

electronic Consent Based SSN Verification (eCBSV) program, which typically requires customer consent prior to accessing this program, how would banks be able to use the eCBSV program if banks no longer obtained the full SSN from the customer?

4. Regarding current practices by parties not subject to the CIP Rule's SSN collection requirement (*i.e.*, non-banks) when using third-party sources for SSN collection:

a. What are the risks and benefits of using a third-party source for SSN collection?

b. What minimum due diligence processes does a non-bank typically conduct before contracting with a third-party source for SSN collection? How do non-banks review and assess the capability, quality, and performance of the third-party source, including the accuracy and reliability of the full SSN collected by the third-party source?

c. What ongoing due diligence and monitoring do non-banks conduct on the third-party source? How frequently is ongoing due diligence conducted?

d. What measures do non-banks have in place to verify the accuracy of a full SSN retrieved from a third-party source?

e. How do non-banks ensure the privacy and security of customer data when using a third-party source for SSN collection?

f. What authoritative or private sector third-party sources are generally used for obtaining SSNs?

g. What, if any, limitations and/or shortcomings have been identified in third-party sources used to obtain SSN information?

h. What is the typical timeframe from when a customer enters their partial TIN to the non-bank receiving the full SSN from the third-party source?

i. What types of processes or strategies may be employed by third-party sources to manage high volume and/or time-sensitive SSN collection requests?

j. How frequently do customers fail the third-party SSN collection? What process(es) can be applied in such instances?

k. Have there been expected or observed differences in the rate of fraud or suspicious activity when non-banks using a partial SSN collection process versus full SSN collection directly from a customer?

l. How frequently does the partial SSN provided by a customer match to more than one individual when submitted to a third-party source? What additional steps are taken in such a case?

m. When the customer provides a partial SSN, is the customer notified that the remaining digits of their SSN

will be obtained from a third-party source? Are there instances when non-banks may display a full SSN to a customer who provided a partial SSN? How would non-banks address and mitigate identity theft-related risks in those instances?

5. Provide any publicly available studies or data points that demonstrate:

a. Customer behavior in seeking or avoiding access to financial products or services based on risks associated with a customer providing a full SSN, whether perceived or actual.

b. Accuracy and reliability of third-party sources from which SSN information could be acquired.

c. Impact on financial crime or other illicit finance activity risks when a customer is not required to provide a full SSN.

d. The benefits and risks for non-banks (*e.g.*, employers, retailers, financial service providers, and government agencies) and third-party service providers in obtaining a partial SSN from the customer and then using a third-party source to obtain the customer's full SSN.

6. Regarding current CIP practices of all financial institutions, both banks and non-banks:

a. What risks have been identified with the SSN collection requirement, and how have those risks been mitigated?

b. Do financial institutions use a combination of documentary and non-documentary methods to verify the identity of its customers, or do financial institutions rely solely on one of the two methods?

i. For financial institutions that do not rely on a combination of both methods, what is the rationale?

ii. For financial institutions that rely solely on non-documentary methods, what is the rationale and what information is collected to form a reasonable belief that it knows the true identity of the customer?

c. What are the variations to TIN collection and verification practices used by financial institutions?

d. Other than processes related to TIN collection and verification, what other means are used by financial institutions to collect and verify customer identifying information?

e. Describe the processes and technologies used by financial institutions when obtaining and verifying partial and/or full customer identifying information as it pertains to various delivery channels (such as telephonic, mobile, and point-of-sale).

f. Describe similarities and differences in the collection and verification practices by financial institutions

between individuals who provide SSNs and legal entities that provide Employer Identification Numbers.

7. What are the competitive advantages and disadvantages between banks that are required to collect the full SSN from the customer and those non-banks that collect a partial SSN from the customer and then use a third-party source to obtain the customer's full SSN?

8. What types of products/services are impacted by differing regulatory requirements related to SSN collection?

Andrea M. Gacki,

Director, Financial Crimes Enforcement Network.

