



Sanctions in a Snap: Developments in Sanctions

US Edition

Sanctions Update

Hughes Hubbard's "Sanctions in a Snap" is intended to provide a clear and concise summary of recent developments from the Office of Foreign Assets Control (OFAC). We hope you find it helpful in assessing U.S. economic sanctions compliance risk against current U.S. government designation and enforcement priorities.

Highlights from November include the largest-ever OFAC civil monetary penalty issued against an individual, continued responses to the blocking of Lukoil and the Foreign Terrorist Organization (FTO) designation of the Venezuela-based Cartel de los Soles.

In total, OFAC added 154 individuals and entities to its Specially Designated Nationals and Blocked Persons list (SDN List) and identified 17 vessels and aircraft as blocked property. The November designations primarily focus on Iran and Mexico, which indicates continued U.S. national security and foreign policy prioritization of those countries. OFAC generally took action against other targeted nations equally, including nationals of or companies based in India, Türkiye, the United Arab Emirates (UAE), China, Panama and Russia.

The graph at the end of this update provides a visual representation of the current targeting priorities reflected in the November designations.

\$4.7M Civil Monetary Penalty Against a US Individual

On Nov. 24, OFAC **announced** a \$4.7 million Penalty Notice against a U.S. individual for two violations of the Russia-related sanctions program and for failure to comply with an OFAC administrative subpoena. According to OFAC, between April 2023 and March 2024, the U.S. person mortgaged, renovated and sold residential real estate owned by an individual blocked pursuant to the Russia-related program. Separately, according to OFAC, the U.S. person provided inaccurate and incomplete responses to an administrative subpoena by failing to disclose the complete scope of their dealings involving the subject blocked property.

OFAC found that the violations were egregious and not voluntarily self-disclosed. Based on those findings, OFAC assessed the base penalty equivalent to the statutory maximum of \$4,677,552.

Root cause of the violations: dealing in property that was both plainly identifiable as blocked and the subject of an OFAC cease and desist order.

OFAC and Market Response to the October Lukoil Designation

On Nov. 14, OFAC issued **Russia-Related General License 131**, "Authorizing Certain Transactions for the Negotiation of and Entry Into Contingent Contracts for the Sale of Lukoil International GmbH and Related Maintenance Activities."

Notably, that license authorizes companies to enter into certain agreements with Lukoil, but the actual acquisition of the Austria-based Lukoil entity and/or its assets must be separately authorized by OFAC through a specific license. Similarly to any other license application, OFAC will primarily consider whether any proposed acquisition of Lukoil International GmbH or its assets is in the national security and foreign policy interests of the United States.

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- Please see our comments on this general license published by [Bloomberg and Reuters](#).
- Please see our comments on the Brazilian response to the Lukoil sanctions published by the [Financial Times](#).

Foreign Terrorist Organization Designation of Cartel de los Soles

OFAC first designated Cartel de los Soles pursuant to its counterterrorism authority in July. In the [press release](#) announcing that action, OFAC alleged the following:

Based in Venezuela, the Cartel de los Soles (a.k.a. Cartel of the Suns) is headed by Nicolas Maduro Moros and other Venezuelan high-ranking individuals in the Maduro regime who corrupted the institutions of government in Venezuela, including parts of the military, intelligence apparatus, legislature and the judiciary, to assist the cartel's endeavors of trafficking narcotics into the United States.

On Nov. 16, the State Department [announced](#) its intention to designate Cartel de los Soles as an FTO on Nov. 24. OFAC [updated](#) the SDN List entry of the cartel on Nov. 24 to include that additional designation.

This FTO listing significantly enhances the risk exposure for any company operating in or trading with Venezuela. Those companies should consider their potential Anti-Terrorism Act civil exposure and the extraterritorial reach of "material support" criminal liability.

- Please see our comments on this action and the concomitant enhanced risk exposure for oil companies operating in Venezuela published by [Bloomberg](#).

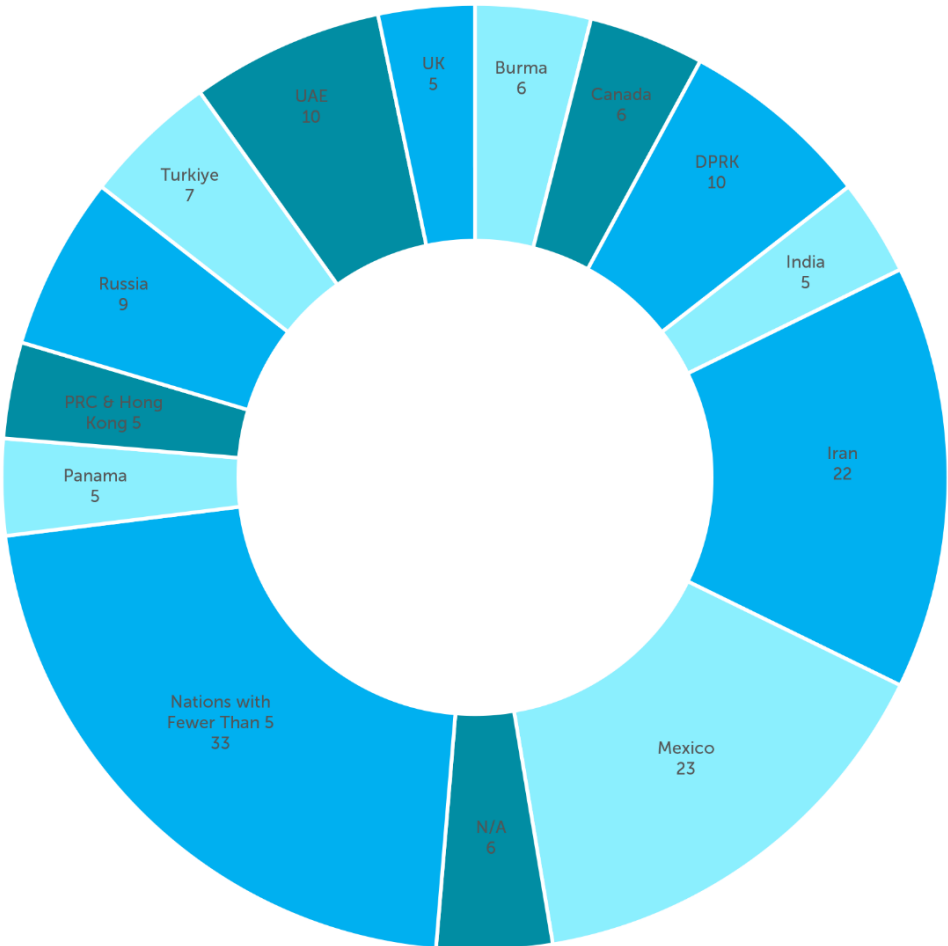
Additional Sanctions Actions in November

