

Client Alert

U.S. Implements New Venezuela Sanctions Program: New Executive Order Enacted

March 9, 2015

Earlier today, President Obama issued an Executive Order (E.O.) "Blocking Property and Suspending Entry of Certain Persons Contributing to the Situation in Venezuela" which enacted a new U.S. sanctions program on Venezuela. The E.O. implements the Venezuela Defense of Human Rights and Civil Society Act of 2014 which was passed in December 2014. Please [see](#) Crowell's previous Client Alert for our summary of the contents of that legislation.

As envisioned in the legislation, the E.O. provides new criteria for imposing sanctions on individuals "found 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 in or in relation to Venezuela":

1. actions or policies that undermine democratic processes or institutions;
2. 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;
3. actions that prohibit, limit, or penalize the exercise of freedom of expression or peaceful assembly; or
4. public corruption by senior officials within the Government of Venezuela.

The E.O. directly imposes sanctions on seven individuals. All seven of these individuals are linked with the Venezuelan military, intelligence service, or judiciary:

1. Antonio José Benavides Torres - Commander of the Central Integral Strategic Defense Region of the National Armed Forces, former Director of Operations for the National Guard;
2. Gustavo Enrique González López - Director General of the National Intelligence Service and President of the Strategic Center of Security and Protection of the Homeland;
3. Justo José Noguera Pietri - President of the Venezuelan Corporation of Guayana, former General Commander of the National Guard;
4. Katherine Nayarith Haringhton Padron - National Level Prosecutor of the 20th District Office of the Public Ministry;
5. Manuel Eduardo Pérez Urdaneta - Director of the National Police;
6. Manuel Gregorio Bernal Martínez - Chief of the 31st Armored Brigade of Caracas, former Director General of the National Intelligence Service; and
7. Miguel Alcides Vivas Landino - Inspector General of the National Armed Forces, former Commander of the Andes Integral Strategic Defense Region of the National Armed Forces.

The list of prohibited parties identified today is substantially more limited than previous proposed lists which have been discussed publicly. Specifically, in May 2014, Senator Marco Rubio (R-FL) proposed draft legislation in

the U.S. Congress which included a longer list of senior government officials including the Minister of Interior, Justice, and Peace, and several governors. To date, none of these politicians has been sanctioned.

Crowell & Moring has been closely monitoring these sanctions as well as assisting clients with the impacts of Venezuela's tightening currency controls.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

David (Dj) Wolff

Partner; Attorney at Law – London, Washington, D.C.

Phone: +44.20.7413.1368, +1.202.624.2548

Email: djwolff@crowell.com

Edward Goetz

Manager, International Trade Services – Washington, D.C.

Phone: +1.202.508.8968

Email: egoetz@crowell.com