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BILLING CODE 4810-02-P

DEPARTMENT OF THE TREASURY

Office of Foreign Assets Control

Notice of OFAC Sanctions Actions

AGENCY: Office of Foreign Assets Control, Treasury.

ACTION: Notice.

SUMMARY: The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) is publishing the names of one or more persons that have been placed on OFAC's Specially Designated Nationals and Blocked Persons List (SDN List) based on OFAC's determination that one or more applicable legal criteria were satisfied. All property and interests in property subject to U.S. jurisdiction of these persons are blocked, and U.S. persons are generally prohibited from engaging in transactions with them.

DATES: See **SUPPLEMENTARY INFORMATION** section for applicable dates.

FOR FURTHER INFORMATION CONTACT:

OFAC: Bradley T. Smith, Director, tel.: 202-622-2490; Associate Director for Global Targeting, tel.: 202-622-2420; Assistant Director for Licensing, tel.: 202-622-2480; Assistant Director for Regulatory Affairs, tel.: 202-622-4855; or the Assistant Director Compliance, tel.: 202-622-2490.

SUPPLEMENTARY INFORMATION:

Electronic Availability

The SDN List and additional information concerning OFAC sanctions programs are available on OFAC's website (<https://www.treasury.gov/ofac>).

Notice of OFAC Action(s)

On March 26, 2024, OFAC determined that the property and interests in property subject to U.S. jurisdiction of the following persons are

blocked under the relevant sanctions
authorities listed below.
BILLING CODE 4810-AL-P

Individuals

1. AL-MINALA, Muhammad 'Ali, Damascus, Syria; DOB 03 Jun 1985; POB Damascus, Syria; nationality Syria; Gender Male (individual) [SYRIA] (Linked To: CENTRAL BANK OF SYRIA).

Designated pursuant to Section 1(b)(ii) of E.O. 13582 of August 17, 2011, "Blocking Property of the Government of Syria and Prohibiting Certain Transactions With Respect to Syria" (E.O. 13582), 76 FR 52209, 3 CFR 2011 Comp., p. 264, for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, the CENTRAL BANK OF SYRIA, a person whose property and interests in property are blocked pursuant to E.O. 13582.

2. MAKAROV, Aleksey (a.k.a. MAKAROV, Alexey), Russia; DOB 06 Aug 1974; nationality Russia; Gender Male; Passport 753533725 (Russia) expires 03 Aug 2026 (individual) [SYRIA] [SYRIA-CAESAR] (Linked To: CENTRAL BANK OF SYRIA).

Designated pursuant to Section 1(b)(i) of E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the CENTRAL BANK OF SYRIA, a person who property and interests in property are blocked pursuant to E.O. 13582.

Also designated pursuant to Section 7412(a)(2)(A)(i) of the Caesar Act, for being a foreign person that knowingly provides significant financial, material, or technological support to, or knowingly engages in a significant transaction with the GOVERNMENT OF SYRIA (including any entity owned or controlled by the GOVERNMENT OF SYRIA).

3. DAVID, Yafi (Arabic: يافى ديفيد) (a.k.a. YAFEE, Daoud), United Arab Emirates; DOB 25 Aug 1969; POB Syria; nationality Ukraine; Gender Male; Passport FE550041 (Ukraine) expires 01 Jun 2026; Identification Number 121619695 (Oman) (individual) [SYRIA] (Linked To: GRAINS MIDDLE EAST TRADING DWC-LLC).

Designated pursuant to section 1(b)(ii) of E.O. 13582 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, GRAINS MIDDLE EAST TRADING DWC-LLC, a person whose property and interests in property are blocked pursuant to E.O. 13582.

4. AL-DJ, Mahmoud Abdulilah (a.k.a. AL-DAJ, Mahmoud Abdul-ilah; a.k.a. AL-DJ, Mahmoud (Arabic: محمد الدج); a.k.a. DAJ, Mahmoud Abdul-ilah; a.k.a. DAJJ, Mahmud Abdulilah), Syria; DOB 26 Jul 1983; POB Tell Rifaat, Aleppo, Syria; nationality Syria; Gender Male (individual) [SYRIA].

