

# ClientAlert

## International Trade

March 2015

# US Issues Executive Order to Impose Venezuela Sanctions and Designates Seven Individuals

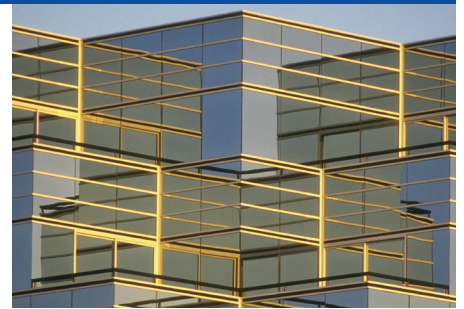
On March 9, 2015, President Obama signed an Executive Order entitled “Blocking Property and Suspending Entry of Certain Persons Contributing to the Situation in Venezuela” (the “Order”). The authority for the Order includes the Venezuela Defense of Human Rights and Civil Society Act of 2014.<sup>1</sup> This Order authorizes the United States to impose sanctions against any individual or entity determined to have engaged in certain activities in relation to the situation in Venezuela, and designates seven individuals in the Annex to the Order.

The Order authorizes blocking the property and interests in property located in the United States or in the possession or control of a US Person<sup>2</sup> of any person determined to be responsible for or complicit in, or responsible for ordering, controlling, or otherwise directing, or to have participated in, directly or indirectly, any of the following activities set out in the Order in or in relation to Venezuela:

- Actions or policies that undermine democratic processes or institutions;
- Significant acts of violence or conduct that constitutes a serious abuse or violation of human rights, including against persons involved in antigovernment protests in Venezuela in or since February 2014;
- Actions that prohibit, limit, or penalize the exercise of freedom of expression or peaceful assembly; or
- Public corruption by senior officials within the Government of Venezuela.

The Order further authorizes the designation of any person determined to be:

- A current or former leader of an entity that has, or whose members have, engaged in any of the activities described above;
- A current or former leader of an entity whose property and interests in property are blocked pursuant to this Order; or
- A current or former official of the Government of Venezuela.



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<sup>1</sup> Our client alert on Venezuela Defense of Human Rights and Civil Society Act is available [here](#).

<sup>2</sup> A US Person is defined to include any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States.

Persons determined to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the prohibited activities described above, or to any person pursuant to the Order also may be subject to designation and blocking. In addition, any person deemed to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, a person blocked pursuant to this Order may be subject to designation and blocking.

This Order prohibits transactions that evade or avoid, have the purpose of evading or avoiding, cause a violation of, or attempt to violate any of the prohibitions set forth in the Order, including any conspiracy to violate any of the prohibitions. The sanctions authorized by the Order include blocking as well as a prohibition on US persons from doing business with entities or individuals designated under the EO or that are 50 percent or greater owned in the aggregate, directly or indirectly, by one or more blocked parties. The Order also imposes a travel ban by suspending entry into the United States of individuals that are designated.

The Order includes an Annex providing for the concurrent designation of the following seven individuals:

- **BENAVIDES TORRES, Antonio Jose** (Latin: BENAVIDES TORRES, Antonio José); DOB 13 Jun 1961; POB Venezuela; citizen Venezuela; Gender Male; Cedula No. 6.371.374 (Venezuela); Passport 026719333 (Venezuela) expires 24 Aug 2014; Major General, Commander of the Strategic Region for the Integral Defense (REDI) of the Central Region, Venezuela's Bolivarian National Armed Forces (FANB); former Division General, Director of Operations, Venezuela's Bolivarian National Guard (GNB) (individual) [VENEZUELA].
- **BERNAL MARTINEZ, Manuel Gregorio** (Latin: BERNAL MARTÍNEZ, Manuel Gregorio); DOB 12 Jul 1965; POB Caracas, Venezuela; nationality Venezuela; citizen Venezuela; Gender Male; Cedula No. 6.976.131 (Venezuela); Passport 0502004 (Venezuela) expires 19 Feb 2014; Brigadier General, Chief of the 31st Armored Brigade of Caracas of Venezuela's Bolivarian Army; former Director General of Venezuela's Bolivarian National Intelligence Service (SEBIN) (individual) [VENEZUELA].
- **GONZALEZ LOPEZ, Gustavo Enrique** (Latin: GONZÁLEZ LÓPEZ, Gustavo Enrique); DOB 02 Nov 1960; POB Venezuela; nationality Venezuela; citizen Venezuela; Gender Male; Cedula No. 5.726.284 (Venezuela); Passport B0111931 (Venezuela); Director General of Venezuela's Bolivarian National Intelligence Service (SEBIN); Major General, President of Venezuela's Strategic Center of Security and Protection of the Homeland (CESPPA) (individual) [VENEZUELA].
- **HARINGHTON PADRON, Katherine Nayarith**; DOB 05 Dec 1971; POB Caracas, Venezuela; citizen Venezuela; Gender Female; Cedula No. 10.548.414 (Venezuela); Passport 042677664 (Venezuela) expires 25 Feb 2016; National Level Prosecutor, 20th District, Venezuela's Public Ministry (individual) [VENEZUELA].
- **NOGUERA PIETRI, Justo Jose** (Latin: NOGUERA PIETRI, Justo José); DOB 15 Mar 1961; POB Piritu, Venezuela; nationality Venezuela; citizen Venezuela; Gender Male; Cedula No. 5.944.426 (Venezuela); Passport B0942407 (Venezuela) expires 18 Dec 2006; alt. Passport 018295955 (Venezuela); President of the Venezuelan Corporation of Guayana (CVG); former Major General, General Commander of Venezuela's Bolivarian National Guard (GNB) (individual) [VENEZUELA].
- **PEREZ URDANETA, Manuel Eduardo** (Latin: PÉREZ URDANETA, Manuel Eduardo); DOB 26 May 1962; POB Venezuela; citizen Venezuela; Gender Male; Cedula No. 6.357.038 (Venezuela); Passport 001234503 (Venezuela) expires 03 Jul 2012; Director of Venezuela's Bolivarian National Police (individual) [VENEZUELA].
- **VIVAS LANDINO, Miguel Alcides**; DOB 08 Jul 1961; POB Venezuela; nationality Venezuela; citizen Venezuela; Gender Male; Cedula No. 7.617.778 (Venezuela); Passport B0097656 (Venezuela); Major General, Inspector General of Venezuela's Bolivarian National Armed Forces (FANB); former Commander of the Strategic Region for the Integral Defense (REDI) of the Andes Region, Venezuela's Bolivarian National Armed Forces (FANB) (individual) [VENEZUELA].

Companies doing business in Venezuela should monitor closely any designations made pursuant to this Order to ensure compliance. Penalties for noncompliance are severe.