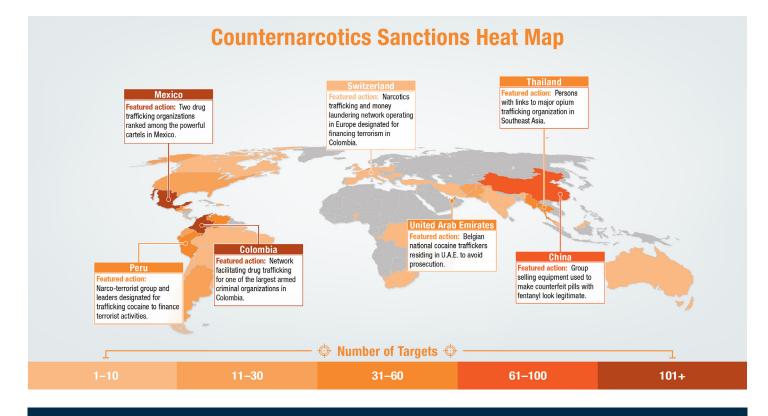
OFAC has played a key role in disrupting the financial networks of drug traffickers since the issuance of <u>E.O. 12978</u>, "Blocking Assets and Prohibiting Transactions With Significant Narcotics Traffickers" in 1995, which gave OFAC the authority to sanction significant narcotics traffickers in Colombia. This authority was expanded beyond Colombia through the Foreign Narcotics Kingpin Designation Act in 1999. OFAC's first Kingpin Act designations included senior Mexican cartel leaders and drug traffickers in Nigeria and Southeast Asia's Golden Triangle.

In 2021, to help combat the threat of fentanyl and synthetic opioids, OFAC's counternarcotics authorities were further expanded through <u>E.O. 14059</u>, "Imposing Sanctions on Foreign Persons Involved in the Global Illicit Drug Trade."

In total, OFAC has sanctioned more than 4000 individuals and entities under counternarcotics authorities.

OFAC's counternarcotics sanctions are global, with designations of traffickers and their front companies in Latin America, Asia, the Middle East, and Africa. In recent years, OFAC has increased sanctions on Mexican cartels and Chinese chemical suppliers involved in fentanyl trafficking.

For organizational charts of narcotics trafficking organizations sanctioned by OFAC dating back to 2011 and other information about this program, visit our <u>Counter Narcotics Trafficking Sanctions</u> page.





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