Designated pursuant to Section 1(b)(i) of E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, GOVERNMENT OF SYRIA, a person whose property and interests in property are blocked pursuant to E.O. 13582.

5. AL-KAYALI, Taher (a.k.a. CAIALI, Taer; a.k.a. KAYALI, Taher (Arabic: طاهر كيالي); a.k.a. KAYALI, Taher Abdel Karim), Syria; DOB 11 Jul 1960; POB Aleppo, Syria; nationality Syria; Gender Male; National ID No. 02010229257 (Syria) (individual) [SYRIA].

Designated pursuant to Section 1(b)(i) of E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, GOVERNMENT OF SYRIA, a person who property and interests in property are blocked pursuant to E.O. 13582.

Entities

1. MAYA EXCHANGE COMPANY (Arabic: شركة مايا للصرافة) (a.k.a. MAYA FOR EXCHANGE AND INTERNATIONAL HAWALAS), Ground Floor, Property Number 17/9/2230, Baqi Zadeh Building, Fardus Street, Salhiyah, Damascus, Syria; First Real Estate Zone, Property Number 936, Section 2, Ground Floor, Haju Building, Abd al-Hamid al-Durubi Street, Homs, Syria; Tartus Real Estate Zone, Section 8, Property Number 3881, Revolution Street, Al-Baraniyah, Tartus, Syria; Ground Floor, Second Real Estate Zone, Sections 7-9, Property 2533, Aziziyah Falls, Baghdad Station, Aleppo, Syria; Organization Type: Other monetary intermediation [SYRIA] [SYRIA-CAESAR] (Linked To: CENTRAL BANK OF SYRIA).

Designated pursuant to Section 1(b)(i) of E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, CENTRAL BANK OF SYRIA, a person who property and interests in property are blocked pursuant to E.O. 13582.

Also designated pursuant to Section 7412(a)(2)(A)(i) of the Caesar Act, for being a foreign person that knowingly provides significant financial, material, or technological support to, or knowingly engages in a significant transaction with the GOVERNMENT OF SYRIA (including any entity owned or controlled by the GOVERNMENT OF SYRIA).

2. GRAINS MIDDLE EAST TRADING DWC-LLC (Arabic: جرينز الشرق الأوسط للتجارة دي دبليو سي ش.ذ.م.م), Building A3 Office 213 Dubai World Central Business Park, Dubai, United Arab Emirates; Office 1705, Lake Central Tower, Business Bay, Dubai, United Arab Emirates; Office 426, A5 Building, Dubai World Central, Dubai, United Arab Emirates; Bahnhofstrasse 29, Zug 6300, Switzerland; Bahnhofstrasse 21, Zug 6300, Switzerland; Website <https://grains-middleeast.com>; Organization Established Date 18 Jul 2019; alt. Organization Established Date 10 May 2022; Company Number CHE-390.605.414 (Switzerland); Business Registration Number 9245 (United Arab Emirates); Registration Number CH-170.9.002.230-0 (Switzerland); Economic Register Number (CBLS) 11454986 (United Arab Emirates) [SYRIA] (Linked To: LIMITED LIABILITY COMPANY STG LOGISTIC).

Designated pursuant to Section 1(b)(i) of E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, LIMITED LIABILITY COMPANY STG LOGISTIC, a person whose property and interests in property are blocked pursuant to E.O. 13582.

3. LIMITED LIABILITY COMPANY STG LOGISTIC (Cyrillic: ОБЩЕСТВО С ОГРАНИЧЕННОЙ ОТВЕТСТВЕННОСТЬЮ СТГ ЛОГИСТИК) (a.k.a. ООО STG LOGISTIK; a.k.a. STG STROYTRANSGAZ LOGISTIC; a.k.a. "STG LOGISTIC"), 12 Universitetsky Ave, Moscow 119330, Russia; Damascus, Syria; Organization Established Date 04 Sep 2009; Tax ID No. 5027148148 (Russia); Registration Number 1095027004236 (Russia) [SYRIA] [SYRIA-CAESAR].