In addition to the OFAC designation actions summarized above, the U.S. government announced the following in November:

- **Designations** (additions to the SDN List and Consolidated Sanctions List):
 - [Nov. 4](#) – Eight North Korean individuals, mostly based in Russia and China, and two North Korean entities for allegedly laundering funds derived from North Korean cybercrime and information technology worker fraud schemes.
 - [Nov. 6](#) – Three Lebanese individuals who allegedly helped funnel tens of millions of dollars from Iran to the Shiite terrorist group Hezbollah in 2025.
 - [Nov. 12](#) – Thirty-two individuals and entities that allegedly operate procurement networks supporting Iran's ballistic missile and unmanned aerial vehicle production. In addition to Iranians, OFAC also sanctioned Emirati, Turkish, Chinese, Indian, German and Ukrainian nationals and companies.
 - [Nov. 12](#) – Eight Burmese and Chinese entities and individuals allegedly affiliated with Southeast Asian scam networks that target the United States.
 - [Nov. 13](#) – Four groups alleged to be violent Antifa organizations. According to the State Department, the groups are purportedly based in Germany, Italy and Greece, respectively. State also designated these groups as FTOs on Nov. 20.
 - [Nov. 13](#) – A network of 27 predominantly Mexican and Albanian individuals and entities allegedly involved in the Hysa Organized Crime Group, a Mexico-based group that allegedly launders the proceeds of narcotics trafficking through gambling establishments and restaurants.
 - Notably, FinCEN concurrently issued a [notice of proposed rulemaking](#) to impose 311 actions against 10 Mexico-based casinos.
 - [Nov. 19](#) – Former Canadian Olympian and alleged narcotrafficker Ryan Wedding, along with nine individuals and nine entities allegedly associated with him. This network consists of nationals of or companies based in Canada, Mexico, Colombia, Italy and the UK.
 - [Nov. 19](#) – Predominately Russia-based network consisting of seven entities and five individuals allegedly involved in ransomware operations and other forms of Russia-based cybercrime that targets the United States.
 - [Nov. 20](#) – OFAC sanctioned a network of 41 individuals, entities, vessels and aircraft that allegedly support the Iranian armed forces through the sale of crude oil. This network is predominately based in Iran, India and Panama.
 - [Nov. 20](#) – The State Department designated 17 entities, individuals and vessels for their alleged involvement in Iran's petroleum and petroleum product sales. This network is predominately based in Iran, the UAE and Singapore

- **Sanctions List Removals**
 - **Nov. 4** – OFAC removed sanctions imposed against a Belarusian airline previously sanctioned pursuant to the Belarus program and delisted an aircraft identified as that company's property.
 - **Nov. 6** – OFAC removed sanctions imposed against current Syrian President al-Sharaa and Interior Minister Anas Hasan Khattab, who were previously sanctioned pursuant to the counterterrorism authority.
 - **Nov. 20** – OFAC removed sanctions imposed against one national of Bosnia-Herzegovina previously sanctioned under the Balkans program, as well as those imposed against a French national and a Tunisian national previously sanctioned pursuant to the counterterrorism authority.
 - **Nov. 24** – OFAC removed sanctions imposed against three Cypriot nationals, one French national and one UK national as well as three Cypriot entities, all previously sanctioned under the Russia-related program.
- **General Licenses**
 - **Belarus General License 12** (Nov. 4), "Authorizing Transactions Related to Certain Blocked Aircraft"
 - **Russia-related General License 124B** (Nov. 14), "Authorizing Petroleum Services and Other Transactions Related to the Caspian Pipeline Consortium, Tengizchevroil, and Karachaganak Projects"
 - **Russia-related General License 128A** (Nov. 14), "Authorizing Certain Transactions Involving Lukoil Retail Service Stations Located Outside of Russia"
 - **Russia-related General License 130** (Nov. 14), "Authorizing Transactions Involving Certain Lukoil Entities in Bulgaria"
 - **Russia-related General License 132** (Nov. 21), "Authorizing Certain Transactions Involving Paks II Civil Nuclear Power Plant"
- **Regulations and Guidance**
 - Advisory
 - On Nov. 10 – The departments of State, Treasury and Commerce issued a **Tri-Seal Advisory** titled "Sanctions and Export Controls Relief for Syria," providing a summary of the current Syria-related sanctions and export controls.
 - Please see our comments on the current state of Syrian trade published by **Global Investigations Review**.
 - Frequently asked questions
 - Nov. 19 – OFAC issued [FAQ 1224](#) to provide guidance on the scope of Russia-Related GL 131, which authorizes certain transactions and dealings involving Lukoil International GmbH.

November 2025 Sanctions Designations by Nationality



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