Designated pursuant to Section 1(b)(i) of E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, GOVERNMENT OF SYRIA, a person whose property and interests in property are blocked pursuant to E.O. 13582.

Also designated pursuant to Section 7412(a)(2)(A)(i) of the Caesar Act, for being a foreign person that knowingly provides significant financial, material, or technological support to, or knowingly engages in a significant transaction with the GOVERNMENT OF SYRIA (including any entity owned or controlled by the GOVERNMENT OF SYRIA).

4. AL-TA'IR COMPANY (Arabic: شركة الطير), Damascus, Syria; Organization Established Date 17 Dec 2012; Organization Type: Transportation and storage [SYRIA] (Linked To: AL-DJ, Mahmoud Abdulilah).

Designated pursuant to Section 1(b)(ii) of E.O. 13582 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, MAHMOUD ABDULILAH AL-DJ, a person whose property and interests in property are blocked pursuant to E.O. 13582.

5. FREEBIRD TRAVEL AND TOURISM (a.k.a. AL-TAIR AL-HUR (Arabic: الطير الحر); a.k.a. FREE BIRD COMPANY), Maysaloon Street, Al Muhandiseen Building Floor No. 12, Damascus, Syria; Hour al-Enz al-Mammzar Center, Second Floor, Office 12, Dubai, United Arab Emirates; Athens, Greece; Organization Established Date 2022; Organization Type: Travel agency activities [SYRIA] (Linked To: AL-DJ, Mahmoud Abdulilah).

Designated pursuant to Section 1(b)(ii) of E.O. 13582 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, MAHMOUD ABDULILAH AL-DJ, a person whose property and interests in property are blocked pursuant to E.O. 13582.

6. NEPTUNUS LLC (a.k.a. NEPTUNUS CO LTD), 653/38 Baghdad Street, Lattakia, Syria; Organization Established Date 2017; Business Registration Number 6068911 (Syria) [SYRIA] (Linked To: AL-KAYALI, Taher).

Designated pursuant to Section 1(b)(ii) of E.O. 13582 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, TAHER AL-

KAYALI, a person whose property and interests in property are blocked pursuant to E.O. 13582.

Dated: March 26, 2024.

Bradley T. Smith,

*Director, Office of Foreign Assets Control,
U.S. Department of the Treasury.*

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BILLING CODE 4810-AL-C

DEPARTMENT OF THE TREASURY

Office of Foreign Assets Control

Notice of OFAC Sanctions Actions

AGENCY: Office of Foreign Assets Control, Treasury.

ACTION: Notice.

SUMMARY: The Department of the Treasury's Office of Foreign Assets Control (OFAC) is publishing the names of seven persons and two vessels that

have been placed on OFAC's Specially Designated Nationals and Blocked Persons List (SDN List) based on OFAC's determination that one or more applicable legal criteria were satisfied. All property and interests in property subject to U.S. jurisdiction of these persons and these vessels are blocked, and U.S. persons are generally prohibited from engaging in transactions with them.

DATES: See **SUPPLEMENTARY INFORMATION** section for effective date(s).

FOR FURTHER INFORMATION CONTACT:

OFAC: Bradley Smith, Director, tel.: 202-622-2490; Associate Director for Global Targeting, tel.: 202-622-2420; Assistant Director for Licensing, tel.: 202-622-2480; Assistant Director for Regulatory Affairs, tel.: 202-622-4855;

or Assistant Director Compliance, tel.: 202-622-2490.

SUPPLEMENTARY INFORMATION:

Electronic Availability

The SDN List and additional information concerning OFAC sanctions programs are available on OFAC's website (<https://www.treasury.gov/ofac>).

Notice of OFAC Action(s)

On March 26, 2024, OFAC determined that the property and interests in property subject to U.S. jurisdiction of the following persons and the following vessels subject to U.S. jurisdiction are blocked under the relevant sanctions authority listed below.

BILLING CODE 4810-AL-P